

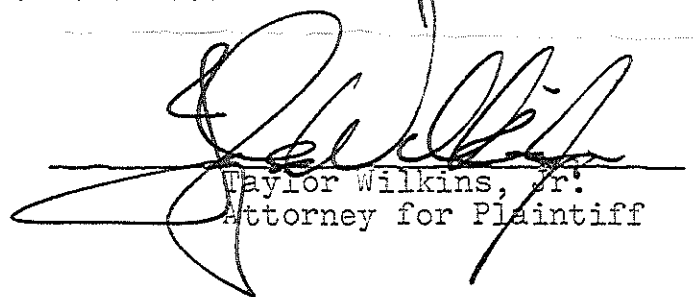
ELDRIDGE HADLEY, : IN THE CIRCUIT COURT OF
PLAINTIFF, : BALDWIN COUNTY, ALABAMA
VS. : AT LAW
CHARLES E. IRWIN and :
ELLA V. IRWIN, :
DEFENDANTS. : CASE NO:

I.

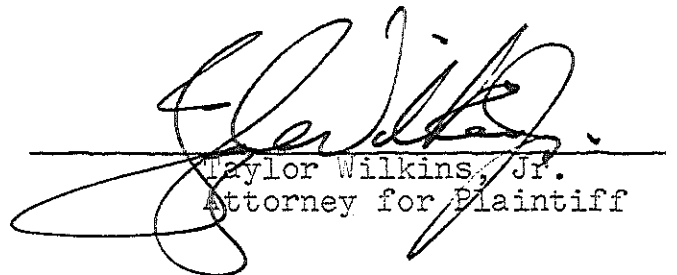
The Plaintiff, Eldridge Hadley, sues to recover possession of the following tract of land:

Lots 10 and 11, Block 18, Town of Silverhill, Alabama, Baldwin County, according to the plat thereof as the same appears of record in the office of the Judge of Probate of Baldwin County, Alabama, in Miscellaneous Book 1, Page 59,

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold together with ONE THOUSAND AND 00/100 (\$1,000.00) DOLLARS for the detention thereof.


Taylor Wilkins, Jr.
Attorney for Plaintiff

Plaintiff respectfully demands a trial of this cause by jury.


Taylor Wilkins, Jr.
Attorney for Plaintiff

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonCHARLES E. IRWIN & ELLA V. IRWIN.....

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.....

CHARLES E. IRWIN & ELLA V. IRWIN....., Defendant.....

byELDRIDGE HADLEY.....

....., Plaintiff.....

Witness my hand this.....14.....day of.....Apr.....1920.....
.....Eldridge Hadley....., Clerk

No. 9211

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ELDRIDGE HADLEY

Plaintiffs

vs.

CHARLES E. IRWIN &
ELLA V. IRWIN

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

APR 14 1970

Clerk

ALICE J. DECK

CLERK
REGISTER

Taylor Wilkins, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Silverhill, Alabama

Received In Office

April 14

19.20

Taylor Wilkins Sheriff

I have executed this summons

this

4-24 19.70

by leaving a copy with

Sherriff claims

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY BROWN
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H B Brown Deputy Sheriff

S Hill
60 miles RT

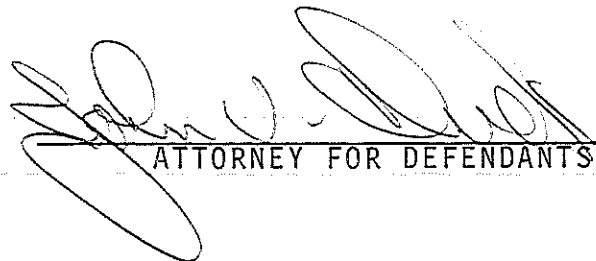
ELDRIDGE HADLEY,)
Plaintiff,)
vs.)
CHARLES E. IRWIN and)
ELLA V. IRWIN,)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 9211

DEMURRER

Comes now the Defendants in the above styled cause, and demur to the Bill of Complaint filed herein and say:

1. The said Bill of Complaint does not state a cause of action.
2. That the Defendants entered and unlawfully withhold is a mere conclusion of the pleader.
3. That the said Bill of Complaint seeks speculative damages.


ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that I have this day served and sealed for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 28 day of April 1970


Attorney for Defendants

FILED

APR 30 1970

ALICE J. DUCK CLERK
REGISTER