3159

The State of Alabama
Baldwin County } **Circuit Court** **Equity**

To Frank Lee et al

You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by Vester E. Fuller Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this 29th day of Nov 195 3

Register

VESTER E. FICK Complainant VS. FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL, RUEBIN ARD, LEON COUCH and DONALD COUCH, RESPONDENTS	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY No._____

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Humbly complaining comes your complainant, Vester E. Fick and respectfully represents ad shows unto your Honor as follows:

1. That your Complainant is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama; that the respondents, Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberis, Agnes Hogans, Edna Mae Ezell and Ruebin Ard are each over the age of twenty-one years and all are residents of Escambia County, Florida; that the respondent Leon Couch is eighteen years of age and resides in Escambia County, Florida; that the respondent Donald Couch is sixteen years of age and resides in Escambia County, Florida.

2. That your complainant has been in actual, open, hostile, notorious, exclusive and continuous possession for more than ten years before the commencement of this action and has annually listed and paid in your complainant's name the taxes for more than ten years before commencing this action on the following described real property in Baldwin County, Alabama, to-wit:

The West Half (W½) of the Southeast Quarter (SE¼) of the Southwest Quarter, (SW¼) of Section 24, Township seven (7) South, Range five (5) East.

3. That your complainant as one of six heirs to said property on June 2, 1937, redeemed said property in her name by paying back taxes on said property for the years 1932-33-34-35- and 36, since which time she has annually assessed and paid the taxes on said property in her name; that immediately upon redemption of said property your complainant claimed said property exclusively as her own and as against all other heirs; that she took immediate possession which has been actual, open, notorious, exclusive and continuous possession since said redemption.

4. That your complainant claims all right, interest and title in fee simple to said property as against the named respondents who claim or are reputed to claim some right, title or interest in the above described lands.

5. That no suit is pending to enforce or test the validity of such title or claim.

The premises considered, your oratrix prays that your Honor will take jurisdiction of the parties and subject matter above set out that the named respondents may be made defedants to this

bill of complaint and proper process may issue from your Honor's Court requiring said respondents to plead answer or demur to this bill within the time required by law, and the rules of your Honor's Court. That said respondents be required to set forth and specify title, claim or interest in said lands and how the sam is derived and created. That your Honor will determine such title, claim or interest and will by decree vest title to the above described lands in your complainant, and if your complainant is mistaken as to the relief to which she is entitled your complainant prays for such other, further and different relief as to your Honor may seem meet and proper.

Arthur C. Epperson
Solicitor for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared, Arthur C. Epperson, who first being by me duly sworn, deposes and says, that he is informed and believes and upon such information and belief says that the allegations in the foregoing bill is correct and true.

Arthur C. Epperson

Sworn to and subscribed before me this the _____ day of December, 1953.

Clerk of the Circuit Court

3159

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
Complainant

VS.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL, RUEBIN ARD, LEON COUCH and DONALD COUCH,
Respondents

****

BILL OF COMPLAINT

****

FILED
DEC 29 1953
ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

VESTER E. FICK COMPLAINANT VS. FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERAS, AGNES HOGANS, EDNA MAE EZELL, and RUBIN ARD. RESPONDENTS	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

This cause coming on to be heard is submitted for final decree upon the complainant's bill of complaint, decree pro confesso on service by registered mail and testimony as noted by the Register; and upon consideration thereof the Court is of the opinion that the complainant is entitled to the relief prayed for in her bill of complainat. It is therefore, ordered, adjudged and decreed by the Court:

1. That the complainant Vester E. Fick, is the owner of the real estate described in the original bill in this cause, and which real estate is situated in the County of Baldwin, State of Alabama; and more particularly described as follows:

> The West Half (W½) of the Southeast Quarter (SE¼) of Southwest Quarter (SW¼) of Section Twenty-four (24), Township Seven (7) South, Range Five (5) East.

2. That Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell and Ruebin Ard, the respondents in this cause, have no right, title, or interest in to or upon said lands described above, or any part thereof.

3. That the Register within thirty days from this date, file a certified transcript of this decree for record in the Probate Court of Baldwin County, Alabama, the County in which said lands lie; and that the Probate Judge record and index said decrees as required by law.

4. That the complainant pay the costs of this suit to be taxed by the Register, for which let execution issue.

DONE THIS 1st DAY OF JULY, 1954.

