

INEZ V. GIVENS,
Plaintiff

vs.

GULF TELEPHONE COMPANY,
a corporation,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO. 3712

Now comes Plaintiff, by her attorney and amends the complaint heretofore filed in this cause so that the same shall read as follows:

The Plaintiff claims of the Defendant the sum of ELEVEN HUNDRED AND SIXTY and No/100 (\$1160.00) DOLLARS for this, that on or about, to-wit: October 10, 1958, the Defendant, acting by and through his servants, agents or employees, acting within the line and scope of their authority as such servants, agents or employees, did enter upon the following described property in Baldwin County, Alabama, to-wit:

Begin at the Northwest corner of the Southwest Quarter of the Northeast Quarter, Section 5, Township 6 South, Range 5 East, thence run East to the Northeast corner thereof, thence run South to U.S. Highway 90, thence run Northwesterly along said Highway 90 to the point or place of beginning, said lands being that portion of the Southwest Quarter of the Northeast Quarter of Section 5, Township 6 South, Range 5 East lying north of U.S. Highway 90.

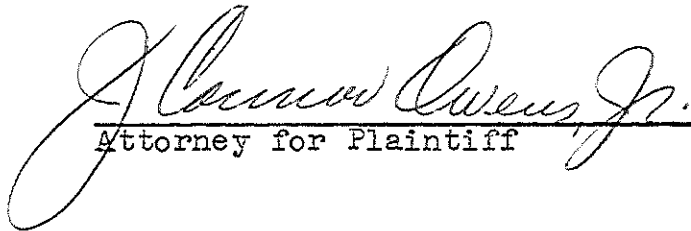
LESS AND EXCEPT THE FOLLOWING:

Commencing at the Southeast corner of the Southwest Quarter of the Northeast Quarter of Section 5, Township 6 South, Range 5 East, Baldwin County, Alabama, thence Northwest along East right-of-way line of U.S. Highway No. 90, 203 feet to place of beginning: thence continue Northwest along East right-of-way of U.S. Highway No. 90, 160 feet, thence Northeast 100 feet, thence Southeast and parallel to East right-of-way of U.S. Highway No. 90, 160 feet, thence Southwest 100 feet to place of beginning, being in the Southwest Quarter of the Northeast Quarter of Section 5, Township 6 South, Range 5 East, Baldwin County, Alabama, and containing 0.37 acres.

Commencing at the Southeast corner of the Southwest Quarter of the Northeast Quarter of Section 5, Township 6 South, Range 5 East, Baldwin County, Alabama, the point of beginning: thence in a Northwesterly direction along the North right-of-way of U.S. Highway No. 90, 203 feet, thence in a Northeasterly direction 214.6 feet, thence Southeast parallel to right-of-way of U.S. Highway No. 90,

203 feet, thence Southwest 214.6 feet to point of beginning, being in Section 5, Township 6 South, Range 5 East, Baldwin County, Alabama, and containing 1 acre.

and did wilfully and knowingly cut therefrom fifty-three (53) pine trees, without the consent of the owner of said premises, and the Plaintiff avers that at the time of the cutting of the said fifty-three (53) pine trees, the Plaintiff had legal title to and was in possession of said premises.


Attorney for Plaintiff

FILED

JUL 22 1959

ALICE J. DUCK, CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3712

INEZ V. GIVENS,
Plaintiff,

vs.

GULF TELEPHONE COMPANY,
a Corporation,
Defendant.

AMENDED COMPLAINT

LAW OFFICES OF
J. CONNOR OWENS, JR.
101 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA

INEZ V. GIVENS,

VS.

Plaintiff,

GULF TELEPHONE COMPANY,
a corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3712

DEMURRER TO COMPLAINT

Now comes the defendant, by its attorney, and demurs to the complaint and for grounds of such demurrer assigns, separately and severally, the following:

1. It does not state a cause of action.
2. No facts are alleged on which the relief sought can be granted.
3. The allegations of the complaint are vague, indefinite and uncertain.
4. The allegations of the complaint are vague, indefinite and uncertain in that the place where the alleged trespass occurred is not described with sufficient certainty.

Filed
1-15-59

J. B. Blackburn
Attorney for defendant

INEZ V. GIVENS,

Plaintiff,

VS.

GULF TELEPHONE COMPANY, a corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 3712

FILED

JAN 15 1939

ALICE I. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2712

Nov. TERM, 1958

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Gulf Telephone Company, a corporation

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against Gulf Telephone
Company, a corporation, Defendant

by Inez V. Givens
Plaintiff.....

Witness my hand this 19 day of November 1958

Alice J. Duck, Clerk

64 11-22-58

76A

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

INEZ V. GIVENS,
Plaintiff

vs.

GULF TELEPHONE COMPANY,
a corporation,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

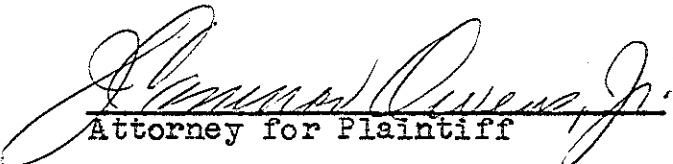
IN LAW NO. _____.

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LESS: That certain 13/8 acres sold to Arthur Emyart by deed dated Oct., 1947, and recorded in D.B. 124 N.S., p. 221 et seq., Baldwin County, Alabama, Records.

and did wilfully and knowingly cut therefrom fifty-three (53) pine trees, without the consent of the owner of said premises, and the Plaintiff avers that at the time of the cutting of the said fifty-three(53) pine trees, the Plaintiff had legal title to and was in possession of said premises.


Attorney for Plaintiff

Plaintiff demands a trial by

jury of said cause.


Attorney for Plaintiff

Received 20 day of Nov 1958
and on 22 Nov 1958
I served a copy of this within 82 C
on Gulf Telephone Co.

By service on John Green

TAYLOR WILKINS, Sheriff
By Charles Williams

Olney

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff
BY Charles Williams
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 3712.

INEZ V. GIVENS,
Plaintiff

vs.

GULF TELEPHONE COMPANY,
a corporation
Defendant

SUMMONS AND COMPLAINT

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
101 Court House Square
BAY MINETTE, ALABAMA

Office of Defendant at
Olney, Alabama,