

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon W. A. Thompson, whose address is Bay Minette, Alabama to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 Orvis M. Brown, against the said W. A. Thompson, and further to do and perform what said Judge shall order and direct in that behalf and this the defendant shall in no wise omit under penalty of the law; and we further command that you return this writ, with your endorsement thereof, to our said court immediately upon the execution thereof.

WITNESS, Alice J. Duck, Register of said Circuit Court, this the 7th day of March, 1955.

Alice J. Duck
Register

ORVIS M. BROWN,

COMPLAINANT

VS

W. A. THOMPSON

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

TO THE HONORABLE HUBERT E. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes Orvis M. Brown, and humbly complaining against W. A. Thompson, respectfully show unto your Honor as follows:

FIRST: That your complainant is over the age of twenty-one years and that he resides in Montgomery, Alabama; that the defendant is over the age of twenty-one years and his residence is Bay Minette, Alabama.

SECOND: That your complainant is the owner of and is in the peaceable possession of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

Lots 11 and 12 in Block 6, Robertsdale,
Baldwin County, Alabama.

THIRD: That the said W. A. Thompson claims or is reputed to claim some right, title, claim or interest in, lien or encumbrance upon the above described lands, or some part or parcel thereof, and the complainant calls upon him to set forth and specify his right, title, claim or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof, and to show how and by what instrument or instruments the same is derived or created.

FOURTH: That there is no suit pending to enforce or test the validity of the complainant's title to the said lands, or to enforce or test the validity of the defendant's right, title, claim or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof.

WHEREFORE, your complainant prays that this Honorable Court take jurisdiction of the cause made by this bill of complaint and make the said W. A. Thompson party defendant hereto, and by appropriate process require 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.

Complainant further prays that upon a final hearing of this cause this Honorable Court will make and enter an order and decree adjudging and decreeing that the said defendant, W. A. Thompson, has no right, title, claim or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof, and that the title to the said lands be quieted and established in this complainant as against the said defendant; and that the said defendant be forever enjoined from asserting or attempting to assert, or from claiming or attempting to claim any right, title, claim or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof.

BEEBE & SWEARINGEN

By

J. B. Swearingen
Solicitor for Complainant.

CASE # ~~4538~~
3497

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SUMMONS & COMPLAINT

Received 8 day of mar 1955
and on 9 day of mar 1955
served a copy of the within BAC
on _____

by service on W. A. Thompson

TAYLOR WILKINS, Sheriff

By J. D. Brown D. S.

ORVIS M. BROWN,
COMPLAINANT

VS

W. A. THOMPSON,
DEFENDANT

FILED
MAR 7 1955
ALICE J. DUCK, Clerk

ORVIS M. BROWN

COMPLAINANT

VS

W. A. THOMPSON

RESPONDENT

IN THE CIRCUIT COURT OF

BAWDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 2558

~~DEMURER~~

Comes now the Respondent in the above styled cause and demurs to the Complainant's Complaint and as grounds therefor shows unto Your Honor as follows:

1.

The Complainant fails to offer to do equity.

Wiltags & Brantley

BY:

Robert M Brantley
Solicitors for the Respondent

3497
~~2448~~

ORVIS M. BROWN

COMPLAINANT

VS

W. A. THOMPSON

RESPONDENT

DEMURRERS

FILED

MAR 26 1955

ALICE J. DUCK, Register

ORVIS M. BROWN,

Complainant,

VS.

W. A. THOMPSON,

Respondent.

IN THE

CIRCUIT COURT OF BALDWIN COUNTY,

ALABAMA. IN EQUITY,

NO. 3497

This cause being regularly called, on this a regular day for the calling of the docket of this Court, and the parties not answering,

IT IS ORDERED by the Court that this cause be continued until April 30, 1956,

IT IS FURTHER ORDERED that this cause be, and it is hereby set down for the taking of testimony, and submission for final decree on April 30, 1956, at the Courthouse in Bay Minette, Alabama, beginning at 10 A. M.

IT IS FURTHER ORDERED that a copy of this order be mailed to the respective Solicitors of Record for the parties to this cause.

This 17th day of April, 1956.

Robert M. Hall

Judge, 28th Judicial Circuit of Alabama

FILED

APR 18 1956

ALICE J. BUCK, Register

ORVISM. BROWN

COMPLAINANT

VS.

W. A. THOMPSON

RES PONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3497

This cause having been settled by the parties and the cost having been paid to the Register of this court, and the same having been considered by the Court: It is ordered and adjudged that this cause stand dismissed out of this court.

Dated this _____ day of _____, 195_____.

JUDGE

ORVISSM. BROWN

COMPLAINANT

VS

W. A. THOMPSON

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
NO. 3497

This cause having been settled by the parties and the cost having been paid to the Register of this court, and the same having been considered by the Court: It is ordered and adjudged that this cause stand dismissed out of this court.

Dated this 30 day of April, 1956.

1. Leland M. Steel
JUDGE