

2405

LAW OFFICES OF
D. R. COLEY, JR.
302-6 FIRST FEDERAL SAVINGS BUILDING
106 ST. JOSEPH STREET
MOBILE, ALABAMA

SYDNEY S. PFLEGER
CHRIS C. DE LANEY

November 8, 1954

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

Dear Mrs. Duck:

I am enclosing herewith answer and Demand for
Jury Trial in the case of Scott Mutry vs. Mary Wainwright,
which I will appreciate your filing for me.

Very truly yours,

D.R. Coley Jr.
D.R. Coley, Jr.

C/D

SYDNEY S. PFLEGER
CHRIS C. DELANEY

LAW OFFICES OF
D. R. COLEY, JR.
302-6 FIRST FEDERAL SAVINGS BUILDING
106 ST. JOSEPH STREET
MOBILE, ALABAMA

December 9, 1954

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

Dear Mrs. Duck:

I will appreciate it if you will file for
me the enclosed motion in the case of Scott Mutry vs.
Mary Wainwright, in your Court.

With kind personal regards, I am

Very truly yours,

D. R. Coley, Jr.
D. R. Coley, Jr.

C/D

SCOTT MUTRY,
Plaintiff,

VS.

MARY WAINWRIGHT,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW

W. R. Coley Jr.
ATTORNEY FOR DEFENDANT

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mary Wainwright to appear within 30 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 Scott Mutry.

WITNESS my hand on this 11 day of October, 1954.

W. J. Wainwright
Clerk

SCOTT MUTRY,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
MARY WAINWRIGHT)	AT LAW
Defendant.)	

C O M P L A I N T

COUNT ONE

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

From the Northeast corner of the Baron DeFerriett Grant in Section 18, Township 6 South, Range 2 East, Baldwin County, Alabama, run thence North 58 degrees 45 minutes West 692 feet to a point or place of beginning; thence continue North 58 degrees 45 minutes West 164 feet; run thence South 31 degrees 15 minutes West 205 feet to a point; run thence South 69 degrees 30 minutes East 213 feet; run thence North 22 degrees 30 minutes East 174 feet to the point or place of beginning containing .9 acres more or less and being situated in Baldwin County, Alabama.

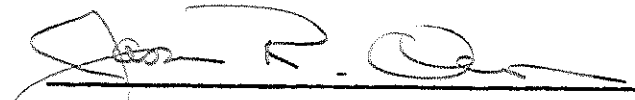
of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with \$500.00 for the detention thereof.

COUNT TWO

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

From the Northeast corner of the Baron DeFerriett Grant in Section 18, Township 6 South, Range 2 East, run thence North 58 degrees 45 minutes West 1096 feet for a point or place of beginning; run thence South 22 degrees 30 minutes West 240 feet to a point; run thence South 69 degrees 31 minutes East 205 feet to a point; run thence North 31 degrees 15 minutes East 205 feet to a point; run thence North 58 degrees 45 minutes West 240 feet to the point or place of beginning, containing 1 acre more or less in Baldwin County, Alabama.

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with \$500.00 for the detention thereof.



Attorney for Plaintiff

2405
RECORDED

COMPLAINT

SCOTT MUTRY,
Plaintiff,

VS.

MARY WAINWRIGHT,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

10-11-54

ALICE L. BUCK, Clerk

JAMES R. OWEN
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA

Received 12 day of Oct 1954
and on 22 day of Oct 1954

I served a copy of the within
on Com plant

By service on Mary Wainwright

TAYLOR WILKINS, Sheriff
Baldwin County, D.S.