

JIM WALTER CORPORATION,  
A Corporation

Plaintiff

VS.

JOHN ROBERT DAVIS

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY

) ALABAMA

) AT LAW

) CASE NO. 6916

COMPLAINT

COUNT ONE

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

Start at the center of Section 16, Township 5 South, Range 3 East and run North 330 feet to a point, thence run West 452.2 feet for a point of beginning; thence continue West 308.8 feet to a point, thence run North 208.8 feet to a point, thence run East 208.8 feet to a point, thence run South 208.8 feet to the point of beginning, containing one acre, more or less.

of which the Plaintiff was in the possession, and upon which, pending such possession, and before the commencement of this suit, the defendant 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:

Start at the center of Section 16, Township 5 South, Range 3 East and run North 330 feet to a point, thence run West 452.2 feet for a point of beginning; thence continue West 208.8 feet to a point, thence run North 208.8 feet to a point, thence run East 208.8 feet to a point, thence run South 208.8 feet to the point of beginning, containing one acre, more or less.

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 defendant entered and unlawfully withhold, together with \$1,000.00 for detention thereof.

GIBBONS & STOKES

BY E. Graham Gibbons

E. Graham Gibbons  
Attorney for Plaintiff  
P.O. Box 293  
Mobile, Alabama  
Telephone 433-2611

Serve the Defendant at:

Loxley, Alabama

FILED

MAR 25 1966

APR 1 1966

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6916

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John Robert Davis

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.....

John Robert Davis

....., Defendant.....

by Jim Walter Corporation, a corp

....., Plaintiff.....

Witness my hand this 25 day of March 19 66.

E. J. - 4-2-66 Chris J. Luck Clerk

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

JIM WATTE CORPORATION, A Corp.

Plaintiffs

vs.

JOHN ROBERT DAVIS

Defendants

SUMMONS AND COMPLAINT

Filed ..... 3-25 ..... 19. 66

Allice J. Duck ..... Clerk

Gibbons & Stokes

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

MAR 25 1966

TAYLOR WILKINS  
SHERIFF

I have executed this summons

this 4-2 ..... 1966

by leaving a copy with

*John Robert Davis*

40  
480

TAYLOR WILKINS

DEPUTY SHERIFF

*John Wilkins*  
Sheriff  
*W.C. Harris*  
Deputy Sheriff  
*Harley*

GIBBONS & STOKES

ATTORNEYS AT LAW  
201 AMERICAN NATIONAL BANK BUILDING  
BIENVILLE OFFICE  
MOBILE, ALABAMA  
TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA, 36601

March 24, 1966

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

Re: Jim Walter Corporation vs. John Robert Davis

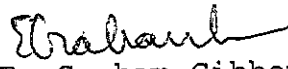
Dear Mrs. Duck:

I would appreciate your filing the enclosed complaint and advising me when there has been service on the defendant.

Since the plaintiff is an out of state corporation authorized to do business in Alabama, I will personally guarantee costs incident to suit.

Thank you very much for your attention to this matter.

Sincerely,

  
E. Graham Gibbons

EGG:he

Enclosure

STATE OF ALABAMA  
Baldwin County

## CIRCUIT COURT

JIM WALTER CORPORATION, A Corp.

Plaintiffs

vs.

JOHN ROBERT DAVIS

Defendants

## SUMMONS AND COMPLAINT

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Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

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Received In Office

MAR 25 1966

19.....

TAYLOR WILKINS

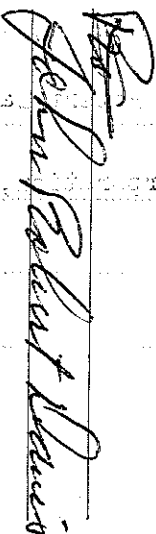
SHERIFF

Sheriff

I have executed this summons

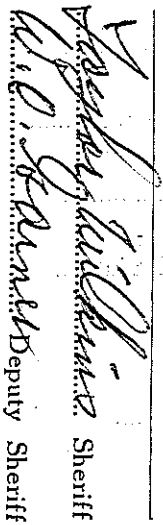
this 4-2 ..... 1966

by leaving a copy with



SHERIFF ALBANY 40 480

TAYLOR WILKINS, Sheriff

BY  ALICE J. DUCK  
DEPUTY SHERIFF Sheriff

Deputy Sheriff



JIM WALTER CORPORATION,	)	IN THE CIRCUIT COURT OF
A Corporation	)	
	)	BALDWIN COUNTY
Plaintiff	)	
	)	ALABAMA
VS.	)	
	)	AT LAW
JOHN ROBERT DAVIS	)	
	)	CASE NO. _____
Defendant	)	

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GIBBONS & STOKES

BY

E. Graham Gibbons  
Attorney for Plaintiff  
P.O. Box 293  
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Telephone 433-2611

Serve the Defendant at:  
  
Loxley, Alabama

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

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MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS  
B. F. STOKES, III

MAILING ADDRESS  
P. O. BOX 293  
MOBILE, ALABAMA, 36601

April 11, 1966

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

Re: Jim Walter Corporation vs. John Robert Davis

Dear Mrs. Duck:

I would appreciate your dismissing the above captioned matter on motion of the plaintiff and forwarding the cost bill to me.

Thank you very much for your attention to this matter.

Sincerely,

  
E. Graham Gibbons

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