

946

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 A.M.Grimsley,

Fayette, Alabama.

Fayette Ala.

~~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

Amos Garrett,

against said

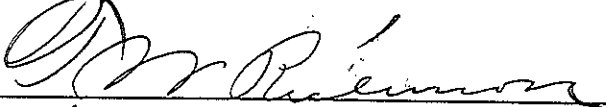
A.M.Grimsley,

Fayette Alabama,

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, T. W. Richerson, Register of said Circuit Court, this 15th day of

December, 1930.

 Register

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

2 Original

RECORDED

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Amos Garrett,

vs.

A.M. Grimsley,

Fayette Ala.

Beebe & Hall,

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this Dec 15th

day of December 1930

C. J. J. J.

Sheriff.

Executed this 16th day of

Dec

1930

by leaving a copy of the within Summons with

A. M. Grimsley

Defendant,

W. F. Berry

Sheriff.

By _____

Deputy Sheriff.

AMOS GARRETT,
Complainant,

vs

A. M. GRIMSLEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes Amos Garrett, Complainant in the above styled cause
and humbly complaining against A. M. Grimsley: shows,

FIRST:

That your Complainant is over the age of twenty-one years
and a resident of Robertsedale, Baldwin County, Alabama; that the
said A. M. Grimsley is over the age of twenty-one years and a resi-
dent of Fayette, Alabama.

SECOND:

That your Complainant is the owner of and is in the actual,
peaceable possession of the following described land, situated in the
County of Baldwin, State of Alabama, ever claiming to own the same,
to-wit:

The West half of the Northeast quarter of
Section Twenty-one, Township Six South of
Range Four East, containing 80 acres, more
or less.

THIRD:

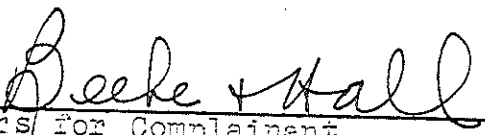
That the said Defendant claims or is reputed to claim some
right, title or interest in, or encumbrance upon the above described
land, or some part thereof, and your Complainant calls upon him to
set forth and specify his title, claim, interest or encumbrance upon
the same and how and by what instrument or instruments, the same is
derived or created.

FOURTH:

That no suit is pending to enforce or test the validity of
such title, claim or encumbrance upon the said land, or any part
thereof.

Wherefore your Complainant prays this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said A. M. Grimsley party defendant to this bill of complaint 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 practice of this Honorable Court.

Complainant further prays that upon a final hearing of the cause made by this bill of complaint, this Honorable Court will order and decree that the said Defendant, A. M. Grimsley has no right, title or interest in, or encumbrance upon the said land or any part thereof, and that the title to the said property be quieted and established in the Complainant as against the said A. M. Grimsley, and that the said A. M. Grimsley be forever enjoined from asserting, or attempting to assert, from claiming or attempting to claim any right, title or interest in, lien or encumbrance upon the said land, or any part thereof, and Complainant further pray for such other, further or different relief as in equity he shall be entitled to receive in the premises.


Solicitors for Complainant.

FOOT NOTE:

The Defendant is required to answer every allegation of the foregoing bill of complaint, paragraphs first to fourth, inclusive, but not under oath. Oath being hereby expressly waived.


Solicitors for Complainant.