

RUDOLPH BAUMANN
COMPLAINANT
VS
ROY L. ARANT
RESPONDENT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

TO WHOM IT MAY CONCERN:

Notice is hereby given that the complainant in this cause has on this date filed in the Circuit Court of Baldwin County, Alabama, Equity Side, against the Respondent a suit to quiet Complainant's title to the property hereinafter described, and to clear up all doubts and disputes concerning same.

The Complainant alleges in his Bill of Complaint that he claims to own and is in actual, peaceable possession of the property described in said suit namely:

South half of Northwest quarter of Northwest quarter of Section 23, Township 7 South, Range 5 East, Baldwin County, Alabama,

and that no suit is pending to enforce or test the title to the said land.

And Said Complainant prays for a decree quieting his title to said property against the said Defendant, for redemption of said land from the tax title of the Respondent and his general relief.

All persons are warned against purchasing the said property, except subject to the right of the Complainant in this suit.

Dated this the 8th day of August, 1956.

Winters & Brantley
Albert M. Brantley
Solicitors for the Complainant

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RUDOLPH BAUMANN

COMPLAINANT

VS

ROY L. ARANT

RESPONDENT

LIS PENDENS

FILED

AUG 8 1956

ALICE J. DUCK, Register

Handwritten notes and signatures at the bottom of the page, including a signature that appears to be "ALICE J. DUCK".

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ROY L. ARANT 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 RUDOLPH BAUMANN, as Complainant and against Roy L. Arant, as Respondent.

WITNESS my hand this the 2th day of August, 1956.

Alice J. Dush
Register

RUDOLPH BAUMANN
COMPLAINANT
VS
ROY L. ARANT
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

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

Comes now the Complainant in the above styled cause and respectfully shows unto your Honor as follows:

1.

That your Complainant is a resident citizen of Baldwin County, Alabama, and over the age of twenty-one years; that the Respondent is a resident of Saraland, Mobile County, Alabama, and is over the age of twenty-one years.

2.

That the Complainant is the owner of and in the peaceable possession of the following described land situated in the County of Baldwin, State of Alabama, to-wit:

South half of Northwest quarter of Northwest quarter of Section 23, Township 7 South, Range 5 East.

3.

That the said Roy L. Arant claims or is reputed to claim some right, title, claim, or interest in, lien or encumbrance upon the above described land, or some part thereof, and the Complainant calls upon him to set forth and specify his right, title, claim, interest in, lien or encumbrance upon

the said lands or any part thereof, and to show how and by what instrument or instruments the same is derived or created.

4.

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 Respondent's right, title, claim, interest in, lien or encumbrance upon the said lands, or any part thereof.

5.

The Complainant further says that he is informed and believes and upon such information and belief alleges that the said respondent claims a right, title, claim or interest in, lien or encumbrance upon the aforesaid lands, or some portion thereof, by virtue of a tax deed issued to Roy L. Arant by the Probate Judge of Baldwin County, Alabama, on to-wit, June 18, 1954, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 209, page 338; that said deeds purports to have been executed under a sale of the said land June 11, 1951, for taxes under an assessment against Jacob Enz and this Complainant alleges that at the time of said sale, Rudolph Baumann was the owner of the said land and is possessed of the same; that your Complainant was the owner of the said lands and in possession thereof at the time of the sale to Roy L. Arant by the tax deed referred to above and that he has been in continuous possession of the said lands from the date of the aforesaid tax sale to this date.

6.

Your Complainant further says that he is informed and believes and upon such information and belief alleges that the said tax title of the said Roy L. Arant is void.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said Roy L. Arant party respondent thereto 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 practices 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 respondent, Roy L. Arant, has no right, title, claim, interest in, lien or encumbrance upon the said land, or any part thereof, and that the title to the said lands be quieted and established in this complainant as against the said respondent; and that the said respondent be forever enjoined from asserting or attempting to assert or from claiming or attempting to claim any right, title, or interest in, or encumbrance upon the said lands, or any part thereof.

Complainant further prays that if he be mistaken in the relief prayed for, that this Honorable Court will ascertain the amount of the taxes and cost for which said lands were sold and interest thereon and the taxes and interest thereon paid subsequent to the said sale and that this Complainant be permitted to redeem the said lands from the aforesaid tax sale; Your Complainant prays for such other, further or different relief as in equity he shall be entitled to receive, premises considered.

Wilters & Brantley

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