

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

319

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon William M Cannon,

of Fayette, 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

The Magnolia Springs Land Company, a Corporation,

against said

William 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 11th, day of November

1911.

T. W. Richerson
Register.

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

Original

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

The Magnolia Springs
Land Company, a Corporation.

vs.

William M Cannon.

Chas. Hall & Gordon and Eddington.

Solicitor for Complainant.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this.....

day of 191.....

Sheriff.

Executed this *13th* day of

Oct 19*11*.

by leaving a copy of the within Summons with

Wm M Cannon

Defendant

R A Burrow

Sheriff

By

Deputy Sheriff.

Recorded in Vol..... Page.....

*Mail to Sheriff of
Fayette Co. Fayette, Ala.*

THE MAGNOLIA SPRINGS LAND
COMPANY, a Corporation,
Complainant,

vs.

William M. Cannon,
Defendant.

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No.

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

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA:

The Bill of Complaint of

The Magnolia Springs Land Company, a corporation, organized under the laws of the State of Alabama, and doing business in said County of Baldwin, respectfully shows unto your Honor:

First, that the defendant, William M. Cannon, is a resident of the County of Fayette, and resides at Fayette, Alabama, in said County, and is over the age of twenty-one years.

Second, that complainant owns and is in peaceable possession of the following described real property in Baldwin County, Alabama, claiming to own same in its own right, namely:

The Southeast (SE $\frac{1}{4}$) quarter of the Southeast (SE $\frac{1}{4}$) quarter of Section five (5), in Township six (6) South of Range four (4) East, containing forty acres, more or less.

Third, that the defendant claims or is reputed to claim some right, title, or interest in, or incumbrance upon, the above described land, or some portion thereof, and that no suit is pending to enforce or test the validity of such title, claim or incumbrance.

Fourth, that complainant now calls upon said defendant to set forth and specify his title, claim, interest, or incumbrance, and how and by what instrument the same is derived and created.

PRAYER FOR PROCESS.

Complainant prays that your Honor will take jurisdiction of this cause and bring the said William M. Cannon into Court by due process as required by law.

PRAYER FOR RELIEF.

COMPLAINANT prays that upon the hearing of this cause, your Honor will order and decree that the defendant above named, has no right, title, interest or estate in, or to, or lien, or incumbrance upon the land or real estate described in the second paragraph of this bill of complaint, or any part thereof, and that said title to said land be vested in complainant. Complainant prays for such further, or other, or different relief as complainant may be entitled to, and to your Honor as may seem meet.

Chas. Hall & Gordon Edington

Solicitors for complainant.

FOOT NOTE:

The defendant is required to answer all of the allegations of each paragraph of the foregoing bill of complaint, from first to fourth, both inclusive, but not under oath, answer under oath being hereby expressly waived.

Chas. Hall & Gordon Edington

Solicitors for Complainant.

No. 319

The Magnolia Springs Land
Company, a corporation,
Complainant,

Vs.

William M. Cannon,
Defendant.

In Circuit Court of Baldwin
County, Alabama.

In equity.

Bill to quiet title.

Filed Oct 11th 1921
D. W. Keelson
Register

RECORDED

Chas. A. Gordon Edgington
Solicitor for Compt

heretofore expressly waived.

Chas. A. Gordon Edgington
Solicitor for Complainant

BOOK NOTE:

This bill is required to amend all of the allegations

allegations for complainant.

Chas. A. Gordon Edgington
Solicitor for Complainant

and to your honor as may seem meet.

or other, or different relief as complainant may be entitled to, or
land be vested in complainant. Complainant prays for such further,
bill of complainant, or any part thereof, and that said title be sold
the land or real estate described in the second paragraph of this
bill is subject or entangled in or by, or free, or unincumbered from
will order and decree that the defendant above named, has no right,
COMPLAINANT prays that upon the hearing of this cause, your honor

EMERSON NOT REPLIED.