

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 Agnes Allegri, Plaintiff.

1966.

Witness my hand this 10 day of January

Alice J. Luck
Clerk

AGNES ALLEGRI,

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. 6814

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 Myrtha E. Perkins, thence run West 235 feet 1 1/2 inches to the point of beginning; thence continuing West 61 feet 10 1/2 inches to a point, thence North 395 feet, more or less, to Mobile Bay, thence Eastwardly along Mobile Bay to a point North of the point of beginning, thence South 387 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 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) DOLLARS for the detention thereof.

WILTERS & BRANTLEY

BY: 

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

FILED

JAN 20 1968

ALICE L. DUNN, CLERK
REGISTER

Received 10 day of Jan 1966
day of Dec 1965
served a copy of the within Leon Hurley & Vancille Hurley
service on Taylor Wilkins, Sheriff
By Taylor Wilkins, Sheriff D. S.

AGNES ALLEGRI,
Plaintiff,

vs:

LEON HURLEY & VONCILLE HURLEY,
Defendants.

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
served on 25 day of Jan 1966
served a copy of the within Leon Hurley & Vancille Hurley
service on Taylor Wilkins, Sheriff

FILED

JAN 30 1966

ALCOCK & CO. CLERK
REGISTER

Wilters & Brantley, Attys.

TAYLOR WILKINS, Sheriff
By Taylor Wilkins D. S.
Q. m.

AGNES ALLEGRI,

Plaintiff,

vs.

LEON HURLEY and
VONCILLE HURLEY,

Defendants,

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

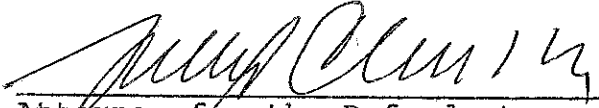
CASE NO. 6814

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. DUCK, CLERK
REGISTER

*Red copy of 10 days
J. J. Hester*