

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 Pete Berga, Plaintiff.

1966.

Witness my hand this

10

day of

January

Alice D. Luck
Clerk,

PETE 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

NO.

6813

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 111 feet 4 1/2 inches to the point of beginning, thence continue West 61 feet 10 1/2 inches to a point, thence North 380 feet, more or less, to Mobile Bay, thence Eastwardly along Mobile Bay to a point North of the point of beginning, thence South 372 feet 6 inches, 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 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
ONE THOUSAND (\$1,000.00) DOLLARS for the detention thereof.

WILTERS & BRANTLEY

BY: 

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

FILED

JAN 10 1966

ALICE J. DUCK, CLERK
REGISTER

CASE NO. 6813

PETE BERGA,

Plaintiff

vs:

LEON HURLEY & VONCILLE HURLEY,

Defendants.

Received 10 day of Jan 1966
day of 1966
a copy of the within Leon Hurley & Voncille Hurley
service on Taylor Wilkins, Sheriff
By Taylor Wilkins, Sheriff D. S.

Returned 18 day of Jan 1966
Not found in my county after diligent search and in
quiry.
By Taylor Wilkins, Sheriff
Deputy Sheriff

Received 25 day of Jan 1966
nd on 25 day of Jan 1966
served a copy of the within Leon Hurley & Voncille Hurley
in Leon Hurley & Voncille Hurley
by service on Taylor Wilkins, Sheriff
By Taylor Wilkins, Sheriff D. S.

FILED

JAN 25 1966

WILKINS & BRANTLEY

Walters & Brantley, Attys.

PETE 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. 6813

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

*Received abstract Feb 24, 1966
of abstract to Feb. 26, 1967
consisting of pages no. 1 to 68.
prepared by
F B Swearington*

FILED

FEB 2 1966

ALICE L. DUCK, CLERK
REC. STEN.

*Received copy of Pdg
Walter*

FOREST A. CHRISTIAN

ATTORNEY AT LAW

P. O. DRAWER 190

AREA CODE 205 — PHONE 943-2201

FOLEY, ALABAMA 36535

January 31, 1966

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

Re: Pete Berga, Plaintiff
Vs: Leon Hurley and Voncille
Hurley, Defendants
Case No. 6813

Dear Mrs. Duck:

Please enter my appearance in the case mentioned above. As soon as I can determine the facts, I will file an answer, but I wish my appearance noted so that a judgment will not be taken without notice to me.

Cordially yours,

FOREST A. CHRISTIAN

FILED
FEB 4 1966
ALICE J. DUCK, CLERK
REGISTER