

WILLIAM C. JACKSON

Complainant

VS.

H. E. GILMORE and
DOROTHY STAPLES GILMORE

Respondents

§

§

§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. _____

COUNT I.

The Plaintiff sues to recover possession of the following tract of land:

Beginning at a point on the West Section line of Section 34, Township 6 South, Range 6 East, said point being 1,732 feet South of the Northwest corner of said Section and known as the Northwest corner of the home place of Mrs. Thekla E. McPhaul, run thence North 172 feet along the Section line to a point which is the intersection of the South line of Lot #1 of the Seminole Subdivision (which is the 5th Subdivision of the Chicago Beach Subdivision Company) with the above described Section line, run thence East 150 feet to a point, run thence South 17° West to the waters edge of Blackwater River, thence follow the meanders of the said river in a Westwardly and Southwesterly direction to the point where the West line of said Section 34 touches the waters edge, run thence North along the West line of said Section to the point of beginning.

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendant entered and unlawfully withholds, together with FIVE HUNDRED DOLLARS (\$500.00) for the detention thereof.

WILTERS, BRANTLEY & NESBIT

BY:

Phillip S. Nesbit
Attorney for Complainant

FILED

MAR 20 1969

ALICE J. BUCK CLERK
RECORDER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon H. E. Gilmore and Dorothy Staples Gilmore

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint

filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

H. E. Gilmore and Dorothy Staples Gilmore Defendant.....

by William C. Jackson

Plaintiff.....

Witness my hand this 20 day of March 19 69

Alice J. Nunez, Clerk

24:3-22-69

No. 8616

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

William C. Jackson

Plaintiffs

vs.

H. E. Gilmore and Dorothy Staples
Gilmore

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

MAR 20 1969

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

RECEIVED

MAR 20 1969

Defendant lives at

Near ~~Chicago Beach~~ Subdivision of the
Chicago Beach Subdivision in
Seminole, Alabama

below a near T.T. Rabren
Received In Office

March 22

1969

Sheriff

I have executed this summons

this

March 22

1969

by leaving a copy with

H. E. Gilmore

Dorothy Staples Gilmore

Sheriff claims

\$40.80

miles at

20 Cents per mile Total \$

8.18

TAYLOR WILKINS, Sheriff

BY

Gilbert

DEPUTY SHERIFF

Taylor Wilkins

Sheriff

Robert Edwards

Deputy Sheriff

Seminole

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

April 26, 1969

Mrs. Alice J. Duck, Celrk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

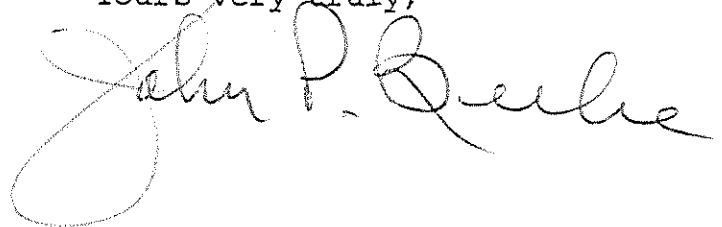
RE: JACKSON VS GILMORE
CIVIL SUIT NO. 8616

Dear Mrs. Duck:

I enclose an amended answer and plea to be file inthe
above suit.

Your file will show that this amended complaint file by the
Plaintiff appears in Equity Suit No. 10,367, whereas Mrs. Nesbit
advises me that it should have been filed in the above numbered civil
suit.

Yours very truly,

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned below the typed name "John P. Beebe".

JOHN P. BEEBE
ATTORNEY AT LAW
ROBERTSDALE, ALABAMA

April 8, 1969

Mrs. Alice J. Duck, Clerk,
Circuit Court, Baldwin County,
Bay Minette, Alabama.

