

Bay Minette, Ala., Mar 22 1971

To the Sheriff of Dallas County, Selma Alabama

I enclose herewith 2 copies of S&C for James ^{EX} & Myrtice ^{EX} Parnell
912 Pike Rd.

Ed Hunter
ll
Selma, ala.

Please serve and return as early as possible.

James Parnell
will be home 4-2-71
Gaylon Wilkins
Sheriff, Baldwin County, Alabama

(If not found in your county, please advise promptly giving information as to present location if possible)

GAMBLE & GAMBLE

ATTORNEYS AT LAW
100 CHURCH STREET
SELMA, ALABAMA 36701

HARRY W. GAMBLE
HARRY W. GAMBLE, JR.
WILLIAM J. GAMBLE

August 13, 1971

MAILING ADDRESS
P. O. Box 345
TELEPHONE
(205) 874-7428

Mrs. Eunice B. Blackmon
Clerk of the Circuit Court
of Baldwin County, Alabama
Bay Minette, Alabama

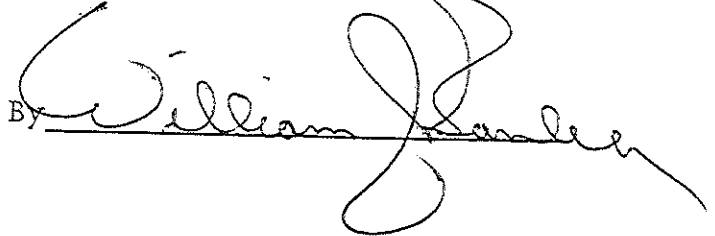
Re: Mid-State Homes, Inc.
vs. James Parnell and
Myrtice Parnell
Case No. 9748

Dear Mrs. Blackmon:

Enclosed is a Joint Motion of Dismissal in the
above styled cause. I would appreciate your filing this motion
and at the judge's convenience have him issue an order to that
effect. The plaintiff is to assume the costs.

Very truly yours,

GAMBLE & GAMBLE

By 

WJG:jma

Encl.

R. A. Norred
ATTORNEY

616

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

March 12, 1971

Clerk of the Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Mid-State Homes, Inc.
vs.
James Parnell and Myrtice Parnell

9748

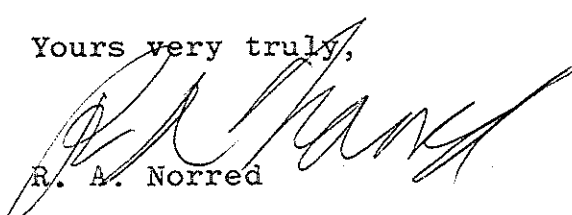
Dear Sir:

I enclose herein an original and two copies of a Summons and Complaint for service and filing on the above. The defendants' address is Mary Ann Beach Road, Fairhope, 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 defendants.

Thank you for your cooperation.

Yours very truly,


R. A. Norred

RAN/tf

Encl.

GAMBLE & GAMBLE

ATTORNEYS AT LAW
100 CHURCH STREET
SELMA, ALABAMA 36701

HARRY W. GAMBLE
HARRY W. GAMBLE, JR.
WILLIAM J. GAMBLE

MAILING ADDRESS
P. O. Box 345
TELEPHONE
(205) 874-7428

April 9, 1971

Mrs. Eunice B. Blackmon
Clerk of the Circuit Court
of Baldwin County, Alabama
Bay Minette, Alabama

Re: Mid-State Homes, Inc.
vs. James Parnell and
Myrtice Parnell
Case No. 9748

Dear Mrs. Blackmon:

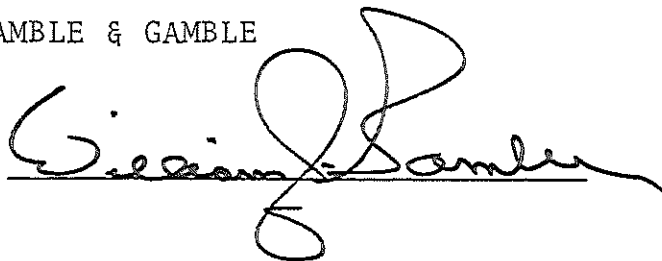
Enclosed is Demurrer we would appreciate your filing
in the above cause.

