ROBERT N. GRICE,

Plaintiffs

VERSUS

J. L. RUPLE,

Defendant

AT LAW

2912 NÓ.

Plaintiffs sue to recover possession of the following described property 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 the commencement of this suit, the Defendant entered and unlawfully withholds, together with the sum of Five Hundred Dollars (\$500.00), for the detention thereof.

Attorneys for Plaintiff

Plaintiffs demand a trial by Jury.

Attorneys for

CHARLES D. GRICE, MARION L. GRICE, O
ANNIE GRICE DOHERTY, AND ROBERT N. O
GRICE,

Plaintiffs,

VS.

J. L. RUPLE,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

$\underline{A} \underline{N} \underline{S} \underline{W} \underline{E} \underline{R}$.

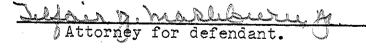
Comes the defendant, J. L. RUPLE, and for answer and plea to the complaint and to each count thereof, separately and severally, says:

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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 filling 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: the planting of young pine trees and construction and maintenance of fire lines, and asks that the Court ascertain the value of said permanent improvements placed on the land as required by law.



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