

C O M P L A I N T

STANLEY MILLER AND FRED A MILLER  
PLAINTIFFS

VS

GILBERT H. FOREMAN AND BETTY M.  
FOREMAN,

DEFENDANTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

4561

The plaintiffs sue to recover possession of the following tract of land, lying and being in Baldwin County, Alabama, to-wit:

Lot Twenty-nine (29) of Gulf Shores Acre Tracts, of the Intracoastal Land Company, Inc., map of which is recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Map Book 4, Pages 12, 13; together with house and furniture;

of which they were in possession and upon which pending such possession and before the commencement of this suit the defendants entered and unlawfully withhold together with One Hundred Seventy-five and NO/100 (\$175.00) Dollars for the detention thereof.

FILED  
JAN 17 1961  
ALICE L. DUCK, Clerk

  
Attorney for Plaintiffs

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

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

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Gilbert H. Foreman and Betty M. Foreman

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 \_\_\_\_\_

\_\_\_\_\_ Gilbert H. Foreman and Betty M. Foreman \_\_\_\_\_, Defendant.S..

by \_\_\_\_\_ Stanley Miller and Freda Miller \_\_\_\_\_

\_\_\_\_\_, Plaintiff.S..

Witness my hand this 17 day of Jan 1961

Alice J. Duck, Clerk

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Stanley Miller and

Freda Miller

Plaintiffs

vs.

H. Gilbert Foreman and

Betty M. Foreman

Defendants

**Summons and Complaint**

Filed **FILED** \_\_\_\_\_ 19\_\_\_\_  
**JAN 17 1961**  
ALICE J. DUCK, Clerk Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Gulf Shores, Ala.

Received In Office

1-17-, 1961

Sheriff.

I have executed this summons

this 26-Jan 1961  
by leaving a copy with

Gilbert H Foreman  
Betty M Foreman

Sheriff claims 200 miles at  
Ten Cents per mile Total \$ 20.00  
TAYLOR WILKINS, Sheriff  
BY CC  
DEPUTY SHERIFF

James A. Brice Sheriff.  
Charles H. Brice Deputy Sheriff.  
Gulf Shores

JAMES A. BRICE  
ATTORNEY AT LAW  
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3501

February 10, 1961

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

Re: Stanley Miller et ux  
Vs: Gilbert H. and Betty M. Foreman  
At Law, No. 4561

Dear Mrs. Duck:

For the Plaintiffs, please dismiss the above suit and  
send me a cost bill.

Thank you.

Sincerely,

  
James A. Brice

JAB:j

STATEMENT

LAW OFFICE OF  
JAMES A. BRICE

FOLEY, ALABAMA

January 16, 1961

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

ENCLOSURE:

Summons and Complaint--Miller vs Foreman