

State of Alabama
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon Leonard B. Jefferies to appear and plead, answer or demur within thirty days, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama in Equity by Grover Redmond as Complainant against Leonard B. Jefferies as Respondent.

Witness my hand, this the 15th day of June 1954.

Arice J. White
Register

Grover Redmond	*	
	*	
Complainant	*	
	*	
Vs	*	In the Circuit Court of
	*	Baldwin County, Alabama
Leonard B. Jefferies	*	In Equity.
	*	
Respondent	*	

To Hon. Hubert M. Hall, Judge of the Circuit Court of Baldwin County Alabama, In Equity.

Your Complainant, Grover Redmond represents and shows unto Your Honor and this Honorable Court as follows;

1.
That your Complainant is over the age of twenty one years and a bona fide resident of Baldwin County, Alabama; that your Respondent is over the age of twenty one years and a bona fide resident of Escambia County, Alabama.

2.
That your Complainant holds the equitable title to the following described property situated in Baldwin County, Alabama, to-wit; the NW $\frac{1}{4}$ of the NE $\frac{1}{4}$ of Sec. 17, T1N, R4E; that he and his mother worked and helped pay for this land; that his mother died and his Father married again and that by deed executed by his father C. H. Redmond and Callie Redmond, his father's second wife to the Respondent, Leonard B. Jefferies, the title to said land was attempted to be conveyed to the Respondent; that your Complainant did not receive any part of the money paid for said land or any consideration for his interest; that his father did not pay him for the labor expended by him in making money to pay for the land or for any part of his mother's share in said land; that his mother did not receive any consideration for the work and money expended in paying for said land; that your complainant has been left out of any enjoyment of the fruits of his mother's and his own labor in paying for this land and the Respondent now is enjoying the fruits of the Complainant's labor without reimbursing him for his interest.

3.
Wherefore the premises considered, your Complainant prays that Your Honor will by proper process make the said Leonard B. Jefferies, party Respondent to this Bill of Complaint, requiring 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.

4.
That your Complainant further prays that upon a final hearing hereof, your Honor will make and enter a decree establishing the title of your Complainant in and to said land; or in the alternative to declare the Respondent resulting trustee for your Complainant for an equitable share of said land and make a just division of said land to your Complainant and the Respondent; that Your Honor will require the

Respondent to make an accounting for the rents and profits derived from said land since he has been in possession thereof and your Complainant prays for such other, further, different or general relief as he may be in Equity and good conscience entitled to receive. Your Complainant offers to do such Equity in the premises as Your Honor may see fit to require.


Solicitor for the Complainant

NO 3286'

Received in Sheriff's Office
this 25 day of June 1954
TAYLOR WILKINS, Sheriff

Grover Redmond

Complainant

Vs

Leonard B. Jefferies

Respondent

*Respondent works
for Atmore Prison Farm*

Executed this 29th day
June 1954 by serving
a copy of the within.

on Leonard B. Jefferies
J. L. Mills
By C. Shivers Sheriff
D.S.

Summons and Complaint

FILED
JUN 125 1954
ALICE J. DUCK, Register

3286