

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 21st day of Aug 1952.

W. J. French
Clerk

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

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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. 1/4 of the N.E. 1/4 of the S.W. 1/4 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. McVieley
Attorney for the Plaintiff

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

received Aug 22 1952
by serving copy of within Summons and
complaint on

John Stewart

Taylor Wilkins Sheriff
By George Hartley Deputy Sheriff

1853
RECORDED

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

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. Walters, Jr.
Attorney for the Defendant

The Defendant demands a trial by jury.


Harry J. Walters, Jr.
Attorney for the Defendant

RECORDED

1853

RECORDED

Answer

Filed 9-19-52
Deirdre French
Clerk

Tom Hadley

Plaintiff

vs

John Stewart

Defendant

In the Circuit Court of
Baldwin County, Alabama
At Law, Case No. 1958

Now comes the Plaintiff in the above styled cause by
his Attorney, Reuben W. 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.


Attorney for the Plaintiff

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

Case No. 1853

Claim of Exemptions

FILED

OCT 24 1952

ALICE J. DUCK, Clerk

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

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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.


Attorney for the Plaintiff

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