

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 W. B. Thompson and Margurete Thompson 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 Charles N. Taylor.

Witness my hand this 26 day of June, 1958.

*Reice J. Houser*  
Clerk.

CHARLES N. TAYLOR,

Plaintiff,

vs.

W. B. THOMPSON and  
MARGURETE THOMPSON,

Defendants.

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

COUNT ONE:

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

PARCEL A: Begin at the Northeast corner of Section Thirty-Six, Township Five South, Range Three East, run thence South 1954 feet, run thence West 700 feet to a point on the East line of U. S. Highway #90, said point being located 688 feet due North of the East and West half Section line of said Section Thirty-six, and which point is the point of beginning; run thence East 397 feet, more or less, to the West line of the right-of-way of the Louisville and Nashville Railroad; run thence North 27 degrees 15 minutes West 251.5 feet along the West margin of said right-of-way to a point; thence run West 393.3 feet to the East margin of U. S. Highway #90; run thence in a South-westerly direction along said Highway 224 feet to the point and place of beginning.

PARCEL B: Beginning at a point on the East line of Highway #90 that is Nine Hundred and twelve (912) feet due North of the East and West Half Section line of

Section 36, Township 5 South, of Range 3 East, and running thence East one hundred and fifty (150) feet along the North line of Emery A. Racine's lot; thence run North twenty-five (25) feet; thence run West, and parallel to said Racine's North line, one hundred fifty (150) feet, more or less to the East line of Highway 90; thence run South twenty-five (25) feet more or less to the point of beginning, being a strip of land 25 feet wide extending 150 feet East from the East line of Highway 90. Said lot contains .086 acres more or less and lies in Section 36, Township Five (5) South, Range Three (3) East, Baldwin County, Alabama.

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendants entered an unlawful withhold, together with Five Hundred Dollars (\$500.00) for the detention thereof.

CHASON & STONE

By: 

Attorneys for Plaintiff.

3602

CHARLES N. TAYLOR,  
Plaintiff,

vs.

W. B. THOMPSON AND MARGURETE  
THOMPSON,

Defendants.

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SUMMONS AND COMPLAINT

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

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**FILED**  
JUN 26 1968  
ALICE J. DUCK, Clerk

LAW OFFICES  
**CHASON & STONE**  
BAY MINETTE, ALABAMA

Received 22 day of June 1968  
and on 1 day of July 1968  
I served a copy of the within S/c  
on W. B. Thompson  
Marguerite Thompson  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Eddie D. Stashand

Robertsdale, Ala

Sheriff claims 50 miles at  
Ten Cents per mile Total \$ 5.00  
TAYLOR WILKINS, Sheriff  
BY Stearlham  
DEPUTY SHERIFF

CHARLES N. TAYLOR

PLAINTIFF

VS

W. B. THOMPSON AND  
MARGURETE THOMPSON

DEFENDANTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW  
CASE NO. 3602

Comes now the Defendants in the above styled cause and files the following demurrers to the Plaintiff's Complaint:

1.

The Complaint fails to state a cause of action.

Wiltens & Brantley

BY:

*Robert M Brantley*  
Attorneys for the Defendants

The Defendants demand a trial by jury.

*Filed  
July 25, 1958*

Wiltens & Brantley

BY:

*Robert M Brantley*  
Attorneys for the Defendants

CHARLES N. TAYLOR

PLAINTIFF

VS

W. B. THOMPSON AND  
MARGURETTE THOMPSON,

DEFENDANTS

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendants in the above styled cause and for answer  
to the Plaintiff's complaint says:

1.

Not guilty.

*Filed*  
*Nov. 18, 1958*

Winters & Brantley

BY:

*Robert M Brantley*  
Attorneys at Law