

2701

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM J. WATSON and T. BLACKMON, to appear and plead, answer or demur, within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ROSA PIERCE DANNE, as Complainant and against WILLIAM J. WATSON and T. BLACKMON, as Respondent.

WITNESS my hand this the 17<sup>th</sup> day of August, 1951.

Rosa Pierce Danne  
Register.

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ROSA PIERCE DANNE  
COMPLAINANT  
VS  
WILLIAM J. WATSON and  
T. BLACKMON  
RESPONDENTS

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

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

Comes your Complainant, Rosa Pierce Danne, and respectively represents  
and shows unto your Honor and this Honorable Court as follows:

ONE:

That she is a bona fide resident of Baldwin County, Alabama, and  
over twenty-one years of age.

TWO:

That the Respondents, William J. Watson and T. Blackmon, are over  
twenty-one years of age, and are residents of Montgomery County, Alabama.

THREE:

That your Complainant is an heir of William Pierce, deceased, and  
is in the quiet, and peaceable possession, claiming to own the same in  
fee simple, of the following described land in Baldwin County, Alabama,  
to-wit:

Northwest quarter of Northeast quarter; South half of Southwest  
quarter of Northeast quarter; North half of Northwest quarter of  
Southeast quarter; North half of North half of Southwest quarter  
of Southeast quarter; North half of Southeast quarter of Southeast  
quarter; North half of Northeast quarter of Southeast quarter;  
South eight acres of Southeast quarter of Northeast quarter, Section  
7 Township 7 South Range 2 East; North half of Northwest of Southwest  
quarter Section 8 Township 7 South Range 2 East.

FOUR:

Complainant further alleges that the Respondents, William J. Watson and T. Blackmon, claim, or are reputed to claim some right, title or interest in, or encumbrance upon said land.

FIVE:

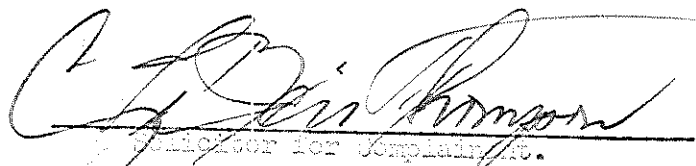
That Complainant further allege that no suit is pending to question or test the validity of such claim, right, title or interest in, or encumbrance of the said Respondents and the Complainant therefore calls upon the Respondents, William J. Watson and T. Blackmon, to set forth and specify their rights, title or interest in, or encumbrance upon said land, and to show how and by what instrument the same is derived, and/or created.

PRAYER FOR PROCESS:

WHEREFORE, the premises considered the Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said William J. Watson and T. Blackmon, Respondents to this Bill of Complaint, requiring them 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.

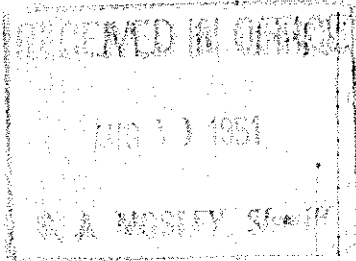
PRAYER:

Complainant further prays that upon the hearing of this Complaint, this Honorable Court establish the title of Complainant in and to the lands herein described, and further find and decree that the said William J. Watson and T. Blackmon, have no claim, right, title or interest in, or encumbrance upon the said lands herein described, or any part thereof, and grant unto your Complaint such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

  
C. B. Brown  
Attorney for Complainant.

65-5-

Received in Sheriff's Office  
this 17 day of Aug., 1951  
TAYLOR WILKINS, Sheriff



M & 701

RECORDED

ROSA FIERCE DARRIE

COMPLAINANT

VS

WILLIAM J. WATSON and  
T. BLACK O'NEAL

Forest Dept. Manager

Residents

EXECUTED BY DELIVERING

a copy of the within

To William J. Watson

OF THE

AND SAID

WAS SUCH WHEN SO SERVED

This the 8-23 1951

G. L. Mosley  
Sheriff, Montgomery County

By Goodman  
Deputy Sheriff

FILED

AUG 17 1951

ALICE J. DUCK, Register

From the law offices of  
C. Leclair Thompson  
Day Lidoite, Alabama

ROSA PIERCE DANNE,

Complainant,

VS.

