

IN THE CHANCERY COURT OF _____ COUNTY, _____

_____, a Corporation)	
_____)	
)	
V.)	NO. _____
)	
THE KNOWN AND UNKNOWN HEIRS,)	
SUCCESSORS AND ASSIGNS OF:)	
_____, DECEASED, _____ A/K/A)	
MRS. _____,)	
_____ 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 _____ 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, _____, who may be served with the process of this Court at her address of _____.

That Defendant, _____, is an adult resident citizen of _____ County, _____, who may be served at his address of _____.

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

II.

That the Plaintiff, _____, a _____ 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 South ½ of the NW 1/4 of the SE 1/4 of Section __, Township ____, Range ____, _____ County, _____ is as follows:

1. The land was patented out of the sovereign and passed by mesne conveyances.
2. In _____ Deed Book 90, Page 411, dated November 3, 1924, filed for record on _____, _____ granted unto _____ the N '2 of the SE 1/4, Section 17, T3N, R3E.
3. In _____ Deed Book 91, Page 429, dated _____, filed for record on _____, _____ granted unto _____ his undivided '2 interest in the N '2 of the SE 1/4, Section 17, T3N, R3E.
4. In _____ Deed Book 104, Page 394, dated _____, filed for record _____, _____ granted unto _____ the 5 '2 of the NW 1/4 of the SE 1/4, Section 17, T3N, R3E.
5. In _____ Deed Book 111, Page 485, dated _____, filed for record _____, _____ quitclaimed unto _____, the 5 '2 of the NW 1/4 of the SE 1/4, Section 17, T3N, R3E.
6. In _____ Deed Book 111, Page 487, dated _____, filed for record _____, _____ granted unto _____ the 5 '2 of the NW 1/4 of the SE 1/4, Section 17, T3N, R3E.
7. In _____ Deed Book 122, Page 377, dated _____, filed for record _____, _____ granted unto _____ and _____ the 5 '2 of the NW 1/4 of the SE 1/4, Section 17, T3N, R3E.
8. In _____ Deed of Trust Book 38, Page 241, dated _____, filed for record _____, _____ unto _____ and _____, Beneficiary, in original principal sum of \$102.00, due _____, covering the 5 '2 of the NW 1/4 of SE 1/4, Section 17, T3N, _____E and the N '2 of the NW 1/4 of the SE 1/4, Section 17, T3N, R3E. This Deed of Trust has been satisfied.
9. In _____ Deed of Trust Book 39, Page 204, dated _____ filed for record _____, _____ unto _____ Trustee and _____ Beneficiary, in the original principal sum of \$324.00, due _____, covering the NW 1/4 of the SE 1/4, Section 17, T3N, R3E. This Deed of Trust has been satisfied.
10. By virtue of a Trust document on file in Deed Book 590, Page 26 and in Deed Book 601, Page 655, _____, is the Trustee of the _____ Trust. Said subject premises is included within the Trust.

11. In _____ Deed Book 772, Page 665, dated _____, filed for record _____, _____ granted unto _____, the S 1/2 of the NW 1/4 of the SE 1/4 of Section 17, T3N, R3E.

12. In _____ Chancery Cause # _____, the Estate of _____, Deceased, filed for record on _____, recites that _____ died intestate on _____, and was survived by his widow, Mrs. _____, as his sole and only heir. The court file was closed on _____.

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 Mrs. _____, his wife. The court file was closed on _____.

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 wife, _____.

16. a. A purported Last Will and Testament of Mrs. _____, under date of _____ devised and bequeathed to _____ and wife, _____, or the survivors of them, all her property of every kind and description, real, personal, or mixed, wheresoever situated, which she owned at the time of 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 her daughter, _____, all the remainder of 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 Mrs. _____ is found to be invalid upon information and belief, the possible heirs of Mrs. _____ a/k/a Mrs. _____ upon information and belief would be as follows:

_____ died intestate and without children. She had seven (7) siblings, all of whom are deceased as of _____. The siblings and such as is known of the heirs is as follows:

1. _____ (two sons)
2. _____ (two children)
3. _____ (one child)
4. _____ (one child)
5. _____, widow of _____ (two children, one being _____)
6. _____ (one child)

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 deduced since _____, and ouster claim title by adverse possession, pursuant to _____ Code _____, Section _____.

V.

Defendants' and Plaintiffs predecessors in possession, _____, his 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 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 South 1/2 of the NW 1/4 of the SE 1/4 of Section 17, Township 3 North, Range 3 East, _____ County, _____.

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,
