

STATE OF ALABAMA)
COUNTY OF BALDWIN) TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LEE NOWELL of Fabric Fair, Elberta, Alabama, to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of Maburn Rhodes.

Witness my hand this 31st day of May, 1971.

Eunice B. Blackmon
Clerk

* * * * *

MABURN RHODES,)	
BONNIE RHODES,)	IN THE CIRCUIT COURT OF
Plaintiffs)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
LEE NOWELL,)	NO. <u>9854</u>
Defendant)	

COMPLAINT FOR STATUTORY RECOVERY OF LAND

The Plaintiffs, Maburn Rhodes and Bonnie Rhodes, sue to recover possession of the following tract of land:

From the Northeast corner of the Northeast Quarter of the Southeast Quarter of Section 13, Township 7 South, Range 3 East, run South 20 feet and West 20 feet for a Point of Beginning; run thence South 325 feet; run thence West 260 feet; run thence North 325 feet; run thence East 260 feet to the Point or Place of Beginning.

of which they were in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendant, Lee Nowell, entered and unlawfully withholds, together with One Hundred Dollars (\$100.00) for the detention thereof.

Daniel E. Robison
Daniel E. Robison
Attorney for the Plaintiffs

FILED

MAY 31 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

TAYLOR WILKINS, Sheriff
By *Childress* D.S.

By service on *Joe Maxwell*

on *Joe Maxwell*

I served a copy of the within *STC*

and on *2* day of *June* 19 *71*

Received *31* day of *May* 19 *71*

Sheriff claims *72* miles at *7.20*
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
By *Childress* DEPUTY SHERIFF

Case 9854
Western Rhodes
Renne
do
Joe Maxwell

* * * * *

FILED
MAY 1971

MICHAEL J. SALMON
LAWYER
SUITE 317
INTERNATIONAL TRADE CENTER
250 N. WATER STREET
MOBILE, ALABAMA 36602
438-3652

June 28, 1971

Mrs. Eunice B. Blackmon
Clerk, Circuit Court
County Courthouse
Bay Minette, Alabama

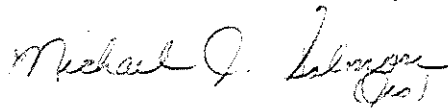
Re: Maburn Rhodes and Bonnie Rhodes vs.
Lee Nowell, At Law Number 9854

Dear Mrs. Blackmon:

Enclosed is a pleading in the above-styled cause
which I will appreciate your filing on behalf of the defendant.

Thank you for your help.

Very sincerely yours,

A handwritten signature in cursive script that reads "Michael J. Salmon". The signature is written in dark ink and is positioned above the typed name.

MICHAEL J. SALMON

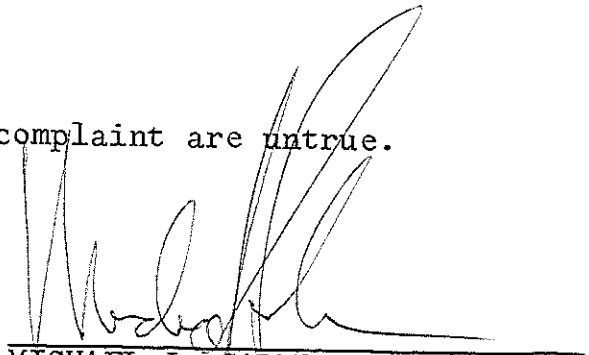
jes

Enclosure

MABURN RHODES and BONNIE
RHODES, : IN THE CIRCUIT COURT OF
Plaintiffs, : BALDWIN COUNTY, ALABAMA
-VS- : AT LAW
LEE NOWELL, :
Defendant. : CASE NUMBER 9854

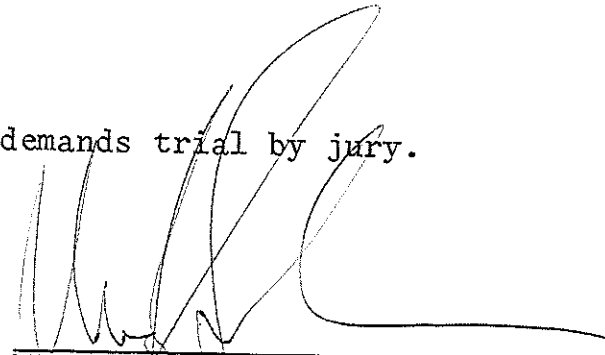
Comes now the Defendant and for answer to the bill
of complaint files the following separate and several pleas:

1. Not guilty.
2. The allegations of the complaint are untrue.


MICHAEL J. SALMON
317 International Trade Center
Mobile, Alabama 36602

Attorney for the Defendant

The Defendant respectfully demands trial by jury.


MICHAEL J. SALMON
Attorney for the Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the
foregoing pleading upon Daniel E. Robison, Esquire, Attorney
for the Plaintiffs in the above-styled cause, by depositing the
same in the United States mail, properly addressed and first
class postage prepaid, this 28th day of June, 1971.

FILED

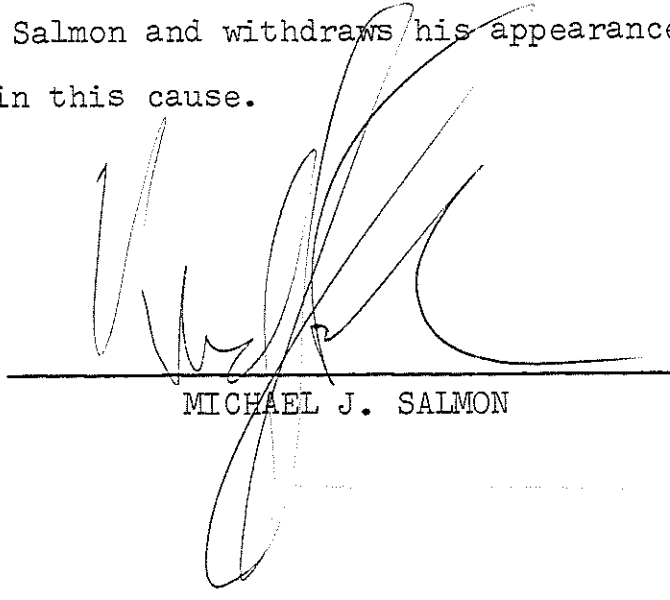
JUN 29 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

MABURN RHODES and BONNIE
RHODES,
Plaintiffs,
vs.
LEE NOWELL,
Defendant.

: IN THE CIRCUIT COURT OF
:
: BALDWIN COUNTY, ALABAMA
:
: AT LAW
: CASE NUMBER 9854

Comes now Michael J. Salmon and withdraws his appearance
as attorney for the Defendant in this cause.



MICHAEL J. SALMON

CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the
foregoing pleading upon Daniel E. Robison, Esquire, Attorney for
the Plaintiffs in this cause, by depositing the same in the United
States mail, properly addressed and first class postage prepaid,
this 2th day of June, 1972.



FILED

JUN 8 1972

EUNICE B. BLACKMON CIRCUIT
CLERK