Thank you for your consideration.

Very truly yours,

GAMBLE & GAMBLE

By

A handwritten signature in dark ink, appearing to read "William J. Gamble", written over a horizontal line.

WJG:lpb

Enc.

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF,

VS.

JAMES PARNELL AND
MYRTICE PARNELL,

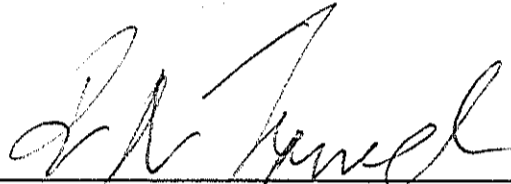
DEFENDANTS,

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

CASE NO. 9748

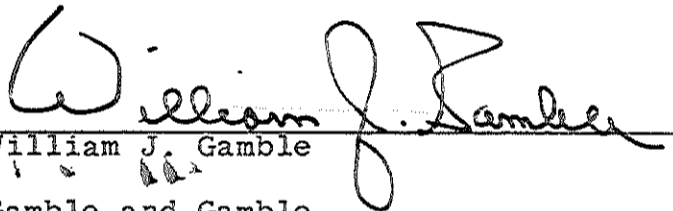
JOINT MOTION OF DISMISSAL

Come the Plaintiff and the Defendants through their
respective undersigned Attorneys of Record, and jointly move
that this cause be dismissed at the cost of the Plaintiff.



R.A. Norred, Attorney for the Plaintiff

616 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203



William J. Gamble

Gamble and Gamble
P.O. Box 345
Selma, Alabama 36701

Filed
8-20-71

Ernie B. Blackmon
Clerk

...
a corporation,

PLAINTIFF,

VS.

JAMES PARNELL AND
MYRTICE PARNELL,


DEFENDANTS,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 9748

JOINT MOTION OF DISMISSAL

Come the Plaintiff and the Defendants through their
respective undersigned Attorneys of Record, and jointly move
that this cause be dismissed at the cost of the Plaintiff.



R.A. Norred, Attorney for the Plaintiff

616 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203



William J. Gamble

Gamble and Gamble
P.O. Box 345
Selma, Alabama 36701

STATE OF ALABAMA)
Baldwin COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James Parnell and wife,
Myrtice Parnell
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 15 day of March, 1971.

Eunice B. Blackmon
CLERK

MID-STATE HOMES, INC.,
a corporation

PLAINTIFF,

VS.

JAMES PARNELL and
MYRTICE PARNELL

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN County, Alabama
At Law

Case No. 9248

COMPLAINT

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

From the North East corner of the SE $\frac{1}{4}$ of the NW $\frac{1}{4}$ of the SW $\frac{1}{4}$
of Section 23, Township 7 South, Range 2 East, run West 60 ft.
to the beginning corner; thence run West 96 feet to a corner;
thence run South 175 feet, more or less, to the Highway Right
of Way line; thence run Southeasterly, along the said Right of
Way line; to the South West corner of the O.C. Parnell lot;
thence run North 193.2 feet to the beginning corner, which is
the North West corner of the said O.C. Parnell lot. Being
a part of that property described in deed recorded in Book
260, Page 35 of the Baldwin County Probate Records.

