

Francis Johnson,
Complainant.

-vs-

Henry Wright,
Defendant.

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA,
In Equity.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA, - In Equity.

Your petitioner, Francis Johnson, respectfully represents and shows unto Your Honor as follows:-

1. That your petitioner is over the age of twenty-one years and a resident of Baldwin County, Alabama, residing at Blacksher.

That Henry Wright is over the age of twenty-one years and a resident of Baldwin County, Alabama, residing at Blacksher.

2. That your petitioner is in peaceable possession of the following described lands, located in Baldwin County, Alabama, claiming to own the same in her own right, to-wit:-

The Northeast quarter of Section Eight (8) Township Three (3) North, Range Three(3) East.

3. That the defendant, Henry Wright, 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 above described land; that no suit is pending to test or enforce the validity of such title, claim or encumbrance; and that your petitioner calls upon the defendant, Henry Wright, to set forth and specify his title, claim, interest, in or encumbrance upon the said land above described, and how and by what instrument the same was derived and created.

PRAYER FOR PROCESS.

The premises considered your petitioner prays that the said defendant, Henry Wright, be made party respondent to this bill of complaint by the usual process of this Honorable Court and that he be required to demur, plead to or answer the same within the time required and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

Petitioner prays that upon the final hearing of this cause Your Honor will be pleased to decree that the said defendant, Henry Wright, has no interest, right, title or claim in, or encumbrance upon the property described in this bill of complaint, or any part thereof, and that the title of petitioner is good to the said property.

Petitioner further prays that if she is mistaken in the relief prayed for that Your Honor will grant unto her such other, further, different and general relief as he may in justice and equity be entitled, she will ever pray, etc.,

HAMILTON & MOORER,

Attorneys for Petitioner.

FOOTNOTE:

the respondent, Henry Wright, is required to answer each and every allegation in full of the foregoing bill of complaint, numbered 1 to 3, inclusive, but not under oath. Answer under oath is hereby expressly waived.

HAMILTON & MOORER,
Attorneys for petitioner.