

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs. Colvin W. Salley to appear and plead, answer or demur within thirty days from the service herof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Orië Bryars as Complainant and against Mrs. Colvin W. Salley, as Respondent.

WITNESS my hand this the 1st day of Apr, 1952

W. J. M. MASHBURN, JR.
Register

Orie Bryars	*	
	*	In the Circuit Court of
Complainant	*	
	*	Baldwin County Alabama
VS	*	
	*	In Equity
Mrs. Colvin W. Salley	*	
	*	
Respondent	*	
	*	

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

Your Complainant, Orië Bryars respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama and over twenty one years of age and your Complainant does not know either the age or the residence of the respondent, only that her address is York, Alabama.

2.

That your Complainant became unable to pay the taxes on his land and on, to wit, June 21, 1948 the following lands in Baldwin County, Alabama owned by your Complainant and in his continuous possession were sold by the State for taxes due and were purchased by the Respondent at the tax sale. These lands are:

The W $\frac{1}{2}$ of N E $\frac{1}{4}$ of N E $\frac{1}{4}$	All lying and being in Sec. 32, Tp 1 N. R. 4.E. Baldwin County, Alabama.
E $\frac{1}{2}$ of N W $\frac{1}{4}$ of N E $\frac{1}{4}$	
W $\frac{1}{2}$ of N.E $\frac{1}{4}$ of S E $\frac{1}{4}$	
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E $\frac{1}{2}$ of S W $\frac{1}{4}$ of N E $\frac{1}{4}$	
W $\frac{1}{2}$ of S E $\frac{1}{4}$ of N E $\frac{1}{4}$	

3.

Your Complainant alleges that he is and continually has been since the tax sale, in possession of said tracts of land and that it is his desire to redeem said tracts of land from the tax sale to the respondent.

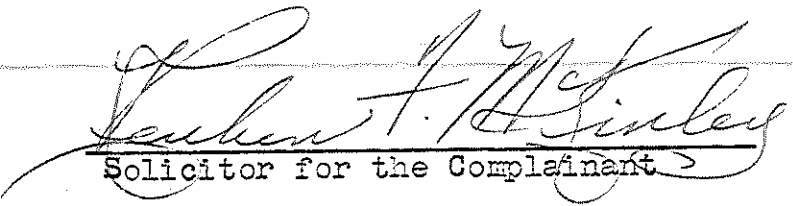
4.

Wherefore, the premises considered, your complainant prays that your Honor will, by proper process, make the said Mrs. Colvin W. Salley, party respondent to this bill of complaint, requiring her 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.

5.

Your Complainant further prays that upon a final hearing herof, Your Honor will make an order granting your complainant the right to redeem his said lands, and will grant him such other, further different or general relief as he may in Equity and good conscience be entitled to receive. Your complainant offers to do such Equity in the premises as this Honorable Court may see fit to require.


Solicitor for the Complainant

2792
ORIE BRYARS

COMPLAINANT

VS

MRS. COLVIN W. SALLEY

RESPONDENT

RECORDED

SUMMONS AND COMPLAINT

From the law office of
Reuben F. McKinley
Bay Minette, Alabama

Filed 4-1-52
Clerk of Court
Register

2792
Firmington Ala
C. H. Scott
served _____ day of _____ 19____
t found in my county after diligent search and inq
iry.

Taylor Wilkins, Sheriff

By _____ Deputy Sheriff

Returned 8 day of May 1952
Not found in my county after diligent search and
quiry.

Taylor Wilkins, S

By H. F. Hall Deputy Sheriff

STATE OF ALABAMA
COUNTY OF BALDWIN

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WITNESS my hand this the 1st day of April, 1952

Archie J. Leach
Register

Orle Bryars

Complainant

VS

Mrs. Colvin W. Salley

Respondent

In the Circuit Court of

Baldwin County Alabama

In Equity

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

Your Complainant, Orle Bryars respectfully represents unto your Honor and this Honorable Court as follows:

1.

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All lying and being in Sec.
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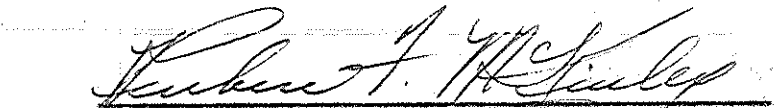
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Solicitor for the Complainant

2792

2792 -

ORIE BRYARS

COMPLAINANT

VS

MRS. COLVIN W. SALLEY

RESPONDENT

SUMMONS AND COMPLAINT

Filed 4-1-57
Reuben F. McKinley
Registrar

From the law office of
Reuben F. McKinley
Bay Minette, Alabama

2792