

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summons Leon Hurley and Voncille Hurley 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 Leon Hurley and Voncille Hurley, Defendants and Angelina Berga, Plaintiff.

1966.

Witness my hand this 10 day of January,

Alice J. Luck
Clerk

ANGELINA BERGA,

Plaintiff,

vs.

LEON HURLEY and
VONCILLE HURLEY,

Defendants,

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NP.

6812

The Plaintiff sues to recover possession of the following tract of land lying in Baldwin County, Alabama, to-wit:

Commencing at the Northeast corner of the Northwest Quarter, Section 19, Township 9 South, Range 3 East, which point is the Southeast corner of the 4 acre tract acquired by Joe Berga, Sr. from G. E. Perkins and Myrtle E. Perkins, thence run West 49 feet 6 inches to the point of beginning, thence continue West 61 feet 10 1/2 inches to a point, thence North 372 feet 6 inches, more or less, to Mobile Bay, thence Eastwardly along Mobile Bay, to a point North of the point of beginning, thence South 365 feet, more or less, to the point of beginning, being a portion of that certain 4 acre tract of land conveyed by the aforesaid deed.

of which she was in possession, and upon which, pending such possession, and before the commencement of this suit, the

defendants entered and unlawfully withholds, together with
ONE THOUSAND (\$1,000.00) DOLLARSSfor the detention thereof.

WILTERS & BRANTLEY

BY: 

The Defendants sometime
reside at Gulf Shores,
Alabama, at the Thomas
Nunley residence.

FILED
JAN 10 1966
ALICE L. DICK, CLERK
REGISTER

ANGELINA BERGA,

Plaintiff,

vs;

LEON HURLEY & VONCILLE HURLEY,

Defendants.

Received 10 day of Jan 1966

day of 19

and a copy of the within

Leon Hurley
Voncille Hurley

by

TAYLOR WILKINS, Sheriff

By _____ D.S.

Returned 18 day of Jan 1966
not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By _____ Deputy Sheriff

Received 25 day of Jan 1966
and on 25 day of Jan 1966
served a copy of the within
Leon Hurley
Voncille Hurley

by service on _____
TAYLOR WILKINS, Sheriff
By _____ D.S.

Boixi, Miss.
won't be back until March
1st week. All
jurors, D.S.
Foley, etc.

CLERK
REGISTER

Wilters & Brantley, Attys.

Om.

ANGELINA BERGA,

Plaintiff,

vs.

LEON HURLEY and
VONCILLE HURLEY,

Defendants,

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


CASE NO. 6812

Comes now the Defendants in the above styled cause
and for answer to the Plaintiffs Complaint, says:

1.


That they are not guilty of the matters alleged
therein.

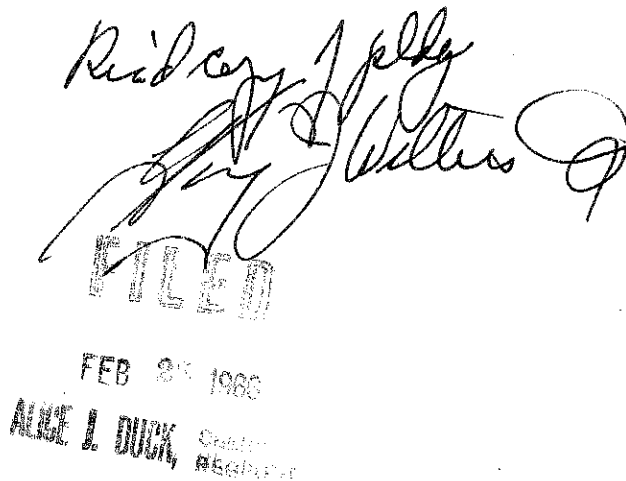
FOREST A. CHRISTIAN


Attorney for the Defendants

The Defendants demand an abstract in writing of the
title that the Plaintiff is relying on for the recovery on
the said suit.

FOREST A. CHRISTIAN


Attorney for the Defendants


FILED
FEB 24 1966
ALICE J. DICK, Clerk
RECORDED