

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

COMPLAINT

COMES NOW, , (hereinafter referred to as " "), Plaintiff, by and through counsel, and files this its Complaint to confirm and quiet title and would show unto the Court the following:

1. The parties are:
  - a. Plaintiff, , a Mississippi corporation, whose address is .
  - b. Defendant, , which is the successor in interest to by virtue of a merger dated and may be served by delivering a copy of this Complaint and Summons to its registered agent, , at ;
  - c. Defendant, , is a Mississippi corporation, which may be served by process by delivering a copy of this Complaint and Summons to its registered agent, ,
  - d. Defendant, County, Mississippi, who may be served by process by delivering a copy of the Complaint and Summons to , Chancery Clerk for County, Mississippi, at .
  - e. Defendant, , in his/her capacity at Attorney General, who may be served at ;

f. Defendant, \_\_\_\_\_, in his/her capacity as District Attorney for \_\_\_\_\_ County, Mississippi, who may be served at \_\_\_\_\_ ;

g. All other persons, firms and corporations having or claiming any legal or equitable interest in the land hereafter described, all of whom are not to be found in the State of Mississippi after diligent search and inquiry therefore by agents of plaintiff and whose names, identities, post offices, post office addresses, and street addresses are all unknown to plaintiff, its officers and its agents and which cannot be ascertained after diligent search and inquiry therefore by agents of plaintiff.

2. \_\_\_\_\_ is the owner in fee simple absolute of that property fully described in Exhibit " \_\_\_\_\_ " attached hereto located in \_\_\_\_\_ County, Mississippi. \_\_\_\_\_ is in possession of said property.

3. \_\_\_\_\_ obtained said property by virtue of a "Quitclaim Deed and Assignment" filed for record in the office of the Chancery Clerk of \_\_\_\_\_ County, Mississippi, at Book \_\_\_\_\_, Page \_\_\_\_\_, from \_\_\_\_\_. A true and correct copy of said Quitclaim Deed is attached hereto as Exhibit " \_\_\_\_\_ ".

4. \_\_\_\_\_ obtained said property by virtue of that certain Tax Deed from the Chancery Clerk of \_\_\_\_\_ County, Mississippi, filed for record in the office of the Chancery Clerk of \_\_\_\_\_ County, Mississippi at Book \_\_\_\_\_ Page \_\_\_\_\_. A true and correct copy of said Tax Deed from the Chancery Clerk's Office is attached hereto as Exhibit "C". \_\_\_\_\_ is one and the same as "Corp Trust Dept \_\_\_\_\_" in said Deed.

5. The above-described interest of \_\_\_\_\_ was granted by \_\_\_\_\_ County, Mississippi. Pursuant to Miss. Code Ann. §11-17-19, therefore, \_\_\_\_\_ County, Mississippi, the Attorney General for the State of Mississippi and the District Attorney for \_\_\_\_\_ County, Mississippi are

named as nominal defendants in this action, and there is no requirement that title be detained to said property.

6. At that Tax Sale dated \_\_\_\_\_, the subject property was sold for taxes due and unpaid thereon for the year \_\_\_\_\_ to \_\_\_\_\_, predecessor in interest to \_\_\_\_\_, which became the purchaser thereof. Said land was properly assessed and said sale was made and certified in the manner required by law. After said sale remained on file in the office of the Chancery Clerk of \_\_\_\_\_ County, Mississippi for the redemption period of more than two years and all required notices were given by the appropriate authorities, the tax sale was not redeemed by any party.

7. After the time for redemption had passed, the Chancery Clerk of \_\_\_\_\_ County, Mississippi, executed a Tax Deed to \_\_\_\_\_, predecessor in interest to \_\_\_\_\_, a copy of which is attached as Exhibit " \_\_\_\_\_".

8. Although plaintiff believes that it and the named defendants are the only persons, firms or corporations who may be interested herein, the plaintiff makes unknown parties, as defendants herein in the event there are any such others having an interest in the subject property.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, \_\_\_\_\_, prays that upon a final hearing hereof, a judgment be entered confirming Plaintiff's tax title against all persons claiming to hold the land by title existing at the time of the sale for taxes and vesting in Plaintiff a good and sufficient title in said land, said judgment to be held as conclusive evidence that title to said land is vested in Plaintiff, as against all persons claiming same under the title existing prior to said sale for taxes.

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for