Hubert M Hall
CIRCUIT JUDGE

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 3159

****

VESTER E. FICK
Complainant

VS

FRANK ARD, LEON ARD, SIDNEY ARD
RAYMOND ARD, WILHEIMINA GODWIN,
GEORGIA PORRAS, BESSIE LIBERIS,
AGNES HOGANS, EDNA MAE EZELL,
and RUEBIN ARD.
Respondents

****

DECREE

****

FILED
July 2 1954
ALICE J. DUCK, Register

VESTER E. FICK
Complainant

VS.
AGNES HOGAN, EDNA MAE EZELL,
FRANK ARD, LEON ARD, SIDNEY ARD,
RAYMOND ARD, WILHELMINA GODWIN,
GEORGIA PORRAS, BESSIE LIBERIS,
RUEBIN ARD, LEON COUCH, DONALD COUCH

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

STATE OF ALABAMA)
)
BALDWIN COUNTY)

AFFIDAVIT OF NONRESIDENCE & MINORITY

Personally appeared before me. Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, Arthur C. Epperson, solicitor of record for the complainant in the above entitled cause who being duly sworn, deposes and says that he is informed and verily believes that the follwoing respondents are non-residents and their residence and address is shown opposite of their names:

1. Frank Ard, Rt. 2, Box 616, Pensacola, Florida.
2. Leon Ard, Rt. 2, Box 616, Pensacola, Florida.
3. Sidney Ard, Rt. 2, Box 369,, Pensacola, Florida.
4. Raymond Ard, Rt. 2, Box 620, Pensacola, Florida.
5. Wilhelmina Godwin, 1008 North Z Street, Pensacola, Florida.
6. Georgia Porras, 1324 West Chase Street, Pensacola, Florida.
7. Bessie Liberis, 8 North G Street, Pensacola, Florida.
8. Agnes Hogan, (Mrs. Don. L. Hogan) Saufley Fld. Rd. Pensacola, Fla.
9. Edna Mae Ezell, Rt. 2, Box 318, Pensacola, Florida.
10. Ruebin Ard, Rt. 2, Box 318, Pensacola, Florida.
11. Leon Couch % Don Hogan, Saufley Field, Rd., Pensacola, Florida.
12. Donald Couch % Bessie Liberis, 8 North G. Street, Pensacola, Fla.

and that all of said respondents are over the age of twenty-one years, except, Leon Couch, who is a minor over the age of eighteen years, and Donald Couch, who is a minor over the age of sixteen years.

Arthur C. Epperson
Affiant

Sworn to and subscribed before me, this the 29th day of December, 1953.

Alice J. Duck
Alice J. Duck, Clerk of the Circuit Court, Baldwin County, Alabama.

3159.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
COMPLAINANT

VS.

FRANK ARD, LEON, ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGAN, EDNA MAE EZELL, RUBIN ARD, LEON COUCH, AND DONALD COUCH.
RESPONDENTS

****

AFFIDAVIT OF NONRESIDENCE

****

FILED
DEC 29 1953
ALICE J. DOCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

The State of Alabama
Baldwin County } Circuit Court Equity

To Agnes Hogan (Mrs. Leon L. Hogan)
Langley Fld Rd.
Pensacola - Fla -

You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by Vester E. Fick Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this 29th day of Dec 195.3

Nicy J. Warren.
Register

The State of Alabama
Baldwin County } Circuit Court Equity

To Leon Gooch
c/o Don Hogan
Sunflower Field Rd.
Pensacola - Fla.

You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by Vester E. Fiebe ..... Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this 29th day of Dec 1953

Register

ANSWER

VESTER E. FICK,	)	
COMPLAINANT	)	IN THE CIRCUIT COURT OF
VS:	)	BALDWIN COUNTY, ALABAMA
FRANK ARD, ET AL.,	)	IN EQUITY
RESPONDENTS	)	

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Come LEON ARD, SIDNEY ARD, RUEBIN ARD, and WILHELMINA GODWIN, by their attorney, Forest A. Christian, and demur to the said Bill of Complaint for the reason that there is no equity in the bill.

Attorney for Respondents
named herein

3159

ANSWER

VESTER E. FICK,

COMPLAINANT

VS:

FRANK ARD ,ET AL.,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

VESTER E. FICK)
Complainant)
)
Vs.)
)
FRANK ARD, LEON ARD, SIDNEY)
ARD, RAYMOND ARD, ET AL.,)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

No. _____

STATE OF ALABAMA)
BALDWIN COUNTY)

I, Dixie Peterson, Foley, Alabama, as register and commissioner have called and caused to come before me Vester E. Fick, Neal J. Fell, Joesph R. Fell witnessess named in the requirement for Oral Examination, on the 25 th day of June , 1954, at the Office of myself in Foley, Alabama, and having first sworn said Witnessess to speak the truth, the whole truth, and nothing but the truth, the said, Vester E. Fick, Neal J. Fell, Joseph R. Fell doth depose and say as follows:

My name is Vester E. Fick. I am sixty-four years of age and am a bona fide resident of Baldwin County, Alabama having lived here all of my life. Leon Ard, Frank Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell, And Rubin Ard are all residents of Escambia County, Florida and all are over the age of twenty-one years of age.

