

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

, a Mississippi Corporation

VS.

THE KNOWN AND UNKNOWN HEIRS,
SUCCESSORS AND ASSIGNS OF:

, DECEASED, A/K/A Mr./Ms. ,
A/K/A ,

THE KNOWN AND UNKNOWN HEIRS,
SUCCESSORS AND ASSIGNS OF

, DECEASED;

THE KNOWN AND UNKNOWN HEIRS,
SUCCESSORS AND ASSIGNS OF

THE KNOWN AND UNKNOWN HEIRS,
SUCCESSORS AND ASSIGNS OF

, , , , AND

COMPLAINT TO ADJUDICATE TITLE

COMES NOW, PLAINTIFF, , a Mississippi Corporation, by and through its
counsel of record, and petitions this Court To Adjudicate Title of the subject property.

I.

That Defendant, , is an adult resident citizen of County, Mississippi, who
may be served with the process of this Court at his/her address of , Mississippi

That Defendant, , is an adult resident citizen of County, Mississippi, who
may be served at his/her address of , Mississippi,

That the other Defendants' street addresses and/or post office boxes are unknown after
diligent search and inquiry.

II.

That the Plaintiff, , a Mississippi corporation, acting by and through its duly
authorized President, , is an adult resident citizen of County.

III.

The Plaintiff would show unto this Court that the deraignment of title of the subject property, including some muniments, which subject property is described as the _____, County, Mississippi, is as follows:

1. The land was patented out of the sovereign and passed by mesne conveyances.
2. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, granted unto _____, the _____.
3. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, granted unto _____, his undivided _____ interest in the _____.
4. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, granted unto _____, the _____ of the _____, Section _____.
5. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, quitclaimed unto _____, the _____, Section _____.
6. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, granted unto _____, the _____, Section _____.
7. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, granted unto _____ and _____, the _____, Section _____.
8. In _____, Deed of Trust Book _____, Page _____, dated _____, _____, filed for record _____, _____, unto _____, Trustee and _____, Beneficiary, in original principal sum of \$ _____, due _____, covering the _____, and the _____, Section _____, _____. This Deed of Trust has been satisfied.
9. In _____, Deed of Trust Book _____, Page _____, dated _____, _____, filed for record _____, _____, unto _____, Trustee and _____, Beneficiary, in the original principal sum of \$ _____, due _____, covering the _____. This Deed of Trust has been satisfied.
10. By virtue of a Trust document on file in Deed Book _____, Page _____ and in Deed Book _____, Page _____, _____, is the Trustee of the _____ Land Trust. Said subject premises is included within the Trust.
11. In _____, Deed Book _____, Page _____, dated _____, _____, filed for record _____, _____, granted unto _____, the _____.
12. In _____, Chancery Cause # _____, the Estate of _____, Deceased, filed for record _____, _____, recites that _____ died intestate on _____, _____, and was survived by his widow/widower, Mr./Ms. _____, as his/her sole and only heir. The court file was closed _____, _____.

13. In Chancery Cause # , the Estate of , Deceased, filed for record , , recites that died testate on , and that all possessions and property are bequeathed and devised unto Mr./Ms. , his/her husband/wife. The court file was closed , .

14. As a matter in pias upon information and belief: and are deceased. The interest of descended into the Land Trust.

15. As to matter in pias upon information and belief any interest of descended to his/her husband/wife, .

16. a. A purported Last Will and Testament of Mr./Ms. , under date of , , devised and bequeathed to and husband/wife, , or the survivors of them, all his/her property of every kind and description, real, personal, or mixed, wheresoever situated, which he/she owned at the time of his/her death.

b. This will is not known to have been probated.

17. a. A purported Last Will and Testament of , under date of , , recited to devise and bequeath to his/her daughter/son, , all the remainder of his/her possession whether real, personal or mixed of whatsoever kind and wherever situated.

b. This will is not known to be probated.

18. If the referenced will of Mr./Ms. is found to be invalid upon information and belief, the possible heirs of Mr./Ms. a/k/a Mr./Ms. upon information and belief would be as follows:

died intestate and without children. He/She had siblings, all of whom are deceased as of . The sibilings and such as is known of the heirs is as follows:

1. ()
2. ()
3. ()
4. ()
5. ()
6. ()

IV.

Defendants' and Plaintiffs predecessors in possession, Land Trust and have been in actual, open and notorious, uninterrupted continual occupancy of the subject property, respectively, and as deeded since , and ouster claim title by adverse possession, pursuant to Mississippi Code of 1972 Annotated, Section 15-1-13.

V.

Defendants' and Plaintiffs predecessors in possession, _____, his/her heirs and the Land Trust have paid in full all taxes levied against the subject property from _____ to the present.

VI.

Defendants' and Plaintiffs predecessors in possession, _____, his/her heirs and the Land Trust have paid in full all insurance coverage for the subject property.

WHEREFORE PREMISES CONSIDERED, Plaintiff seeks that this Court vest full fee simple title by adverse possession to the subject property as follows:

Unto _____ :

The _____, Township _____, Range _____, _____ County, Mississippi.

Plaintiff further prays that it be granted such other relief, either general or specific, or both, to which they may be further entitled in the premises.

Respectfully submitted,

Attorney for

Of counsel:

Telephone:
MSB #
Attorney for