

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Nathaniel S.

Foote and Annie Lee Foote

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 12 day of Jan, 1972.

Eunice B. Blackmon
CLERK

MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF,

VS.

NATHANIEL S. FOOTE and
ANNIE LEE FOOTE,

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,192

COMPLAINT

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

From the Center of Section 24, Township 7 South, Range 3
East, run North 30 feet, run thence East 757.12 feet to the
point of beginning, from the point of beginning run North
400 feet, run thence East 82.12 feet, run thence South 400
feet, run thence West 82.12 feet to the point of beginning.
Being also described as the East $\frac{1}{2}$ of the Lot 5, unrecorded
Mills Quarter Subdivision.

FILED

JAN 12 1972

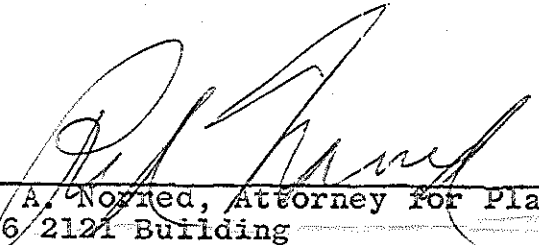
EUNICE B. BLACKMON CIRCUIT
CLERK

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

FILED

JAN 12 1972

DEFENDANT'S ADDRESS:

Nathaniel Foote
and Annie Lee Foote
Route 1, Box 161
Foley, Alabama

EUNICE B. BLACKMON CIRCUIT CLERK

Received 13 day of Jan. 1972
and on 15 day of Jan. 1972
I served a copy of the within of Atty
on Nathaniel S. Fote
Annie Lee Fote

By service on _____

TAYLOR WILKINS, Sheriff

By Charles Chace D. J.

Sheriff claims 144 miles at
Ten Cents per mile Total \$ 14.40
TAYLOR WILKINS, Sheriff
BY [Signature] DEPUTY SHERIFF

#10,192
Mid-State Names, Inc.

U.S.
Nathaniel S. Fote &
Annie Lee Fote

FILED

JAN 12 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

JAN 13 1972

TAYLOR WILKINS
SHERIFF

R. A. Norred

R. A. Norred

ATTORNEY

January 10, 1972

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

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

Re: ~~Mid-State Homes, Inc.~~
vs.
Nathaniel S. Foote and
Annie Lee Foote

Dear Sir:

I enclose herein an original and two copies of a Summons and Complaint for service and filin on the above. The defendants address is Route 1, Box 161, Foley, 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
R. A. Norred

RAN/tf

Encl.

10, 1972

R. A. Norred

ATTORNEY

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

February 24, 1972

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

Re: Mid-State Homes, Inc.

vs.

Nathaniel Foote and Annie Lee Foote
(Suit in Ejectment)

Dear Sir:

It has become unnecessary to proceed further in the above case, and I therefore enclose herein a Motion of Dismissal.

I will appreciate it very much if you will have the case dismissed at your earliest convenience, and bill me for the costs.

Thank you for your attention to this matter.

Yours very truly,

R. A. Norred

R.A. Norred *13y/h*

RAN/hn

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10 192

MOTION OF DISMISSAL

Comes the plaintiff, Mid-State Homes, Inc., a corporation, and respectfully moves that the above cause be dismissed without prejudice, and that the costs herein accrued be taxed against this plaintiff.

R. A. Norred
Attorney for the Plaintiff

616 2121 Bldg.
2121 8th Ave. North
Birmingham, Alabama 35203

FILED

FEB 25 1972

EUNICE B. BLACKMON CIRCUIT CLERK

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. _____

MOTION OF DISMISSAL

Comes the plaintiff, Mid-State Homes, Inc., a corporation, and respectfully moves that the above cause be dismissed without prejudice, and that the costs herein accrued be taxed against this plaintiff.

R. A. Norred
Attorney for the Plaintiff

616 2121 Bldg.
2121 8th Ave. North
Birmingham, Alabama 35203