

LOUIS BERGA,

X

Plaintiff,

X IN THE CIRCUIT COURT OF

vs.

X BALDWIN COUNTY, ALABAMA

LEON HURLEY and  
VONCILLE HURLEY,

X

AT LAW

Defendants

X

CASE NO. 6815

X

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

*Rec'd by J. P. Lyle  
J. P. Lyle*

FILED

FEB 2 1966  
ALICE J. DUCK, CLERK  
REGISTER

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 Louis Berga, Plaintiff.

Witness my hand this 10 day of January, 1966.

Alice J. Luck  
Clerk,

LOUIS 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. 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 North-west 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 173 feet 3 inches to the point of beginning thence continue West 61 feet 10 1/2 inches to a point, thence North 387 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 380 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 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 29 1966

AME L. DUK, CLERK  
REGISTER

LOUIS BERGA,

Plaintiff,

VS:

LEON HURLEY & VONCILLE HURLEY,

Defendants.

Received 10 day of Jan 1966  
day of 19  
a copy of the within  
Leon Hurley & Voncille Hurley  
service on

TAYLOR WILKINS, Sheriff

By 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  
day of 25 day of Jan 1966  
a copy of the within  
Leon Hurley & Voncille Hurley  
service on

TAYLOR WILKINS, Sheriff  
By D. S.

FILED  
JAN 10 1966  
CLERK REGISTER

Walters & Brantley, Attys.