FILED

MAR 15 1971

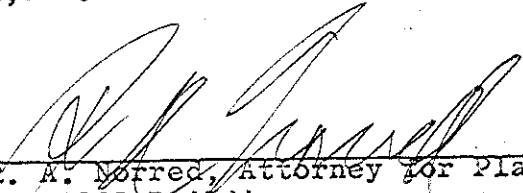
EUNICE B. BLACKMON CIRCUIT
CLERK

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:

(The 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
616 ~~222~~ 2121 Building
2121 8th Avenue, North
Birmingham, Alabama 35203
Telephone 323-4076

PLAINTIFF'S ADDRESS:

Mid-State Homes, Inc.
c/o R. A. Norred, Attorney
616 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203

DEFENDANTS' ADDRESS:

James V. Parnell and
Myrtice Parnell
Mary Ann Beach Road
Fairhope, Alabama 36532

FILED

MAR 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

9748

Mid-State Homes
Inc.

vs.

James Parnell +
Myrtice Parnell

212
LIVE ON PIKE ROAD
SELMA, ALA.
W. Crook
3-18-71

FILED

MAR 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

R. A. Norred

Sheriff claims _____
Taxes at _____

Ten Cents per mile Total \$ _____
TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

Received In Office

Date 3-23-71
WILSON BAKER
Sheriff, Dallas County, Ala.

By g. Davis

Received 15 day of March 1971
and on _____ day of _____ 19____
I served a copy of the within 8 & C
on James Parnell +
Myrtice Parnell
By service on _____

TAYLOR WILKINS, Sheriff
By _____ D. S.

Executed this the 5 day of April, 1971
by leaving a copy of the within summons and complaint with

James Parnell +
Myrtice Parnell

Wilson Baker Defendant.
Sheriff of Dallas County, Ala.

By a. Atchison
Deputy Sheriff, Dallas County, Ala.

EXECUTED

This the 5 day of April, 1971
Wilson Baker
WILSON BAKER, Sheriff

a. Atchison
Deputy Sheriff

Mileage 15

DEMURRER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 9748

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF,

VS.

JAMES PARNELL AND
MYRTICE PARNELL,

DEFENDANTS,

DEMURRER

GAMBLE & GAMBLE
ATTORNEYS AT LAW
SELMA, ALABAMA

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF,

VS.

JAMES PARNELL and
MYRTICE PARNELL,

DEFENDANTS,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 9748

NOTICE OF TAKING DEPOSITION

TO: The Honorable William J. Gamble
Gamble & Gamble
100 Church Street
Selma, Alabama 36701

AS ATTORNEY OF RECORD FOR THE DEFENDANTS.

You are hereby notified that the plaintiff will take the testimony by deposition upon oral examination for the purpose of discovery and other purposes in this cause in accordance with the laws of Alabama of the following named person, to-wit:

James Parnell, Mary Ann Beach Road, Fairhope, Alabama
Myrtice Parnell, Mary Ann Beach Road, Fairhope, Alabama.

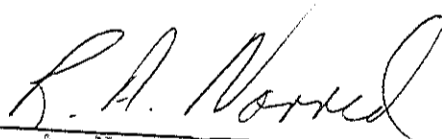
TIME: Said deposition shall be taken on May 20, 1971, commencing at 9:30 o'clock A.M., and from time to time thereafter as said deposition may be continued for completion.

PLACE: Said deposition shall be taken in the Office of the Court Reporter, Courthouse, Selma, Alabama.

PERSON BEFORE WHOM TAKEN: Said deposition shall be taken before Gertrude M. Bailey, who is authorized to administer oaths by the laws of the State of Alabama.

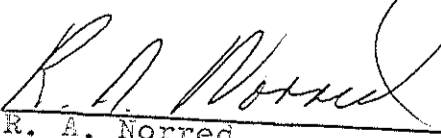
The Clerk will please issue a subpoena to the above designated witness at the address indicated.

This the 6th day of May, 1971.


R. A. Norred
Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing notice has this day been mailed postage prepaid to the Honorable William J. Gamble, as Attorney of Record for the Defendants, at 100 Church Street, Selma, Alabama, on this the 6th day of May, 1971.


R. A. Norred
Attorney for the Plaintiff

FILED

MAY 10 1971

EUNICE B. BLACKMON CIRCUIT CLERK

VOL

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