

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

Comes W. C. BEEBE and humbly complaining against JASON

MALBIS, respectfully shows unto your Honor as follows:

FIRST:

That the said W. C. Beebe and Jason Malbis are each
over the age of twenty-one years and residents of Baldwin County,
Alabama.

SECOND:

That your complainant is the owner of and in the actual,
peaceable possession of the following described lands situated in
the County of Baldwin, State of Alabama, ever claiming to own the
same, to-wit:

The Northeast quarter of the Northwest quarter,
the Southwest quarter of the Northwest quarter
and the Southeast quarter of the Northwest quarter
of Section twenty-seven (27), Township five (5)
South of Range five (5) East.

THIRD:

That the said Jason Malbis claims or is reputed to
claim some right, title or interest in, or encumbrance upon the
above described lands, or some part thereof, and your complain-
ant calls upon the said Jason Malbis to set forth and specify
his right, title, claim, interest or encumbrance upon the same,
and how and by what instrument or instruments the same is de-
rived or created.

FOURTH:

That there is no suit pending to enforce or test the
validity of such right, title, claim, interest in or encumbrance
upon the said lands, or any part thereof.

WHEREFORE, complainant prays this Honorable Court will
take jurisdiction of the cause made by this bill of complaint
and make the said Jason Malbis a party defendant to the same,

and by appropriate process require him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of the cause made by this bill of complaint this Honorable Court will order and decree that the said defendant, Jason Malbis, has no right, title or interest in or encumbrance upon the said lands, or any part thereof; that the title to the said property be quieted and established in the said complainant as against the said Jason Malbis, and that the said Jason Malbis be forever enjoined from asserting or attempting to assert, from claiming or attempting to claim any right, title or interest in, lien or encumbrance upon or possession of the said lands, or any part thereof. And complainant prays for such other, further or different relief as in equity he shall be entitled to receive in the premises.

Bube Hall
Attorneys for Complainant.

FOOT NOTE:

Defendant is required to answer every allegation of the foregoing bill of complaint, paragraphs FIRST to FOURTH inclusive, but not under oath; oath is hereby expressly waived.

Bube Hall
Attorneys for Complainant.

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

Comes E. C. BEEBE and humbly complaining against JASON
MALBIS, respectfully shows unto your Honor as follows:

FIRST:

That the said E. C. Beebe and Jason Malbis are each
over the age of twenty-one years and residents of Baldwin County,
Alabama.

SECOND:

That your complainant is the owner of and in the actual,
peaceable possession of the following described lands situated in
the County of Baldwin, State of Alabama, ever claiming to own the
same, to-wit:

The Northeast quarter of the Northwest quarter,
the Southwest quarter of the Northwest quarter
and the Southeast quarter of the Northwest quarter
of Section twenty-seven (27), Township five (5)
South of Range five (5) East.

THIRD:

That the said Jason Malbis claims or is reputed to
claim some right, title or interest in, or encumbrance upon the
above described lands, or some part thereof, and your complain-
ant calls upon the said Jason Malbis to set forth and specify
his right, title, claim, interest or encumbrance upon the same,
and how and by what instrument or instruments the same is de-
rived or created.

FOURTH:

That there is no suit pending to enforce or test the
validity of such right, title, claim, interest in or encumbrance
upon the said lands, or any part thereof.

WHEREFORE, complainant prays this Honorable Court will
take jurisdiction of the cause made by this bill of complaint
and make the said Jason Malbis a party defendant to the same,

and by appropriate process require him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of the cause made by this bill of complaint this Honorable Court will order and decree that the said defendant, Jason Malbis, has no right, title or interest in or encumbrance upon the said lands, or any part thereof; that the title to the said property be quieted and established in the said complainant as against the said Jason Malbis, and that the said Jason Malbis be forever enjoined from asserting or attempting to assert, from claiming or attempting to claim any right, title or interest in, lien or encumbrance upon or possession of the said lands, or any part thereof. And complainant prays for such other, further or different relief as in equity he shall be entitled to receive in the premises.

Beebe & Hall
Attorneys for Complainant.

FOOT NOTE:

Defendant is required to answer every allegation of the foregoing bill of complaint, paragraphs FIRST to FOURTH inclusive, but not under oath; oath is hereby expressly waived.

Beebe & Hall
Attorneys for Complainant.

and by appropriate process require him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of the cause based on this bill of complaint this Honorable Court will

order and decree that the said defendant, Jason Malbis, has no title or interest in or encumbrance upon the said lands, and that the title to the said property be quieted and established in the said complainant as against the said Jason Malbis, and that the said Jason Malbis be forever enjoined from asserting or attempting to assert, from claiming or attempting to claim any right, title or interest in, lien or encumbrance upon or possession of the said lands, or any part thereof. And complainant prays for such other, further or different relief as in equity he shall be entitled to receive in the premises.

Filed June 19, 1933
J.P. Richardson
Per [Signature]

Bill of Complaint

Jason Malbis

W.C. [Signature]

copy

[Signature]
Attorney for Complainant.

FOOT NOTE:
Defendant is required to answer every allegation of the foregoing bill of complaint, paragraphs FIRST to FOURTH inclusive, but not under oath; oath is hereby expressly waived.

[Signature]
Attorney for Complainant.