

STATE OF ALABAMA

BALDWIN COUNTY

### IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Henry Styron 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 John Styron as Complainant, against Henry Styron, as Respondent.

Witness my hand this the 23 day of October, 1958.

Buie June R. Register.

JOHN STYRON,		X	
	Complainant,	X.	IN THE CIRCUIT COURT OF
vs.		X	BALDWIN COUNTY, ALABAMA
HENRY STYRON,		X	BAHD"IN COUNTI, AHABAMI
	Respondent.	X	IN EQUITY
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Comes the Complainant in the above styled cause and files this his Bill of Complaint and shows unto this Honorable Court and unto Your Honor as follows:

#### FIRST:

That the Complainant and the Respondent are both over the age of twenty-one years and are resident citizens of Baldwin County, Alabama, residing near Foley, Alabama.

#### SECOND:

That your Complainant is the owner of the following described real property situated in Baldwin County, Alabama, to-wit:

Begin at the Southwest corner of the Southeast Quarter of the Northwest Quarter (SE $\frac{1}{4}$  of NW $\frac{1}{4}$ ) of Section Fourteen (14), Township Eight South, (8S), Range Three East (3E), run thence North 15 feet to an iron pipe which is the point of beginning; run thence East 668.5 feet to an iron pipe; run thence North 1,322 feet to an iron pipe; run thence West 668.5 feet to a point; run thence South 1,322 feet to an iron pipe, the point of beginning. Said land also being described as the West Half ( $\frac{1}{4}$ ) of the Southeast Quarter of Northwest Quarter (SE $\frac{1}{4}$  of NW $\frac{1}{4}$ ) of said Section, SAVE AND EXCEPT a strip of land 15 feet along the South side thereof which has been reserved for a roadway.

#### THIRD:

That the Respondent, Henry Styron is the owner of the following described real property situated in Baldwin County, Alabama, to-wit:

The West Half ( $\mathbb{W}_2^1$ ) of the Northeast Quarter of the Southwest Quarter ( $\mathbb{N}\mathbb{E}_2^1$  of  $\mathbb{S}\mathbb{W}_2^1$ ) of Section Fourteen (14), Township Eight South (8S), Range Three East (3E).

#### FOURTH:

That the Complainant and the Respondent are coterminous property owners and that a dispute exists between them as to the true and correct boundary line between said parcels of real property claimed by them respectively. The Complainant alleges that his true Southern boundary line runs East and West 15 feet North of the South line of the West Half of the Southeast Quarter of Northwest Quarter ( $\mathbb{W}_2^1$  of  $\mathbb{SE}_2^1$  of  $\mathbb{NW}_2^1$ ) of Section Fourteen (14), Township Eight South (8S), Range Three East (3E), and that the Respondent's North boundary line is the North line of the West Half of the Northeast Quarter of the Southwest Quarter ( $\mathbb{W}_2^1$  of  $\mathbb{SW}_2^1$ ) of said Section.

#### PRAYER FOR PROCESS:

The Complainant prays that Your Honor will cause the usual Writ of Process to issue to the Respondent requiring him to plead, answer or demur to the Bill of Complaint filed against him in this cause within the time required by the laws of the State of Alabama.

#### PRAYER FOR RELIEF:

The Complainant prays that upon a final hearing of this cause that Your Honor will make and enter an order and decree ascertaining and fixing the true boundary line between the property owned by the Complainant and the Respondent as above set out, and that the North boundary line of the property of the Respondent be ascertained and fixed as the North line of the West Half of the Northeast Quarter of the Southwest Quarter ( $W_2^1$  of  $NE_4^1$  of  $SW_4^1$ ) of Section Fourteen (14), Township Eight South (8S), Range Three East (3E), as fixed by governmental survey. The Complainant further prays that such judgment shall locate and define such boundary line and if the Court shall deem it necessary, that such line be marked in accordance with Title 47, Section 4 of the 1940 Code of Alabama. The Complainant prays for such other, further and general relief to which he may be entitled.

CHASON & STONE

y: Solicitors for Complainant

JESSE WALLACE

# The State of Alabama, Baldwin County

### CIRCUIT COURT, IN EQUITY

	vs.
ELIZABETH ANN WALLAC	E, Respondent
And the Control of th	<b>,</b>
This cause coming on to be heard was submit	ted upon Bill of Complaint, Decree Pro Confesso or
personal service by registered a	il nd Testimony as noted by the Register, and upon con
sideration thereof, the Court is of the opinion that the said bill.	ne Complainant is entitled to the relief prayed for in
It is therefore ordered, adjudged and decreed existing between the Complainant and Defendant be	by the Court that the bonds of matrimony heretofore, and the same are hereby dissolved, and that the said
Jesse Wallace	is forever divorced from the
said Elizabeth Ann Wallace	
voluntary abandonment.	
and on the state of the state o	
	The second of th
ays, neither party shall again marry except to each o  It is futher ordered that the Complainant and F  gain contract marriage upon payment of the cost of the cos	Respondent be, and they are hereby permitted to his suit.
the Complainant pay the co	st herein to be taxed, for which executed may issue.
This 24th day of February	<u>/</u> 19 59
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	Judge Circuit Court, In Equity.
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foregoing is a confidence of the Ci	in County, Alabama, do hereby certify that the orrect copy of the original decree, rendered by the reuit Court in the above stated cause, which said and enrolled in my office.
Witness	my hand and seal this theday
	, 19 <sub></sub>
	Register of Circuit Court, In Equity.

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THE CTATE OF ALABAMA

THE STATE OF ALABAMA BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

VS.

Respondent

## DIVORCE DECREE



FZB 27 1959

CLERK REGISTE