

MARY P. REYNOLDS,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW
EDWARD E. BYRD,) NO. 4683
Defendant.)

COUNT ONE

Plaintiff sues to recover possession of the following real property
situate, lying and being in Baldwin County, Alabama, described as
follows, viz:

Lots 7 and 8 in Block 18 in the Town of
Robertsdale, Alabama, according to the
official map or plat thereof recorded in the
office of the Judge of Probate of Baldwin
County, Alabama, and being a subdivision
of a part of the Northwest Quarter of Section
6, Township 6 South, Range 4 East.

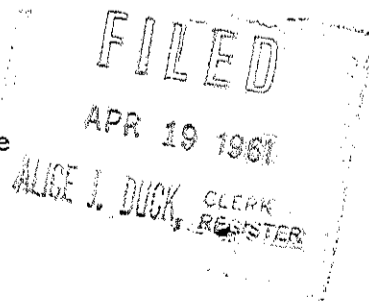
to the immediate possession of which the Plaintiff is entitled by virtue of
the purchase of said land at a sale of the same on a foreclosure of a
mortgage and which the Defendant, after the termination of his possessory
interest and after the Plaintiff's demand in writing therefor, unlawfully
detains, together with, to-wit, \$500.00 for the detention thereof. The
Plaintiff claims the right to have this case set and tried as a preferred case
under the laws governing such matters.

William R. Lauten
J. Terry Reynolds, Jr.
Attorneys for Plaintiff

Defendant may be served at:

Mr. Byrd lives in a nine (9) room house
located one block west of the Central
Telephone Company there. This house
is on Alabama Street directly in rear of the
telephone exchange building. One block
off Main Street in Robertsdale, Alabama.

Mr. Byrd is employed by Hinote Sand
& Gravel, Robertsdale, Alabama



SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Edward E. Byrd

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 -----

Edward E. Byrd, Defendant.---

by Mary P. Reynolds

-----, Plaintiff.---

Witness my hand this 19th day of April 1961..

Alice J. Duck, Clerk

No. 4683 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MARY P. REYNOLDS

Plaintiffs

vs.

EDWARD E. BYRD

Defendants

SUMMONS and COMPLAINT

Filed 4-19-61, 19____

Alice J. Duck

, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

April 19, 1961
Taylor Wilkins, Sheriff
I have executed this summons

this _____, 19____
by leaving a copy with _____

Not served
Defendant Deceased

Sheriff

Deputy Sheriff

LAW OFFICES OF
J. TERRY REYNOLDS, JR.
AND
WILLIAM R. LAUTEN
ATTORNEYS AT LAW
605-6 FIRST NATIONAL BANK BUILDING
MOBILE, ALABAMA

HEMLOCK 3-3661

April 18, 1961

Mrs. Alice J. Duck
Clerk of the Circuit Court of
Baldwin County, Alabama
Bay Minette, Alabama

Re: Mary P. Reynolds, Plaintiff
Vs. Edward E. Byrd, Defendant

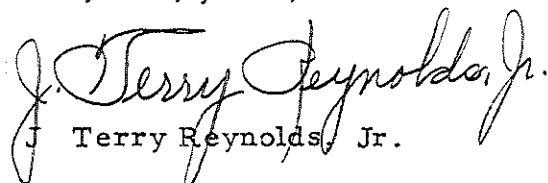
Dear Mrs. Duck:

It will be most sincerely appreciated if you will file this suit for me immediately. The Plaintiff is my mother and I would like to get action on the matter as quickly as possible. I will ask you to please also note the very last sentence alleged in this complaint as this case is entitled to a preference under the law as to the setting of such matters; viz, an earliest possible date of setting.

I would thank you most kindly if you would advise me on receiving the Sheriff's return when the Defendant has been served, so that I may watch the matter for the Defendant's thirty day appearance.

Your usual prompt attention will be most sincerely appreciated and I thank you personally.

Very truly yours,


J. Terry Reynolds, Jr.

JTR/mr

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4683

-----TERM, 19-----

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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 _____
Edward E. Byrd _____, Defendant-----

by Mary P. Reynolds _____
_____, Plaintiff-----

Witness my hand this 19th day of April 19-----

Alice J. Lusk, Clerk

MARY P. REYNOLDS,) IN THE CIRCUIT COURT OF
 Plaintiff,) BALDWIN COUNTY, ALABAMA
 VS.) AT LAW
 EDWARD E. BYRD,) NO. _____
 Defendant.)

COUNT ONE

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Lots 7 and 8 in Block 18 in the Town of Robertsdale, Alabama, according to the official map or plat thereof recorded in the office of the Judge of Probate of Baldwin County, Alabama, and being a subdivision of a part of the Northwest Quarter of Section 6, Township 6 South, Range 4 East.

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 Attorneys for Plaintiff

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