

827

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 Cebel Boyd. Edmund Carlisle.
Ed. Harris. Minnie Veal.

of Baldwin. 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 Robert C Wilson.

against said Cebel Boyd. Edmund Carlisle. Ed H arris. and
Minnie Veal.

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 27th day of May., 194²

R. S. Duck, Register

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

ROBERT C. WILSON,

Complainant,

-vs-

CEBEL BOYD, EDMUND CARLISLE,
ED HARRIS and MINNIE VEAL,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN CHANCERY.

DEMURRER

Come now the above named Respondents and demur to the Bill of Complaint and to each and every count thereof and as grounds for such demurrer, say:

There is no equity in the Bill.

Solicitor for Respondents.

ROBERT C. WILSON,
Complainant,
vs
CEBEL BOYD, ET AL,
Respondents

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY
No. 827

DECREE ON DEMURRER

This cause coming on to be heard on the demurrer of the respondents to the Bill of Complaint and was submitted to the court upon consideration whereof the court finds that there is no equity in the Bill and that said demurrer should be sustained.

It is therefore ordered adjudged and decreed that the demurrers of the respondents to the Bill of Complaint be and they hereby are, sustained and the complainant allowed thirty days within which to amend.

Dated at Bay Minette, Alabama, this 27th day of September 1943.


Judge

ROBERT C. WILSON,
Complainant,

-vs-

CEBEL BOYD, EDMUND CARLISLE,
ED HARRIS and MINNIE VEAL,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN CHANCERY.

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Come now the above named Respondents and demur to the Bill
of Complaint and to each and every count thereof and as grounds
for such demurrer, say:

There is no equity in the Bill.

Solicitor for Respondents.



RECORDED

Handwritten signatures and notes:
C. M. ...
C. M. ...
C. M. ...

ROBERT C. WILSON,
Complainant,

-vs-

ED HARRIS and MINNIE VEAL,
CEBEL BOYD, EDMUND CARLISLE,
Respondents.

IN CHANCERY
BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN CHANCERY

ROBERT C. WILSON,
Complainant,

-vs-

•CEBEL BOYD, EDMUND CARLISLE,
ED HARRIS and MINNIE VEAL,
Respondents.

827

DEMURRER

ROBERT C. WILSON, Complainant,

Filed July 11 1925
Produce
off

Orin M. Bram
@ Am Hall

Lloyd A. Magney
Foley, Alabama

There is no equity in the bill.

For each defendant, say:

of Cebel Boyd and Edmund Carlisle, say:

There is no equity in the bill.

Respondents.

ED HARRIS and MINNIE VEAL,
CEBEL BOYD, EDMUND CARLISLE,

-vs-

Complainant,

ROBERT C. WILSON,

IN CHANCERY,
BALDWIN COUNTY, ALABAMA.
IN THE CIRCUIT COURT OF

857

Filed 1947

John

I have the honor to acknowledge the receipt of your letter of the 11th inst. in relation to the above captioned matter. The same has been referred to the proper authorities for their consideration. I am, Sir, very respectfully,
 Yours very truly,
 J. Edgar Hoover
 Director

827 RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN CHANCERY

ROBERT C. WILSON,

Complainant,

-vs-

CEBEL BOYD, EDMUND CARLISLE,
ED HARRIS and MINNIE VEAL,

Respondents.

DEMURRER

*Filed July 14, 1922
O. J. ...
...*

Lloyd A. Magney
Foley, Alabama

Serve On _____

Circuit Court of Baldwin County

IN EQUITY

No. 827

Summons

Robert C Wilson.

VS.

Cebel Boyd, Edmund Carlisle.

Ed Harris, and Minnie Veal.

Orvis, M Brown.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

**THE STATE OF ALABAMA,
Baldwin County**

Received in office this _____

27th

day of _____

194

W.R. Stuart

Sheriff.

Executed this _____

day of _____

194

by leaving a copy of the Summons with _____

Defendant

Sheriff

By _____

Deputy Sheriff

Received in the Sheriff's office on the 27th, day of May 1942 and on the 10th day of June 1942 I served a copy of the within Summons & Complaint on Cebel Boyd, Edmund Carlisle and Minnie Veal, and on the 13th day of June 1942, I served a copy of the within Summons and Complaint on Ed. Harris.

W.R. Stuart, Sheriff Baldwin County

BY

A.P. Pruitt & John R. Davis
A.P. Pruitt & John R. Davis, Deputy Sheriff's

ROBERT C. WILSON, :
 Complainant : IN THE CIRCUIT COURT OF
 -vs- : BALDWIN COUNTY, ALABAMA.
 CEBEL BOYD, EDMUND CARLISLE, : IN EQUITY NO. _____
 ED HARRIS AND MINNIE VEAL, :
 Respondents. :

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

Comes your complainant in the above styled case and shows unto the court as follows;

ONE: The Complainant, Robert C. Wilson is a resident of Baldwin County, State of Alabama and has been for more than twenty years immediately preceeding the filing of this bill of complaint, and is over the age of twenty-one (21) years, the respondents, Cebel Boyd, Edmund Carlisle, Ed Harris and Minnie Veal, are all residents of Baldwin County, Alabama and have been in excess of ten (10) years next immediately preceeding the filing of this bill of complaint and are each over the age of twenty-one (21) years.

