STATE OF ALABAMA)	) IN THE CIRCUIT COURT
BALDWIN COUNTY).	) BALDWIN COUNTY, ALABAMA
	) CASE # 9955
and the second	

TO ANY SHEFIFF OF THE STATE OF ALABAMA ---GREETINGS:

You are hereby commanded to summon George B. Johnson and Mattie L. Johnson to appear before the Circuit Court to be held for said County at the place of holding the same within thirty days from service of this process, then and there to answer the Complaint of Engel Mortgage Company, Inc., a Corporation.

Witness my hand this the 27 day of 1971. . . . . . . . . . .

ENGEL MORTGAGE COMPANY, INC. a Corporation

PLAINTIFF,

COMPLAINT

VS

DEFENDANTS.

George B. Johnson and

Mattie L. Johnson

The Plaintiff sues to recover possession of the following described real estate, together with the improvements thereon:

Starting at the Southwest corner of Section 12, Township 5 South, Range 2 East, run thence East along the section line 351 feet to the point of beginning; run thence North 208.7 feet; run thence East 104.3 feet; run thence South 208.7 feet; run thence West along the Section line 104.3 feet to the point of beginning, containing 1/2 acre, more or less, and lying in Section 12, Township 5 South, Range 2 East, Baldwin County, Alabama

To which the Plaintiff is entitled to immediate possession by virtue of the purchase of said land at a sale of same on a foreclosure of a mortgage, deed to said real estate delivered to Plaintiff from said foreclosure sale and recorded in Volume 415, Page 70, in the Office of the Judge of Probate of Baldwin County, Alabama, and which the defendants, after the Plaintiff's demand in writing thereof, unlawfully detains, together with \$500.00 for the detention thereof.

> W. A. JENKINS, JR. ATTORNEY FOR PLAINTIFF PLEASE SERVE DEFENDANTS AT: Rt. 2 Box 159-A

> > 68 PAGE 673

Daphne, Alabama 36526 -

YUDARA

PLAINTIFF'S ADDRESS P.O. Box 847 Birmingham, Alabama

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JUL 2 9 1971

JENKINS & WALLIS, Attorneys 301 Frank Nelson Building Birmingham, Alabama 35203

Sec. Style

EUNICE B. BLACKMON CIRCUIT

9955 Engel Montgage to. Inc. a corp. service Us. Heorge B. Johnson & Mattic F. Johnson Rt. 2 Boy 159. A Daphna FILED JUL 2 9 1971 EUNICE B. BLACKMON CIRCUIT JUL 2 9 1971 DATEC : MERINS SHEAIFT 68 PAGE U74 Yeschins & Wallis EVOL

ENGEL MORTGAGE COMPANY, INC. a Corporation

PLAINTIFF

IN THE CIRCUIT COURT BALDWIN COUNTY, ALABAMA. CASE #\_9955

VS

GEORGE B. JOHNSON and MATTIE L. JOHNSON

DEFENDANTS,

## JUDGEMENT IN EJECTMENT

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This cause being presented to the Court this date and it being made known to the Court from an examination of the records herein that the defendants, George B. Johnson and wife, Mattie L. Johnson, were personally served with a copy of said summons and complaint on August 3, 1971, and said defendants having failed to enter their appearance or file an answer thereto within 30 days from such service and the Court having considered the evidence offered by the plaintiff and taking the allegations of the complaints as being admitted, it therefore,

ORDERED, ADJUDGED, and DECREED, that the defendants, Geroge B. Johnson and wife, Mattie L. Johnson, be and are hereby declared in default herein and that the plaintiff have and recover of said defendants George B. Johnson and wife, Mattie L. Johnson, the property described in the complaint and that said defendants, George B. Johnson and wife, Mattie L. Johnson, be and are hereby ordered to surrender possession of the same within ten (10) days from the date hereof, and upon failure to do so, the circuit clerk be and is hereby ordered to execute a Writ of Possession directed to the sheriff of said county requiring him to forthwith execute the same.

Done and ordered this <u>pure</u>day of <u>Splencher</u>, 1971.

FILED

"VOL 68 PAGE 875 SEP 16 1971

EUNICE B. BLACKMON CIRCUIT

STATE OF ALABAMA BALDWIN COUNTY IN THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA

CASE # 9955

WRIT OF POSSESSION

TO THE SHERIFF OF SAID COUNTY AND STATE:

You are hereby commanded to deliver possession to the Engel Mortgage Company, Inc. of the lands and tenements which the said Engel Mortgage Company, Inc. recovered of George B. Johnson and Mattie L. Johnson by the judgement of this Court entered in this cause on the 14th day of September, 1971, to-wit:

> Starting at the Southwest corner of Section 12, Township 5 South, Range 2 East, run thence East along the Section line 351 feet to the point of beginning; run thence North 208.7 feet; run thence East 104.3 feet; run thence South 208.7 feet; run thence West along the Section Line 104.3 feet to the point of beginning, containing 1/2 acre, more or less, and lying in Section 12, Township 5 South, Range 2 East, Baldwin County, Alabama.

