

1853

State of Alabama  
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon John Stewart to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the time and place for holding the same, then and there to answer the complaint of Tom Hadley.

Witness my hand, this the 21<sup>st</sup> day of Aug, 1952.

W. J. Wrenck  
Clerk

\*\*\*\*\*  
Tom Hadley

Plaintiff

Vc

John Stewart

Defendant

\* In the Circuit Court of  
Baldwin County, Alabama

\* At law.

The Plaintiff sues to recover possession of the following tract of land;

The N.W.<sup>1</sup>/4 of the N.E.<sup>1</sup>/4 of the S.W.<sup>1</sup>/4 of Section 27,  
Township 1 North, Range 3 East, Baldwin County, Alabama

of which he was in possession and pending such possession and before the commencement of this suit, the Defendant lawfully entered on demise of the Plaintiff's grantor as his tenant at will and which now the Defendant after the termination of his possessory interest and after the Plaintiff's demand in writing therefor, unlawfully detains, together with Five Hundred dollars for the detention thereof.

Robert J. Hadley  
Attorney for the Plaintiff

Received in Sheriff's Office  
this 21 day of July, 1952  
TAYLOR WILKINS, Sheriff

RECORDED

1863

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

Aug 22 1952

Served \_\_\_\_\_  
of serving copy of written Summons and  
complaint on

John Stewart

Taylor Wilkins Sheriff  
George Hartley Deputy Sheriff

Summons and Complaint

Filed 8-21-52

Alice J. Duck - Clerk

Tom Hadley

Plaintiff

-vs-

John Stewart

Defendant

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA AT LAW.

Now comes the Defendant in answer to the Plaintiff bill of complaint say:

ONE

He is not guilty.

TWO

The cause of the action is barred by the Statute of Limitations of three years.

  
Harry J. Wilters, Jr.  
Attorney for the Defendant

The Defendant demands a trial by jury.

  
Harry J. Wilters, Jr.  
Attorney for the Defendant

RECORDED

1853

Answer

Filed 9-19-52  
Acid French  
Clerk

Tom Hadley

Plaintiff

We

John Stewart

Defendant

In the Circuit Court of  
Baldwin County, Alabama  
at Law, Case No. 1858

Now comes the Plaintiff in the above styled cause by his Attorney, Robert P. McKinley and claims his exemptions of \$2,000 Real Estate as allowed him under Code title 7, section 625 and \$1,000 personal property, as well as all wearing apparel, portraits, pictures, books, etc., as allowed him under code title 7, section 629 of the 1940 code of the State of Alabama, as well as all other exemptions from execution allowed him under Alabama law.

*Robert P. McKinley*  
Robert P. McKinley  
Attorney for the Plaintiff

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

Case No. 1853

Claim of Exemptions

FILED  
OCT 21 1952  
MUSE L BUCK, CLERK

Tom Hadley

Plaintiff

Vs

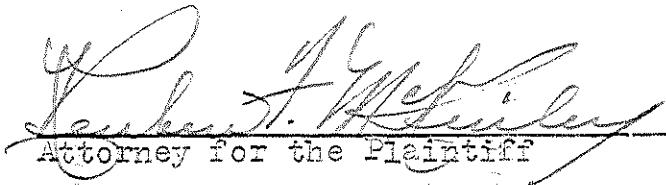
John Stewart

Defendant

\*  
\*  
\*  
\* In the Circuit Court of  
\* Baldwin County, Alabama  
\* At Law. Case No. 1853

\*  
\*

Now comes the Plaintiff in the above styled cause by his Attorney, Reuben F. McKinley and Claims his exemptions of \$2,000 Real Estate as allowed him under Code title 7, section 625 and \$1,000 personal property, as well as all wearing apparel, portraits, pictures, books, etc., as allowed him under code title 7, section 629 of the 1940 code of the State of Alabama, as well as all other exemptions from execution allowed him under Alabama law.

  
Reuben F. McKinley  
Attorney for the Plaintiff

RECORDED

Tom Hedley

Plaintiff

Vs

John Stewart

Defendant

Case No. 1853

Claim of Exemptions

FILED

OCT 24 1952

Alice J. Duck, Clerk