

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon J. L. Ruple to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of Chas. D. Grice, Marion L. Grice, Annie Grice Doherty, and Robert N. Grice.

Witness my hand this 23rd day of Aug, 1954.

Heise J. Deneck
CLERK

CHAS. D. GRICE, MARION L. GRICE,
ANNIE GRICE DOHERTY, and ROBERT
N. GRICE

Plaintiffs

vs.

J. L. RUPLE,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE. NO. 2364.

The Plaintiffs sue to recover possession of the following described land situated in Baldwin County, Alabama, viz:

All of the Thomas Byrne Grant, Section 40, Township 3 South,
Range 2 East.

of which they were in possession and upon which, pending such possession and before the commencement of this suit, the Defendant entered and unlawfully withholds, together with Two Hundred Fifty and no/one-hundredths Dollars (\$250) for the detention thereof.

FILED

8-23-54

ALICE L. DUCK, Clerk

James C. Lewis, Jr.
Attorney for Plaintiff

William D. Hayes
Attorney for Plaintiff

Plaintiffs demand a trial by jury.

James C. Lewis, Jr.

CHAS. D. GRICE, MARION L. GRICE,
ANNIE GRICE DOHERTY, and ROBERT
N. GRICE,

Plaintiffs,

VS.

J. L. RUPLE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

NO. 2364

ANSWER.

Comes the defendant, J. L. RUPLE, and for answer and plea to the complaint and to each count thereof, separately and severally, says:

1. Defendant disclaims possession of any portion of said lands except as lies east of Bayou Wiltz. Specifically, the defendant claims to own, and admits possession of, the following described lands in Baldwin County, Alabama, viz:

All Section 40, Township 3 South, Range
2 East, East of Bayou Wiltz.

2. As to the remainder of said lands the defendant pleads not guilty.

3. Defendant suggests upon the record that he and those whose possession he has have been in possession of said lands for more than three years next preceding the filing of the complaint in this cause, under a claim of ownership and color of title, and have placed permanent improvements thereon, consisting of, to-wit: fence posts and fence and the planting of young pine trees, and asks that the Court ascertain the value of said permanent improvements placed on the land as required by law.

FILED

9-24-54

ALICE J. DUCK, Clerk

J. L. Ruple
Attorney for defendant.