

R. A. Norred

ATTORNEY

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

December 8, 1972

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

Re: Mid-State Homes, Inc.
vs.
Melvin Steadham, et al
Case No. 10,603

Dear Sir:

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

As I understand Tital 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 herein a suggested form for such default judgment.

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

Yours very truly,



R. A. Norred

RAN/t1

Encl.

R. A. Norred

ATTORNEY

616 2121 BUILDING
2121 8TH AVENUE NORTH
BIRMINGHAM, ALABAMA 35203
TELEPHONE
823-4076

September 13, 1972

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

Re: Mid-State Homes, Inc.
vs.
Melvin Steadham and Cleo Steadham

Dear Sir:

I enclose herein an original and one copy of a Summons and Complaint for service and filing on the above. The defendant's address is Rt. 5, 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

RAN/kc

Encl.

MID-STATE HOMES, INC.,)	IN THE CIRCUIT COURT OF
a corporation,)	
)	BALDWIN COUNTY, ALABAMA
PLAINTIFF,)	
)	AT LAW
VS.)	
)	
MELVIN STEADHAM and)	
CLEO STEADHAM,)	
)	
DEFENDANTS.)	CASE NO. <u>10,603</u>

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:

From the NE Corner of the SE $\frac{1}{4}$ of the SE $\frac{1}{4}$, of Section 19, T7S, R4E, Run West 342 feet, run thence South 350 feet, to a point, for the point of beginning; from the point of beginning run thence East 100 feet, run thence South 200 feet, run thence west 100 feet run thence North 200 feet to the point of beginning.

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 17th day of December, 1972.

Dezair J. Madlibere
JUDGE

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Melvin L. Steadham and wife, Cleo Steadham 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 15 day of Sept, 19 72

Erinice B. Blackmon
CLERK

MID-STATE HOMES, INC., A
Corporation,

PLAINTIFF,

VS.

MELVIN STEADHAM and
CLEO STEADHAM

DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.

10,603

COMPLAINT

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

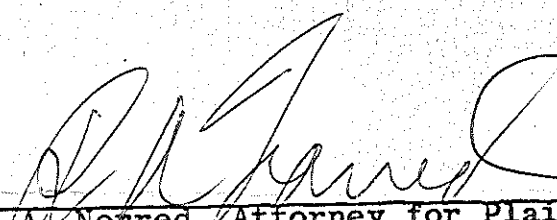
From the NE Corner of the SE $\frac{1}{4}$ of the SE $\frac{1}{4}$, of Section 19, T7s, R4E, Run West 342 feet, Run thence South 350 feet to a point, for the Point of Beginning; from the Point of beginning run thence East 100 feet, Run thence South 200 feet, Run thence west 100 feet Run Thence North 200 feet to the Point of Beginning.

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:

Mr. and Mrs. Melvin Steadham
Rt. 5
Foley, Ala.

FILED

SEP 15 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

249-22-72

VOL

69 PAGE 766

Received 18 day of Sept 1972
and on 22 day of Sept 1972
I served a copy of the within DC
on Melvin Steadham;
Cleo Steadham
By service on _____

Sheriff claims 1440 miles at
Ten Cents per mile Total \$ 144.00
TAYLOR WILKINS, Sheriff
BY Charles
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff
Charles

CASE NO. 10,603

MID STATE HOMES, INC. A Corporation

Plaintiff

VS.

MELVIN STEADHAM and CLEO STEADHAM

Defendant

R. A. Norred

Attorney for Plaintiff

RECEIVED

SEP 18 1972

TAYLOR WILKINS
SHERIFF

CLERK