

2649

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A.B. McCorvey to appear within thirty days from the service of this writ in the Circuit Court, Equity Side, to be held for said County at the place of holding same, and then and there demur, plead to or answer the Bill of Complaint filed against her by C.A. Thompson.

WITNESS my hand this 17<sup>th</sup> day of May.  
1951.

Herbert J. Wrenn  
Register.

A. B. McCORVEY resides at 1913 Clearmont Street, Mobile, Alabama.

### COMPLAINT

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Orator, C. A. Thompson, presents this Bill of Complaint against A. B. McCorvey and thereupon your Orator complains and shows unto the Court and your Honor as follows:

1. Your Orator is over twenty-one years of age and a resident of Bay Minette, Alabama. The Respondent, A. B. McCorvey, is over twenty-one years of age. A. B. McCorvey is a resident of Mobile, Alabama, residing at 1913 Clearmont Street, Mobile, Alabama.

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

East Half of the Northeast Quarter  
of the Southwest Quarter of Section  
35, Township 6 South, Range 5 East.

3. The Respondent claims or is reputed to claim some right, title or interest in or encumbrance upon 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 to clear up all doubts and disputes concerning the same. Your Orator here and now calls upon the said Respondent to set forth and specify her 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 A. B. McCorvey be made a party Respondent to this Bill of Complaint and that the usual process of this Court do forthwith issue to her.

PRAYER FOR RELIEF

Your Orator further prays that upon a final hearing of this cause the Court will make and enter a Decree against the said Respondent, quieting the title to the said lands and adjudging and decreeing that your Orator is the owner thereof in his own right, that title thereto is in him, forever quieting your Orator's title against the said A. B. McCorvey, adjudging and decreeing that she is without right, title or interest in the said lands and has and holds no encumbrance thereon. Your Orator further prays for such other, further and general relief as he may be equitable entitled to, the premises considered.

J. B. Tschalman  
Solicitor for Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A.B. McCorvey to appear within thirty days from the service of this writ in the Circuit Court, Equity Side, to be held for said County at the place of holding same, and then and there demur, plead to or answer the Bill of Complaint filed against her by C.A. Thompson.

WITNESS my hand this 17<sup>th</sup> day of May.  
1951.

Alfred L. French  
Register.

A. B. McCORVEY resides at 1913 Clearmont Street, Mobile, Alabama.

### COMPLAINT

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Orator, C. A. Thompson, presents this Bill of Complaint against A. B. McCorvey and thereupon your Orator complains and shows unto the Court and your Honor as follows:

1. Your Orator is over twenty-one years of age and a resident of Bay Minette, Alabama. The Respondent, A. B. McCorvey, is over twenty-one years of age. A. B. McCorvey is a resident of Mobile, Alabama, residing at 1913 Clearmont Street, Mobile, Alabama.

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

East Half of the Northeast Quarter  
of the Southwest Quarter of Section  
35, Township 6 South, Range 5 East.

3. The Respondent claims or is reputed to claim some right, title or interest in or encumbrance upon 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 to clear up all doubts and disputes concerning the same. Your Orator here and now calls upon the said Respondent to set forth and specify her 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 A. B. McCorvey be made a party Respondent to this Bill of Complaint and that the usual process of this Court do forthwith issue to her.

PRAYER FOR RELIEF

Your Orator further prays that upon a final hearing of this cause the Court will make and enter a Decree against the said Respondent, quieting the title to the said lands and adjudging and decreeing that your Orator is the owner thereof in his own right, that title thereto is in him, forever quieting your Orator's title against the said A. B. McCorvey, adjudging and decreeing that she is without right, title or interest in the said lands and has and holds no encumbrance thereon. Your Orator further prays for such other, further and general relief as he may be equitable entitled to, the premises considered.

J. B. Blalock  
Solicitor for Complainant.

C.A. THOMPSON,  
 Complainant,  
 VS.  
 A.B. McCORVEY,  
 Respondents.

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

# LIS PENDENS NOTICE

TO WHOM IT MAY CONCERN:

Notice is hereby given that the Complainant in this cause has on this date filed in the Circuit Court of Baldwin County, Alabama, Equity Side, a suit against the Respondent to quiet Complainant's title to the property hereinafter described and to clear up all doubts and disputes concerning the same. The Complainant alleges that he claims to own and is in the actual, peaceable possession of the property described in the said suit, namely:

The East Half of the Northeast Quarter  
 of the Southwest of Section 35, Township  
 6 South, Range 5 East,

and prays for a decree quieting his title to the said property against the said respondent: All persons are cautioned against purchasing the said property except subject to the rights of the Complainant.

DATED this 17th day of May, 1951.

J. B. Blackburn  
 Solicitor for Complainant.

STATE OF ALABAMA, BALDWIN COUNTY  
 Filed 5/17/51 3:15 P.M.  
 Recorded Lis Pend. book 2 page 345  
 J. M. Stuart  
 Judge of Probate

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577-571

LIS PENDENS NOTICE

C. A. THOMPSON,

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Complainant,

VS.

A. B. McCORVEY,

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Respondent.

2-345-

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

2649

R-50

Mrs. Duck