I have been in actual, open, hostile, notorious, exclusive and continuous possession for more than ten years before commencing this suit and I have annually listed and paid in my name the taxes for more than ten years before commencing this action and maintained my home claiming homestead exemption on the West Half of the Southeast Quarter of the Southwest Quarter of Section twenty-four, Township Seven South, Range Five East, in Baldwin County, Alabama.

The property was sold to the State of Alabama in 1932 for back Taxes and I as an heir redeemed the property on June 2, 1937 after first asking and giving all of the other heirs first chance to redeem the property. They all refused and said they didn't want the property. I told them all if I redeemed the property that I was claiming it for my own exclusive of any rights they might have. I had to pay back taxes for the years 1932, 1933, 1934, 1935, and 1936. I immediately upon redeeming the property took possession and have lived and maintained my home there every since. I have every since redeeming the property annually assessed and paid the taxes in my name and held an actual, open, notorious, exclusive and continous possession and claimed said property exclusively as my own since I redeemed the property in 1937.

There was no suit pending at the time I filed this suit to test the validity or title of my ownership of this property.

Vester E. Fick

My name is Joseph R. Fell. I am over sixty years of age and have lived in Baldwin County, Alabama all of my life. Vester E. Fick is my sister. In the year 1932 the West Half of the Southeast Quarter of the Southwest Quarter of Section 24, Township Seven South, Range Five East in Baldwin County, Alabama which belonged to my father was sold to the State of Alabama for taxes. My father was dead at that time. In 1937 there was all back taxes on the property for the years since it had been sold to the State of Alabama, due. My sister, Vester E. Fick in that year

said that she would like to have the property and would redeem it from the State for herself if none of the rest of the children or heirs wanted it. The only heirs at that time were my brothers and sisters. Vester Fick gave all of us who were heirs first opportunity to redeem the property in our names but none of us would do it. She then redeemed the property in her name and has regularly assessed and paid the taxes in her name since that time. Since 1936, Vester E. Fick has claimed the property as her own openly and exclusive of all of the other heirs. She has lived on the property and had continous, actual, open, hostile, exclusive and notorious possession of the property since 1937, or before. None of the heirs or their children, other than Vester E. Fick have ever claimed any right, title or interest to the property since Vester E. Fick redeemed it from the State, but all recognized her right and ownership.

Joseph R. Fell

MY NAME IS Neal J. Fell. I am over forty years of age and have lived in Baldwin County, Alabama, all of my life. Mrs. Vester E. Fick is my father's sister. Mrs. Fick redeemed the West Half of the Southeast Quarter of the Southwest Quarter of Section 24, Township Seven South, Range Five East, in Baldwin County, Ala. which had belonged to my fathers parents, in the year 1937from the State of Alabama by paying back taxes for the years 1932-1933, 1934, 1935 and 1936. Mrs. Fick before redeeming the property gave all of the heirs who were my uncles and aunts a chance to redeem it in their names before she redeemed it. She told them all that if she redeemed it, the property was to be hers alone and none of the others was to have any interest in it. They all agreed that it should be her property if she redeemed it as none of them would redeem it or help redeem it from the State. Mrs. Vester E. Fick has always lived on the place and had complete and exclusive possession of the property since 1937 when she redeemed it and has since then always claimed the property as her own exclusive of any of my grandfather's and grandmother's heirs.

Neal J. Fell

I Dixie A. Peterson, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself, Dixie A. Peterson at the time and place herein mentioned; that I have personal knowledge of said witnesses identity; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 25th day of June, 1954.

Dixie A. Peterson (SEAL)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK, Complainant

VS

FRANK ARD, LEON ARD, SIDNEY ARD,
RAYMOND ARD, ET AL..

Respondents

****

** ********

ORAL DEPOSITIONS

****

VESTER E. FICK
Complainant

vs.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, ET AL..
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

No.----------

DEMAND FOR ORAL EXAMINATION

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from BAY MINETTE, in the County of BALDWIN Alabama, the place of trial of said cause, to-wit:

VESTER E. FICK, JOSEPH R. FELL, NEAL J. FELL

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

Arthur C. Epperson
Solicitor for Complainant

NOTE:

Complainant suggests the name of Dixie A. Peterson as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Arthur C. Epperson
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION

_____ Complainant

vs.

_____ Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this_____day of_____

194____

FILED
JUN 25 1954
ALICE J. DUCK, Register

_____ Register

Moore Printing Co.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: DIXIE A. PETERSON, FOLEY, ALA.

KNOW YE: that we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine VESTER E. FICK NEAL J. FELL and JOSEPH R. FELL

as witnesses in behalf of VESTER E. FICK in a cause pending in our Circuit Court in Baldwin County, of said State, wherein VESTER E. FICK

Complainant

and FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA ~~XXX~~ GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL ~~and~~ RUBIN ARD.

