



20240419000114640 1/3 \$28.00
Shelby Cnty Judge of Probate, AL
04/19/2024 03:19:47 PM FILED/CERT

In the Circuit Court of Shelby County, Alabama

The Estate of Annie P. Perry

VS

Darnell Williams
Real Estate Agent Keller Williams Hoover

Request to Expunge Notice of Lis Pendens

To the Clerk of Shelby County, Alabama State:

You are hereby notified that on the 18th day of April, 20 24, that I
Lovell Perry on behalf of The Estate of Annie Perry petitions the court to
expunge the Notice of Lis Pendens record 20220922000365640 filed by
Darnell Williams Real Estate Agent Keller Williams. This request is being submitted because
Darnell was the listing agent for my property located at 333 Normandy Lane, Chelsea, AL 35043 more than 3 years ago. I
exercised my right to cancel a real estate deal before going to the closing table, therefore I do not owe any money to Darnell
Williams for commission. Alos, jewelry valued at \$60,000K was stolen from my home while Darnell had the home listed
which more than compensates for any commission he would have received had the home sold.

The original Lis Pendens suit was instituted by the undersigned in the above captioned and styled
cause in the Probate Court of Shelby County, Alabama and that the
following are all the names of parties to said suit:

Darnell Williams Real Estate Agent Keller Williams Hoover

Plaintiff(s)

V.

The Estate of Annie P. Perry

Defendant(s)

Original Suit:

Lis Pendens in the amount of \$33,900 filed 09/21/2022 for Real Estate Commission.

REF: 20220922000365640 1/2 Shelby Cny Judge of Probate, AL 09/22/2022 10:06:54 AM
FILED/CERT.

Described Real Estate:

BEG @ INTER MOST SLY COR Lot 52 Courtyard Manor MB 35 PG 144 & E ROW

Normandy Lane NE 413.76 E49.28 SW 452.75 TO POB

Parcel ID 14-1-01-4-002-023.000

Plat Book: 35 / Plat Page: 144

Census Tract: 030214 / Block: 2094

Lat: 33.320312 Lon: -86.695585

Commonly known as: 333 Normandy Lane, Chelsea, AL 35043

Plaintiff(s) Signature

LOVELL PERRY, JR

Plaintiff(s) Printed Name

4/19/2024 (Date)

STATE OF ALABAMA

COUNTY OF shelby

Subscribed and sworn before me this 19th day of April, 2024 By
Lovell Perry JR who personally appeared before me.

IN WITNESS WHEREOF, I have hereunto set my official hand and seal the day and year above written.

Kellie R Haller Notary

Printed Name: Kellie R Haller

My Commission Expires: 10/20/27

This document was prepared by:

Lovell Perry, Jr. on behalf of the
Estate of Annie Perry
333 Normandy Lane
Chelsea, AL 35043



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PS-19

Rev. 1/13

Answer to Complaint

(Do not use this form for Evictions or Divorces)

Case Number:

20220922000365640

In the (check one): ☒ Circuit ☐ District ☐ Small Claims Court of Shelby County, Alabama

Darnell Williams, Real Estate Agent Keller Williams

Plaintiff's Name

v.

The Estate of Annie P. Perry

Defendant's Name

To the Defendant(s): You are being sued. The Plaintiff is the person who is suing you. The reason(s) the Plaintiff is suing you are listed in the *Complaint*.

If you disagree with the Plaintiff's claims, you must do the following things by the deadline:

(The deadline is 14 days for District or Small Claims Court cases or 30 days for Circuit Court cases.)

- Fill out and sign this *Answer*. (Keep a copy for your records.)
- Mail or deliver a copy of this *Answer* to the Plaintiff or his/her lawyer at the address listed on the *Complaint*. Then to prove that you have done so, fill out and sign the *Certificate of Service* at the bottom of this page.
- Mail or deliver the original of this *Answer* to the Court Clerk by the deadline.

If you file and serve your *Answer* by the deadline, the court will mail you a notice with the date of your trial. At the trial, you can present evidence, bring witnesses, and tell the judge your side. **Important!** Even if you file an *Answer*, you still **must go to the trial**. If you do not go to the trial or file your *Answer* by the deadline, the judge may enter a default judgment against you for everything requested in the *Complaint*.

① Tell the court how you want to handle this case.

I am the Defendant in this case, and (check only one):

- a. ☐ I do not owe the Plaintiff any money, and I do not agree with the *Complaint*. I understand that if I check this box, there will be a trial and the Plaintiff will have to prove his/her case.
- b. ☐ I admit that I owe the Plaintiff money, but not the amount listed in the *Complaint*. I understand that if I check this box, there will be a trial. *Explain why you checked this box:* _____

Caution: If you made a payment after the *Complaint* was filed, ask the Plaintiff (or his/her lawyer) what the current balance is. You may be able to settle this case without going to court.

- c. ☐ I do not want a trial. I admit everything in the *Complaint*. I agree to pay: a judgment for the amount claimed, court costs, and any interest accrued at the legal rate (12%). I do not agree to pay a higher interest rate.
- d. ☐ I want to sue the Plaintiff (the person who is suing me). I claim the Plaintiff owes me (amount) \$ _____ because (explain): _____

I understand that if I check this box, there will be a trial. (If the case is in Circuit Court, you will have to pay a fee to file your counterclaim.)

- e. ☒ I ask the court to dismiss this case because (check all that apply):
- ☒ It was filed past the legal deadline (2 years for most personal injury or damage cases, 3 years for open accounts, 6 years for stated accounts and signed, written contracts).
 - ☒ I (or an adult in my home) was not personally served with the *Complaint*.

Sign here, then go to ② below: [Signature]

Date: 4/20/2024

- ② Fill out the box below. Next, mail or deliver a copy of this form to the Plaintiff or his/her lawyer, then sign below, and file the original of this *Answer* with the Court Clerk.

Certificate of Service

I certify that a true copy of this *Answer* was delivered or mailed to the Plaintiff or his/her lawyer on (date): _____, to this address: _____

street address

city

state

zip

Sign: [Signature]

Date: _____