

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Harry Ponds and
wife Alice L. Ponds
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., a corporation

Witness my hand this 16 day of July, 1941 .

Emmie B. Blackmon
CLERK

MID-STATE HOMES, INC.
a corporation

PLAINTIFF,

VS.

HARRY PONDS and
ALICE L. PONDS

DEFENDANTS

IN THE CIRCUIT COURT OF
Baldwin County, Alabama
At Law

Case No. 9924

COMPLAINT

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

Commencing at the Southwest corner of the Northwest
 $\frac{1}{4}$ of Section 27, Township 2 South Range 3 East proceed
North along the West line of said Section 611 feet to
a point, which point is the point of beginning of the
tract of real estate hereinafter described, thence East
and at right angles to the aforesaid West line 320
feet., thence North, and parallel with said West line
75 feet., thence West 320 feet., thence South and
along the said West line of said Section 75 feet, to
the Point of Beginning, said property line, being and
situated in Baldwin County, Alabama

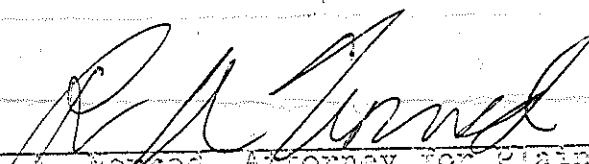
of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.

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.

616


R. A. Norred, Attorney for Plaintiff
xxx 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

FILED

JUL 16 1971

EUNICE B. BLACKMON CIRCUIT CLERK

DEFENDANTS' ADDRESS:
Harry Ponds and Alice L. Ponds
Box 196
Bay Minette, Alabama

MID-STATE HOMES, INC.

vs:

HARRY PONDS & ALICE L. PONDS

Sheriff claims 10 miles at
Ten Cents per mile Total \$ 1.00
TAYLOR WILKINS, Sheriff
BY DEPUTY SHERIFF

FILED

JUL 16 1971

EUNICE B. BLACKMON CIRCUIT /
CLERK

R. A. NORRED
616 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203

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Presented to on July 19 71
d on 4 day of Aug 19 71
served a copy of the writ to
on Harry Ponds
Alice L. Ponds
By service on

TAYLOR WILKINS Sheriff
By W. G. Walker

ANSWER

MID-STATE HOMES, INC.,
a corporation,

Plaintiff,

VS.

HARRY PONDS and ALICE L.
PONDS,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 9924

Come now the Defendants in the above styled cause and file the following Answer to the Plaintiff's Bill of Complaint.

COUNT I

Not guilty.

COUNT II

Not guilty.

WILTERS & BRANTLEY

BY: [Signature]
Attorneys for Defendants

The Defendants demand a trial by jury.

WILTERS & BRANTLEY

BY Attorneys for Defendants

FILED

AUG 9 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 9th day of August 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.

WILKERS & BRANTLEY

On

R. A. Norred

ATTORNEY

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

July 15, 1971

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

9924

Re: Mid-State Homes, Inc.
vs.
Harry Ponds and
Alice L. Ponds

Dear Sir:

I enclose herein an original and two copies of a Summons and Complaint for service and filing on the above. The defendant's address is Box 196, Bay Minette, 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/cc

Encl.

FILED

JUL 16 1971

UNICE B. BLACKMON CIRCUIT CLERK

FILED

UNICE B. BLACKMON CIRCUIT CLERK