Respondent

on oath, to be by you administered, upon THEM

to take and certify the deposition of the witness~~es~~ and return the same to our Court, with all convenient speed, under your hand.

Witness 25th day of June, 1954.

Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

VESTER E. FICK

Complainant—

vs.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, ET AL.

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

DIXIE A. PETERSON

WITNESSES:

VESTER E. FICK Complainant VS FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL and RUEBIN ARD. Respondents	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

Comes the complainant, Vester E. Fick, in the above styled cause and shows unto the register that a summons directed to the respondents, Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberis, Agnes Hogans, Edna mae Ezell and Ruebin Ard together with a copy of the complaint in this cause was issued and forwarded by registered mail on the 31st day of December, 1953, directed to said respondents at their places of residence as shown by sworn affadavit made a part of the bill of complaint. The lettersor packages was postage prepaid and the same marked "for delivery only to the person to whom addressed", and return receipt requested and demanded. Said demanded return receipts bearing the signatures of Georgia Porras, Edna Mae Ezell, Leon Ard, Raymond Ard, Agnes Hogans and Frank Ard was duly received and filed for record in this cause January 2, 1954. Said Demanded receipts bearing the signatures of Sidney Ard, and Wilhelmina Godwin was duly received and filed for record January 6, 1954. Said demanded receipts bearing the names and signatures of Ruebin Ard and Bessie Liberis was duly received and filed for record in this cause January 11, 1954. The said respondents have to this date hereof failed to plead, answer or demur to the bill of complaint, all of which appears of record in this cause.

Wherefore, complainant Vester E. Fick moves that a decree pro confesso be entered against said respondents.

This the 26th day of May, 1954.

Arthur C. Epperson
Attorney for Complainant

3159

IN THE CIRCUIT COURT OF

OF BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
Complainant

VS

FRANK ARD, LEON ARD, SIDNEY ARD, ET AL.
Respondents.

****
MOTION FOR DECREE PRO CONFESSO
****

FILED
MAY 27 1954
ALICE J. BUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

VESTER E. FICK Complainant VS FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL and RUEBIN ARD. Respondents	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

In this cause it appears to the Register that a copy of the bill of complaint and summons was sent to each of the respondents, Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell and Ruebin Ard at their addresses in Escambia County, Florida, by registered mail, postage prepaid, marked " for delivery only to the person to whom addressed", and return receipt demanded adressed totthe Register of this Court, andit further appearing that said return receipts are on file in this cause, and said Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell and Ruebin Ard, respondents, having been duly served with process more than thirty days prior to this date, and having failed to plead, answer or demur to the bill of complaint in this cause, it is now, therefore, on motion of the complainant ordered and decreed by the register that the said bill of complaint in this cause be and it is hereby, in all things taken as confessed against the named respondents.

This the 27th day of May, 1954.

Vester E. Fick
Register

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

** **********

VESTER E. FICK
Complainant

VS

FRANK ARD, LEON ARD, SIDNEY ARD. ET AL.

****

****

DECREE PRO CONFESSO

****

FILED
MAY 27 1964
JUDGE & CLERK, BALDWIN

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

VESTER E. FICK Complainant VS FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL and RUEBIN ARD. Respondents	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

In this cause it appears to the Register that a copy of the bill of complaint and summons was sent to each of the respondents, Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell and Ruebin Ard at their addresses in Escambia County, Florida, by registered mail, postage prepaid, marked " for delivery only to the person to whom addressed", and return receipt demanded adressed totthe Register of this Court, andit further appearing that said return receipts are on file in this cause, and said Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell and Ruebin Ard, respondents, having been duly served with process more than thirty days prior to this date, and having failed to plead, answer or demur to the bill of complaint in this cause, it is now, therefore, on motion of the complainant ordered and decreed by the register that the said bill of complaint in this cause be and it is hereby, in all things taken as confessed against the named respondents.

This the 27th day of May, 1954.

Register

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

** **********

VESTER E. FICK
Complainant

VS

FRANK ARD, LEON ARD, SIDNEY ARD. ET AL.

****

****

DECREE PRO CONFESSO

****

FILED
MAY 27 1954
ALICE L. DAILEY, REGISTER

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

VESTER E. FICK Complainant VS FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL, RUBIN ARD, LEON COUCH and DONALD COUCH. Respondents	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

Comes the complainant in the styled cause and amends her original bill of complaint so as to exclude Leon Couch and Donald Couch as parties respondents and makes the style of said cause as follows:

VESTER E. FICK
Complainant

Vs.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL, RUEBIN ARD
Respondents.

and excludes the said Leon Couch and Donald Couch from paragraph one of the bill of complaint as parties respondents and from the prayer for process.

