

1878

Tom Hadley

Plaintiff

vs

John Stewart

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

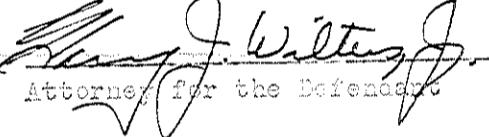
AT LAW.

MOTION TO STRIKE

Comes now the Defendant in the above style cause and moves the Court to strike the pleading of the Plaintiff and for grounds for said motion show unto the Court as follows:

1.

The pleading the Prolix.


Henry J. Wiltz Jr.
Attorney for the Defendant

1828

RECORDED

Tom Hadley

plaintiff

Vs

John Stewart

Defendant

MOTION TO STRIKE

FILED
NOV 18 1952
ALICE J. BOCK, Register

Reuben F. McKinley
Attorney at Law
Bay Minette, Alabama
October 23, 1952

Mr. John Stewart
Rabun, Alabama

Re; Tom Hadley Vs John Stewart.

Dear Sir:

The Plaintiff in the above styled cause demands that you furnish him with an abstract of title to the lands sued for, as provided by Title 7 Section 940 of the 1940 code of the State of Alabama, upon which you will rely for defense.

Yours Very Truly



Attorney for the Plaintiff

RFM:

FILED
OCT 31 1952
FBI - BOSTON, MASS.

Tom Hadley

Plaintiff

vs

John Stewart

Defendant

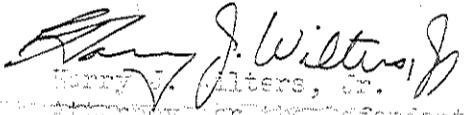
IN THE CIRCUIT COURT OF

RAIFORD COUNTY, ALABAMA

AT JAHN

Now comes the defendant, John Stewart, and makes this demand in writing to the plaintiff, Tom Hadley, for an abstract in writing of the title or titles on which he will rely for recovery of the land sued for at the trial of this cause which is now set for the next term of the Circuit Court, a date more than ten days before this notice and demand.

Witness my hand at Ray Minette, Alabama, this the 28 day of October, 1952.


Harry J. Wilcox, Jr.
Attorney for the Defendant

Receipt of above demand in writing for an abstract of title in writing covering property the subject of this suit, is hereby acknowledged on this the _____ day of _____, 19____.

Attorney for _____

1878
RECORDED

Tom Hadley

Plaintiff

vs

John Stewart

Defendant

Notice of Abstract

Filed 10-28-52
Alice Ammons
clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1878

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

John Stewart

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

John Stewart, Defendant
by *Tom Wadley*, Plaintiff

Witness my hand this 22nd day of Oct 1953

Asst. Clerk, Clerk

No. _____ Page _____

**THE STATE OF ALABAMA
BALDWIN COUNTY**

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

, 19 _____

, Sheriff

I have executed this summons

this _____, 19 _____
by leaving a copy with _____

Sheriff

Deputy Sheriff

Tom Hadley *
Plaintiff *
Vs * In the Circuit Court of
John Stewart * Baldwin County, Alabama
Defendant * At Law.

1.

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

The N.W. $\frac{1}{4}$ of the N.E. $\frac{1}{4}$ of the S.W. $\frac{1}{4}$, Sec. 27, T1N, R3E, Baldwin County, Alabama, of which he was in possession and upon which pending such possession and before the commencement of this suit, the Defendant entered and unlawfully withdraws, together with five hundred dollars for the detention thereof.

2.

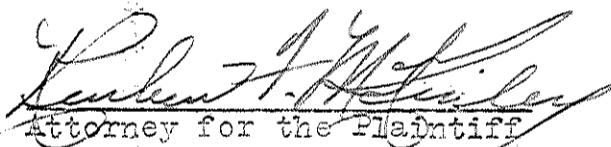
The Plaintiff claims of the Defendant Five Thousand dollars damages for a trespass by the Defendant on the following tract of land, viz;

The N.W. $\frac{1}{4}$ of the N.E. $\frac{1}{4}$ of the S.W. $\frac{1}{4}$, Sec. 27, T1N, R3E, Baldwin County, Alabama, belonging to the Plaintiff and for keeping the Plaintiff out of possession of said tract of land from January 1, 1952 to this date.

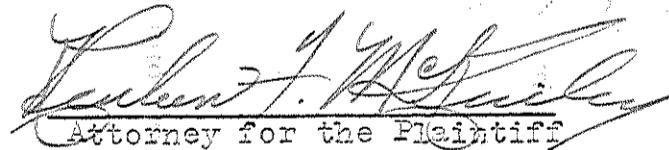
3.

The Plaintiff claims of the Defendant Three Hundred dollars for the use and occupation by him of the following tract of land, viz;

The N.W. $\frac{1}{4}$ of the N.E. $\frac{1}{4}$ of the S.W. $\frac{1}{4}$, Sec. 27, T1N, R3E, Baldwin County, Alabama, belonging to the Plaintiff, from the 1st day of January, 1952 to this date.


Leibert J. McNeely
Attorney for the Plaintiff

Plaintiff demands a trial by jury.


Leibert J. McNeely
Attorney for the Plaintiff

Received in Sheriff's Office
this 22 day of Oct 1952
TAYLOR WILKINS, Sheriff

RECORDED
NOV 18 1952

Executed 10-25-1952
by serving copy of within Summons and
Complaint on

John Stewart

Taylor Wilkins
Rita Collier Deputy Sheriff

Tom Hadley

Plaintiff

Vs

John Stewart

Defendant

Summons and Complaint

FILED
OCT 22 1952
ALICE J. DICK, Clerk

1878

Bog Minette Ala.
March 2, 1953

Mrs. Alice J. Duck.

Circuit Clerk,

Bog Minette, Alabama

This is to authorize
you to withdraw the case.

Tom Hadley vs John Stewart
upon payment of the costs in
the case by the defendant,
John Stewart. This is a
~~small~~ Case No. 1878.

Stephen J. McGehee
Attorney for the Plaintiff