

Wilson Naval Stores Co.,  
vs.  
Horace White.

CIRCUIT COURT, BALDWIN  
COUNTY, ALA., SPRING  
TERM, 1916.

Now comes the defendant, and appearing specially for the sole and exclusive purpose of filing this motion and no other, and moves the Court to quash the Sheriff's return and assigns as grounds for the said motion, the following:

1. No summons was ever served on this defendant as required by law.
2. The original return shows that a copy of the summons was served on the defendant, when in fact and in truth no copy of any summons has ever been served on this defendant.

PAGE & MOORER,

Attorneys for Defendant,  
Appearing Specially.

*[Handwritten signature]*

Wilson Naval Stores Company,

a corporation, Plaintiff.

Versus

Horse White,

Defendant.

In Circuit Court of Baldwin County,  
Alabama.

Spring Term, 1916.

The plaintiff sues to recover possession of the following tract of land: The Northwest quarter of the Northwest quarter of Section 9, Township 2 North of Range 4 East, in Baldwin County, Alabama, of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with (\$200.00) Two Hundred Dollars for the detention thereof.

*Stace & Becher*

Attorneys for Plaintiff.

SUMMONS AND COMPLAINT

The State of Alabama {  
Baldwin County { No. ....

Circuit Court

April 20th, 1916.

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Horace White,

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 him the Defendant.

by Wilson Naval Stores Company, a Corporation.

Plaintiff

Witness my hand this 20th day of April 1916.

J. W. Richardson Clerk.

COMPLAINT

Plaintiff Versus

The plaintiff claims of the defendant

Dollars due by

Plaintiff's Attorney.

*Original*

No. \_\_\_\_\_

STATE OF ALABAMA,

BALDWIN COUNTY.

CIRCUIT COURT

Wilson Naval Stores Company,

a Corporation.

vs.

Plaintiffs

Horace White,

Defendants

SUMMONS AND COMPLAINT

Filed

April 20th,

191

6.

*D. V. Reardon*

Clerk

Defendant lives at

Port Blachford.

Hall and Bobo

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette

Received in office

April 20th,

191

6.

*C. E. Eubanks*

Sheriff

I have executed this Writ

this

*April 22<sup>d</sup>*

191

6.

by leaving a copy of the within summons and complaint with

*Horace White*

*C. E. Eubanks*

Sheriff

*John Langham*

Deputy Sheriff.

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

THE STATE OF ALABAMA, }  
Baldwin County. }

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING.

You are hereby commanded to summon

*N. L. Durant, J. B. Smith*

if to be found in your county, at the instance of the

*Plff*

to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on

the *24<sup>th</sup>* day of *May* 191*6* then and there to testify,

and the truth to say, in a certain case pending, wherein

*Wilson Naval Stores Co* Plaintiff.

*Horace White* Defendant

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ.

Witness my hand *4<sup>th</sup>* day of *May* 191*6*

ATTEST:

*J. W. Harrison* Clerk.

Original

No. ....

THE STATE OF ALABAMA,  
Baldwin County.

Wilson Naval

Flora Co

Vs. }

SUBPOENA FOR

Horace White

CIRCUIT COURT

WITNESSES:

W L Durant

J B Smith

SET FOR TRIAL

24 day of May 1916

Baldwin Times Print.

E,

Presented in full May 17th 1916  
J B Smith Sheriff