

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, 1941.

Eunice B. Blackburn
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. 9913

COMPLAINT

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

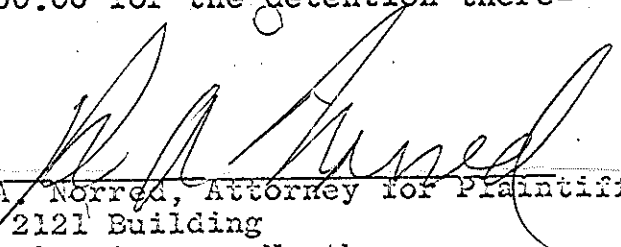
The South Half of the following described Property to wit: Commencing at the East corner of Block Number 5 of the Subdivision of John Cook Grant, Section 4, Township 9 South, Range 3 East, Run thence North 61 degrees, 30 Minutes west 1051 feet to the point of beginning, Run thence South 89 degrees 25 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, 16 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
616-222 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 Fryman, Rosetta
H. Fryman, Barbara
Jean Merrill, & Donald
Wayne Merrill.

Sherriff claims 252 Miles 24
Ten Cents per mile Total \$28.00
TAYLOR WILKINS, Sheriff
By Charles Wilkins
DEPUTY SHERIFF

FILED

JUL 9 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Received 9 day of July 19 71
and on 10 day of July 19 71
I served a copy of the within StC
on Gladys (Fryman) -
Rosetta N. Fryman -
Barbara Jean Merrill -
By service on Donald Wayne Merrill -

TAYLOR WILKINS Sheriff
By Charles Wilkins

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 9913

PLEA

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:

1. Not guilty.

~~Attorney for Defendants~~

Defendants demand a trial by jury
of said cause.

Attorney for Defendants

CERTIFICATE OF SERVICE

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 Defendant

FILED

JUL 16 1971

EUNICE B. BLACKMON CIRCUIT
CLERK