

2527

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are commanded to summons JOSEPH STRAKA, 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 MARY STRAKA, as Complainant and against Joseph Strakam as Respondent.

WITNESS My hand this the 16th day of August, 1950.

Alice French
Register

MARY STRAKA

COMPLAINANT

VS

JOSEPH STRAKA

RESPONDENT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainant, Mary Strake, respectfully represents and shows unto
your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age and a bona fide
resident of Baldwin County, Alabama; that the Respondent, Joseph Straka,
is over twenty-one years of age and a non-resident of the State of Alabama,
his address being Berrien General Hospital, Berrien, Michigan.

2.

That your Complainant is the owner in fee simple and in the actual
possession of the following described lands situated in Baldwin County,
Alabama, to-wit:

West half of Northeast quarter of Southwest quarter, East half
of Northwest quarter of Southwest quarter of Section 30, Township
5 South, Range 4 East,

3.

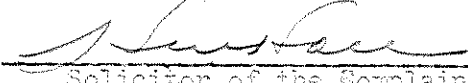
That there is no suit pending to test the Complainant's right, title of
interest in or to the said property.

4.

That the Respondent is alleged to claim some right, title or interest
in and to the said property and the Complainant therefore calls upon the
Respondent to set forth and specify what right, title or interest he has
in or claims to said property, and by what instrument the same is derived
and/or created.

WHEREFORE the premises considered your Complainant prays that your
Honor will by proper proceeding make the said Joseph Straka, 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.

Your Complainant further prays that upon a hearing hereof your Honor will make and enter a decree establishing the title of your Complainant in and to said lands and that the Respondent has noright, title or interest in or encumbrance upon the said lands or any part thereof; that your Honor will enter a decree granting unto your Complainant such other, further different or general relief as she may be in equity and good conscience entitled to receive and in duty bound she will ever pray.


Solicitor of the Complainant

Received in Sheriff's Office
this 16 day of Aug 19 56
TAYLOR WILKINS, Sheriff

NO 2527

RECORDED

MARY STRAKA

COMPLAINANT

VS

JOSEPH STRAKA

DEFENDANT

2527

FILED

FILED

AUG 16 1956

ALICE J. DUCK, Register

5th Prec Michigan

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