

3158

STATE OF ALABAMA )  
                          \*)  
BALDWIN COUNTY    )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. L. Richardson to appear within 30 days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Bill of Complaint filed against him by Della Rayford.

WITNESS my hand this 21<sup>st</sup> day of December, 1953.

Arcif. Luck  
Register.

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Orator, Della Rayford, presents this Bill of Complaint against H. L. Richardson and, thereupon, your Orator complains and shows unto the court and your Honor as follows:

1. Your Orator is over the age of twenty-one years and a resident of Baldwin County, Alabama. The respondent, H. L. Richardson, is over twenty-one years of age and is a resident of Mobile County, Alabama.

2. Your Orator claims to own and is in the actual, quiet, peaceable possession of the following described real property situated in Baldwin County, Alabama, to-wit:

Lot 1, Block 2 in Dryer's Subdivision of Daphne, according to the official map or plat thereof which is recorded in Map Book 1, page 98, Baldwin County, Alabama Records.

3. The respondent claims, or is reputed to claim some right, title or interest in, or encumbrance on the said lands. No suit is pending to enforce or test the validity of such title, interest in, lien or encumbrance upon the said lands, and your Orator brings this Bill of Complaint against the said respondent to settle the title to the said lands and clear up all doubt and disputes concerning the same. Your Orator has and now calls upon the said respondent to set forth and specify his right, title or interest in, lien or encumbrance on the said lands, or any part thereof, and how and by what instrument the same is derived and created.

#### PRAYER FOR PROCESS

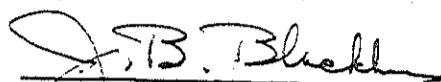
Your Orator prays that the said H. L. Richardson be made a party respondent to this Bill of Complaint and that the usual process of this honorable court forthwith issue to him.

#### PRAYER FOR RELIEF

Your Orator prays that upon a final hearing of this cause the court will make and enter a decree against the said respondent, quieting your Orator's title to the said lands, adjudging and decreeing that your Orator is the owner thereof, in her own right; that title thereto is in her, forever quieting her title against

the said respondent, adjudging that he is without right, title or interest in and to the said lands and has and holds no encumbrance thereon; and further, that he be permanently and perpetually enjoined from trespassing on the said lands or any part thereof.

Your Orator further prays for such other, further and general relief as she may be equitably entitled to, the premises considered.



Solicitor for Complainant.