Arthur C. Egbert
Solicitor for Complainant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 3159

****

VESTER E. FICK
COMPLAINANT

VS.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, ET AL..

****

AMENDMENT OT ORIGINAL BILL OF COMPLAINT

ANSWER

VESTER E. FICK, COMPLAINANT	)	
VS:	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
FRANK ARD, ET AL., RESPONDENTS	)	IN EQUITY

Comes R. L. COUCH, SR. as father and next friend of LINN COUCH (also known as LEON COUCH), a minor, and GORDON COUCH (also known as DONALD COUCH) a minor, and suggests that the Court appoint suitable guardians ad litem for these minors.

Attorney for R. L. Couch, Sr.

No 315-9

ANSWER

VESTER E. FICK,

COMPLAINANT

VS:

FRANK ARD, ET AL.,

RESPONDENTS

IN THE CIRCUIT COURTOF

BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

FEB 4 1954

ALICE J. DUCK, Clerk

8581. NOTE OF TESTIMONY

Printed by the Baldwin Times, Bay Minette, Alabama.

VESTER E. FICK

vs.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, ET AL..

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, and affidavit thereto; affidatit of non residence of respondents; Order of service upon respondents by registered mail, return receipt requested; decree pro confesso on service by registered mail, return receipt requested; demand for oral examination; Oral Depositions of complainants witnesses; Commission to take depositions

and in behalf of Defendant upon

Arthur C. Egerton

Solicitor for Complainant

Reise J. Duck

Register.

No. .....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

VESTER E. FICK

vs.

FRANK ARD, LEON ARD, SIDNEY ARD,

RAYMOND ARD, ET AL..

NOTE OF TESTIMONY

Filed in Open Court this 28th

day of June, 1954

Register.

Printed by the Baldwin Times

VESTER E. FICK
Complainant

VS.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE ERELL, RUBEIN ARD, LEON COUCH and DONALD COUCH,
Respondents

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

No. _____

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Humbly complaining comes your complainant, Vester E. Fick and respectfully represents and shows unto your Honor as follows:

1. That your Complainant is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama; that the respondents, Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberis, Agnes Hogans, Edna Mae Erell and Rubein Ard are each over the age of twenty-one years and all are residents of Escambia County, Florida; that the respondent, Leon Couch is eighteen years of age and resides in Escambia County, Florida; that the respondent Donald Couch is sixteen years of age and resides in Escambia County, Florida.

2. That your complainant has been in actual, open, hostile, notorious, exclusive and continuous possession for more than ten years before the commencement of this action and has annually listed and paid in your complainant's name the taxes for more than ten years before commencing this action on the following described real property in Baldwin County, Alabama, to-wit:

The West Half (W½) of the Southeast Quarter (SE¼) of the Southwest Quarter, (SW¼) of Section Twenty-four (24), Township seven (7) South, Range five (5) East.

3. That your complainant , as one of six heirs to said property on June 2, 1937, redeemed said property in her name by paying back taxes on said property for the years 1932-33-34-35 and 36, since which time she has annually assessed and paid the taxes on said property in her name; that immediately upon redemption of said property your complainant claimed said property exclusively as her own and as against all other heirs; that she took immediate possession which has been actual, open, notorious, exclusive and continuous possession since said redemption.

4. That your complainant claims all right, interest and title in fee simple to said property as against the named respondents who claim or are reputed to claim some right, title or interest in the above described lands.

5. That no suit is pending to enforce or test the validity of such title or claim.

The premises considered, your oratrix prays that your Honor will take jurisdiction of the parties and subject matter above set out, that the named respondents may be made defendants

to this bill of complaint and proper process may issue from your Honor's Court requiring said respondents to plead answer or demur to this bill within the time required by law, and the rules of your Honor's Court. That said respondents be required to set forth and specify title, claim or interest in said lands and how the same is derived and created. That your Honor will determine such title, claim or interest and will by decree vest title to the above described lands in your complainant, and if your complainant is mistaken as to the relief to which she is entitled your complainant prays for such other, further and different relief as to your Honor may seem meet and proper.

Arthur C. Epperson
Solicitor for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Alice J. Buck, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared, Arthur C. Epperson, who first being by me duly sworn, deposes and says, that he is informed and believes and upon such information and belief says that the allegations in the foregoing bill is correct and true.

Arthur C. Epperson

Sworn to and subscribed before me this the 29th day of December, 1953.

Alice J. Buck
Clerk of the Circuit Court

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
Complainant

VS.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL, RUEBIN ARD, LEON COUCH and DONALD COUCH,
Respondents

****

BILL OF COMPLAINT

****

FILED
DEC 29 1953
ALICE I. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

ALICE J. DUCK, Circuit Clerk

Baldwin County

BAY MINETTE, ALA.

