

J. HAMILTON HASTIE,
Complainant,

v.

THE HEIRS AT LAW, PERSONAL
REPRESENTATIVES, EXECUTORS,
AND DEVISEES OF JAMES ABER-
CROMBIE, AND MRS. GLADYS B.
WILLETTS, MRS. VERA B. SCRIBNER
AND MISS BLANCHE MESLIER,
Respondents.

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The bill of complaint of J. Hamilton Hastie, complainant,
against the heirs at law, personal representatives, executors,
and devisees of James Abercrombie, and Mrs Gladys B. Willetts,
Mrs. Vera B. Scribner and Miss Blanche Meslier, respondents,
respectfully shows unto your honor:

FIRST.

Complainant is over the age of twenty-one year and resides in
Stockton, Baldwin county, Alabama;

Complainant has made diligent search to ascertain the names
and residences of the heirs at law, personal representatives, executors
and devisees of James Abercrombie, deceased, but is unable to as-
certain the same; but complainant is informed and believes, and upon
such information and beliefs states that they are non-residents of
the State of Alabama and are over the age of twenty-one years:
the respondent Mrs. Gladys B. Willetts is over the age of twenty-one
years and resides at 150 West Fifty-eighth Street in the City of New
York; and respondent Mrs. Vera B. Scribner is over the age of twenty-
one years and resides in the City of New York, but her more particular
address is to complainant unknown; the respondent Miss Blanche Mes-
lier is over the age of twenty-one years and resides in St. Louis, Miss-
ouri.

SECOND.

The complainant owns and is in the peaceable possession of that
certain land in Baldwin County, Alabama, known as the Hastie homestead
and particularly described as follows:

That certain piece, parcel or lot of land known as the Robert
or Barlow Moll
Gilchrist tract, being Section 43, township 1 south, range 2 east, and

2.

That certain piece, parcel of lot of land commencing at a point at the north east corner of the Robert Gilchrist tract, being section 43 in township 1 south, range 2 east, running thence north 38 degrees 45 minutes east 64 chains and 33 links to a point in section 11, township 1 south, range 2 east; thence south 52 degrees east 58 chains and 45 links to a point in section 13, township 1 south, range 2 east; thence south 52 chains and 20 links to a point in section 24 township 1 south range 2 east; thence west 31 chains and 58 links to a point in section 23, township 1 south, range 2 east; thence south 15 degrees and 30 minutes west 20 chains; thence west 61 chains and 39 links to a point on the east line of said Robert Gilchrist tract; thence north 18 degrees east along the east line of said Robert Gilchrist tract 61 chains and 31 links to the place of beginning, it being the same property reserved as a homestead of geclusa K. Hastie in deed from John F. Popp and Mary F. Popp, his wife, to A. W. Bryant and Peyton R. Tunstall Jr., recorded in deed book 3, pages 544-548 of the Baldwin County records.

THIRD.

~~That complainant's title to said real property is denied or disputed or is reputed to be denied or disputed by the respondent's herein who claim or are reputed to claim some right, title or interest in or to of lien upon the said real property and no suit is pending to enforce the validity of such right, title or interest.~~

Fourth

Complainant calls upon said respondents above named and upon each and all of them, to set forth and specify their title, claim, interest, ^{said} lien or encumbrance in, to or upon real property, and how and by what instrument the same is derived and created.

PRAYER FOR PROCESS.

~~complainant prays that by the state's writ of subpoena or by~~ process of publication, as may be appropriate, the said heirs at law personal representatives, executors, and devisees of James Abercrombie, and the said Mrs. Gladys B. Willette, Mrs. Vera B. Scribner, and Miss Blanche Meslier, be made respondents to this bill of complaint and be commanded to demur to, plead to or answer this bill of complaint within

the time allowed by law.

PRAYER FOR RELIEF.

Complainant prays that upon a hearing of this cause your Honor will order and decree that the respondents above named, and none of them have any right, title, interest, estate or claim in or to, or lien or encumbrance upon, said real property above described, or any part thereof; and complainant prays for such further or other or different relief as complainant may be entitled to, and to your Honor may seem meet.

---Brooks & McMillan - - - - -

Solicitors for Complainant.

Foot Note:

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

Brooks & McMillan.

Solicitors for Complainant.

State of Alabama,)
))
Baldwin County,)

Before me, W. H. McMillan, a Notary Public in and for said County, in said State, personally appeared J. Hamilton Hastie, who is known to me and who, being first duly sworn, says that the allegations of the foregoing bill of complaint are true.

Sworn to and subscribed before me this day of December
1918.

Notary Public, Mobile, Co. Ala.

J. HAMILTON HASTIE,
Complainant,

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Solicitors for Complainant.

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