Re: Jackson vs. Gilmore,
Civil No. 8616

Dear Mrs. Duck:

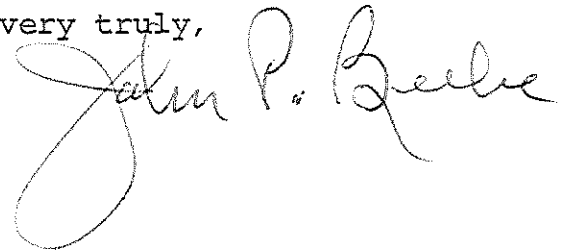
I return file of the court No. 8616 Civil, Jackson vs. Gilmore, together with answer and plea of the defendants.

A true and exact copy of this answer and plea has this day been mailed to Mrs. Phyllis Nesbit, Attorney for the Plaintiff, Robertsdale, Alabama.

Yours very truly,

P. S. The Defendants in and by said answer
and plea DEMAND A TRIAL BY JURY

JPB

A handwritten signature in cursive script, reading "John P. Beebe". The signature is written in dark ink and is positioned to the right of the typed name "John P. Beebe".

WILLIAM C. JACKSON

Plaintiff

VS.

H. E. GILMORE and
DOROTHY STAPLES GILMORE

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8616

Comes now the Plaintiff in the above styled cause and demands the Defendants, H. E. Gilmore and Dorothy Staples Gilmore, to furnish him an Abstract of Title on which they will depend for recovery in this cause.

WILTERS, BRANLEY & NESBIT

BY:

Hyman S. Nesbit
Attorney's for Plaintiff

FILED

AUG 25 1969

ALICE J. DUCK

CLERK
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 25 day of August 1969 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANLEY & NESBIT

By:

Hyman S. Nesbit

WILLIAM C. JACKSON,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
vs)	
)	BALDWIN COUNTY, ALABAMA.
)	
H. E. GILMORE and)	
DOROTHY STAPLES GILMORE,)	AT LAW No. 8616
)	
Defendants.)	

Com the said Defendants and for further answer and plea to the amended compleint heretofore filed, separately and severally say:

. The Defendants disclaim possession of the following por-
tion of said lands sued for:

Begin at the Northwest corner of Section 34, Township 6 South, Range 6 East, run South 1,860 feet, more or less, to the North edge of Blackwater, which is the point of beginning: Run North 300 feet, more or less, to South edge of Chicago Gulf Beach Company's 5th Sub-division recorded in Miscellaneous Book 1, pages 254, run East 150 feet, run South 320 feet, more or less, to the North edge of Blackwater, run Westwardly along the meanders of Blackwater to the point of beginning; LESS and EXCEPT THE following portion of said lands: Beginning at a point on the Section line 1650 feet South of the Northwest quarter of Section 34, Township 6 South, Range 6 East, run thence East 150 feet, run thence South 113.3 feet, run thence North 78 degrees West 153.0 feet to the Section Line, run thence North along the Section Line 83 feet to the point of beginning, being a lot in the Southwest quarter of the North-west quarter of Section 34, Township 6 South, Range 6 East.

2. As to that portion of said lands EXCEPTED hereinabove, the said Defendants plead not guilty.

John P. Beebe
Attorney for the Defendants

I, John P. Beebe, do hereby certify that I have on this day mailed a true and exact copy of the foregoing answer and plea, by mailing a copy thereof to Wilters, Brantly & Nesbit, Attorneys for the Plaintiff, to Robertsdale, Alabama, postage prepaid.

Dated this the 16th, day of August, 1969.

John P. Beebe
Attorney for the Defendants

FILED

AUG 20 1969

WILLIAM C. JACKSON

Complainant

VS.

H. E. GILMORE and
DOROTHY STAPLES GILMORE

Respondents

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

8616
CASE NO. 10367

Comes now your Complainant, in the above styled cause, and
amends his Bill of Complaint as follows:

COUNT I.

