

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon OBBIE HADLEY and LOUISE HADLEY to appear within thirty days from the date of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of MID-STATE HOMES, INC., a corporation.

Witness my hand this 3rd day of March, 1969.

Alice J. Duck
CLERK

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF,

VS.

OBBIE HADLEY and
LOUISE HADLEY,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8625-

COMPLAINT

COUNT ONE: The Plaintiff sues to recover possession of the following tract of land in Baldwin County, Alabama:

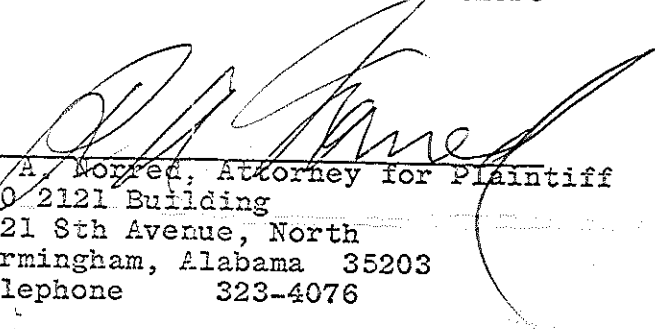
Begin at the South West corner of the North $\frac{1}{2}$ of the North $\frac{1}{2}$ of the North East $\frac{1}{4}$ of the SE $\frac{1}{4}$, Section 10; thence run 105 yards East, thence 70 yards North for Point of Beginning, thence run North 70 yards, thence West 70 yards, thence South 70 yards, thence East 70 yards to point of beginning, containing one acre, more or less.

of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.

COUNT TWO: The Plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama:

(The Plaintiff incorporates herein as fully and completely set out at length herein, by reference and adoption, the full legal description of the real estate set out and described in Count One of the Complaint.)

to which said tract of land the Plaintiff has the legal title, and upon which tract of land, before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.


R. A. Norred, Attorney for Plaintiff
200 2121 Building
2121 8th Avenue, North
Birmingham, Alabama 35203
Telephone 323-4076

PLAINTIFF'S ADDRESS:

Mid-State Homes, Inc.
c/o R.A. Norred, Attorney
200 2121 Building
2121 8th Ave. North
Birmingham, Alabama 35203

DEFENDANTS' ADDRESS:

Obbie Hadley and
Louise Hadley
Rt. 1 Box 37
Perdido, Alabama

FILED

MAR 30 1969

ALICE J. DUCK CLERK
REGISTER

8625

Received 31 day of March 1969
and on 3 day of April 1969
I served a copy of this within 84C
on Abbie Hadley &
Louise Hadley
by service on

TAYLOR WILKINS, Sheriff
W. A. Talbot
Lettie

Sheriff claims 80 miles at
Ten Cents per mile Total \$ 8.00
TAYLOR WILKINS, Sheriff
BY Norred
DEPUTY SHERIFF

Mid-State Homes
Inc. a corp.
Pltz.
vs.
Abbie Hadley &
Louise Hadley
Depts

FILED

MAR 30 1969

ALICE J. DUCK CLERK
REGISTER

R. A. Norred
200-2121-Bldg- B'ham

MID-STATE HOMES, INC.,)	
a corporation,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW
OBBIE HADLEY and LOUISE)	CASE NO. 8625
HADLEY,)	
Defendants.)	

Comes now the Defendants in the above styled cause and file the following Demurrer to the Plaintiff's Complaint and each and every count thereof separately and severally:

1.

The Complaint does not state a cause of action.

WILTERS & BRANTLEY

BY: *William M Brantley*
Attorneys for Defendants

The Defendants demand a trial by jury.

WILTERS & BRANTLEY

BY: *William M Brantley*
Attorneys for Defendants

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9 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

By: *William M Brantley*

FILED

APR 9 1969

ALICE J. DUCK CLERK
REGISTER

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF

VS.

OBBIE HADLEY AND LOUISE
HADLEY,

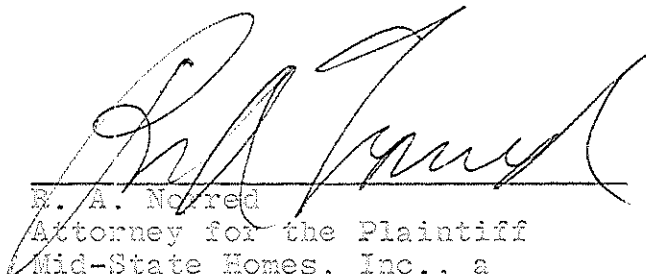
DEFENDANTS

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW
)

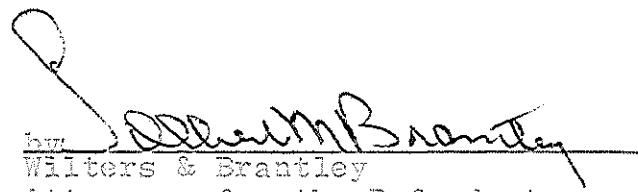
) CASE NO. 8625

MOTION OF DISMISSAL

Comes the plaintiff in the above styled cause and moves that said cause be dismissed, and that the costs herein accrued be taxed against the plaintiff.


E. A. Norred
Attorney for the Plaintiff
Mid-State Homes, Inc., a
corporation

Come the defendants and consent to a dismissal of this cause in accord with the above Motion.


Wilters & Brantley
Attorneys for the Defendants

R. A. Norred

ATTORNEY

200 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM, ALABAMA 35203
TELEPHONE
323-4076

July 11, 1969

Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

Re: Mid-State Homes, Inc.,
vs.
Obbie Hadley and Louise Hadley
At Law
Case #8625

Dear Sir:

I enclose herein a Motion of Dismissal in the above. Please note that, by separate copy of this letter, I am asking that Mr. Brantley endorse his consent thereon whenever he is next in your office. I assume that the case will be dismissed in due course.

I would appreciate a statement of costs at your earliest convenience.

Yours very truly,


R. A. Norred

RAN/hc

cc: Mr. Tolbert M. Brantley
Walters & Brantley
P. O. Box 967
Bay Minette, Alabama