

4650

DOYLE HORNBEAK
and
MAGGIE L. HORNBEAK

Complainant

-VS-

PEOPLES FERTILIZER COMPANY
A Corporation

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE 4650

BILL TO QUIET TITLE

TO: THE HONORABLE H. M. HALL, CIRCUIT JUDGE OF BALDWIN COUNTY
ALABAMA.

Comes your complainants DOYLE HORNBEAK and MAGGIE L. HORNBEAK
by this their Bill of Complaint presented against PEOPLES FERTILIZER
COMPANY, a corporation Defendant and shows:

FIRST: That Complainants are residents of Baldwin County,
Alabama over the age of twenty-one years and the Defendant is a
Corporation doing business in Baldwin County, Alabama.

SECOND: That the Complainants are in peaceable possession
of and claims to own, subject to mortgage, the following described
property, that is:

"The Southwest quarter (SW $\frac{1}{4}$) of the Southwest
quarter (SW $\frac{1}{4}$) and West one half (W $\frac{1}{2}$) of the
Southeast one quarter (SE $\frac{1}{4}$) of the Southwest
one quarter (SW $\frac{1}{4}$) of Section eleven (11),
township seven (7) South, range two (2) east
subject to a reservation of one half ($\frac{1}{2}$) of
all oil, gas and minerals under said land.

THIRD: That the Defendant claims or is reputed to claim
some right, title, or interest in or incumbrance upon such lands.

FOURTH: No suit is pending to enforce or test the validity
of such title, claim or encumbrance.

FIFTH: The Defendant is now 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.

Complainants pray that the Defendant be made a party to this
bill by appropriate process requiring it to plead as required by
law.

Complainant further prays that on a final hearing of this bill that the court will decree that the Defendant has no estate or interest in, or encumbrance on, such land, or any part there of and that a copy of this decree be recorded in the Probate Court of Baldwin County, Alabama and Complainants pray for such other further relief as to equity is meet and proper.

E. G. RICKARBY



E. G. RICKARBY
SOLICITOR FOR COMPLAINANT

FILED

JUL 18 1959

ALICE J. DUCK, Register

DOYLE HORNBEAK
and
MAGGIE L. HORNBEAK

Complainant

-VS-

PEOPLES FERTILIZER COMPANY
A Corporation

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE 4658

BILL TO QUIET TITLE

TO: THE HONORABLE H. M. HALL, CIRCUIT JUDGE OF BALDWIN COUNTY
ALABAMA.

Comes your complainants DOYLE HORNBEAK and MAGGIE L. HORNBEAK
by this their Bill of Complaint presented against PEOPLES FERTILIZER
COMPANY, a corporation Defendant and shows:

FIRST: That Complainants are residents of Baldwin County,
Alabama over the age of twenty-one years and the Defendant is a
Corporation doing business in Baldwin County, Alabama.

SECOND: That the Complainants are in peaceable possession
of and claims to own, subject to mortgage, the following described
property, that is:

"The Southwest quarter (SW $\frac{1}{4}$) of the Southwest
quarter (SW $\frac{1}{4}$) and West one half (W $\frac{1}{2}$) of the
Southeast one quarter (SE $\frac{1}{4}$) of the Southwest
one quarter (SW $\frac{1}{4}$) of Section eleven (11),
township seven (7) South, range two (2) east
subject to a reservation of one half ($\frac{1}{2}$) of
all oil, gas and minerals under said land.

THIRD: That the Defendant claims or is reputed to claim
some right, title, or interest in or incumbrance upon such lands.

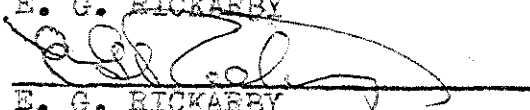
FOURTH: ~~No suit is pending to enforce or test the validity~~
of such title, claim or encumbrance.

FIFTH: The Defendant is now 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.

Complainants pray that the Defendant be made a party to this
bill by appropriate process requiring it to plead as required by
law.

Complainant further prays that on a final hearing of this bill that the court will decree that the Defendant has no estate or interest in, or encumbrance on, such land, or any part there of and that a copy of this decree be recorded in the Probate Court of Baldwin County, Alabama and Complainants pray for such other further relief as to equity is meet and proper.

E. G. RICKARBY


E. G. RICKARBY
SOLICITOR FOR COMPLAINANT

FILED

JUL 18 1959

ANCE J. DUCK, Register

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FILED
JUL 18 1959
ALICE J. DUCK, Register

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DOYLE HORNBEAK
and
MAGGIE L. HORNBEAK

Complainant

-VS-

PEOPLES FERTILIZER COMPANY
A Corporation

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE _____

LIS PENDENS NOTICE

Notice is hereby given that DOYLE HORNBEAK and MAGGIE L. HORNBEAK have begun a suit in the Circuit Court in Equity in Baldwin County, Alabama, against PEOPLES FERTILIZER COMPANY, a Corporation to quiet title to the following described land, vis:

"The Southwest quarter (SW $\frac{1}{4}$) of the Southwest quarter (SW $\frac{1}{4}$) and West one half (W $\frac{1}{2}$) of the Southeast one quarter (SE $\frac{1}{4}$) of the Southwest one quarter (SW $\frac{1}{4}$) of Section eleven (11), township seven (7) South, range two (2) east subject to a reservation of one half ($\frac{1}{2}$) of all oil, gas and minerals under said land.

And to determine that the said PEOPLES FERTILIZER COMPANY have no claim against said land.

FILED

JUL 18 1959

ALICE J. DUCK, Register



E. G. RICKARBY
SOLICITOR FOR DOYLE HORNBEAK
AND MAGGIE L. HORNBEAK