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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

RALPH W. SHRINER and

NEVA A. SHRINER,

of _____ 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

H. C. GREEN.

against said

RALPH W. SHRINER & NEVA SHRINER.

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 4th day of June 1937

Rs Duck

Register

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

H. C. GREEN,

Complainant,

VS.

RALPH W. SHRINER and
NEVA A. SHRINER,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Comes your Complainant, H. C. GREEN, and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That he is a bona fide resident of Alabama, over twenty-one years of age, his Post Office address being 554 Dauphin Street, Mobile, Alabama.
2. That the Respondents, RALPH W. SHRINER and NEVA A. SHRINER, are both over twenty-one years of age and non-residents of the State of Alabama, their Post Office address being C/o Peninsula Telephone Company, Tampa, Florida.
3. That your Complainant is in the quiet and peaceable possession, claiming to own the same in fee simple of the following described lands situated in Baldwin County, Alabama, to-wit:

That real property described as Block No. 55, containing 15 lots in Park City, located on the East side of Dolive Bay, as surveyed by Civil Engineer, Theodore Widell, and recorded in Miscellaneous Book No. 1, pages 230-231, Baldwin County records, in the Office of the Judge of Probate of Baldwin County, State of Alabama.

4. That your Complainant further alleges that the Respondents, RALPH W. SHRINER and NEVA A. SHRINER claim or are reputed to claim some right, title, or interest in or encumbrance upon the said land.
5. That Complainant further alleges that no suit is pending to question or test the validity of such claim, right, title or interest in or encumbrance of the said Respondent, or either of them, and the Complainant therefore calls upon the Respondents, RALPH W. SHRINER and NEVA A. SHRINER, to set forth and specify their respective rights, title or interest in or encumbrance upon said land and to show how and by what instrument the same is derived and/or created.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, the Complainant prays that your

Honor will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said RALPH W. SHRINER and NEVA A. SHRINER party respondents to this Bill of Complaint, requiring them and each of 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 FOR RELIEF

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 the said RALPH W. SHRINER and NEVA A. SHRINER have no 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 he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.


Solicitors for Complainant.

FOOT NOTE:

The Respondents, RALPH W. SHRINER and NEVA A. SHRINER, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 5, inclusive, but not under oath, oath being hereby expressly waived.


Solicitors for Complainant.

340
RECORDED 7-179
Sued

BILL OF COMPLAINT

H. C. GREEN,

Complainant,

VS.

RALPH W. STRINER and
NEVA A. STRINER,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN MOBILE.

Filed June 3, 1937

W. S. Beck,
Registrar

RECORDED
Dued
7-1-35

RECORDED

Serve on _____
Circuit Court of Baldwin County
IN EQUITY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. 340

Received in office this _____

SUMMONS

day of _____, 193_____

SHERIFF

H. C. GREEN

Executed this _____ day of _____

193_____

by leaving a copy of the within Summons with

vs.

Defendant

RABPH W. SHRINER &

Sheriff

NEVA A. SHRINER.

Deputy Sheriff

BERBE, HALL & BERBE
Solicitor for Complainant

Recorded in Vol. _____ Page _____