

4460

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 E. A. Ruge,

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

J. W. Johnson,

against said

E. A. Ruge,

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 16th day of June,

1924.

T. W. Richerson

Register.

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

2 Original
Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

J. W. Johnson

RECORDED
RECORDED
RECORDED
RECORDED

vs.

E. A. Ruge.

Damp paper

RECORDED
RECORDED
RECORDED

Richardby, Beebe & Hall.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this 16th
day of June, 1924.

W. R. Stuart

Sheriff.

Executed this 18th day of
June, 1924

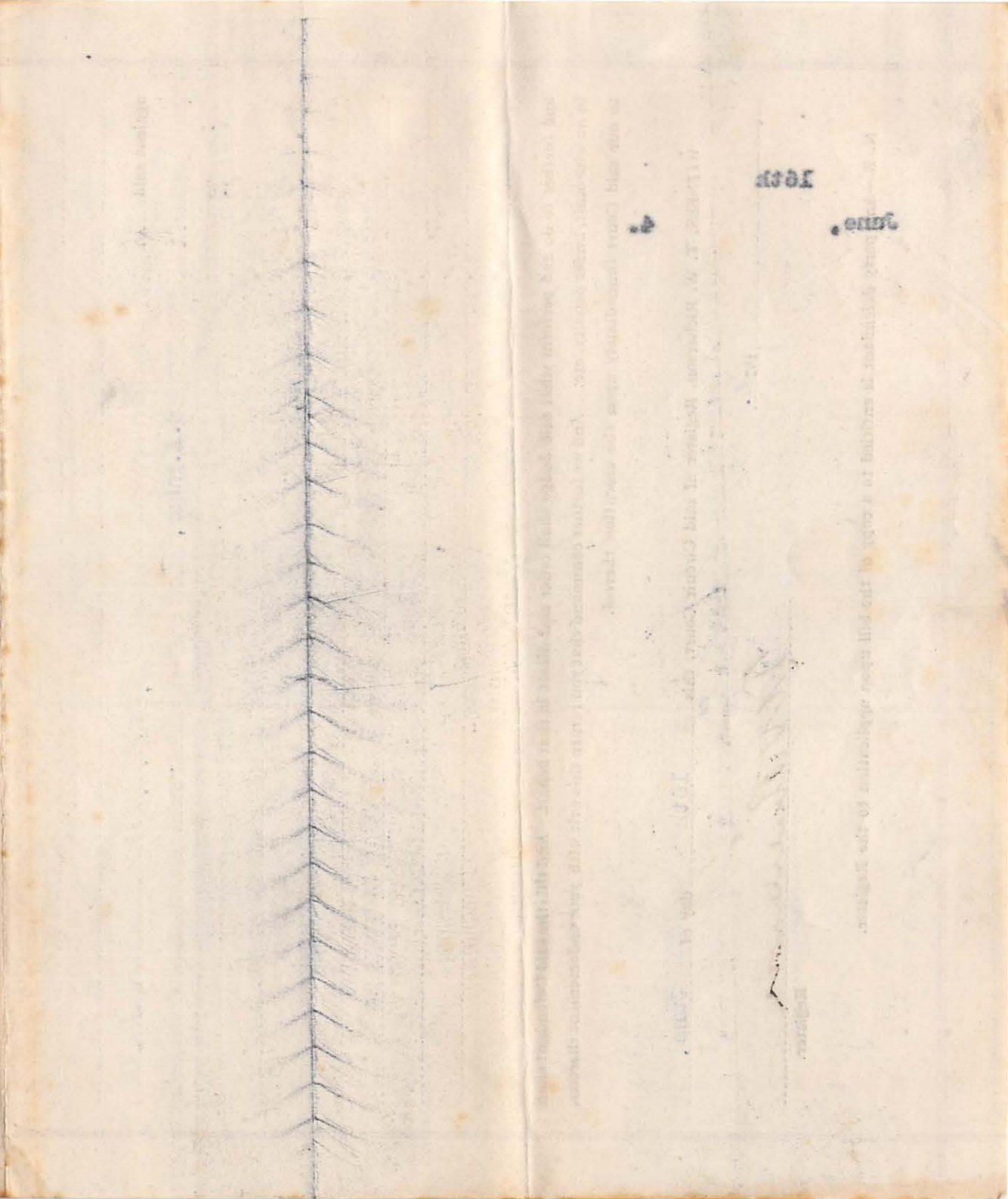
by leaving a copy of the within summons with
E. A. Ruge

Defendant.

W. R. Stuart

Sheriff.

By _____
Deputy Sheriff.



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

Comes J.W. Johnson, and humbly complaining
against E.A. Ruge, respectfully shows unto your honor, as
follows:-

FIRST: That your complainant J.W. Johnson
is over the age of twenty-one years and a resident of
Baldwin County, Alabama; that the said E.A. Ruge is over
the age of twenty-one years and a resident of Baldwin County,
Alabama

SECOND: That your complainant is the owner
of and in possession of the following described lands
situated in the County of Baldwin, State of Alabama:-

Being Lot No. Two (2) in Section Eighteen (18)
of Township Seven (7) South, Range Two (2) East, said lot
containing 57.71 acres, and being bounded North by the
Section line between Sections Seven (7) and Eighteen (18),
East by Lot One (1), South by Lot Three (3) and West by
Mobile Bay.

THIRD: That the said E.A. Ruge claims or
is reputed to claim some right, title, interest, claim or
demand in, or encumbrance upon the aforesaid lands; that
there is no suit pending to enforce or test the validity of
any such right, title, interest, claim or demand in or
encumbrance upon the aforesaid lands.

FOURTH: Wherefore, complainant calls upon
the said E.A. Ruge to set forth and specify any right, title,
interest, claim in or encumbrance upon the aforesaid lands
or any part thereof and how and by what instrument or
instruments the same is created or derived.

WHEREFORE complainant prays this Honorable
Court will take jurisdiction of the cause made by this bill
of complaint; that the said E.A. Ruge be made party defendant
hereto and by appropriate process be required to plead,

answer or demur within the time and under the usual penalties prescribed by law and the practice of this honorable court.

And Complainant further prays that upon the final hearing of this cause your honor will make and enter a decree that the said defendant E.A. Ruge has no right, title, interest, claim or demand in or encumbrance upon the aforesaid lands or any part thereof; that the title to said lands as against the said E.A. Ruge be forever quieted in your complaint and that complainant prays for such other further or different relief as in equity he shall be entitled to receive.

Rickarby, Beebe & Hall
SOLICITORS FOR COMPLAINANT

NOTE:

Defendant E.A. Ruge is required to answer every allegation of the foregoing bill of complaint, paragraphs one to four inclusive, but not under oath. Oath is hereby expressly waived.

Rickarby, Beebe & Hall
SOLICITORS FOR COMPLAINANT