You are further commanded to levy upon the goods or chattels of said George B. Johnson and Mattie L. Johnson for the payment of the sum of  $\frac{1}{100} - \frac{1}{100}$ dollars as costs incurred in said suit and to make return of this Writ and the execution thereof according to law.

Witness my hand this 14 th day of (

Clerk of Circuit Court

, 1971.

Baldwin County, Alabama

EVOL BS PAGE 575

9955 Engel Martgage Co. Inc. YLD. George B. Schneson & Mattice J. Johnson Bollows Br. Z. Borrspan Walt of Pessession \_\_\_\_\_f 20 1971 TAYLOR WILKINS SHERIFF Jenkins & Wallis B'ham -

### JENKINS AND WALLIS

ATTORNEYS AT LAW 302-04 FRANK NELSON BUILDING BIRMINGHAM, ALABAMA 35203

TELEPHONE 328-6845

November 24, 1971

W. A.JENKINS, JR. KENNETH D. WALLIS

J. MASSEY RELFE, JR.

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

> Re: Case #9955 Engel Mortgage Company, Inc. vs George B. Johnson and Mattie L. Johnson

Dear Miss Blackmon:

Please advise if all costs have been paid in connection with the captioned case.

Your promptness in advising concerning this matter will be appreciated as I am in the process of completing this file.

Yours truly,

JENKINS AND WALLIS

W. A. Jenkíns, Jr.

WAJ,jr/bc

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#### JENKINS AND WALLIS

ATTORNEYS AT LAW

302-04 FRANK NELSON BUILDING

TELEPHONE 328-6845

W. A. JENKINS, JR. KENNETH D. WALLIS

October 12, 1971

J. MASSEY RELFE, JR.

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

> Re: Case # 9955 Engel Mortgage Company, Inc. vs George B. JOhnson and Mattie L. Johnson

Dear Miss Blackmon:

Since all efforts to get the defendants to peaceably vacate this property have failed, I am enclosing the original and two copies of a form ofWrit of Possession for your use and would greatly appreciate your placing this Writ in the hands of the Sheriff for immediate action in vacating this property.

I am notifying the defendants of my intention to have them forcibly evicted by sending a copy of this letter. Please advise when action has been taken and this property vacated. Please complete cost on the attached Writ.

Your assistance in this regard will be greatly appreciated.

Very truly yours,

JENKINS AND WALLIS

W. A. Jenkins, Jr.

WAJ,jr/bc Encl.

cc : Mr. and Mrs. George B. Johnson Engel Mortgage Company, Inc. JENKINS AND WALLIS

ATTORNEYS AT LAW

302-04 FRANK NELSON BUILDING

# BIRMINGHAM, ALABAMA 35203

TELEPHONE 328-6845

July 28, 1971

W. A. JENKINS, JR. KENNETH D. WALLIS

> Clerk of Circuit Court Circuit Court, Baldwin County Bay Minette, Alabama Engel Mortgage Company, Inc. a corporation Re: 9955 George B. Johnson and Mattie L. Johnson I am enclosing three copies of a Summon and Complaint and ask that you please file same and see that each of the defendants Dear Sir: I would greatly appreciate it if you would advise me as to is served with a copy. when the defendants are served and as to the probable time of the trial.

Thank you.

yours truly,

JENKINS AND WALLIS Sulpin W. A. Jenkins, Jr.

WAJ,jr/bc

Encl. (3)

cc Engel Mortgage Company, Inc.

ENGEL MORTGAGE COMPANY, INC. a Corporation

PLAINTIFF

IN THE CIRCUIT COURT BALDWIN COUNTY, ALABAMA. CASE # 9955

VS

GEORGE B. JOHNSON and MATTIE L. JOHNSON

DEFENDANTS,

#### JUDGEMENT IN EJECTMENT

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ORDERED, ADJUDGED, and DECREED, that the defendants, Geroge B. Johnson and wife, Mattie L. Johnson, be and are hereby declared in default herein and that the plaintiff have and recover of said defendants George B. Johnson and wife, Mattie L. Johnson, the property described in the complaint and that said defendants, George B. Johnson and wife, Mattie L. Johnson, be and are hereby ordered to surrender possession of the same within ten (10) days from the date hereof, and upon failure to do so, the circuit clerk be and is hereby ordered to execute a Writ of Possession directed to the sheriff of said county requiring him to forthwith execute the same.

Done and ordered this \_\_\_\_\_day of \_\_\_\_\_, 1971.

Circuit Judge