INSUFFICIENT ADDRESS
Returned to Writer
Unclaimed From
Myrtle Grove Branch
Pensacola, Florida

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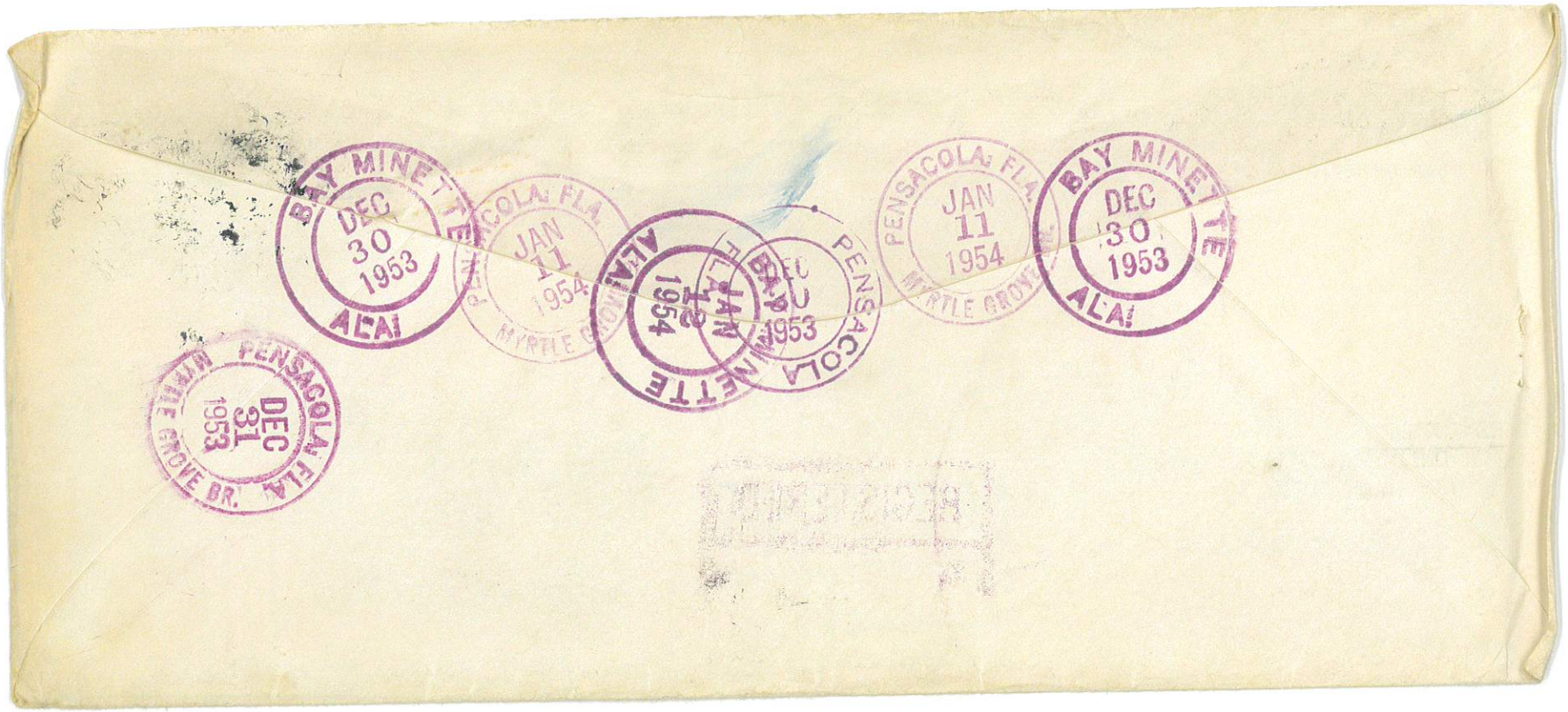
REGISTERED
No. 4315

Leon Couch c/o Don Bogan
Saufley Field Rd
Pensacola, Florida

170

Deliver to Addressee Only


BAY MINETTE
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ALA.
PENSACOLA, FLA.
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MYRTLE GROVE BR.
ALA.
JAN
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BAY MINETTE
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PENSACOLA, FLA.
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1954
MYRTLE GROVE BR.
BAY MINETTE
DEC
30
1953
ALA.
PENSACOLA, FLA.
DEC
31
1953
MYRTLE GROVE BR.

