

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 S. S. BAGGETT, MRS. JOE C. AARON and MRS. LENORA LONG, 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 WINSTON AARON against said S. S. Baggett, Mrs. Joe C. Aaron, and Mrs. Lenora Long, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendants 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, R. S. DUCK, Register of said Circuit Court,
this 17th day of May, 1940.

R. S. Duck
Register.

WINSTON AARON,

Complainant,

VS.

S. S. BAGGETT, MRS.

JOE C. AARON and

MRS. LENORA LONG,

Respondents.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA,

) IN EQUITY.

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, WINSTON AARON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That he is a resident of the State of Alabama, living at Owassa, and over twenty-one years of age.

2. That the Respondents, S. S. Baggett, Mrs. Joe C. Aaron and Mrs. Lenora Long, are all over twenty-one years of age and residents of Bay Minette, in Baldwin County, Alabama.

3. That John D. Aaron, the father of your Complainant, during his lifetime and at the time of his death owned the following described lands in Baldwin County, Alabama, to-wit:

Lots 1 and 2, in the Stapleton Addition to Bay Minette, as per plat of record in the office of the Judge of Probate of Baldwin County, Alabama;

that the said John D. Aaron died intestate, on to-wit, February 16th, 1928; that your Complainant is the son and only child of the said John D. Aaron, and was ten years old at the time of his father's death; that he attained the age of twenty-one years on December 23rd, 1939. *That The Complainant has not Conveyed said property*

4. That the above described property was, for the tax year 1930, assessed in the name of Mrs. Lenora Long, and on July 8th, 1931, sold by the Tax Collector to the State of Alabama, for the unpaid taxes, as is shown by Sales Book 8, page 13; that the consideration for said sale was \$23.18.

5. That on September 3rd, 1936, the property hereinabove described was, by the State Land Commissioner of Alabama, by Henry S. Long, sold and conveyed to Mrs. Joe C. Aaron, as is shown by

deed of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 60 NS, pages 135-6; that the consideration for said conveyance, as shown by said record, was \$141.00.

6. That on March 2nd, 1937, Mrs. Joe C. Aaron and Joe C. Aaron, her husband, conveyed the said property to S. S. Baggett, by Quit Claim Deed of record in Deed Book 61 NS, page 496, in the office of the Probate Judge of Baldwin County, Alabama; that the consideration for said conveyance, as shown by said deed, was \$205.06.

7. That the said S. S. Baggett is now in the possession and claiming to own said property.

8. That your Complainant, Winston Aaron, submits himself to the jurisdiction of the Court and agrees to abide by all orders and decrees, and to do equity as determined by this Court.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said S. S. Baggett, Mrs. Joe C. Aaron and Mrs. Lenora Long party respondents to this Bill of Complaint, requiring them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that your Honor will ascertain and determine the amount necessary to be paid by your Complainant to the said Respondents in order to redeem the property hereinabove described from the said tax sale.

Your Complainant further prays that upon a final hearing of this cause, your Honor will enter an order and decree authorizing and empowering him to redeem the said property from said tax sale, and requiring the said Respondents to convey said property to your Complainant, upon the payment of the amount ascertained by the Court necessary to redeem, and that in the event the said Respondents fail or refuse for a period of thirty days to execute the said conveyance, then the Register of this Court, upon the payment of said amount so ascertained, be authorized and empowered to execute conveyance to the Complainant, conveying any and all title that the said Respondents may have acquired in and by said tax sale

and the conveyances subsequent thereto.

Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL,

By: 
Solicitors for Complainant.

STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

Before me, O'Byrne Jones, a Notary Public, in and for said County, in said State, personally appeared WINSTON AARON, who is known to me and who having been by me first duly sworn, deposes and says, that he has read over and understands the facts stated in the foregoing Bill of Complaint; that said facts are true and correct.

Winston Aaron

Sworn to and subscribed before me
this 9th day of May, 1940.

O'Byrne Jones
Notary Public, Baldwin County,
Ala.

631 RECORDED
SUMMONS AND COMPLAINT

WINSTON AARON,

Complainant,

VS.

S. S. BAGGETT, ET AL.,

Respondents:

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

Filed May 17, 1940
R.S. Dunch, Clerk-Register

Received in sheriff office
this the 17th day of May 1940
W.R. Stuart Sheriff

Executed 5/18th 1940
by serving copy of within Summons and
Complaint on

Mr. Joe Arison,
Mr. Geneva Long and
S.S. Baggett

W.R. Stuart Sheriff
By M.B. Hamilton Deputy Sheriff