

1790

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETINGS:

WE COMMAND YOU, that you summons Edna C. Thiem to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by Maude H. Taylor, against the said Edna C. Thiem, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in wise omit, under penalty of the law. And we further command that you return this writ with your execution thereof.

WITNESS, Alice J. Duck, Register of said Court, this the 20 day of December, 1946.

Alice J. Duck
Register

MAUDE H. TAYLOR,)	
Complainant,)	
)	IN THE CIRCUIT COURT OF
vs.)	
)	BALDWIN COUNTY, ALABAMA
)	
EDNA C. THIEM, TRUSTEE,)	IN EQUITY.
Respondent.)	

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

Comes your Complainant, a resident of Baldwin County, State of Alabama, and over the age of twenty-one years, and avers that she is in peaceable possession and the owner of the following described real estate situated in the County of Baldwin, State of Alabama, to-wit:

All that part or portion of the Augustine LaCoste Spanish Grant known as section 30 (also known as section 39), township eight (8) south of range four (4) east which lies east of Bon Secour River and South of Boggy Branch containing 16.52 acres, more or less.


Complainant further avers that she claims to own said lands in fee simple in her own right; that no suit is pending to enforce or test the validity of her right, title, interest or claim in and to said land.

That the Respondent, Edna C. Thiem, trustee, is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and said Respondent claims or is reputed to claim some right, title, interest or encumbrance in and to the above specifically described land.

Your Complainant hereby calls upon the said Edna C. Thiem, trustee, to set forth and specify her title, claim, interest, or encumbrance in and to the said land specifically described above, or in and to any part thereof and to set forth and specify by what instrument the same are derived and created.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Edna C. Thiem, trustee, party Respondent to this cause of action, requiring ~~her~~ 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 hereof, your Honor will decree that the said Edna C. Thiem, trustee, has no estate, interest, right, title or encumbrance in and to the land specifically described above; that your Honor will give and grant your Complainant such other, further, different or general relief as she may be entitled to receive and as in duty bound she will ever pray.


Forest A. Christian, Foley, Alabama
Solicitor for Complainant