

(Original) RECORDED

Suek
7-510

SUMMONS AND COMPLAINT.

DAISY HARTS,

Plaintiff,

VS.

JESSIE DANIEL, et al,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. ____.

Filed July 14, 1936
Robert S. Suek, Clerk.

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

(112) Rec. in office
7/14/36

M. H. Wilkins
Sheriff

Executed July 21, 1936
by serving copy of within Summons and
Complaint on

Jessie Daniel
Bet Perryman
& Dottie Gray

M. H. Wilkins Sheriff
C. N. Anderson Deputy Sheriff

DAISY HARTS,

Plaintiff,

-vs-

JESSIE DANIEL, ET AL,
Defendants.

IN THE CIRCUIT COURT--AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Now come the Defendants, and file their Demurrer to the Complaint in this cause, and assign the following grounds therefor, viz:-

1st. That said Complaint does not state a cause of action.

2nd. That the description of the lands in said Complaint is indefinite and uncertain.

3rd. It does not appear exactly as to what lands are being sued for.

4th. That it does not appear for certain as to where said ten acres of land is located in said Section 12, Township 2 North of Range 2 East.

H. J. Carter & R. J. Rouse
Attorneys for Defendants.

Defendants demand a trial
of this cause by Jury.

H. J. Carter & R. J. Rouse
Attorneys for Defendants.

RECORDED
Duck
7. 519

DEMURRER.

DAISY HARTS,

Plaintiff,

-VS-

JESSIE DANIEL ET AL,

Defendants.

IN THE CIRCUIT COURT-AT LAW
STATE OF ALABAMA
BALDWIN COUNTY.

Filed August 7th, 1936

Robert S. Duck
Clerk.

Recd Aug 19 1936

Robert S. Duck

DAISY HARTS,

Plaintiff,

VS.

JESSIE DANIEL, BET PERRYMAN
AND DOLLIE GRAY,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

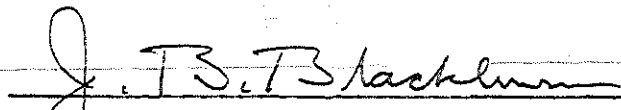
AT LAW. NO. ____.

AMENDED COMPLAINT.

The Plaintiff sues to recover possession of the following tract of land in Baldwin County, Alabama, to-wit: The (10) acres of land located in Section Twelve (12), Township Two (2) North, Range Two (2) East, bounded on the North and East by lands now or formerly owned by Silas Rice, on the South by lands now or formerly owned by Tony Brown, and on the West by lands now or formerly owned by Dick Williamson; being more particularly described as follows, to-wit:

From the Southwest Corner of Fractional Section 12, Township 2 North, Range 2 East, run North 1435 feet and North 80 degrees West 300 feet for a point of beginning; thence North 80 degrees West 485 feet; thence North 11 degrees West 619 feet to the South bank of Pine Log Creek; thence Northeasterly 800 feet, more or less up the South bank of Pine Log Creek to a point which is 300 feet West of the West line of said Section 12; thence South 1334 feet to the point of beginning, containing 10.9 acres, more or less, in Baldwin County, Alabama;

of which she was in possession, and upon which pending such possession, and before the commencement of this suit the Defendants entered and unlawfully withhold, together with \$100.00 for the detention thereof.


Attorney for Plaintiff.

RECORDED.

Duck

8-42

AMENDED COMPLAINT.

DAISY HARTS,

Plaintiff,

VS.

JESSIE DANIEL, BET PENTYMAN
AND EOLLIE GRAY.

Defendants.

Filed February 25, 1937.
C. S. Duck, Clerk.