

STATE OF ALABAMA
COUNTY OF BALDWIN

To any Sheriff of the State of Alabama:

You are hereby commanded to summon Reynour J. White, Celeste White and Dorothy Sims to appear plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama against Reynour J. White, Celeste White and Dorothy Sims, Defendant by William J. Langley, Plaintiff.

Witness my hand, this the 6th day of April 1955.

W. J. Langley
Plaintiff

William J. Langley	1	
Plaintiff	1	In the Circuit Court of
	1	Baldwin County, Alabama
Reynour J. White	1	at Law
Celeste White and	1	
Dorothy Sims	1	
Defendant	1	

The Plaintiff claims of the Defendants One Thousand dollars (\$1,000) as damages as a proximate result of the wrongful leasing of the Celeste White house near Perdido, Alabama by the Defendants to the Plaintiff on to-wit December 15, 1954, thus subjecting the Plaintiff to a lawsuit for possession of said premises, which said suit is now pending in the Circuit Court of Baldwin County, Alabama, Case No. 2559, at Law. As a result of said wrongful leasing, the Plaintiff has been subjected to the time and trouble and expense of defending said lawsuit, the family of Plaintiff has been harassed, scared and worried by the Plaintiff in said Case No. 2559, by his constant visits to the leased premises, demanding possession, and otherwise proving himself obnoxious; the Plaintiff in this present suit has had to move both to and from said leased premises, as a result of said harassment of his family thus causing great damage to his furniture, moving away from said premises to another residence, to avoid said harassment; Plaintiff has been worried and troubled about his family, while away from home on his job, thus decreasing his efficiency at said job and possibly preventing him from getting a raise which he was in line for and failed, or will in having to employ an attorney to defend said suit, also having to pay rent on other premises for the period of the lease, all to the damage of the Plaintiff as aforesaid.

Reuben F. McFarley
Attorney for the Plaintiff

The Plaintiff demands a trial by Jury.

Reuben F. McFarley
Attorney for the Plaintiff

WILLIAM J. LANGLEY,

PLAINTIFF

VS

SEYMOUR J. WHITE
CELESTE WHITE AND
DOROTHY SIMS

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

At Law, Case No. 2559

Comes the defendant, Dorothy Sims, in the above styled cause, demurring to the plaintiff's complaint in the Circuit Court of Baldwin County, Alabama, at law, and as grounds of demurer says:

FIRST: That the complaint shows on its face that there is a misjoinder of parties defendant.

SECOND: That the complaint shows on its face that the plaintiff was not damaged.

THIRD: That the complaint alleges no facts which would make this defendant liable to the plaintiff in said cause.

says It does not appear from said complaint that the defendant has leased the premises to plaintiff

BEEBE & SWEARINGEN

BY

A. B. Swearingen
Attorneys for Defendant

WILLIAM J. LANGLEY,
PLAINTIFF

VS

SEYMOUR J. WHITE
~~CELESTE WHITE AND~~
DOROTHY SIMS

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

At Law, Case No. 2559

Comes the defendant, Seymour J. White, in the above styled cause, demurring to the plaintiff's complaint in the Circuit Court of Baldwin County, Alabama, at law, and as grounds of demurrer says:

FIRST: That the complaint shows on its face that there is a misjoinder of parties defendant.

SECOND: That the complaint shows on its face that the plaintiff was not damaged.

THIRD: That the complaint alleges no facts which would make this defendant liable to the plaintiff in said cause.

Fourth: It does not appear from said complaint that the defendants leased the premises to plaintiff.

FILED

APR. 30 1955

ALICE A. DUCK, Clerk

BEEBE & SWEARINGEN

BY *J. B. Swearingen*
Attorneys for Defendant

WILLIAM J. LANGLEY,

PLAINTIFF

VS

SEYMOUR J. WHITE
CELESTE WHITE AND
DOROTHY SIMS

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

At Law, Case No. 2559

Comes the defendant, Celeste White, in the above styled cause, demurring to the plaintiff's complaint in the Circuit Court of Baldwin County, Alabama, at law, and as grounds of demurrer says:

FIRST: That the complaint shows on its face that there is a misjoinder of parties defendant.

SECOND: That the complaint shows on its face that the plaintiff was not damaged.

THIRD: That the complaint alleges no facts which would make this defendant liable to the plaintiff in said cause.

Fourth. It does not appear from the complaint that the defendants based their defense on the plaintiff

BEEBE & SWEARINGEN

BY *J. B. Swearingen*
Attorneys for Defendant