

BEATRICE SHIPP

PLAINTIFF

VS

J. C. GALT JR.

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

No. 1786

Now comes the Defendant and for answer to the Plaintiff's complaint

says:

True.

That he is not guilty.



John H. Danner  
Attorney for the Defendant

1786

RECORDED

BEATRICE SWIFF

M. SWIFF

73

C. C. GANTT CO.

MANUFACTURER

SWIFF

PAILED

MAY 2 1952

ALICE L. DICK, Clerk

SUMMONS AND COMPLAINT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons C. C. Gantt, Sr., to appear within thirty 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 Beatrice Shipp.

Witness my hand, this 8<sup>th</sup> day of April, 1952.

Alice L. Jernigan  
Clerk

BEATRICE SHIPP,	X	IN THE CIRCUIT COURT OF
Plaintiff,	X	BALDWIN COUNTY, ALABAMA.
VS.	X	AT LAW
C. C. GANTT, SR.,	X	CASE NO. _____.
Defendant.	X	

COUNT ONE: Plaintiff sues to recover possession of the following tract of land: The South Half of the Northwest Quarter of the Southeast Quarter of Section 24, Township 4 North, Range 3 East, Baldwin County, Alabama, of which she 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 THOUSAND (\$1,000.00) DOLLARS for the detention thereof.

Plaintiff demands a trial by jury.

C. LeNOIR THOMPSON

TOLBERT M. BRANTLEY

BY: Doliver M. Brantley  
Attorneys for Plaintiff

RECORDED

TAYLOR WILKINS, Sheriff

SUBMITTED  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW  
CASE NO. 1786.

Received 4-16- 19  
By serving copy of within Summons  
Complaint on

C. C. Gantt.

BEATRICE SHIPP,  
Plaintiff,  
VS.  
C. C. GANTT, SR.,  
Defendant.

FILED 4-8-52

Rose L. Wessels  
Clerk

1786