

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Lenon Jones and wife,
Indiana Jones
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 / day of March, 19 72.

Eunice B. Blackmon
CLERK

Mid-State Homes, Inc.,
a corporation
PLAINTIFF,

VS.

Lenon Jones and Indiana Jones,

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,270

COMPLAINT

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

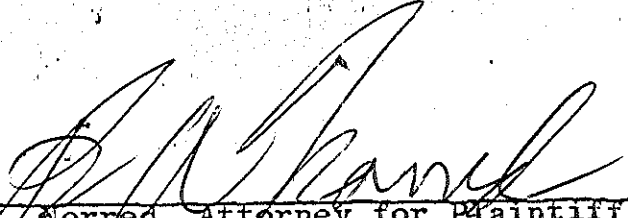
Lot 7, beginning 550 feet South and 20 feet West of the
Northeast Corner of the Southeast Quarter of the South-
west Quarter of Section 32, Township 7 South, Range 4
East, run South 71.5 feet; thence run North 86 degrees
00 minutes West 125.3 feet, thence run North 62.8 feet;
thence run east 125 feet to the point of beginning.
For source of title see Deed book 335 page 574.

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 County 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 Mr. R.A. Norred, Attorney
616 2121 Building
2121 8th Avenue North
Birmingham, Alabama 35203

DEFENDANT'S ADDRESS:

Mr. and Mrs. Lenon Jones
1812 S. Cedre
Foley, Alabama

FILED

MAR 1 1972

EUNICE B. BLACKMON CIRCUIT CLERK

Received 3 day of March 1972
and on 4 day of March 1972
I served a copy of the within SVC
on Lenon Jones v Indiana Jones

By service on _____

TAYLOR WILKINS, Sheriff
C. L. Blackmon

Sherry claims 1461 miles of
Ten Cents per mile Total \$ 1440
TAYLOR WILKINS, Sheriff
BY C. L. Blackmon
COUNTY CLERK

10,278 I
Mid-State Homes, Inc.
a corp.
vs.
Lenon Jones v Indiana
Jones

FILED

MAR 3 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

MAR 3 1972

TAYLOR WILKINS
SHERIFF

R. A. Norred

R. A. Norred

ATTORNEY

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

February 28, 1972

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

10,270

Re: Mid-State Homes, Inc.
vs.
Lenon Jones and Indiana Jones

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 1812 S. Cedre, 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 defendant.

Thank you for your cooperation.

Yours very truly,

R.A. Norred

RAN/kc

Encl.

FILED

MAR 1 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

R. A. Norred

ATTORNEY

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

April 4, 1972

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

Re: Mid-State Homes, Inc.
vs.
Lenon Jones and Indiana Jones
Case No. 10270

Dear Sir:

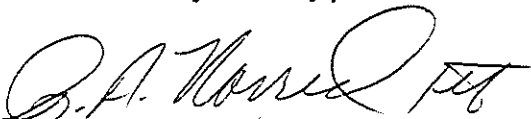
It is my impression that the above case is ready for a default judgment.

As I understand Title 7, Section 951, the defendants' default operates as an admission of title in the plaintiff, but that the plaintiff cannot recover costs in the absence of proof of possession by the defendants.

It is my suggestion - if it would not be too much trouble to you, that you present the file to the Judge with the request that he enter a default judgment for the Plaintiff for the property sued for, and that costs be taxed against the plaintiff. I am enclosing a suggested form for such default judgment.

I will appreciate hearing from you as to whether or not a judgment has been entered.

Yours very truly,



R. A. Norred

RAN/tf

Encl.

MID-STATE HOMES, INC.,)	IN THE CIRCUIT COURT OF
a corporation,		
Plaintiff)	BALDWIN COUNTY,
VS.)	ALABAMA
LENON JONES and INDIANA JONES)	AT LAW
Defendants)	CASE NO. <u>10,270</u>

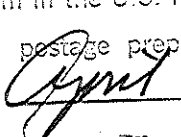
MOTION TO SET ASIDE JUDGMENT

Come now the Defendants in the above styled cause and files this Motion To Set Aside Judgment and says unto the Court as follows:

1. That they have a good and valid defense in this action in that they have paid all monies due and owing to the Plaintiff and have receipts showing same.
2. That the Defendants are elderly people and are unable to read and did not understand what the papers were that were served on them by the Deputy Sheriff.
3. That they live a long distance from the Courthouse and were physically unable to travel long distance to get their records to properly prepare their defense.
4. That less than thirty (30) days have elapsed since the day of the judgment. The date of judgment being April 6, 1972.



