

J. W. KING

Plaintiff

VS.

HENRY M. WALDEN, as
Executor of the Estate
of Alvin L. Walden

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9871

ANSWER

Comes now the Defendant in the above styled cause
and files this his answer to the Plaintiffs Bill of Complaint:

1.

At the time of the Execution of the lease, he advised
the Lessee that he did not think that the Estate of Alvin L. Walden
owned any mineral interest in and to the land described in the lease
and he was advised by the Lessee that unless the Estate did own the
minerals, no money would be paid him.

WILTERS, BRANTLEY & NESBIT

BY: Thos S. Nesbit

Attorneys for Defendant

FILED

AUG 19 1971

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 19 day of Aug,
1971 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Thos S. Nesbit

LUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Henry M. Walden, as Executor of the Estate of Alvin L. Walden, to appear within thirty days from the service 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 J. W. King.

WITNESS my hand this 10 day of June, 1971.

Ernie B. Blackmon
Clerk

J. W. KING,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
HENRY M. WALDEN, as	X	
Executor of the Estate		
of Alvin L. Walden,	X	AT LAW 9871
Defendant.	X	

COMPLAINT

The Plaintiff claims of the Defendant the sum of Six Hundred Seventy-five Dollars (\$675.00) as damages for a breach of warranty in the lease of all oil, gas and minerals in, under and upon the following described land in Baldwin County, Alabama, to-wit:

The North 60 acres of the South one-half of the Northeast Quarter; the North one-half of the Southeast Quarter of the Northwest Quarter; the Southeast Quarter of the Southwest Quarter of the Northwest Quarter, all in Section 14, Township 6 South, Range 4 East

which the Defendant warranted that he owned and warranted the title thereto, when, in fact, the Defendant had no right, title nor interest in the said oil, gas and minerals, the same having been reserved unto the Denniston Company, Inc., a corporation, in a deed dated August 7, 1946 from the said Denniston Company to Alvin L. Walden.

CHASON, STONE & CHASON

BY: Edward E Ball
Attorneys for Plaintiff

DEFENDANT MAY BE
SERVED AT RT 1
POBEEBDALE, ALA.

FILED

JUN 10 1971

UNICE B. BLACKMON CIRCUIT
CLERK

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Received 11 day of June 19 71
and on 13 day of Aug 19 71
I served a copy of the within
on Henry M. Walden

By service on

TAYLOR WILKINS, Sheriff

By H. B. Young, D. S.
some R. T.
R. Dale

9871

J. W. KING,

Plaintiff,

vs.

HENRY M. WALDEN, et al.,

Defendant.

* * * * *

SUMMONS

AND

COMPLAINT

* * * * *

FILED

JUN 10 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

CHASON, STONE & CHASON

ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

JUN 11 1971

TAYLOR WILKINS
SHERIFF