

VLASTA TUMA, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

JOSEPH TUMA, RESPONDENT.

IN EQUITY.

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

Your Complainant, VLASTA TUMA, humbly complaining against the Respondent, JOSEPH TUMA, respectfully represents and shows unto your Honor and this Honorable Court, as follows:

1. That the Complainant and Respondent are both over twenty-one years of age and residents of Baldwin County, Alabama;

2. That your Complainant and the Respondent are joint owners, or tenants in common of the following described lands in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 33, Township 5 South of Range 3 East, of St. Stephens Meridian in Baldwin County, Alabama, containing forty acres, more or less;

that the Complainant and the Respondent each own an undivided one-half interest therein;

3. That said lands cannot be equitably divided between the owners, without a sale thereof;

4. That the Complainant has employed counsel to prosecute this action, which is to the interest of the parties concerned.

Wherefore, the premises considered, the Complainant prays that your Honor will by proper process make the said JOSEPH TUMA party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the penalty prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing hereof, your Honor will enter an order and decree ordering the said land to be sold for division among the owners thereof; that a reasonable attorney fee be allowed to the attorneys of record for the Complainant and the Respondent, for services rendered; that your Honor will give and grant unto the Complainant, such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Vlasta Tuma

BEEBE & HALL
By: [Signature]
Solicitors for Complainant.

834

VLASTA TUMA, COMPLAINANT,

VS.

JOSEPH TUMA, RESPONDENT.

PETITION TO SELL LAND
FOR DIVISION.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said County, in said State, personally appeared VLASTA TUMA, who is known to me and who having been by me first duly sworn, deposes and says that she is the Complainant in the foregoing cause; that she has signed said Complaint for the purpose of asking for a sale of said lands for division; that the facts contained in said Complaint are true.

Vlasta Tuma

Sworn to and subscribed before me on this the 11 day of June, 1942.

John S. Gannus.
Notary Public, Baldwin County, Ala.

No. 836.

RECORDED

Page

25th

Defendant lives at

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

VLASTA. TUMA.

IN EQUITY.

Plaintiffs

vs.

JOSEPH TUMA.

Defendants

SUMMONS AND COMPLAINT

Filed JUNE 13th 1942

Register

Beebe & Hall

Plaintiff's Attorney

Defendant's Attorney

RECEIVED IN OFFICE

June 13 1942
W.R. Stuart Sheriff

I have executed this summons

this June 25th 1942
by leaving a copy with

Joseph Tuma, the
Defendant

W.R. Stuart Sheriff
B. F. Nucum Deputy Sheriff

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 8386.

CIRCUIT COURT BALDWIN COUNTY

In Equity.

June. TERM, 194 2.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Joseph. Tuma.

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

Joseph Tuma.

Respondant.

by Vlasta Tuma.

~~Complainant~~
Complainant.

Witness my hand this 13th. day of June. 194 2

R. Duck

Register.