The Plaintiff sues to recover possession of the following
tract of land:

Begin at the Northwest corner of Section 34,
Township 6 South, Range 6 East, run South
1,860 feet more or less to the North edge of
Blackwater which is the point of beginning,
run North 300 feet more or less to South edge
of Chicago Gulf Beach Company's 5th Subdivision
recorded in Miscellaneous Book 1, Pages 254,
run East 150 feet, run South 320 feet more or
less to the North edge of Blackwater, run West-
wardly along the meanders of Blackwater to the
point of beginning.

of which he was in possession, and upon which, pending such possession,
and before the commencement of this suit, the Defendants entered and
unlawfully withholds, together with FIVE HUNDRED DOLLARS (\$500.00)
for the detention thereof.

WILTERS, BRANTLEY & NESBIT

BY:

Thyllo S. Nesbit
Attorney for Complainant

FILED

APR 17 1969

ALICE J. DUCK CLERK
REGISTER

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 17 day of April,
1969 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By:

Thyllo S. Nesbit

WILLIAM C. JACKSON,

Plaintiff,

vs

H. E. GILMORE and
DOROTHY STAPLES GILMORE,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

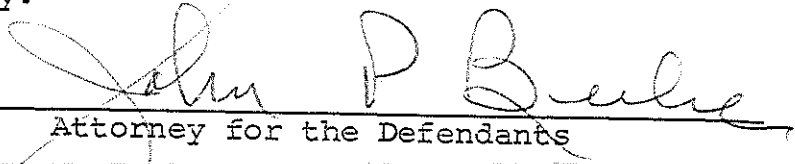
AT LAW No. 8616

Come the Defendants and for answer and plea to the amended complaint heretofore filed, separately and severally, say:

1. Defendants disclaim possession of the following portion of said lands sued for:

Begin at the northwest corner of Section 34, township 6 South, Range 6 East, run South 1860 feet, more or less, to the North edge of Blackwater, which is the point of beginning: Run North 300 feet, more or less, to South edge of Chicago Gulf Beach Company's 5th Subdivision, recorded in Miscellaneous Book 1, pages 254, run East 150 feet, run South 320 feet, more or less to the North edge of Blackwater, run Westwardly along the meanders of Blackwater to the point of beginning; LESS and EXCEPT the following portion of said lands: Beginning at a point on the Section Line 1650 feet South of the Northwest corner of Section 34, Township 6 South, Range 6 East, run thence East 150 feet, run thence South 113.3 feet, run thence North 78 degrees 35 minutes West 153.0 feet to the Section Line, run thence North along the Section Line 83 feet to the point of beginning, being a lot in the Southwest quarter of the Northwest quarter of Section 34, Township 6 South, Range 6 East.

2. As to the portion of the said lands EXCEPTED hereinabove, the Defendants plead not guilty.


Attorney for the Defendants

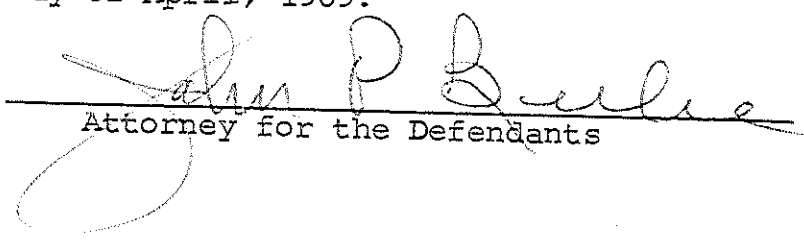
THE DEFENDANTS AGAIN DEMAND A TRIAL BY JURY

I, John P. Beebe, do hereby certify that I have on this day mailed a true and exact copy of the foregoing answer and plea, by mailing a copy of the same to Wilters, Brantley & Nesbit, Attorneys for the Plaintiff, to Tobertsdale, Alabama, postage prepaid.

Dated this the 26th day of April, 1969.

FILED

APR 28 1969


Attorney for the Defendants

ALICE J. DUCK

CLERK
REGISTER

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