BOOK 211 PAGE 363

VESTER E. FICK COMPLAINANT VS. FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERAS, AGNES HOGANS, EDNA MAE EZELL, and RUBIN ARD. RESPONDENTS	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

This cause coming on to be heard is submitted for final decree upon the complainant's bill of complaint, decree pro confesso on service by registered mail and testimony as noted by the Register; and upon consideration thereof the Court is of the opinion that the complainant is entitled to the relief prayed for in her bill of complainat. It is therefore, ordered, adjudged and decreed by the Court:

1. That the complainant Vester E. Fick, is the owner of the real estate described in the original bill in this cause, and which real estate is situated in the County of Baldwin, State of Alabama; and more particularly described as follows:

> The West Half (W½) of the Southeast Quarter (SE¼) of Southwest Quarter (SW¼) of Section Twenty-four (24), Township Seven (7) South, Range Five (5) East.

2. That Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell ad Rubin Ard, the respondents in this cause, have no right, title, or interest in to or upon said lands described above, or any part thereof.

3. That the Register within thirty days from this date, file a certified transcript of this decree for record in the Probate Court of Baldwin County, Alabama, the County in which said lands lie; and that the Probate Judge record and index said decrees as required by law.

4. That the complainant pay the costs of this suit to be taxed by the Register, for which let execution issue.

DONE THIS 1st DAY OF July, 1954.

Hubert M. Hall
CIRCUIT JUDGE

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in above stated cause, which said decree is on file and enrolled in my office.
WITNESS MY HAND AND SEAL THIS THE 25 day of July, 1954

Alice J. Duck
Register of Circuit Court, in Equity

STATE OF ALABAMA, BALDWIN COUNTY
Filed 8-25-54 2 P. M
Recorded Ded by 211 page 363
M. Stuart
Judge of Probate

VESTER E. FICK
Complainant

VS.
AGNES HOGAN, EDNA MAE EZELL,
FRANK ARD, LEON ARD, SIDNEY ARD,
RAYMOND ARD, WILHELMINA GODWIN,
GEORGIA PORRAS, BESSIE LIBERIS,
RUEBIN ARD, LEON COUCH, DONALD COUCH)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

STATE OF ALABAMA)
)
BALDWIN COUNTY)

AFFIDAVIT OF NONRESIDENCE & MINORITY

Personally appeared before me. Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, Arthur C. Epperson, solicitor of record for the complainant in the above entitled cause who being duly sworn, deposes and says that he is informed and verily believes that the follwoing respondents are non-residents and their residence and address is shown opposite of their names:

1. Frank Ard, Rt. 2, Box 616, Pensacola, Florida.
2. Leon Ard, Rt. 2, Box 616, Pensacola, Florida.
3. Sidney Ard, Rt. 2, Box 369, Pensacola, Florida.
4. Raymond Ard, Rt. 2, Box 420, Pensacola, Florida.
5. Wilhelmina Godwin, 1008 North Street, Pensacola, Florida.
6. Georgia Porras, 1324 West Chase Street, Pensacola, Florida.
7. Bessie Liberis, 8 North G Street, Pensacola, Florida.
8. Agnes Hogans, (Mrs. Don. L. Hogan) Saufley Fld. Rd. Pensacola, Fla.
9. Edna Mae Ezell, Rt. 2, Box 318, Pensacola, Florida.
10. Ruebin Ard, Rt. 2, Box 318, Pensacola, Florida.
11. Leon Couch % Don Hogen, Saufley Field, Rd., Pensacola, Florida.
12. Donald Couch % Bessie Liberis, 8 North G. Street, Pensacola, Fla.

and that all of said respondents are over the age of twenty-one years, except, Leon Couch, who is a minor over the age of eighteen years, and Donald Couch, who is a minor over the age of sixteen years.

Arthur C. Epperson
Affiant

Sworn to and subscribed before me, this the _____ day of December, 1953.

Alice J. Duck, Clerk of the Circuit Court, Baldwin County, Alabama.

3159

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
COMPLAINANT

VS.

FRANK ARD, LEON, ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGAN, EDNA MAE EZELL, RUEBIN ARD, LEON COUCH, AND DONALD COUCH.
RESPONDENTS

****

AFFIDAVIT OF NONRESIDENCE

****

FILED
29 1953
CLERK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

ALICE J. DUCK, Circuit Clerk

Baldwin County

BAY MINETTE, ALA.

