

STATE OF ALABAMA :
BALDWIN COUNTY :

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James W. Thomas and his wife, Katie Lee Bryant Thomas to appear within thirty days from the date of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Mid-State Investment Corporation.

Witness my hand, this 14 day of Apr, 1962

Ex-5-10-62

Alice J. French
Clerk

MID-STATE INVESTMENT CORPORATION, :
A Corporation, :
Plaintiff, : IN THE CIRCUIT COURT OF
VS. : BALDWIN COUNTY, ALABAMA
JAMES W. THOMAS AND HIS WIFE, KATIE: AT LAW
LEE BRYANT THOMAS, : CASE NO. 5117
Defendants, :

COMPLAINT

COUNT ONE: The Plaintiff sues to recover possession of the following tract of land in Baldwin County, Alabama:

From the Southeast corner of Section Twenty-eight, Township Four South, Range Two East, Baldwin County, Alabama, run North along the East Boundary of said Section 28, 276.6 feet, for a point of beginning; thence run West 336.4 feet; thence run North parallel to the said East boundary of said section, 388.4 feet, more or less, to a point on the North boundary of the South $\frac{1}{2}$ of the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of said Section 28, thence run East along the said North boundary of S $\frac{1}{2}$ of SE $\frac{1}{4}$ of SE $\frac{1}{4}$, 336.4 feet to a point on the East boundary of said section 28; thence run South along the Section Line 388.4 feet, more or less, to the point of beginning. Containing 3.0 acres, more or less in the South $\frac{1}{2}$ of the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama.

of which the Plaintiff was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.

COUNT TWO: The Plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama:

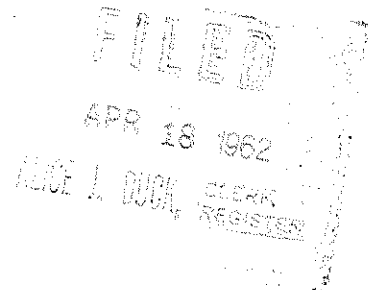
From the Southeast corner of Section Twenty-Eight, Township Four South, Range Two East, Baldwin County, Alabama, run North along the East boundary of said Section 28, 276.6 feet for a point of beginning; thence run West 336.4 feet; thence run North and parallel to the said East boundary of said section, 388.4 feet, more or less, to a point on the North boundary of the South $\frac{1}{2}$ of the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of said Section 28, thence run East along the said North boundary of S $\frac{1}{2}$ of SE $\frac{1}{4}$ of SE $\frac{1}{4}$, 336.4 feet to a point on the East boundary of said section 28, thence

run South along the Section Line 388.4 feet, more or less, to the point of beginning. Containing 3.0 acres, more or less in the South $\frac{1}{2}$ of the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 28, Township 4 South, Range 2 East, Baldwin County, Alabama.

to which said tract of land the Plaintiff has the legal title, and upon which tract of land, before the commencement of this suit, the defendants entered and unlawfully withhold, together with \$1,000.00 for the detention thereof.



R. A. NORRED
Attorney for the Plaintiff
718 Title Building
Birmingham, Alabama



MID-STATE INVESTMENT CORPORATION, :
A Corporation, :

Plaintiff, :

VS. :

JAMES W. THOMAS, :

Defendant. :

IN THE CIRCUIT COURT OF

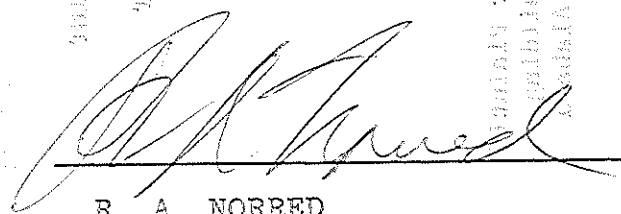
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO.-----

DEMAND FOR ABSTRACT

Comes the Plaintiff in the above styled cause and demands of the defendant, James W. Thomas, an abstract in writing of the title or titles on which such defendant will rely for defense.



R. A. NORRED
Attorney for the Plaintiff
718 Title Building
Birmingham, Alabama

APR 18-62

AND L. B. B. 7-23-62

ed 13 day of Apr. 1962
ed 10 day of May 1962
ed a copy of the within SH & demand
James W. Thomas & Katie
Lee Bryant Thomas
vice on _____

TAYLOR WILKINS, Sheriff
By W.O. Garner D. S.

Daphne

Sheriff claims 108 miles or
Ten Cents per mile Total \$ 10.80
TAYLOR WILKINS, Sheriff
BY Garner
DEPUTY SHERIFF

CASE NO. 5117

MID-STATE INVESTMENT CORP.,
A CORP.,

Plaintiff

vs:

JAMES W. THOMAS and his wife,
KATIE LEE BRYANT THOMAS,

Defendants.

R.A. Norred Daphne, Ala

SUMMONS and COMPLAINT
and
DEMAND FOR ABSTRACT

R.A. NORRED
Attorney for Plaintiff
718 Title Building
Birmingham, Alabama

R. A. NORRED
ATTORNEY

718 TITLE GUARANTEE BUILDING
BIRMINGHAM 3, ALABAMA

TELEPHONE
322-2351

May 16, 1962

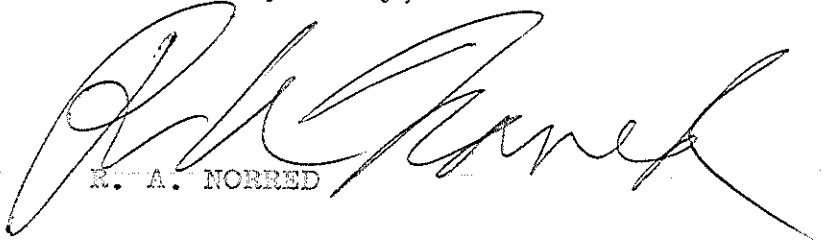
Honorable Alice J. Duck
Clerk - Circuit Court of
Baldwin County
Bay Minette, Alabama

Re: Mid-State Investment Corporation
vs.
James W. Thomas, et al
Case No. 5117

Dear Mrs. Duck:

It will apparently be unnecessary to proceed further in the above and I would appreciate it if you would have same dismissed upon motion of the complainant, and if you would also forward me a statement of costs.

Yours very truly,



R. A. NORRED

RAN:jmc

R. A. NORRED
ATTORNEY

718 TITLE GUARANTEE BUILDING
BIRMINGHAM 3, ALABAMA

TELEPHONE
322-2351

April 12, 1962

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

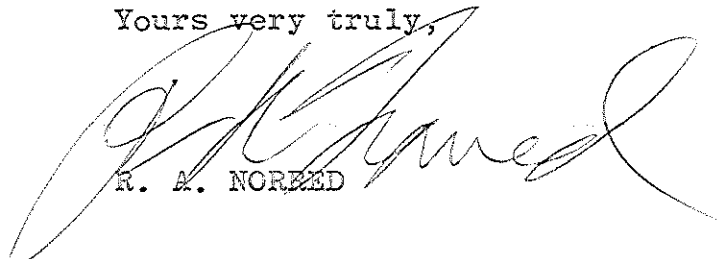
Re: Mid-State Investment Corporation
vs.
James W. Thomas and his wife,
Katie Lee Bryant Thomas

Dear Mrs. Duck:

I enclose herein an original and one copy of a Summons and Complaint for service in the above. I would appreciate it if you will file the Summons and issue same for service.

I also enclose a demand for abstract and I suggest that it might be served at the same time as the Summons and Complaint.

Yours very truly,



R. A. NORRED

RAN:jmc

Encls.