

The State of Alabama, }
Baldwin County.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama--GREETING :

WE COMMAND YOU, That you summon Olive M. Comstock,

Coral Gables, Fla.

of _____ County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by F. C. Turner & Company,

against said

Olive M. Comstock,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 21st day of May 6 192

T. W. Richerson Register.

N. B.— Any party defendant is entitled to a copy of the bill upon application to the Register.

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

J.R. Duran Esq

vs.

Olive M. Courtlock

A.S. Morrison

Solicitor for Complainant

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

..... 192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

Recorded in Vol. Page

Mail copy of Bill to X

- ✓ 1 - William Raley,
New Orleans, La.
- ✓ 2 - ~~Ida Raley McLalet,~~
~~1449 E. Beach St, Biloxi, Miss~~
- ✓ 3 - George Raley,
1723 E Howard Ave, Biloxi, Miss
- ✓ 4 - Sophronia Raley Thornton
246 Oak St, Biloxi, Miss
- ✓ 5 - Grover Raley,
1125 E. Howard Ave, Biloxi, Miss
- ✓ 6 - ~~Louise Yancy Potter (Hold)~~
~~College Park, Atlanta, Ga~~
- ✓ 7 - Laura Hinati Cheatem
San Antonio, Texas.
- ✓ 8 - Gus Portovan,
Pascagoula, Miss.
- ✓ 9 - ~~Lorena Valeriani~~
~~Pensacola, Fla.~~

- ~~V-10- Mary Weston
W. Belmont St (near St. Johns
Cemetery) Passauga, Ala~~
- ~~V-11- Russel Putman
Arauton, Miss~~
- ~~V-12- Mary Fletcher Putman
Arauton, Miss~~
- ~~V-13- Victoria Fletcher Cubie,
Arauton, Miss~~
- ~~V-14- Virginia Fletcher
Arauton, Miss~~
- ~~V-15- Claude Fletcher
Arauton, Miss~~
- ~~V-16- Mike Fletcher
Arauton, Miss~~
- ~~V-17- Fritz Beck
Arauton, Miss~~
- ~~V-18- Mrs Silas Powell,
Passauga, Miss~~

V-19 - Fred Beck,
Forcagaula, Miss.

Issac Simmons Her

V 1 - Fred D Raley }
V 2 - Anna Raley } Bayou La Batre

V 3 - Etta Raley Banks
No 3 Harris st,

V 4 - Nora Raley Walker
No 3 Harris st,

V 5 - David Raley
No 2 Harris st,

V 6 - Ethel Raley Allen
815 Bay Avenue,

V 7 - Alice Henate X Hold
Broad st

V 8 - Ruby Henate Williams X Hold
Broad st

V 9 - Carrie Henate Ruel, X Hold
Broad st

Mobite
Ala

(Summons - case.)

V 10

Leow C Raley
Jackson, Ala

V 11 Ella Crane X Hald
~~Stanton, Ala.~~

V 12 Jennie Yancey -

V 13 William Yancey -

V 14 Lydia Yancey Phillips

} Daphne Hald

V 15 Frank Yancey X Hald
Spanish Gr.

V 16 - Artemus Villar (alias
Artemus Bullard)
Marlow

V 17 Martin B. Villar
Alberta,

FRED S. BALL
FRED S. BALL, JR.

BALL & BALL
ATTORNEYS AND COUNSELLORS
FIRST NATIONAL BANK BUILDING
MONTGOMERY, ALA.

May 2, 1927

Hon. T. W. Reisman, Clerk

Circuit Court

Bay Minette, Alabama

Dear Sir:

We enclose original and one copy of summons and complaint in the suit of C. M. Beckwith v. Baldwin Mutual Insurance Company, which we wish you would have served immediately on the President or the Secretary and let us know as soon as the service is made.

We are enclosing also original and copy of interrogatories propounded by the plaintiff to the defendant, which we wish you would serve immediately and let us know the date of the service.

We enclose ten cents in postage so that you may notify us promptly of any papers which may be filed in the case.

Yours very truly,



FSB/MCS

~~_____~~
Enc

State of Alabama,
Baldwin County.

In the Circuit Court.

To the Honorable John D. Leigh, Judge of the Circuit Court,
Baldwin County, Alabama. - - - - -In Equity.

Your petitioner F.C. Turner & Company, humbly complaining respectfully represents and shows unto your Honor and unto the Court as follows:-

FIRST:

That it is a corporation doing business in the State of Alabama, and its place of residence is Mobile, Mobile County, Alabama.

That D.S. Comstock, who is also known as Deane S. Comstock, is a who is ~~known~~ also known as Deane S. Comstock, is a resident of Coral Gables, in the State of Florida; that the said D.S. Comstock, is over the age of twenty one years and resided in the County of Baldwin, State of Alabama, up until a short time ago

SECOND.

