

1778

Mrs. Colvin W. Salley

Plaintiff

VS

Orie Bryars

Defendant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Now comes the Defendant in the above styled cause by his Attorney, Reuben F. McKinley, and moves this Honorable Court to ascertain the amount of taxes due on the said lands sued for, as well as other reasonable expenses, as provided for in Title 51, Section 296 of the 1940 Code of the State of Alabama and pronounce judgment for the Defendant clearing the title of the Defendant of the claim of the Plaintiff, as provided for in said title and section of the code. The Defendant alleges that the above styled cause was brought by the Plaintiff, who claims title under a tax deed, to eject the Defendant, the original owner of the land in question, who has remained in possession continuously since the tax sale.

  
ATTORNEY FOR THE DEFENDANT

1778  
Mrs. Colvin W. Salley

Plaintiff

VS

Orie Bryars

Defendant

Motion

From the Law Office of  
Reuben F. McKinley  
Bay Minette, Alabama

*Filed 4-2-62  
Arling J. French  
Clerk*

COUNTY OF BALDWIN      §

You are hereby commanded to summon Orie Bryars to appear within thirty days from the service of this writ, in the Circuit Court to be held for said County, at the place of holding the same, then and there to answer the complaint of Mrs. Colvin W. Salley.

Clerk of the Circuit Court of Baldwin  
County, Alabama.

## Defendant

Cause No. \_\_\_\_\_

of which she was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with \$250.00, for the detention thereof.

Attorneys for Plaintiff

this 7 day of March 1952  
TAYLOR WILKINS, Sheriff

1978  
RECORDED

dated April - 4 - 1952  
by serving copy of within Summons and  
Complaint on

Orrie Bryans

Taylor Wilkins  
George Herty

Mrs. Calvin W. Sallee  
V. C.  
Orrie Bryans.

Filed 3-31-52  
Arlene J. Ruck  
Clerk