

Mrs. Colvin W. Salley \* IN THE CIRCUIT COURT OF
Plaintiff \* BALDWIN COUNTY, ALABAMA
VS \*
Orie Bryars \*
Defendant \*

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

Mrs. Colvin W. Salley
Plaintiff

VS

Orie Bryars

Defendant

Motion

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

> Filed 4-2-6-2 Acrich-Lench.

STATE OF ALABAMA
COUNTY OF BALDWIN

To any Sheriff of the State of Alabama, -Greeting:

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.

Witness my hand, this the 310 day of April, 1952.

Clerk of the Circuit Court of Baldwin County, Alabama

## COMPLAINT

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MRS. COLVIN W. SALLEY,	: IN THE CIRCUIT COURT OF
Plaintiff	
and the second s	BALDWIN COUNAY, ALABAMA,
	2 Edit Render polytical AT. LAW territoria (1919)
ORIE BRYARS,	
	Cause No
Defendant	- <b>Q</b>

1. The plaintiff sues to recover possession of the following tract of land:

The W2 of NE2 of NE4, E2 of NW2 of NE4, W2 of NE4 of SE4, E2 of NE4 of SE4, SE4 of NE4 of NE4, E2 of NE4, SE4 of NE4, E2 of SW4 of NE4, W2 of SE4 of NE4, all lying and being in Section 32, Township 1 North, Range 4 East, Baldwin County, Alabama,

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 \$2.00, for the detention thereof.

Attorneys for Plaintiff

this I day of Marios 1778 RECORDED TAYLOR WILKINS, Sheriff mrs. Calvin W. Saley Ves. Ornie Bryans by serving copy of within Summons and Complaint on Filed 3-31-52 And Journ