IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE, TENNESSEE

HAROLD MASON BROWN, SR., )
Plaintiff, )
vs. ) CIVIL ACTION NO. 77-1095-II
GOLDIE B. BROWN, )
Defendant. )

JUL 14 MISC 8* 4.00 * 4.00

ABSTRACT OF COMPLAINT

The complaint in this cause is to set aside a final decree of divorce entered on August 23, 1973, in Minute Book 83A, Page 204 in the case of Goldie Bee Brown vs. Harold Mason Brown, Sr. in the Fourth Circuit Court of Davidson County, Docket Number 69238, to have the interest of plaintiff Harold Mason Brown, Sr. which was divested out of him and vested in the defendant herein Goldie B. (Bee) Brown, revested in the plaintiff Harold Mason Brown, Sr. along with any interest in personal property which may have been divested out of him and that said final decree be held void and of no effect.

Said real estate is more fully described as follows:

A tract of land in the 2d, formerly 5th Civil District of Davidson County, Tennessee, described as follows:

BEGINNING at the northeast corner of the property conveyed to Cora Lee Bowling Morgan by deed from Joseph R. West, Clerk and Master, of record in Book 981, Page 496, Register's Office for said County, in W.W. Goodwin's northwesterly line; thence with Goodwin's northwesterly line North 47° East 189 feet to the southwesterly right-of-way line of the N. C. & St. L. Railroad; thence with said right-of-way line North 39° West 120 feet to J.T. Barrett's southeast corner; thence with Barrett's southeasterly line south 49 1/2° West 189 feet to Morgan's northwest corner; thence with Morgan's northeasterly line South 46° East 120 feet to the beginning, containing one-half acre, more or less.

Being the same property conveyed to Harold Mason Brown, Sr. and wife, Goldie B. Brown by deed from Guy Wallace and wife, Dorris D. Wallace of record in Book 4483, Page 178, Register's Office for said County.

The complaint prays in the alternative if the divorce decree not be set aside for recovery from the defendant Goldie B. Brown of sums applied on the real estate, purchase money obligation by the plaintiff since August 23, 1973 and also sums paid to her by the plaintiff for her support by reason of the concealment and failure to disclose the divorce by Goldie B. Brown and amounts paid for the improvements on the real estate and for additions to the personal property. The complaint prays that the amount of the recovery allowed to Plaintiff against the Defendant be declared an equitable lien on the real estate described above or for adjudication that the real estate and personal property is held by defendant subject to a constructive trust in favor of plaintiff for such sums.

The complaint prays further for general relief.

The complaint is duly sworn to by the Plaintiff.

RUTHERFORD, CROCKETT & GUENTHER
306 Nashville City Bank & Trust Bldg.
Nashville, Tennessee 37201

BY: J. Vaulx Crockett
J. VAULX CROCKETT, Solicitor

CERTIFICATE

RAYMOND L. BARRETT, Clerk and Master, does hereby certify that the above is abstract of the Complaint filed in the above styled cause on the 14th day of July, 1977 in the Chancery Court at Nashville, Tennessee.

Given under my hand and official seal of office this the 14th day of July, 1977 and 202nd year of American Independence.

RAYMOND L. BARRETT, CLERK AND MASTER

BY Dan Burwell
DEPUTY CLERK AND MASTER

IDENTIFICATION REFERENCE

FILED
JUL 14 11 35 AM '77
DAVIDSON COUNTY, TENN.
REGISTER

E 14379