

4731

COMPLAINT

J. A. PILGRIM,
PLAINTIFF
VS
RICHARD BECK,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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

Commencing at a point 445 feet West of the Southeast corner of the Northeast Quarter (NE $\frac{1}{4}$) of the Southwest Quarter (SW $\frac{1}{4}$) of Section 29, Township 6 South, Range 4 East, run thence West a distance of 725 feet, more or less, to the Bay Minette and Fort Morgan Railroad right-of-way; run thence South along the right-of-way of the Bay Minette and Fort Morgan Railroad 165 feet more or less, to a point due West of the Northwest corner of Block 3 of Summerdale, as per plat recorded in Misc. Book 1, page 21, run thence due East along the North line of Blocks 3 and 2, a distance of 725 feet; run thence North 165 feet, more or less, to the point of beginning; 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 withheld together with \$150.00 for the detention thereof.

James A. Quinn
Attorney for Plaintiff

The defendant resides upon the property above described in Summerdale, Alabama

FILED
JUN 12 1961

ALICE J. DUCK, Clerk

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 Richard Beck

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

Richard Beck

....., Defendant.....

by

J. A. Pilgrim

..... Plaintiff.....

Witness my hand this 12

day of

June 1961

Alice J. Duke, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

J. A. Pilgrim

Plaintiffs

vs.

Richard Beck

Defendants

Summons and Complaint

Filed _____ 19____

FILED

JUN 12 1961 Clerk

Alice J. Buck, Clerk

J. A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Summerdale, Alabama

Received In Office

June 12, 1961

Sheriff.

I have executed this summons

this *June 20* 19*61*

by leaving a copy with

Richard Beck

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY *Childress*
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Childress

Deputy Sheriff.

Daugherty

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

July 21, 1961

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

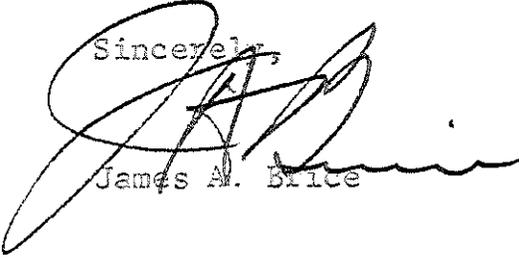
Re: J. A. Pilgrim
Vs: Richard Beck
Case No. 4731

Dear Mrs. Duck:

Please dismiss the above case and send me the cost bill.

Thank you.

Sincerely,


James A. Brice

JAB:j