

STATE OF ALABAMA)
)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Harvey Riley and
Maybelle Riley
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 14 day of Sept , 1971 .

Emmie B. Blackburn
CLERK

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF,

VS.

HARVEY RILEY and
MAYBELLE RILEY,

DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10027

COMPLAINT

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

Lot 16, Block 3, of First Addition of South Douglasville
according to map recorded in the Probate Office Map
4, Page 197.

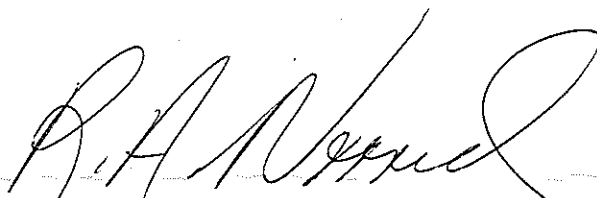
This deed does not purport to convey any oil, gas, or minerals
on, in or under said lands or excepted herefrom. Together
with all and singular the rights, members, privileges, tene-
ments, hereditaments and other appurtenances thereto belonging
or in anywise appertaining.

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.
c/o R. A. Norred, Attorney
616 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203

DEFENDANT'S ADDRESS:

Harvey Riley and
Maybelle Riley
1102 Lower Street
Bay Minette, Alabama

FILED

SEP 14 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

Ex: Sept. 22-71

VOL

69 PAGE 547

Try service on

TAYLOR WILKINS, Captain

By W. J. [Signature]

TAYLOR WILKINS, County Clerk
W. G. Wilkins

[Handwritten signature]

Sheriff claims 8 miles at 80 Ten Cents per mile Total \$ 6.40
TAYLOR WILKINS, Sheriff
BY Robert DEPUTY SHERIFF

us;

Harvey Riley & Maybelle
Riley

Case # 10,027

FILED

SEP 15 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SEP 15 1971

JANE WILKS
CHIEF

R. A. Norred

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

September 28, 1971

* Mrs. Eunice B. Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama 36507

Re: Mid-State Homes, Inc. v
Riley, at Law #10027

* Dear Eunice:

Please file the enclosed demurrer in the
above noted case.

With kind regards, I am

Yours very truly,



Wilson Hayes

WH/mm
Enc.

MID-STATE HOMES, INC.,
a Corporation,

Plaintiff,

Vs.

HARVEY RILEY and
MAYBELLE RILEY,

Defendants.

§

IN THE CIRCUIT COURT OF

§

BALDWIN COUNTY, ALABAMA

§

AT LAW

§

§

NUMBER: 10027

Comes now Defendants in the above styled cause and
demur to the complaint and for grounds say:

1. The complaint does not state a cause of action.
2. The complaint fails to set out any cause of action.

W. L. Hayes

Attorney for Defendants
Wilson Hayes

Defendants demand trial by Jury
this 28th day of September, 1971.

W. L. Hayes

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 28th day of Sept
1971 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by first class United States
Mail, properly addressed, with first class postage prepaid.

W. L. Hayes

FILED

SEP 29, 1971

ELNICE B. BLACKMON CIRCUIT
CLERK

R. A. Norred
ATTORNEY

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

September 13, 1971

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

Re: Mid-State Homes, Inc.
vs.
Harvey Riley and Maybelle Riley

18027

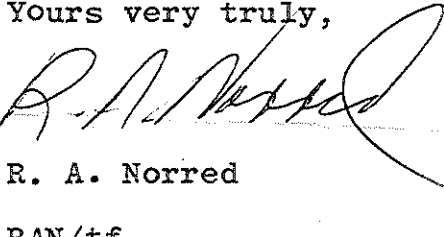
Dear Sir:

I enclose herein an original and two copies of a Summons and Complaint for service and filing on the above. The defendants' address is 1102 Lower Street, 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/tf

Encl.