

R. A. NORRED, ATTORNEY
200 2121 BUILDING
2121 8TH AVE., NORTH
BIRMINGHAM, ALABAMA 35203

9249
Case No.

To

Judge Masphorne

DATE

5/26/70

SUBJECT

Mid-States Harness Throats

Judge -

We will appreciate it if your Honor
would dismiss this cause at the
cost of the plaintiff.

R. A. Norred

R. A. Norred

ATTORNEY

200 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM, ALABAMA 35203
TELEPHONE
323-4076

May 6, 1970

Clerk:
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

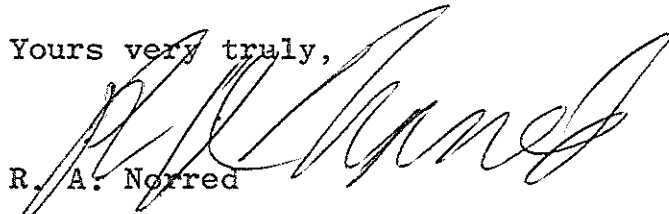
Re: Mid-State Homes, Inc.
vs.
James Thomas

Dear Sir:

I enclose herein an original and one copy of a Summons and Complaint for service and filing in the above. The defendant's address is Routel, Box 229, Daphne, Alabama.

I would appreciate it if you would acknowledge receipt hereof, confirming the filing date with case number for future correspondence; and if you would also advise when service has been perfected on the defendant.

Yours very truly,


R. A. Norred

RAN/hc

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STATE OF ALABAMA)
)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

James Thomas

to appear within thirty days from the date of this Writ in the
Circuit Court to be held for said County at the place of holding
same, then and there to answer the Complaint of
Mid-State Homes, Inc.

Witness my hand this 8 day of May, 1920.

Alfred [unclear]
CLERK

MID-STATE HOMES, INC.,)
a corporation)
PLAINTIFF,)
VS.)
JAMES THOMAS,)
DEFENDANTS)
IN THE CIRCUIT COURT OF)
BALDWIN County, Alabama)
At Law)
Case No. 9249)

COMPLAINT

COUNT ONE: The Plaintiff sues to recover possession of the
following tract of land in Baldwin County, Alabama

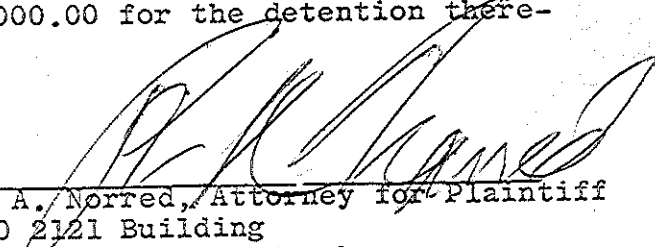
Start at the Southeast corner of Section 28, Township
4 South, Range 2 East for a point of beginning; Thence
run North 76.6 feet; thence run West 250 feet thence run
South 76 feet, more or less, to a point on the Section
line; thence run East 250 feet along the sectionline to
the Point of Beginning. Lot contains 0.43 acres, and lies
in the extreme Southeast corner of Section 28, Township
4, South, Range 2 East.

of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.

COUNT TWO: The Plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama:

(Plaintiff incorporates herein as if fully and completely set out at length herein by reference and adoption, the full legal description of the real estate set out and described in Count One of the Complaint.)

to which said tract of land the Plaintiff has the legal title, and upon which tract of land, before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.


R. A. Norred, Attorney for Plaintiff
200 2121 Building
2121 8th Avenue, North
Birmingham, Alabama 35203
Telephone 323-4076

PLAINTIFF'S ADDRESS:

Mid-State Homes, Inc.
% R. A. Norred, Attorney
200 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203

DEFENDANTS' ADDRESS:

James Thomas
Route 1, Box 229
Daphne, Alabama

FILED

MAY 8 1970

ALICE J. DUCK CLERK
REGISTER

Received 8 day of May 1970
and on 15 day of May 1970
I served a copy of the within Doc
on James Thomas

By service on James Thomas

TAYLOR WILKINS, Sheriff
By W. G. [Signature] D. S.

Malbis 40 miles

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

Rt 1 Box 229
Daphne

9249

Mid State Homes

VS

James Thomas

Att: R.A. NORRIS

Filed
MAY 8 1970
Alice T. Deck
Clerk