That on to wit:- Betewen the date of October 22, 1924, and November 26, 1924, the said D.S. Comstock purchased from your petitioner a bill of material or goods, an itemized statement which is hereto attached and marked Exhibit "A" and made apert as though fully set out herein, said bill of goods and material purchased amounting to the sum of Four Hundred Eighteen & 97/100 Dollars, which is still due and unpaid.

That at the time of said purchase of the bill of material or goods by the said D.S. Comstock from your petitioner the said D.S. Comstock was the owner of the following described real estate, to-wit:

The Southeast quarter of Section thirty one, Township Four South, Range Four East, except 10 acres previously sold to Leon P. Comstock, containing one hundred and fifty acres more or less, lying and being in Baldwin County, Alabama.

THIRD.

That as stated herein, D.S. Comstock was the owner of the property herein described at the time of the purchase of the said material and that the said D.S. Comstock and his wife, Olive M. Comstock, made and executed to the Loxley Concrete and Construction Company, a deed purporting to convey the said real estate above described upon a recited consideration One & 00/100 ~~(\$1.00)~~ Dollars and other valuable considerations, a copy of which said deed is hereto attached and marked exhibit "B" and made a part hereof as though fully set out herein and your petitioner avers and states the truth to be that the conveyance, a copy of which is hereto attached and marked Exhibit "B" and made a part hereof, made and executed by the said D.S. Comstock, who is also known as Deane S. Comstock, and his wife Olive M. Comstock, to the Loxley Concrete and Construction Company was made for the sole and exclusive purpose of defrauding your petitioner to whom he was then indebted in the sum of \$418.97 as is fully shown by itemized statement hereto attached and marked exhibit "A" That in fact and in truth no consideration was paid by the said Loxley Concrete and Construction Company, to the said D.S. Comstock and wife, Olive M. Comstock, and that the said deed was executed without consideration and wholly and utterly void and the said D.S. Comstock reserved unto himself a secret equity in and to the real estate

herein set out and described.

PRAYER FOR PROCESS.

The premises considered your petitioner respectfully prays that the said D.S. Comstock and Olive M. Comstock, his wife and the Loxley Concrete and Construction Company, be made parties respondent to this original Bill of Complaint by the usual process of this Honorable Court and that they be required to demur, plead to or answer the same within the time prescribed by law and under pains and penalties as provided by law or that the same be forever be confessed.

PRAYER FOR RELIEF.

That on the final hearing of this cause that the said conveyance, copy of which is hereto attached as Exhibit "B" be declared fraudulent and void as to the debt of your petitioner and that it be ascertained by this Honorable Court by reference or otherwise the amount due owing from the said D.S. Comstock to your petitioner and that the said Loxley Concrete and Construction Company, be required by a proper decree of this Honorable Court to surrender the said conveyance to this Court and that the said conveyance be cancelled, avoided, annulled and set aside and that the records of said conveyance be so marked by the Register of this Honorable Court and that the real estate hereinabove described be subjected and sold to the satisfaction of your petitioners indebtedness.

That if your Petitioner is mistaken in the relief above prayed for that Your Honor will grant unto it such other, further and different ~~relief~~ and general relief as in justice and equity it may be entitled to receive under the allegations and proof it will ever pray. etc.

Henry D. Moorer

Solicitor for Complainant.

Foot Note: The respondents are required to answer each and every paragraph of the foregoing bill of Complaint numbered one to three both inclusive, but not under oath, answer under oath being hereby expressly waived.

Henry D. Moorer.

Solicitor for Complainant.

The State of Alabama, }
Baldwin County.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama--GREETING :

WE COMMAND YOU, That you summon D.S. Constock and Loxley

Concrete and Construction Company,

of Opelika, Ala. County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

F.C. Turner and Company,

against said

D.S. Constock and Loxley Concrete and Construction Co.,

and further to do and perform what said Judge shall order and direct in that behalf. And this the
said Defendant shall in no wise omit, under penalty, etc. And we further command that you return
this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 21st day of

May 1926

T. W. Richerson Register.

N. B.— Any party defendant is entitled to a copy of the bill upon application to the Register.

[Handwritten signature]

SERVE ON _____
Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

vs.

[Handwritten signature]

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this _____
day of _____ 192_____

Sheriff.

Executed this _____ day of _____
192_____

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.

The State of Alabama,
Baldwin County.

CIRCUIT COURT OF BALDWIN-COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING :

WE COMMAND YOU, That you summon ~~D. S. Comstock and Loxley~~

~~Concrete and Construction Company,~~

of ~~Coral Gables, Fla.,~~ ~~County~~ to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

~~F. C. Turner and Company,~~

against said

~~D. S. Comstock and Loxley Concrete and Construction Co,~~

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this ~~21st~~ day of

~~May~~ 192 ~~6.~~



Register.

