

NELLIE VALRIE,		
Complainant,		
-vs-		IN THE CIRCUIT COURT
FRANCIS WILLIAMS, ET AL,		OF BALDWIN COUNTY.
Defendants.		IN EQUITY. NO. <u>199</u> .

Comes the respondent, Francis Williams, and answering the bill of complaint filed against her in this cause says:

FIRST.

So far as this respondent knows complainant may be a resident of Baldwin County and over the age of twenty-one years. This respondent, however, does not admit the fact but demands strict proof thereof.

SECOND.

This respondent admits that she is over the age of twenty-one years.

THIRD.

This respondent denies that the complainant is in the quiet and peaceful possession of the property described in the third paragraph of the bill of complaint and respondent alleges that the complainant is not in possession of said property but she alleges that she herself, the respondent, is in possession of said property by her tenant.

FOURTH.

The respondent admits that she claims the property described in the complaint and she alleges that she does claim it and that she owns it and that she is in the possession of same, her title thereto being derived from a deed from Sarah Valrie dated June, 1934; that Sarah Valrie derived title by a deed from Ed Valrie by deed dated January 30th, 1931, and that Ed. Valrie derived title by deed from G. B. Stapleton who was in possession and claiming to own the land and this respondent alleges that she and those through whom she claims have been in quiet, peaceable, exclusive adverse possession of said lands for more than ten years and the ~~respondent~~ ^{complainant} has no title to the same, all of which this respondent is ready to prove.

Respondent therefore prays that the bill be dismissed at the cost of complainant.



 Attorney for Francis Williams.

NELLIE VALRIE,
Complainant,
VS.
FRANCIS WILLIAMS,
ET AL,
Defendants.

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

Comes the Complainant, NELLIE VALRIE, and humbly complaining against the Respondents, FRANCIS WILLIAMS and EMMET D. GOODRICH, respectfully represents and shows unto your Honor and this Honorable Court as follows:

FIRST:

That she is a bona fide resident of Montrose, Baldwin County, Alabama, over twenty-one years of age.

SECOND:

That the Respondent, FRANCIS WILLIAMS, is over twenty-one years of age and a resident of Prichard, Mobile County, Alabama; that the Respondent, EMMET D. GOODRICH, is over twenty-one years of age and a resident of Fairhope, in Baldwin County, Alabama.

THIRD:

That she is the owner and in the quiet and peaceable possession of the following described lands in Baldwin County, Alabama, to-wit:

Square No. 25 in the Village of Montrose, Baldwin County, Alabama, according to plat made by Gavin B. Yuille, Jr., recorded in Book "E", page 388 of the Baldwin County records.

FOURTH:

That the Respondents, FRANCIS WILLIAMS and EMMET D. GOODRICH, claim or are reputed to claim some right, title, or interest in, or encumbrance upon said lands.

FIFTH:

That no suit is pending to question or test the validity of

such claim, right, title, or interest in, or encumbrance of the said Respondents, and the Complainant, therefore, calls upon the Respondents, and each of them, to set forth and specify their right, title, or interest in, or encumbrance upon said land, and how and by what instrument the same is derived or created.

PRAYER FOR PROCESS:

Wherefore, the premises considered, Complainant prays that your Honor will, by proper process, make the said FRANCIS WILLIAMS and EMMET D. GOODRICH party respondents to this Bill of Complaint, requiring them 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.

PRAYER:

Complainant further prays that upon a final hearing of this cause this Honorable Court establish the title of the Complainant in and to the lands herein described and further find and decree that ^{neither} the said FRANCIS WILLIAMS and EMMET D. GOODRICH, nor either of them, have any claim, right, title, or interest in, or encumbrance upon the said lands herein described, or any part thereof, and grant unto your Complainant such other, further, different, or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Beebe + Hase
Solicitors for Complainant.

FOOT NOTE:

The Respondents, FRANCIS WILLIAMS and EMMET D. GOODRICH, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs First to Fifth, inclusive, but not under oath, oath being hereby expressly waived.

Beebe + Hase
Solicitors for Complainant.

R. S. DUCK
REGISTER AND CLERK
OF THE
CIRCUIT COURT, BALDWIN COUNTY
BAY MINETTE, ALA.

JANUARY 20, 1937.

Hon. B. F. McMillan, Jr.,
803-806 Van Antwerp Building,
Mobile, Alabama.

Dear Mr. McMillan:

Complying with your request, I am enclosing herewith the warrant and affidavit in the case of the State vs. Sarah Valrie, and the Chancery file in the case of Nellie Valrie vs. Francis Williams, et al.

Very truly yours,


R. S. Duck,
Clerk, Circuit Court.

RSD:MLF
Encls. 2

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

Francis.

WE COMMAND YOU, That you summon ~~Francis~~ Williams.

of Mobile . County, to be and appear before the Judge of the Circuit Court of Baldwin County, 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

Nellie Valrie.

against said Francis Williams.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 28th day of February 1936.

Robert S. Duck Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

NELLIE VALRIE,

Complainant,

vs

FRANCES WILLIAMS,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 199.

Williams
And now come the respondents, Emmett D. Goodrich,
and refers to the answer filed in said cause by ~~Nellie Valrie~~ *Frances Williams*
on to-wit March 27th, 1936, and by reference makes said answer
the answer of this respondent in said cause.

