

3381

You are hereby commanded to summons ROBERT SUAREZ 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 ANNIE G. SUAREZ as Complainant, and against Robert Suarez, as Respondent.

Benjamin F. Drake
Register

That the Complainant is desirous of a termination of her tenancy-in-common and avers that a sale of the land would be to the best interest of the joint--

owners heretofore named.

5.

The Complainant alleges that it has become necessary for her to employ a Solicitor to represent her in this proceedings and that she has employed the Firm of Wilters & Brantley as such Solicitors.

6.

That the Baldwin County Savings & Loan Association holds a mortgage on the aforesaid land with an unpaid balance in the amount of EIGHTEEN HUNDRED (\$1800.00) DOLLARS.

The Complainant offers to do equity.

PRAYER FOR PROCESS

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Robert Suarez 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.

PRAYER FOR RELIEF

Premises, considered, your Complainant prays that this Honorable Court will render a decree ordering a sale of said lands for a division of the proceeds therefrom among the joint owners and tenants-in-common.

Your Complainant further prays that Your Honor will cause the indebtedness to the Baldwin County Savings & Loan Association to be paid out of the proceeds of this sale.

Complainant further prays that Your Honor will fix a reasonable attorneys fee for the firm of Wilters & Brantley and order the same paid out of the proceeds of said sale.

Complainant prays for such other, further, different or general relief as in equity and good conscience she may be entitled to receive.

Wilters & Brantley

BY: J. Allen M. Brantley
Solicitors for the Complainant

this 18 day of Oct, 1954
TAYLOR WILKINS, Sheriff

70 3381

Received _____ day of _____ 19____
and on 11 day of Dec 1954
served a copy of the within
on Complainant
By service on Robert Suarez
TAYLOR WILKINS, Sheriff
By [Signature] D. S.

ANNIE G. SUAREZ
COMPLAINANT
VS
ROBERT SUAREZ
RESPONDENT

BILL OF COMPLAINT

FILED
OCT 18 1954
MADE A. BARK, Register