

STATE OF ALABAMA)
)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Gladys Fryman, Rosetta H. Fryman, Barbara Jean Merrill, and Donald Wayne Merrill 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 9 day of July, 1971.

Eunice B. Blackmer
CLERK

MID-STATE HOMES, INC.,
a corporation

PLAINTIFF,

VS.

GLADYS FRYMAN, ROSETTA H.
FRYMAN, BARBARA JEAN MERRILL,
AND DONALD WAYNE MERRILL.

DEFENDANTS

IN THE CIRCUIT COURT OF

Baldwin County, Alabama

At Law

Case No. 9912

COMPLAINT

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

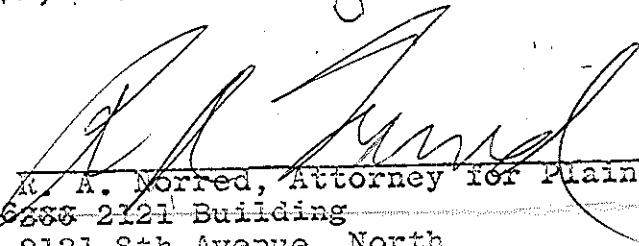
The North half of the following described property to wit: Commencing at the East corner of Block number 5 of the Subdivision of John Cook Grant, Section 4, Township 9 South, Range 3 East, Run thence North 61 degrees, 30 minutes west 1051 feet to the point of beginning, run thence south 89 degrees 25 minutes west 710 feet to the margin of Bay John, Run thence North 15 degrees 30 minutes East 251 feet along and with the margin of said Bay John or Bon Secour River, Run thence South 81 degrees, 10 minutes East 292.4 feet, Run thence South 61 degrees 30 minutes East 401 feet to the point of beginning, Containing 2.43 acres and being part of block number 5 of the subdivision of the John Cook Grant in Section 4, Township 9 South, Range 3 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:

(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 2121 Building
2121 8th Avenue, North
Birmingham, Alabama 35203
Telephone 323-4076

PLAINTIFF'S ADDRESS:

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

FILED

JUL 9 1971

EUNICE B. BLACKMON CIRCUIT CLERK

DEFENDANTS' ADDRESS:

Route 3, Box 157
Foley, Alabama

9913

Mid-State Homes, Inc.
a Corp.

vs:

Gladys Gryman, Rosetta
H. Gryman, Barbara Jean
Merrill, & Donald Wayne
Merrill.

FILED

JUL 9 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Sheriff claims 250 million of
Ten Cents per mile Total \$ 2800
TAYLOR WILKINS Sheriff
BY William
DEPUTY SHERIFF

95
X4
380

Received 9 day of July 1971
and on 10 day of July 1971
I served a copy of the within S&C
on Gladys Gryman -
Rosetta H. Gryman -
Barbara Jean Merrill -
By service on Donald Wayne Merrill -

TAYLOR WILKINS Sheriff
BY Donald Lawrence D. S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 9912

Now come the defendants in the above styled cause and for plea to the complaint heretofore filed in said cause and to each count thereof, separately and severally, and say, separately and severally:

~~Attorney for Defendants~~

~~Attorney for Defendants~~

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 15 day of July, 19 71.

Attorney for

FILED

JUL 16 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

R. A. Norred

ATTORNEY

616 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM, ALABAMA 35203
TELEPHONE
323-4076

July 7, 1971

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

Re: Mid-State Homes, Inc.
vs.
Donald Wayne Merrill, Et al

Dear Sir:

I enclose herein two originals and eight copies of two
Summons and Complaints for service and filing on the above.
The defendants' address is Route 3, Box 157, Foley, Alabama.

I would appreciate it if you would acknowledge receipt here-
of, confirming the filing date with case numbers 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/kc

Enc.