N. B.— Any party defendant is entitled to a copy of the bill upon application to the Register.

J. J. [Signature]

SERVE ON _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

vs.

H. D. [Signature]

Solicitor for Complainant

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this _____
day of _____ 192_____

Sheriff.

Executed this _____ day of _____
192_____

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By _____ Deputy Sheriff.

herein set out and described.

PRAYER FOR PROCEEDS.

The premises considered your petitioner respectfully prays that the said W.S. Comstock and Olive M. Comstock, his wife and the Rowley Concrete and Construction Company, be made parties respondent to this original Bill of Complaint by the usual process of this Honorable Court and that they be required to appear, plead to or answer the same within the time prescribed and under pains and penalties as prescribed by law or that the same be forever be confessed.

PRAYER FOR DAMAGES.

That at the final hearing of this cause that the said conveyance, copy of which is hereto attached as Exhibit "A" be declared fraudulent and void as to the debt of your petitioner and that it be ascertained by this Honorable Court by reference or otherwise the amount due owing from the said W.S. Comstock to your petitioner and that the said Rowley Concrete and Construction Company, be required by express decree of this Honorable Court to surrender the said conveyance to this Court and that the said conveyance be cancelled, voided, annulled and set aside and that the records of said conveyance be so marked by the Register of this Honorable Court and that the real estate hereinabove described be subjected and sold to the satisfaction of your petitioners indebtedness.

That if your Petitioner is mistaken in the relief above prayed for that Your Honor will grant unto it such other, further and different relief and general relief as in justice and equity it may be entitled to receive under the allegations and proof it will aver, pray, etc.

Henry D. Hooper

Solicitor for Complainant.

Foot Note: The respondents are required to answer each and every paragraph of the foregoing Bill of Complaint numbered one to three both inclusive, but not underneath, answer underneath being hereby expressly waived.

Henry D. Hooper

Solicitor for Complainant.

State of Alabama,
Baldwin County.

In the Circuit Court,
In Equity.

To the Honorable John D. Leigh, Judge of the Circuit Court,
Baldwin County, Alabama. ---In Equity.
Your petitioner F. S. Furrow & Company, humbly complaining
respectfully represents and shows unto your Honor and unto
the Court as follows:-

FIRST:

That it is a corporation doing business in the State of
Alabama, and its place of residence is Mobile, Mobile County,
Alabama.

That D. S. Constock, who is also known as Deane S. Constock, is a
who is ~~also~~ also known as Deane S. Constock, is a resident
of Coral Gables, in the State of Florida; that the said
D. S. Constock, is over the age of twenty one years and resided
in the County of Baldwin, State of Alabama, up until a short time ago.

SECOND:

That on to wit: Between the date of October 23, 1924, and
November 23, 1924, the said D. S. Constock purchased from your
petitioner a bill of material or goods, an itemized statement which
is hereto attached and marked Exhibit "A" and made apart as
though fully set out herein, said bill of goods and material
purchased amounting to the sum of Four Hundred Eighteen & 97/100
Dollars, which is still due and unpaid.

That at the time of said purchase of the bill of material
or goods by the said D. S. Constock from your petitioner the said
D. S. Constock was the owner of the following described real estate,
to wit:

The Southeast quarter of Section thirty one, Township
Four South, Range Four East, except 10 acres previously sold
to Leon F. Constock, containing one hundred and fifty acres
more or less, lying and being in Baldwin County, Alabama.

THIRD:

That as stated herein, D. S. Constock was the owner of the
property herein described at the time of the purchase of the said
material and that the said D. S. Constock and his wife, Olive M.
Constock, made and executed to the Loxley Concrete and Construction
Company, a deed purporting to convey the said real estate above de-
scribed upon a recited consideration One & 00/100 Dollars (\$1.00)
Dollars and other valuable considerations, a copy of which said
deed is hereto attached and marked exhibit "B" and made apart
hereof as though fully set out herein and your petitioner avers
and states the truth to be that the conveyance, a copy of which
is hereto attached and marked Exhibit "B" and made apart
heretofore, made and executed by the said D. S. Constock,
who is also known as Deane S. Constock, and his wife Olive
M. Constock, to the Loxley Concrete and Construction Company was made
for the sole and exclusive purpose of defrauding your petitioner
to whom he was then indebted in the sum of \$418.97 as is fully shown
by itemized statement hereto attached and marked exhibit "A".
That in fact and in truth no consideration was paid by the Lox-
ley Concrete and Construction Company, to the said D. S. Constock and
wife, Olive M. Constock, and that the said deed was executed without
consideration and wholly and utterly void and the said D. S. Constock