

816

W. A. DYCKMAN

PLAINTIFF

VS

HENRY GIBSON

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

And now comes the Defendant, and for answer to  
the Complainant's Complaint, says:

1.

Not Guilty.

BEENE & HALL

BY *Shirley*  
Attorneys for Defendant.

The Defendant demands a trial by jury.

*Beene & Hall*

816

W. A. DYCKMAN  
PLAINTIFF

VS

HENRY GIBSON  
DEFENDANT.

ANSWER.

Filed 2-19-43  
H. H. H. H. H.  
6006

THE STATE OF ALABAMA, )  
ESCAMBA COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Henry Gibson to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of W. A. Dyckman.

Witness My Hand this 6th day of May, 1943.

R. D. [Signature]  
Clerk of the Circuit Court

\*\*\*\*\*

C O M P L A I N T

W. A. DYCKMAN,

PLAINTIFF

VS.

HENRY GIBSON,

DEFENDANT.

Count 1. The plaintiff sues to recover possession of the following tract of land situated in Baldwin County, Alabama:

All of the Northeast Quarter of Section Thirty-five (35) Township Four (4) South, Range Five (5) East of St Stephens Meridian except a strip Seven (7) chains wide off the west side thereof, containing Twenty-eight (28) acres, more or less, and except Three (3) acres in the form of a square in the Northeast corner of the Northeast Quarter of the Northeast Quarter (NE $\frac{1}{4}$  of NE $\frac{1}{4}$ ) and except five (5) acres in the South west corner of the Southeast Quarter of the Northeast Quarter (SE $\frac{1}{4}$  of NE $\frac{1}{4}$ ), being Two and One-half (2 $\frac{1}{2}$ ) acres East and West and Two (2) acres North and South and except Three (3) acres in the Southeast corner of the Southwest Quarter of the Northeast Quarter, being one and one-half (1 $\frac{1}{2}$ ) acres East and West and Two (2) acres North and South, containing one hundred twenty-three (123) acres, more or less,

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with One Hundred Dollars (\$100.00) for the detention thereof.

Heun G. Brock  
Attorney for Plaintiff,  
Brewton, Alabama.

The plaintiff is a non-resident of Alabama, residing at Dallas, Texas and I hereby acknowledge myself as security for the court costs in this case.

Heun G. Brock  
Attorney for Plaintiff

Executed 7th May 1943  
by serving copy of within Summons and  
Complaint on  
Henry Gibson

By W. R. Stuart Sheriff  
Deputy Sheriff

918

816

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
W. A. DUCKMAN, PLAINTIFF,  VS.  HENRY GIBSON, DEFENDANT <i>Johnston</i>
SUMMONS & COMPLAINT FILED MAY 6 1943. <i>Johnston</i> Clerk
Received at Sheriff's Office this 6 day of May 1943 W. R. STUART Sheriff
LAW OFFICES OF LEON G. BROOKS BREWTON, ALA.