

TO THE HONORABLE FRANCIS W. HARE,  
JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,  
IN EQUITY:

Comes JOHN R. FUGARD and by this his bill of complaint presented against FRANK H. RIDDLE respectfully shows:

FIRST: That Complainant is a resident of the City of Chicago, Illinois, with property interests in Baldwin County; that Frank H. Riddle is 21 years of age and a resident of Aurora, Illinois, where his address is 104 Fox Street.

SECOND: That Complainant is the owner of and in peaceful possession of the following lands in Baldwin County, Alabama:

The East half: the East half of the Northwest quarter; the Northeast quarter of the Southwest quarter, less three acres in Southwest corner lying West of Silver Creek; the North thirty acres of the Northwest quarter of the Southwest quarter, all in Section Twenty-nine; the North thirty acres of the Northeast quarter of the Southeast quarter, and that part of the Northwest quarter of the Southeast quarter of Section Thirty which lies East of Fish River, both in Section Thirty; and the Southwest Quarter of the Southwest quarter of Section Twenty-eight, all in Township Six South of Range Three East of the St. Stephens Meridian.

THIRD: That the defendant above named claims, or is reputed to claim, some right, title, interest in, or encumbrance upon the lands above described.

FOURTH: Complainant now calls upon said Frank H. Riddle to set forth and specify his claim, interest, or encumbrance in or on the said property and how and by what instrument the same is derived and created.

THE PREMISES CONSIDERED, Complainant prays that Frank H. Riddle be made party defendant to this cause and notified by registered mail to plead, answer, or demur to this bill of complaint within the time required by law, and abide by such orders and decrees as may hereafter be made.

COMPLAINANT FURTHER PRAYS that a day be set for hearing this cause and on such hearing a decree be rendered forever divesting such Frank H. Riddle of all claim, title, right or interest in the property above described and forever quieting title thereto in Complainant, and

granting to Complainant such other, further, or different relief as to equity may seem meet.

*Elliott G. Rickarby*  
Solicitor for Complainant.

The defendant is required to answer each paragraph of the foregoing bill, but not under oath.

*Elliott G. Rickarby*  
Solicitor for Complainant.

STATE OF ALABAMA )  
BALDWIN COUNTY )

Before me the undersigned Notary personally appeared this day Elliott G. Rickarby, who says that he is a solicitor for John R. Fugard, and that he is reliably informed and believes, and on such information so states, that Frank H. Riddle, Defendant in the foregoing cause, is over the age of 21 years and a non-resident of the State of Alabama, residing in Aurora, Illinois, where his business address is 104 Fox Street in that City, so that personal service of notice cannot be had upon him, and for which reason notice to said Defendant of the pendency of this cause will have to be given by registered mail.

*Elliott G. Rickarby*

Subscribed and sworn to before me this 16th day of July, 1941.

*W. H. [Signature]*  
Notary Public, Baldwin County, Alabama.

The State Of Alabama }  
Baldwin County }

Circuit Court of Baldwin County, In Equity.

To Any Sheriff of the State of Alabama—GREETINGS:

WE COMMAND YOU, That you summon

FRANK H. RIDDLE

of 104 Fox St., Aurora, Ill.

County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited

by

JOHN R. FUGARD,

against said

FRANK H. RIDDLE

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. Duck, Register of said Circuit Court, this 17th day of July, 194 1.

*R. S. Duck*

, Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

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JOHN R. FUGARD  
Complainant

RECORDED  
vs

FRANK H. RIDDLE  
Defendant

BILL TO QUIET TITLE

*Filed July 17, 1941  
R. S. Dush, Register*

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ELLIOTT G. RICKARBY  
LAWYER  
FAIRHOPE, ALABAMA

STATE OF ALABAMA,  
BALDWIN COUNTY.

I, E. S. DUCK, Register of the Circuit Court of said State and County, hereby certify that I have mailed a copy of the within Summons, together with a copy of the Bill of Complaint, filed in this cause, to the Respondent, Frank H. Riddle, at the address given therein, postage prepaid, by registered mail, with return receipt requested, and marked for delivery only to the person to whom addressed.

This the 17th day of July, 1941.

  
E. S. DUCK, Register.