WARREN L. FINCH
Attorney for Defendants

I hereby certify that a copy of these pleadings have been served on all parties by entering them in the U.S. Post Office, properly addressed, postage prepaid, on this 24 day of April, 1972
 Warren L. Finch

FILED

APR 2 1972

EUNICE B. BLACKMON CIRCUIT CLERK

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 10270

DEFAULT JUDGMENT

This day came the plaintiff by its attorney and the defendants being called, came not,,but made default, and on motion of the plaintiff, it is considered and adjudged, and it is the judgment of the Court, that judgment be and the same is hereby rendered in favor of the plaintiff and against the defendants for the following described property:

Lot 7, beginning 550 feet South and 20 feet West of the Northeast Corner of the Southeast Quarter of the Southwest Quarter of Section 32, Township 7 South, Range 4 East, run South 71.5 feet; thence run North 86 degrees 00 minutes West 125.3 feet; thence run North 62.8 feet; thence run east 125 feet to the point of beginning. For source of title see Deed book 335 page 574.

It is, therefore, considered, ordered, and adjudged by the Court that the plaintiff have and recover of the defendants the aforesaid property, and that the costs herein are taxed against the plaintiff, for all of which let execution issue.

This the 4th day of April, 1972.

Joseph D. Madhuberie
JUDGE

R. A. Norred

ATTORNEY

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

April 17, 1972

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

Re: Mid-State Homes, Inc.
vs.
Lenon Jones and Indiana Jones
Case No. 10270

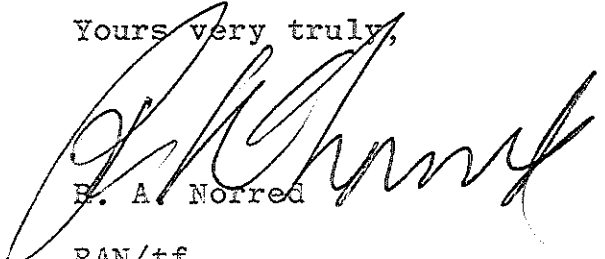
Dear Sir:

I am enclosing herein an original and two copies of a Writ of Possession which I would like to have issued under the judgment rendered in the above case.

I believe it would be desirable to have one of my client's representatives, who is uahtoirzed to aaccept possession for my client, contact the Sheriff within the next few days and make arrangements for accepting possession of the property described in the Writ.

I am, of course, sending a copy of this letter to the Sheriff so that he will be informed of these arrangements, and will know to expect one of my client's representatives to contact him in the immediate future.

Yours very truly,



R. A. Norred

RAN/tf

Encl.

CC: Sheriff, Baldwin County
Bay Minette, Alabama

Mr. Ron Divers
Mid-State Homes, Inc.
Birmingham, Alabama

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MID-STATE HOMES, INC.,
a corporation,

PLAINTIFF.

VS.

LENON JONES and INDIANA
JONES,

DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10270

WRIT OF POSSESSION

STATE OF ALABAMA)

BALDWIN COUNTY)

TO ANY SHERIFF OF SAID STATE - GREETINGS:

You are hereby commanded to deliver to Mid-State Homes, Inc., a corporation, possession of the lands and tenements which the said Mid-State Homes, Inc., recovered of Lenon Jones and Indiana Jones by the judgment of our Circuit Court, held for the County of Baldwin on the 6th day of April, 1972, to-wit:

Lot 7, beginning 550 feet South and 20 feet West of the Northeast corner of the Southeast Quarter of the Southwest Quarter of Section 32, Township 7 South, Range 4 East, run South 71.5 feet; thence run North 86 degrees 00 minutes West 125.3 feet; thence run North 62.8 feet; thence run East 125 feet to the point of beginning.
For source of title see Deed Book 335 page 574.

You are further commanded to make return of this Writ and the execution thereof according to law.

Witness my hand, this 18 day of April, 1972.

Ernest B. Blackman
CLERK

10,270

Mid-State Homes
a corp.

vs.

Lenon Jones & Indiana
Jones

Writ of Possession

APR 18 1972

RECEIVED
SHERIFF'S OFFICE
SHERIFF CLERK
JEN CENTE PER FILED TOLSON 14-110
TAYLOR W. JONES
BY W. J. Jones
S. CO. JONES COUNTY STAFF
JID. JONES COUNTY STAFF

FILE NO. 10810
RECEIVED 14 day of April 1972
and on 27 day of April 1972
I served copy of this writ with
on Lenon Jones, Indiana
By W. J. Jones

W. J. Jones