

JAMES E. COTTRELL, :
 Complainant, :
 vs. : IN THE CIRCUIT COURT OF
 GEORGE T. HANSON, : BALDWIN COUNTY, ALABAMA.
 Respondent. :
 :

Comes the complainant and brings this bill of complaint against the Respondent, George T. Hanson, representing unto this Honorable Court, as follows:

1. The Complainant and the Respondent are both adult residents of Mobile County, Alabama.

2. On March 8th, 1927, George M. Hanson, now deceased, owned the following described real property in Baldwin County, Alabama, to-wit:

Block numbered Thirty (30) of Magnolia Beach, addition to town of Fairhope, as per map or plat thereof recorded in Miscellaneous Book No. One (1), Page 236, of the Probate Records of Baldwin County, Alabama, and being a portion of the property described in the deed from James A. Mackintosh and wife to George A. Tonsmeire, as Trustee, which is recorded in Record Book Seventeen (17) N.S., Page 345, of the Probate Records of Baldwin County, Alabama.

3. On to-wit March 8th, 1927, George M. Hanson, now deceased, executed a mortgage note securing Eleven Hundred (\$1100.00) Dollars, secured by property described above in this complaint, and has failed to pay the indebtedness due to the complainant under said mortgage note; and complainant has a lien against said property for the amount of said indebtedness, together with the interest thereon, from the date of said note.

4. The respondent is the only heir at law and next of kin of the said George M. Hanson, deceased.

The complainant seeks to enforce his lien against

said property by a foreclosure of the lien and a sale of the property for the satisfaction of the indebtedness due thereunder, and alleges that he is entitled to such relief.

P R A Y E R

Complainant prays that personal service be made against the respondent, according to law and according to the rules and practices of this Honorable Court, and that the respondent be required to plead, answer or demur hereto within the time allowed by law, or the rules and practices of this Honorable Court, and that at a hearing of said cause, this Honorable Court will order, adjudge and decree that the respondent is indebted to the complainant in the sum of Eleven Hundred (\$1100.00) Dollars, together with interest thereon from March 8th, 1927, and that the complainant has a lien on the property described herein for the satisfaction of said indebtedness, and prays that this Honorable Court order, adjudge and decree that the property be sold for the satisfaction of said indebtedness and lien, and that this sale be made by the Register in Chancery of the Circuit Court of Baldwin County, Alabama, sitting in Equity, and that such sale be reported to this Honorable Court for consummation, and if confirmed, the complainant prays that this court will order the said Registrar to execute a deed to the Purchaser of said property at said sale; and prays for such other, further and different relief as complainant may be entitled to in equity.


Solicitors for Complainant.

FOOTNOTE:

Respondent is required to answer the allegations contained in this bill of complaint, but answer under oath is expressly waived.


Solicitors for Complainant.

FOOTNOTE:

Respondent's address - Marine St. (between Baltimore and Seneca Sts.) Mobile, Ala.

RECORDED

James C. Leavelle
vs

George T. Hanson

Five-w. Sept 25/90
J. M. Hanson
De Jure

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 George T. Hanson,

Mobile Alabama,

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

James E. Cottrell,

against said

George T. Hanson

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 25th day of

September,

1931.

T. W. Richerson Register.

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

Copy

Serve on _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

James E. Cottrell,

Could not find

vs.

George T. Hanson,

1055 Maine

Caillard & Caillard,

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

The State of Alabama,
BALDWIN COUNTY.

Received in office this _____

day of _____ 193

Sheriff.

Executed this _____ day of _____

193

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____ Deputy Sheriff.

The State of Alabama, { **CIRCUIT COURT OF BALDWIN COUNTY,**
Baldwin County **IN EQUITY**

To Any Sheriff of the State of Alabama---GREETING:

WE COMMAND YOU, That you summon George T. Hanson,

Mobile Alabama,

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

James E. Cottrell,

against said

George T. Hanson

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 25th day of

September, 1931.

T. W. Richerson Register.

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

11/8/11 Original
Returned

Serve on _____
Circuit Court of Baldwin County
In Equity.

No. _____
SUMMONS
James E. Cottrell,

Not found in my County after diligent search and inquiry
this 13 day of Oct 1931
W. H. HOLCOMB, Jr., Clerk

By A. L. Palmer D. S.

vs.
George T. Hanson,

W. H. Holcomb, Jr., Clerk

Gaillard & Gaillard,
Solicitor for Complainant.

Recorded in Vol. _____ Page _____

The State of Alabama,
BALDWIN COUNTY.

Received in office this _____
day of _____ 1931

Sheriff.

Executed this _____ day of _____ 1931

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____
Deputy Sheriff.

JAMES E. COTTRELL,

Complainant,

vs

GEORGE T. HANSON,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Comes the complainant and moves the Court to
set aside the decree pro confesso heretofore rendered
against the respondent.


Solicitors for Complainant.

EQUITY NO 1003

~~RECORDED~~
~~227900~~

COTTRELL
COMPLAINANT

VS.

HANSON
RESPONDENT.

MOTION TO SET ASIDE DECREE RPO

CONFESSO

Filed Feb. 6th 1934
W. L. Dineen
clerk

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 George T. Hanson, Mobile, Ala.

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 James E. Cottrell

against said George T. Hanson

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 3rd day of November 1931

T. W. Richerson Register.

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

Alins
132
(Original)
RECORDED

Serve on _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

James E. Cottrell

vs.

George T. Hanson
Mobile, Ala.

Gaillard & Gaillard.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

RECORDED
The State of Alabama,
BALDWIN COUNTY.

Received in office this _____

day of _____ 1931

Dr. P. H. Holcomb
Sheriff.

Executed this _____ day of _____

Mar. 1931

by leaving a copy of the within Summons with

George T. Hanson
Defendant.

Dr. P. H. Holcomb
Sheriff.

By *K. Farmer*
Deputy Sheriff.