

6547

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 Antonio Sariego 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 same, then and there to answer the complaint of Margaret Sharpe.

Witness my hand this 17 day of February, 1955.

Reice J. Sharpe
Clerk.

MARGARET SHARPE,
Plaintiff,

vs.

ANTONIO SARIOGO,
Defendant.

I
I
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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

The Plaintiff sues to recover possession of the following tract of land situated in Baldwin County, Alabama, to-wit:

The East half of the Southeast Quarter of the Southwest Quarter of Section 21, Township 6 South, Range 4 East,

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 the sum of One Thousand Dollars (\$1,000.00) for the detention thereof.

CHASON & STONE

By: Malone S. Stone
Attorneys for Plaintiff.

We, Chason & Stone, Attorneys at Law, Bay Minette, Alabama, do hereby acknowledge ourselves as security for the costs in this suit.

CHASON & STONE

By: Malone S. Stone

The Defendant resides near Summerdale, Alabama.

and on 19 day of Feb 1955
served a copy of the within Summons
Complaint

By service on Antonio Sarriego

TAYLOR WILKINS, Sheriff
Geo. Sarriego D. S.

257
3472

MARGARET SHARPE,
Plaintiff,
vs.
ANTONIO SARRIEGO,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

SUMMONS AND COMPLAINT

FILED
FEB 17 1955
ALICE J. DUCK, Register

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

MARGARET SHARPE,
Plaintiff,
VS.
ANTONIO SARIOGO,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.
NO. 3472

P L E A S .

Comes the defendant, ANTONIO SARIOGO, and, for answer and plea to the complaint and to each count thereof, separately and severally, says:

1. That he is not guilty.
2. Defendant suggests upon the record that he and those ^{Have} whose possession he has/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, drainage ditches, phosphate and lime and permanent pasture, and asks that the Court ascertain the value of said permanent improvements placed on the land as required by law.

Jeffair G. Madlebourn Jr.
Attorney for Defendant.

Defendant requests that this cause be tried by a jury.

Jeffair G. Madlebourn Jr.
Attorney for Defendant.

I hereby certify that I have this 3rd day of March, 1955, served a copy of the above pleas on Honorable Norborne C. Stone, attorney for Plaintiff, by mailing him a copy in a properly stamped and addressed envelope.

Jeffair G. Madlebourn Jr.
Attorney for Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 3472-2547

MARGARET SHARPE,
Plaintiff,

VS.

ANTONIO SARIEGO,
Defendant.

P L E A S .

FILED
MAR 3 1955
ALICE J. BUCK, CLERK