

T. W. RICHERSON

CLERK OF THE CIRCUIT COURT AND REGISTER IN CHANCERY  
BALDWIN COUNTY

BAY MINETTE, ALA. Aug 26th, 1918.

Hon. Jno E Mitchell

Mobile, Ala.

Dear Sir:-

Enclosed find cost bill in cause of  
J.A.Akin vs W.M.Cannon, please o k and instruct Complainant to pay  
same , you will remember that this cause was dismissed by Complainant  
Fall Term, 1917.

Yours truly.

*T. W. Richerson*

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon W.M.Cannon

of Fayette, Ala. ~~to~~ to be and appear before the Judge of the Circuit Court of  
Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to  
answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by.....

J.A.Akins

against said .....

W.M.Cannon

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 8th day of August

.....1917.....

T. W. Richerson  
Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

*Original*

*copy*  
Serve on W.M. Cannon

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No. 39.

SUMMONS.

~~W.M. Cannon~~

J.A. Akins.

vs.

W.M. Cannon.

John E Mitchell.

Solicitor for Complainant.

Recorded in Vol. .... Page .....

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this 10

day of August 1917

J. Harwell  
Sheriff.

Executed this 10 day of

August 1917

by leaving a copy of the within Summons with

W.M. Cannon

Defendant

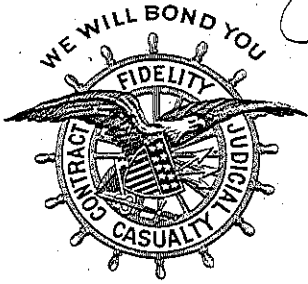
J. Harwell  
Sheriff

By G. H. Patterson

Deputy Sheriff.

John R. Bland, President.

Capital Paid in Cash \$3,000,000.



# United States Fidelity and Guaranty Company

JOHN E. MITCHELL,  
ATTORNEY

MOBILE, ALA.,

August 6, 1917.

Mr. T. W. Richerson, Clerk,

Bay Minette, Ala.

Dear Sir:- In re J. A. Akins vs W. M. Cannon

I am enclosing bill of complaint in this cause, and ask that you send subpoena and copy for the respondent by mail to me, and I will send same to the Sheriff of the county in which the respondent lives, for service, and will mail the Sheriff's return to you. I think this is the most reliable way of attending to the matter.

Yours very truly,

JEM/GFN

Enc.

## WE ISSUE

GUARDIANS'  
ADMINISTRATORS'  
EXECUTORS'  
TRUSTEES'  
ATTACHMENT  
AND ALL OTHER  
JUDICIAL BONDS.  
OUR BONDS COVER  
CONTRACTORS  
AND GUARANTEE  
THE SPECIFIC  
PERFORMANCES  
OF ANY  
CONTRACT;  
THE FIDELITY  
OF CASHIERS,  
BOOKKEEPERS  
AND OTHER  
TRUST OFFICERS  
OF MERCANTILE AND  
MANUFACTURING  
ESTABLISHMENTS;  
THE OFFICERS,  
EMPLOYES  
AND AGENTS OF  
RAILROADS,  
FEDERAL, STATE,  
COUNTY AND  
CITY OFFICERS;  
THE OFFICERS AND  
EMPLOYES OF  
BANKS AND  
TRUST COMPANIES,  
AND GUARANTEE  
STATE, CITY AND  
COUNTY DEPOSITS;  
INTERNAL REVENUE  
AND CUSTOMS  
OFFICIALS,  
DISTILLERIES  
AND BREWERIES;  
FRATERNAL ORDERS.

WE ALSO ISSUE  
ACCIDENT,  
HEALTH,  
BURGLARY,  
PLATE GLASS,  
PHYSICIANS',  
DENTISTS',  
DRUGGISTS',  
ELEVATOR,  
AUTOMOBILE  
AND EMPLOYERS'  
LIABILITY;  
WORKMEN'S  
COLLECTIVE AND  
COMPENSATION  
POLICIES.

Hon. A. E. Gamble,

Judge of the Circuit Court of Baldwin County, Sitting in Equity:-

Your orator, J. A. Akins, humbly complaining against W. M. Cannon, respectfully alleges and shows unto your Honor as follows:-

FIRST

Complainant and respondent are each over the age of twenty one years, and complainant is a resident of Baldwin County, Alabama, and respondent resides at Fayette, Alabama.

SECOND

Complainant is the sole heir of M. L. Akins, formerly Ellen Boone, and is the owner and in peaceable possession of that tract of land in Baldwin County, Alabama, as follows: S. 1/2 of the N. W. 1/4 and the W. 1/2 of the S. W. 1/4 of Section 12, Township 3 North, Range 4 East.

THIRD

The respondent claims or is reputed to claim some, right, title or interest in, or encumbrance upon, said tract of land or some portion thereof, and he is hereby called upon to set forth and specify his title, claim, interest or encumbrance, and how and by what instrument the same is derived and created. No suit is pending to enforce or test the validity of such title, claim or encumbrance.

PRAYER

Wherefore, the premises considered, complainant prays that the State's writ of subpoena may issue to the said W. M. Cannon, requiring him to demur, plead to or answer the allegations of this bill of complaint within the time required by law and in accordance with the practice of this Honorable Court.

Complainant prays that upon the final hearing hereof your Honor will quiet and establish complainant's title to the above described lands, and will decree that the said W. M. Cannon has no right, title or interest therein or encumbrance thereon.

*Jno. E. Winchell*  
Solicitor for Complainant.

FOOT NOTE:-

The respondent is required full, true and sufficient answers to make to each paragraph of this bill of complaint, from first to third, inclusive, but answer under oath is waived.

*Jno. E. Winchell*  
Solicitor for Complainant.

