

3192

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 thirty 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 M. W. STUART.

WITNESS my hand this 28th day of January, 1954.

George J. Duck
Register.

M. W. STUART,

COMPLAINANT,

VS

H. L. RICHARDSON,

RESPONDENT,

)

)

)

)

)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Your Orator, M. W. Stuart, present this Bill of Complaint against H. L. Richardson and, thereupon, your Orator complain and show unto the court and your Honor as follows:

I.

Your Orator is over the age of 21 years and a resident of Baldwin County, Alabama, the Respondent, H. L. Richardson, is over the age of 21 years, and is a resident of Plateau, Mobile County, Alabama.

II.

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:

All of Lots 3, 10, and 11 of the subdivision of Lot 7 in Block 13 of Berdido Beach, as shown by a map recorded in Book # 1, pages 63-64 at the Court house in the Office of the Judge of Probate in Baldwin County, Alabama.

III.

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 have and now call 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.

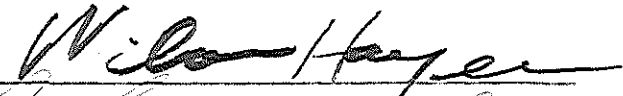
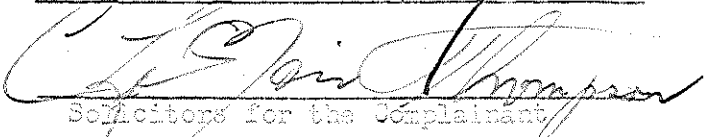
PRAYER FOR PROCESS

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 do 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 his own right; that title thereto is in him, forever quieting his 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 encumbrances ~~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 he may be equitably entitled to, the premises considered.



Solicitors for the Complainant

The Defendant may be located at 1932 Telegraph Road
Plateau, Alabama

Received in Sheriff's Office
this 30 day of Jan, 1954
TAYLOR WILKINS, Sheriff

EXECUTED
This 25 day of Feb 19 54
by serving a copy of the within on
H. L. Richardson
W. H. HOLCOMBE, Sheriff
Mobile County, Ala.
By: H. B. Sanders D.S.

713192
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

M. V. STUART,

COMPLAINANT

VS

H. L. RICHARDSCH,

RESPONDENT

Bill of Complaint

FILED

JAN 28 1954

ALICE J. DUCK, Register

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

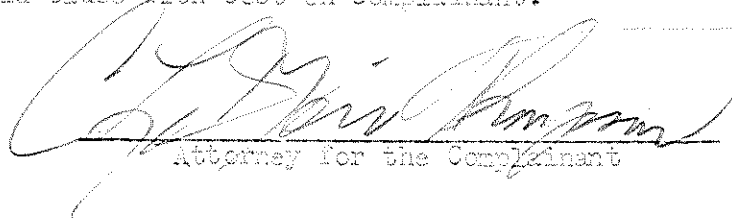
M. W. STUART,
COMPLAINANT,

VS

H. I. RICHARDSON,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the Complainant in the above styled cause by his attorney in fact and moves, by agreement with Honorable John Chason, attorney for the said respondent, to dismiss said cause with cost on complainant.


Attorney for the Complainant

3192

M

E. W. STUART,

COMPLAINANT,

VS

H. L. RICHARDSCH,

RESPONDENT.

March file

FILED

APR 8 1954

ALICE J. DUCK, Register