

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

Plaintiffs

VERSUS

J. L. RUPLE,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2972

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.

D.R. Colby
Chris McManey
Attorneys for Plaintiffs.

Plaintiffs demand a trial by Jury.

D.R. Colby
Chris McManey
Attorneys for Plaintiffs.

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

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A N S W E R .

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: 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.

Julian G. Marbleberry, Jr.
Attorney for defendant.