TWO: In the year of 1913, Peter Harris and wife Lizzie Harris, gave to your complainant, Robert C. Wilson, the lands in Baldwin County, Alabama, described as to-wit:

The North Half ($N\frac{1}{2}$) of the North Half ($N\frac{1}{2}$) of the Northeast Quarter ($NE\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) of Section Seventeen (17), Township Seven (7) South, Range Three (3) East, containing ten acres more or less,

This land was given to your complainant as his part of the property of Peter Harris and Lizzie Harris, with the understanding that he would construct a home on this land for himself and Ida Harris Wilson, she being the daughter of Peter Harris and Lizzie Harris,

More Printing Co.

3271 Bay Minette, Ala.

RECORDED

827

RECORDED

Respondents addresses are;

1; Cebel Boyd, *Serial 6/10 P*
Route Box 32-A (near Underwoods near
Summerdale, Ala. Marlow river ☐

2; Edmund Carlisle, *Serial 6/10 P*
Route Box 32-A. (same as above
Summerdale, Ala. turn right Moors
store this side of
Foley and go straight west..

3; Ed. Harris, (near Clay city)
Route,
Fairhope, Alabama. *6/13 P*

4; Minnie Veal *6/10 - Dards*
ask Cebel Boyd as to her present
residence.

Page "2".

Your complainant immediately in 1933 started the construction of a home on this above described land, which said home was completed in due time and he and Ida Harris Wilson, who is now deceased moved into this home where they both resided until the death of Ida Harris Wilson, in October of 1950, and your Complainant at this time resides on this land in this home and has resided there continuous since the construction of the home more than twenty nine (29) years ago. I have resided on the land and paid Taxes on this land, the taxes being paid all in one assessment as "Ida Wilson and Victoria Carlisle Agts, of Pete Harris Estate" I was of the Opinion and so was Peter Harris and Lizzie Harris, that it was not necessary to have a written conveyance to me and therefore no written conveyance was ever made to me of this land, although they recognized that I was the owner thereof in fee simple and never attempted to controll this land or the possession thereof in any manner.

Your Complainant shows further unto this Honorable Court that Peter Harris and Lizzie Harris , husband and wife are now deceased and have been for a number of years, and that they left surviving as their Heirs at Law,

1; Ida Harris Wilson, now deceased, the wife of your complainant, who died without issue.

2; Charlotte Harris Boyd, now deceased, and whose sole and only heir is Cebel Boyd, a single woman over 21 years old.

3; Victoria Harris Carlisle, who is now deceased and whose sole and only heir is a son Edmund Carlisle, over the age of twenty one years old.

4; Penfield Harris, who is now deceased and left no issue.

5; Frank Harris, a son who is now deceased, and who left two heirs, a son Ed Harris, and a daughter Minnie Veal, who are both over the age of twenty one years, and all residents of Baldwin County, Alabama.

Your Complainant shows further unto this Honorable Court that he has on numerous occasions requestd of the Heirs of Peter Harris and Lizzie Harris, deceased, that they executed to him a deed to the ten acres above described, but they have refused to do so.

PRAYER FOR PROCESS:

The Premises considered, complainant prays that the Court cause due process to issue, in accordance with the rules and practice of this court, to the said Respondents, directing them to appear before the court and plead, answer or demur within the time allowed by law.

PRAYER FOR RELIEF:

WHEREFORE the premises considered, complainant prays that after the hearing thereof, this honorable court will issue it's Decree, establishing title in fee simple to the lands described in this complaint in the complainant, and further decreeing that the Respondents, Cebel Boyd, Edmund Carlisle, Ed Harris, and Minnie Veal, have no right title or interest in the lands now under consideration, and declaring that the interest which they claim is a cloud on the title of complainant and remove it as such; and Complainant prays for such other, further or different relief as this honorable court, in equity and good conscience may deem meet, the premises considered, as complainant will ever pray.

Robert Wilson
COMPLAINANT.
Orvis M. Brown
SOLICITOR FOR COMPLAINANT.

FOOT NOTE:

The Respondents are required to answer but not under oath the same being expressly waived, as to each and every paragraph of the foregoing complaint numbering from one to two inclusive.

Robert Wilson
COMPLAINANT.
Orvis M. Brown
SOLICITOR FOR COMPLAINANT.

STATE OF ALABAMA
COUNTY OF BALDWIN

PERSONALLY appeared before me, Orvis M. Brown, a Notary Public, in and for said State and County, Robert C. Wilson, who upon oath deposes and says; that he is the complainant in the foregoing Bill of Complaint; therefore does make this oath; that the facts stated therein are true upon his knowledge and information

Sworn to and subscribed to before me this 14th day of May, 1942.

Orvis M. Brown
Notary Public, Baldwin Co. Ala.

6666 Robert Wilson

Page "2".

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More Printing Co.

3271 Bay Minette, Ala.

837 ~~RECORDED~~

RECORDED

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Route Box 32-A. (same as above
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Route,
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4; Minnie Veal *6/10 - Dada*
ask Cebel Boyd as to her present
residence.

ROBERT C. WILSON,

Complainant

-vs-

CECEL BOYD, EDMUND CARLISLE,
ED HARRIS AND MINNIE VEAL,

Respondents.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY NO. _____

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY.: