

2760

MARY WILLIAMS

COMPLAINANT

VS

ARREANER WHITE

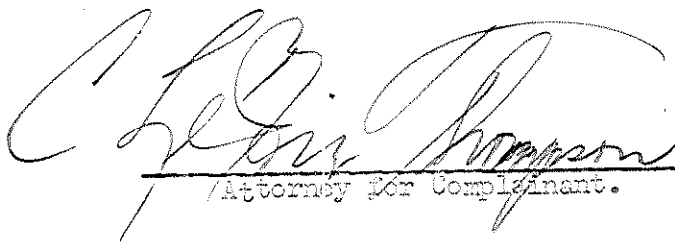
DEFENDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes the Attorney for the Complainant and moves to dismiss said
cause.



Attorney for Complainant.

702700

File

MARY WILLIAMS

COMPLAINANT

VS

ANDREAS WHITE

DEFENDANT

RECORDED

FILED

SEP 25 1951

ALICE L. DICK, CLERK

From the law offices of
C. LeBoir Thompson
Bay Minette, Alabama

MARY WILLIAMS
COMPLAINANT
VS
ARREANER WHITE
RESPONDENT

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

TO THE HONORABLE TERRY J. WASHBURN JR., JUDGE OF THE TWENTY-EIGHTH
JUDICIAL CIRCUIT OF ALABAMA:

Your oratrix Mary Williams, humbly complaining of the Respondent
in a matter of partition, shes unto your Honor as follows:-

FIRST:

That she is a resident of Baldwin County, State of Alabama; that
she is over the age of twenty-one years; that the Respondent Arreaner
White is over the age of twenty-one years and a resident of Baldwin
County, Alabama.

SECOND:

That your Complainant and the Respondent are the joint owners of
the following described real estate situated in Baldwin County, Alabama,
to-wit:

Begin Southeast corner West half of Southeast quarter 31,
4 North 4 East and run North on Eastline of West half, 200 feet
for beginning corner, thence North 1590 feet, West 861 feet to
point in easterly route of West public road. South 1590 feet
East 861 feet to beginning, all being in Section 31, Township 4
North Range 4 East,-- 23.28.

That your Complainant and the Respondent each own an undivided one-half
interest in said property.

THIRD:

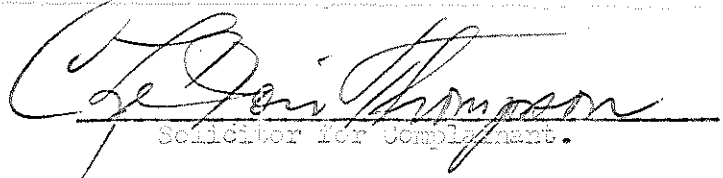
Your oratrix further shows unto your Honor that a dwelling house is
now located on said land and that said house and land can not be
equitably divided by metes and bounds so as to bring about an equitable
division of said lands; that said lands together with the improvements
situated thereon should be ordered sold by the Register of this Court,
after due notice thereof, for a partition and division of the proceeds,
of said sale, among the joint owners of said land. Your oratrix further
shows unto your Honor that to bring about this proceeding and to secure
a partition of said land among the joint owners, that it was necessary
that she employ a solicitor for this purpose and she has employed the
law firm of C. LeNoir Thompson, Bay Minette, Alabama, as such solicitor.

PRAYER FOR PROCESS.

To the end that equity may be had in the premises your oratrix prays that your Honor will cause the usual writ of process to be issued to Arreaner White making her a party Defendant to this Bill of Complaint and requiring her to plead, answer or demur to the same within the time required by law and the practice of this Honorable Court.

PRAYER FOR RELIEF.

The premises considered your oratrix prays that on a hearing of this cause that your Honor will make an appropriate decree ordering the Register of this Court to proceed to sell the aforesaid lands and the improvements thereon for partition and division among the joint owners thereof after giving due notice of the time and place of such sale as provided by the laws of the State of Alabama and the practice of this Honorable Court; that said sale be made in front of the Court House door of Baldwin County, Alabama, to the highest bidder for cash, during the legal hours of sale. Your oratrix further prays that after said sale that your Honor will order and direct the Register to make a proper Deed to the Purchaser and that your Honor will order a reference to be held by the Register to ascertain a reasonable amount of Attorneys fee to be paid to C. LeMoix Thompson, solicitor for your Complainant, for his services in connection with the prosecution of this suit and the bringing about of a sale of said land and distribution of the proceeds thereof among the joint owners; that your Honor will order and direct the Register to divide the proceeds derived from the said sale, after the solicitor fees due C. LeMoix Thompson, and the Court costs have been paid. Your oratrix prays for such other, different and general relief to which she may be entitled.


Solicitor for Complainant.

no 2700

Mary Williams
vs.

Areaner White

FILED

AUG 16 1951

ALICE P. STICK, Register

5100

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1201

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ARREANER WHITE

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

ARREANER WHITE

Defendant

by MARY WILLIAMS

Plaintiff.....

Witness my hand this 16th day of August 1951

Aricef. Leach Clerk

No. 2700

Page

RECORDED
THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MARY WILLIAMS

Plaintiffs

vs.

ARREANER WHITE

Defendants

SUMMONS and COMPLAINT

Filed August 16, 1951, 19

Archie Luck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

8-17, 1951

Archie Luck, Sheriff

I have executed this summons

this 24-Aug-1951

by leaving a copy with

Arreaner White

Archie Luck, Sheriff

Archie Luck, Deputy Sheriff

Little River

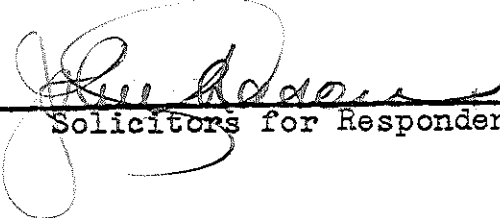
MARY WILLIAMS,
Complainant,
vs.
ARREANER WHITE,
Respondent.

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

Comes the Respondent in the above styled cause and demurs to the Bill of Complaint filed in said cause and each and every paragraph thereof separately and severally and assigns the following separate and several grounds, viz:

1. That said Complaint does not state a cause of action.
2. That said Complaint is vague and indefinite.
3. That the description of the property sought to be sold is vague and indefinite.

CHASON & STONE

By: 
Solicitors for Respondent.