

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

May 10th, 1954.

Mrs. Alice Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama.

Dear Mrs. Duck:

We enclose herewith original and one copy of summons
and complaint in the case of James v. Johnson, which we
ask that you file and acknowledge receipt upon the en-
closed copy and return to us.

Very truly yours,
LYONS, PIPES & COOK



Sam W. Pipes, III

SWP:ee

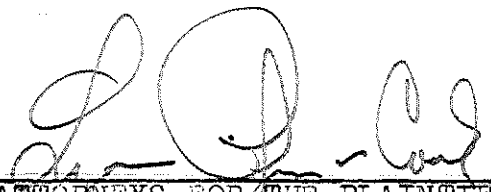
ESTELLE GILMORE JAMES,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
vs.)	
ROMINA JOHNSON,)	AT LAW NO. <u>2249</u>
Defendant.)	

COUNT ONE.

Plaintiff sues to recover possession of the following tract of land:

Lot 5, Block 7 Hoyle-Worcester Addition to Fairhope, and a four room frame house and a two room frame house thereon, Baldwin County, Alabama,

of which she was in possession and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with Two Thousand and no/100 (\$2,000.00) Dollars, for the detention thereof.


ATTORNEYS FOR THE PLAINTIFF.

Defendant's Address:

Defendant resides on the property described in the complaint, which is located at Twin Beech, south of Fairhope, Alabama.

FILED

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 2249

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Rovina Johnson

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Rovina Johnson, Defendantby *Estelle Gilmore James*, PlaintiffWitness my hand this *11th* day of *May*, 19 *54**Beice J. James*, Clerk

ESTELLE GILMORE JAMES,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
ROVINA JOHNSON,	I	AT LAW NO. 2249
Defendant.	I	

DISCLAIMER

Comes now the Defendant, by her attorneys, and for answer to the complaint heretofore filed against her says that she is not in possession of the property sued for, to-wit, Lot 5, Block 7 Hoyle-Worcester Addition to Fairhope, and a four-room frame house and a two-room frame house thereon, Baldwin County, Alabama, and neither was she in possession of said property at the time of the commencement of this suit.

And the Defendant, for further answer, denies that she has entered said property and unlawfully withholds the same or that she has damaged the Plaintiff in any amount for the detention thereof.

FILED

10-14-54

ALICE J. DUCK, Clerk

Respectfully submitted,

CHASON & STONE

By: M. L. Chason & J. P. Stone
Attorneys for Defendant.

ESTELLE GILMORE JAMES,

Plaintiff,

vs.

ROVINA JOHNSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2249

DISCLAIMER

FILED

10-14-54

ALICE J. DUCK, CLERK
LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

6429

LYONS, PIPES & COOK

ATTORNEYS AT LAW

517 FIRST NATIONAL BANK BUILDING

MOBILE 8, ALABAMA

JOSEPH H. LYONS
SAM W. PIPES, III
WALTER M. COOK

June 14th, 1954.

Mrs. Alice J. Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama.

Re: Case #2249 Estelle Gilmore James v.
Rovina Johnson.

Dear Mrs. Duck:

The above case is an ejectment suit and Mr. Norborne Stone, who represents the defendant, has advised us that his client claims no interest in the property and that he has, or will, file a disclaimer.

We have accordingly advised our client to take possession of the property, which she was supposed to do last week. If she does obtain possession of the property without incident it is our intention to dismiss the present suit. This case will therefore not be tried.

If our client does not actually take possession of the property before the 15th of this month, would you please ask the court to continue the case.

Very truly yours,
LYONS, PIPES & COOK


Sam W. Pipes, III

SWP:ee

cc: Mr. Norborne Stone, Atty.
Bay Minette, Alabama.

No. 2249

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Estelle Gilmore James

Plaintiffs

vs.

Rowena Johnson
Young + White

Defendants

Summons and Complaint

Filed 5-11 19 54

Alice J. French Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

May 11 19 54

Taylor Wilkerson Sheriff

I have executed this summons

this 13 May 19 54

by leaving a copy with

Leaving a Copy
C + S on
Rowena Johnson

Taylor Wilkerson Sheriff
for Henry Ford Deputy Sheriff