NELLIE VALRIE,	Ž.	
Complainant,	X	The marks of the determine of the contracts
V S	<u> </u>	IN THE CIRCUIT COURT
FRANCIS WILLIAMS, ET AL,	Ä	OF BALDWIN COUNTY.
,	¥ .	IN EQUITY. NO. 199.
Defendants.	Ŷ	

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 Salrie 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, peacable, exclusive adverse possession of said lands for more than ten years and the respondent 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.

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Defendants.

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 twentyone 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:

question or That no suit is pending to/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 neither find and decree that/the said FRANCIS WILLIAMS and EMMET D. GOODRICH, nor either of them, have any plaim, 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.

Solicitors for Complainant.

### FOOT NOTE:

The Respondents, FRANCIS WILLIAMS and EMMET D. GOOD-RICH, 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.

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,

Clerk, Circuit Court.

RSD:MLF Encls. 2

# The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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

NELLIE VALRIE,	¥
Complainant,	TW GITT ATDALTE GATTOR AT
Vs	IN THE CIRCUIT COURT OF
FRANCES WILLIAMS,	BALDWIN COUNTY, ALABAMA
Respondent.	IN EQUITY. NUMBER 199.

and refers to the answer filed in said cause by Mallie Valrie on to-wit March 27th, 1936, and by reference makes said answer the answer of this respondent in said cause.

Solicitor for Respondent.

## The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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

MILLE VALUE.

Compleinant.

FRANCIS VILLIANS. ET AL.

pefenánnto.

IN THE CIRUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITE.

Genes the Complainant, NELLIE VALUE, and humbly complaining against the Respondents, FRANCIS WILLIAMS and MAMER D. GOODRIGH, respectfully represents and shows unto your Honor and this Monorable Court as follows:

## 777071

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

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That the Respondent, FRANCIS WILLIAMS, is over twentyone years of age and a resident of Prichard, Mobile County, Alabene; that the Respondent, EMBET D. GOUDRICH, is over twenty-one
years of age and a resident of Pairhope, in Baldwin County, Alabons.

## 1001117

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

Square No. 25 in the Village of Montrose, Boldwin County, Alebana, according to plat made by Cavin B. Yuille, Jr., recorded in Book "H", page 1980 of the Baldwin County records.

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That the Respondents, FRANCIS WILLIAMS and IMMET D. COUDRIGH, claim or are reputed to claim some right, title, or interest in, or encushrance upon said lands.

That no suit is pending to/test the validity of

Such Claim, right, title, or interest in, or enougheance of the said Respondents, and the Completeent, 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 PRODUCES:

Proper that your Monor will, by proper process, make the said PLANCIS WILLIAMS and MARKED, boodwards party respondents to the Sand Complaint, requiring them to Mead, enswer or deman to the same within the time and under the penaltics processible by law and the process of this positive Court.

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Complainant further prays that upon a finel hearing of this cause this Homorable Court establish the title of the Complainant in and to the lands herein described and further neither find and decree that/the said FRANCIS WILLIAMS and EMMET D. COURTCH, nor either of them, have any claim, right, title, or interest in, or endumbrance upon the said lands herein described, or any part thereof, and grant unto your complainant such there, 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.

FOUR MOTOR

The peopondents, FRANCIS WILLIAMS and EMERID, GOOD-RICH, and each of them, are required to answer each and every ellegation contained in the foregoing hill of Compleint, in Paragraphs First to Fifth, inclusive, but not under outh, outh being hereby expressly weired.

Solicitors for Complaining

Serve on Emmet D. Goodrich.

Rairhope Ala dia County of Baldwin County IN EQUITY

No. 199
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Nellis Valris.

Vs.

Francis Williams et al

Beebe & Hall.

Solicitor for Complainant

Solicitor for Complainant

Recorded in Vol. Page

By C. M. Andleson Deputy Sheriff

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BILL OF COMPLAINT.

NELLIE VALRIE,

Complainant,

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FRANCIS WILLIAMS, ET AL, Respondents

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

Filed Feb. 28, 1936 Robert D. Auck, Register

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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 ensumbrance upon said land, and how and by what instrument the same is derived or created.

## PRINTER FOR PROCEED.

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