WILLIAM J. WATSON AND  
T. BLACKMON,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 2701.

DECREE OVERRULING DEMURRER

This cause coming on to be heard is submitted on Respondents' Demurrer to Complainant's Bill of Complaint in the above styled cause, and the same being considered and understood by the Court, the Court is of the opinion that the Demurrer is not well taken and should be overruled.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED that Respondents' Demurrer to Complainant's Bill of Complaint be, and the same is hereby overruled.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Respondents have twenty days in which to file further pleadings should they so desire.

DONE AND ORDERED this 6th day of June, 1952.

J. A. Madhury Jr.  
Judge

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM J. WATSON and T. BLACKMON, to appear and plead, answer or demur, within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ROSA PIERCE DANNE, as Complainant and against WILLIAM J. WATSON and T. BLACKMON, as Respondent.

WITNESS my hand this the 17<sup>th</sup> day of August, 1951.

Deight Leach  
Register.

ROSA PIERCE DANNE

COMPLAINANT

VS

WILLIAM J. WATSON and  
T. BLACKMON

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

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

Comes your Complainant, Rosa Pierce Danne, and respectively represents  
and shows unto your Honor and this Honorable Court as follows:

ONE:

That she is a bona fide resident of Baldwin County, Alabama, and  
over twenty-one years of age.

TWO:

That the Respondents, William J. Watson and T. Blackmon, are over  
twenty-one years of age, and are residents of Montgomery County, Alabama.

THREE:

That your Complainant is an heir of William Pierce, deceased, and  
is in the quiet, and peaceable possession, claiming to own the same in  
fee simple, of the following described land in Baldwin County, Alabama,  
to-wit:

Northwest quarter of Northeast quarter; South half of Southwest  
quarter of Northeast quarter; North half of Northwest quarter of  
Southeast quarter; North half of North half of Southwest quarter  
of Southeast quarter; North half of Southeast quarter of Southeast  
quarter; North half of Northeast quarter of Southeast quarter;  
South eight acres of Southeast quarter of Northeast quarter, Section  
7 Township 7 South Range 2 East; North half of Northwest of Southwest  
quarter Section 8 Township 7 South Range 2 East.

FOUR:

Complainant further alleges that the Respondents, William J. Watson and T. Blackmon, claim, or are reputed to claim some right, title or interest in, or encumbrance upon said land.

FIVE:

That Complainant further allege that no suit is pending to question or test the validity of such claim, right, title or interest in, or encumbrance of the said Respondents and the Complainant therefore calls upon the Respondents, William J. Watson and T. Blackmon, to set forth and specify their rights, title or interest in, or encumbrance upon said land, and to show how and by what instrument the same is derived, and/or created.

PRAYER FOR PROCESS:

WHEREFORE, the premises considered the Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said WILLIAM J. Watson and T. Blackmon, Respondents to this Bill of Complaint, requiring them 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.

PRAYER:

Complainant further prays that upon the hearing of this Complaint, this Honorable Court establish the title of Complainant in and to the lands herein described, and further find and decree that the said William J. Watson and T. Blackmon, have no claim, right, title or interest in, or encumbrance upon the said lands herein described, or any part thereof, and grant unto your Complaint such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

*C. L. G. Thompson*  
Solicitor for Complainant.

FILED

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WIT I HERE BY

ROSA PEIRCE DANNE

COMPLAINANT

VS

WILLIAM J. WATSON and  
T. Blackmon

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Comes the respondents in the foregoing stated cause and by way of demurrer  
thereto, assigns the following:

ONE

It is apparent upon the face of the original bill the same is without equity.

TWO

It is apparent upon the face of the original bill that not all of the proper  
parties have been joined in the suit.

THREE

It is apparent upon the face of the original bill that not all of the necessary  
parties have been joined in the suit.

FOUR

It is apparent upon the face of the original bill that not all of the indis-  
-pensable parties have been joined in the suit.

FIVE

That the description contained in said bill is indefinite.

Wm. J. Watson  
Telford Blackmon  
RESPONDENTS.

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FILED

SEP 18 1951

ALICE J. DUCK, Register