



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 W. M. Cannon,

of Baldwin 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

Plummer Smith,

against said

W. M. Cannon.

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 2nd, day of July,

1918.

Register.

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

Original

Copy
Serve on W.M. Cannon.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. 111.

SUMMONS.

Plummer Smith

vs.

W.M. Cannon.

Page and Moorer, Bay Minette, Ala.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this _____

day of _____ 191

Sheriff.

Executed this July 3 day of
1918

by leaving a copy of the within Summons with

W.M. Cannon

Defendant

J.H. Dowell

Sheriff

By _____
Deputy Sheriff.

Plummer Smith,
Complainant.

vs

W. M. Cannon,
Defendant.

IN EQUITY.
IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

This cause coming on to be heard was submitted for decree on decree pro confesso against the said W. M. Cannon, the defendant named herein, as noted by the Register and upon consideration thereof, the Court is of the opinion the Complainant is entitled to the relief prayed for in his bill of complaint.

It is therefore, ordered, adjudged and decreed that the defendant, W. M. Cannon, has no right, title, or interest in, or encumbrance upon the lands described herein below or any part thereof; and the title and right of the Complainant, Plummer Smith, is good and valid as against said defendant W. M. Cannon.

The South half of the Northeast quarter of Southeast quarter Section Twenty-three, Township Four South of Range Four East, Baldwin County, Alabama, containing 20 acres more or less.

It is further ordered that the Register of this Court, within thirty days from the rendition of this decree, file a certified copy of said decree in the office of the Judge of Probate, Baldwin County, Alabama, for record therein, and the cost thereof be taxed as cost in this cause.

This decree is subject to the provisions of Sections 3170 and 3171 of the Code of 1907, and the complainant is hereby directed to send a certified copy of this decree to said defendant, W. M. Cannon if his place of residence can be ascertained.

It is further ordered that the defendant pay the costs of the court in this cause for which execution may issue.

In vacation, this 3rd day of October, 1918.

W. E. Gable
Judge of Second Judicial Circuit,
Baldwin County, Alabama.

5600
5804
2796

Filed 10/7/1918
D. W. McQuinn
Register

Recorded on Minutes

Plummer Smith,
Complainant.
vs
W. M. Cannon,
Defendant.

IN EQUITY.
IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA? -----SITTING IN EQUITY.

Plummer Smith, brings this his bill of complaint against W. M. Cannon, and thereupon your Orator complain and say:

FIRST.

That your Orator is over the age of twenty-one years and reside at Gateswood, Baldwin County, Alabama.

SECOND.

That the defendant, W. M. Cannon is a resident of the State of Alabama, residing at Fayette, Alabama.

THIRD.

That your Orator is in the peaceable possession of the following lands, located in Baldwin County, Alabama, claiming to own the same in their own right, to-wit:

The South half of the Northeast quarter of Southeast quarter of Section Twenty-three in Township Four South of Range Four East, containing 20 acres more or less.

FOURTH.

That the said defendant, W. M. Cannon, against whom this bill of complaint is exhibited, claims, or is reputed to claim, some right, title or interest in, or encumbrance upon, the said lands; that no suit is pending to enforce or test the validity of such title, claim or encumbrance; and that your Orator call upon the said defendant to set forth and specify his title, claim, interest in, or encumbrance upon, the said lands, and how and by what instrument the same was derived and created.

PRAYER FOR PROCESS.

That the said W. M. Cannon be made a party defendant to this bill of complaint, and that the usual process of this Honorable Court do forthwith issue to him, and that all such other steps be taken as may be necessary to properly bring the said defendant into Court in this cause.

PRAYER FOR RELIEF.

That the said defendant be required to set forth and specify his title, claim, or encumbrance ~~on the~~ ~~land,~~ or any part thereof, and how and by what instrument the same was derived and created; that upon the hearing of this cause it be adjudged and decreed by the court that the said defendant has no right, title or interests in, or encumbrance upon, the above described land, or any part thereof; and that the title and right of your Orator to said land, is good and valid as against said defendant.

Your Orator pray for such other further and general relief as he may be equitably entitled to, the premises considered.

And Orator will ever pray, etc.

P A G E & M O O R E R.
Solicitors for complainant

Foot Note.

The above named defendant is required to answer each paragraph of the foregoing bill of complaint, numbered from first to fourth, both inclusive, but not under oath, the benefit whereof is hereby expressly waived.

P A G E & M O O R E R,
Solicitors for complainant.