

2556

C. V. HOOVER,
Complainant,

-vs-

PEYTON NORVILLE,
Respondent.

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: Sitting in Equity;

Comes now the Respondent in the above entitled
cause and demurs to the Bill of Complaint heretofore
filed in this cause, and for grounds of demurrer sets
down and assigns the following:

1. For that the said Bill of Complaint is to
vague, indefinite and uncertain on which to join issue.
2. For that there is no equity in the Bill.

Robert D. Williams
Solicitor for Respondent.

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Peyton Norville

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 _____

Peyton Norville

_____, Defendant

by C. V. Hoover

_____, Plaintiff.....

Witness my hand this 6th day of October 19 50

Wesley Welch, Clerk

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

vs. Plaintiffs

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

C. V. HOOVER,) (
Complainant,) (IN THE CIRCUIT COURT OF
-vs-) (BALDWIN COUNTY, ALABAMA
PEYTON NORVILLE,) (IN EQUITY
Respondent.) (

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY: Sitting in Equity;

Comes the complainant, C. V. Hoover, and brings this his Bill of Complaint against Peyton Norville and shows unto your Honor and this Honorable Court as follows:-

- I -

That complainant is over the age of twenty-one years and a resident of Baldwin County, Alabama; that respondent is over the age of twenty-one years and a resident of Mobile County, Alabama.

- II -

That complainant is in the peaceable possession of the following described real estate in Baldwin County, Alabama, viz:-

Hoover's Subdivision lying in the Southwest Quarter (SW $\frac{1}{4}$) of Section twenty-two (22), Township nine (9) South, Range two (2) East, according to a plat thereof recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Map Book 3, Page 41, also being described as follows: Begin at the Southwest corner of Section twenty-two (22), Township nine (9) South, Range two (2) East, thence run East 200 feet for a point of beginning, thence run East 963.48 feet to an iron stake, being the Southwest corner of the Olney Subdivision, thence due North 611.7 feet to Mobile Bay, at or near the mouth of Alligator Bayou, thence run Westerly along the Bay with its meanderings 976.23 feet, more or less, to a point directly North of the point of beginning, thence due South 444.6 feet to the point of beginning, all being in Baldwin County, Alabama.

- III -

That complainant claims to own the above described real estate in his own right and in fee simple.

- IV -

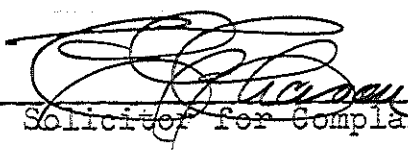
That Peyton Norville, the respondent in this action, is reputed to own said real estate, or some part thereof, or interest therein, or to hold a lien or encumbrance thereon, and complainant calls upon the respondent to set forth and specify his title, claim, interest or encumbrance, and how and by what instrument the same is derived or created.

PRAYER FOR PROCESS

TO THE END THEREFORE, that equity may be had, complainant prays that your Honor will cause the usual writ of process to be issued to the respondent named herein and that he be required to plead, answer or demur to this Bill of Complaint within the time as required by law.

PRAYER FOR RELIEF

Your complainant further prays that on a hearing of this cause that your Honor will establish complainant's right of title to said land as against the respondent named herein, and will decree that respondent has no right, title or interest in, or lien or encumbrance upon said land or any part thereof, and complainant further prays for such other, further, different and general relief as in equity may seem just and meet as Complainant will ever pray.


Solicitor for Complainant