B. Williams
Solicitor for Respondent.

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Emmet D Goodrich.

of Baldwin. County, to be and appear before the Judge of the Circuit Court of Baldwin County, 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

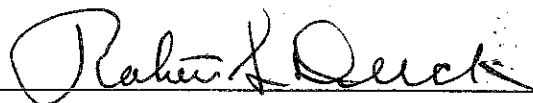
Nellie Valrie.

against said Emmet D Goodrich.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 28th day

of February. 1936



Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

NELLIE VALKIE,
Complainant,
VS.
FRANCIS WILLIAMS,
ET AL,
Defendants.

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

Comes the Complainant, NELLIE VALKIE, and humbly complaining against the Respondents, FRANCIS WILLIAMS and EMMET D. GOODRICH, respectfully represents and shows unto your Honor and this Honorable Court as follows:

FIRST:

That she is a bona fide resident of Montrose, Baldwin County, Alabama, over twenty-one years of age.

SECOND:

That the Respondent, FRANCIS WILLIAMS, is over twenty-one years of age and a resident of Prichard, Mobile County, Alabama; that the Respondent, EMMET D. GOODRICH, is over twenty-one years of age and a resident of Fairhope, in Baldwin County, Alabama.

THIRD:

That she is the owner and in the quiet and peaceable possession of the following described lands in Baldwin County, Alabama, to-wit:

Square No. 25 in the Village of Montrose, Baldwin County, Alabama, according to plat made by Gavin B. Nulle, Jr., recorded in Book "E", page 533 of the Baldwin County records.

FOURTH:

That the Respondents, FRANCIS WILLIAMS and EMMET D. GOODRICH, claim or are reputed to claim some right, title, or interest in, or encumbrance upon said lands.

FIFTH:

That no suit is pending to question or test the validity of

such claim, right, title, or interest in, or encumbrance of the said Respondents, and the Complainant, therefore, calls upon the Respondents, and each of them, to set forth and specify their right, title, or interest in, or encumbrance upon said land, and how and by what instrument the same is derived or created.

PRAYER FOR PROCESS:

Wherefore, the premises considered, Complainant prays that your Honor will, by proper process, make the said FRANCIS WILLIAMS and EMMET D. GOODRICH party respondents to this Bill of Complaint, requiring them 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.

PRAYER:

Complainant further prays that upon a final hearing of this cause this Honorable Court establish the title of the Complainant in and to the lands herein described and further find and decree that ^{neither} the said FRANCIS WILLIAMS and EMMET D. GOODRICH, nor either of them, have any claim, right, title, or interest in, or encumbrance upon the said lands herein described, or any part thereof, and grant unto your Complainant such other, further, different, or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Beecher & Hogg
Solicitors for Complainant.

FOOT NOTE:

The Respondents, FRANCIS WILLIAMS and EMMET D. GOODRICH, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs First to Fifth, inclusive, but not under oath, oath being hereby expressly waived.

Beecher & Hogg
Solicitors for Complainant.

7 months ago

Serve on ~~Emmet D. Goodrich~~

~~John P. Thompson~~
Circuit Court of Baldwin County
IN EQUITY

No. 199.

SUMMONS

~~Nellie Valrie.~~

vs.

Francis Williams, et al

Beebe & Hall,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this *March 27* day of _____

193_____

by leaving a copy of the within Summons with

Emmet Goodrich

Defendant

M. H. McIlhenny

Sheriff

By *E. W. Anderson*

Deputy Sheriff

RECORDED

Ducks

6-371

RECEIVED THE REGISTER

[Handwritten signature]

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Filed May 13, 1936

Robert S. Duck

Register

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124

188

RECORDED
Book
6-319

Serve on Francis Williams,
Pritchard Ala.
Circuit Court of Baldwin County
IN EQUITY

No. 199.
SUMMONS

Nettie Valrie.

10 vs.
X Francis Williams, et al.

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this 28

day of Sept, 1936

Robert H. Price
SHERIFF

Executed this 10 day of
March 1936

by leaving a copy of the within Summons with

Francis Williams

R. T. Selander
Defendant
Sheriff

By A. Turner
Deputy Sheriff

Bebe & Hall
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED
Duck
6-319

BILL OF COMPLAINT.

NELLIE VARRIE,

Complainant,

VS.

FRANCIS WILLIAMS, ET AL,

Respondents.

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

Filed Feb. 28, 1936

Robert S. Duck,
Register.

Faint, mostly illegible text, likely a legal document or official record.

RECORDED
Duck
6-272

Filed this 27th Nov. 1936
Robert S. Duck
Clerk-Register 7.

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...the provisions of the Act...

...the provisions of the Act...

...the provisions of the Act...

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...the provisions of the Act...

...the provisions of the Act...

Robert J. ...
Filed ...
1933

FRANCIS WILLIAMS, JR.,
ALABAMA,
IN SENATE,
JANUARY 1933.

BILL OF COMPLAINTS

THE STATE OF TEXAS,
COUNTY OF _____

WITNESSETH:

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

Witness my hand and the seal of the County Clerk of this County at the City of _____, this _____ day of _____, 19____.

County Clerk

WITNESSETH:

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

County Clerk

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

County Clerk

WITNESSETH:

County Clerk

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

County Clerk

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

County Clerk

WITNESSETH:

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

County Clerk

WITNESSETH:

That the within and foregoing instrument is the true and correct copy of the original instrument as the same appears from the records of the County Clerk of this County.

County Clerk

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County Clerk

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