INSUFFICIENT ADDRESS
Returned to Writer
Unclaimed From
Myrtle Grove Branch
Pensacola, Florida

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RETURN RECEIPT REQUESTED

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TO WHOM ADDRESSED

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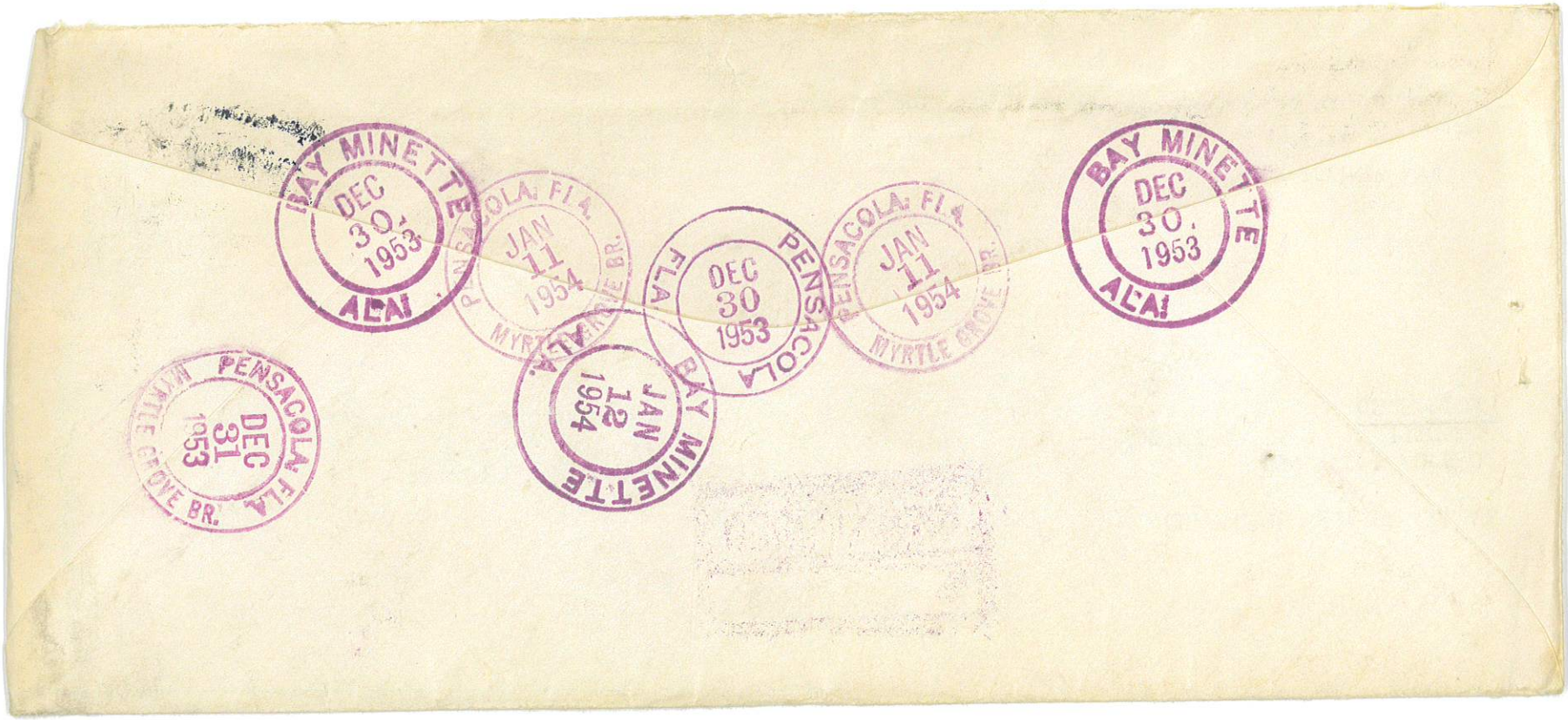
REGISTERED
No. 4313

Agnes Hogans (Mrs. Don L. Hogan)
Sauflay Fld Rd.
Pensacola, Florida

~~Deliver to Addressee Only~~


BAY MINETTE
DEC 30 1953
ALA.
PENSACOLA, FLA.
JAN 11 1954
MYRTLE GROVE BR.
PENSACOLA FLA
DEC 30 1953
BAY MINETTE ALA.
JAN 12 1954
PENSACOLA, FLA.
JAN 11 1954
MYRTLE GROVE BR.
BAY MINETTE
DEC 30 1953
ALA.
PENSACOLA, FLA.
DEC 31 1953
MYRTLE GROVE BR.

VESTER E. VICK Complainant .	
VS.	IN THE CIRCUIT COURT OF
FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA COBBIN, GEORGIA FORNES, EMERIE LIBERTE, ANNIE ROGANS, EDNA MAE EXELL, ROBERT ARD, LEON COUCH and DONALD COUCH,	BALDWIN COUNTY, ALABAMA IN EQUITY No._____
RESPONDENTS	

TO THE HONORABLE HERBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Humbly complaining comes your complainant, Vester E. Vick and respectfully represents as above unto your Honor as follows:

1. That your Complainant is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama; that the respondents, Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Cobbin, Georgia Fornes, Emerie Liberte, Annie Rogans, Edna Mae Exell and Robert Ard are each over the age of twenty-one years and all are residents of Escambia County, Florida; that the respondent Leon Couch is eighteen years of age and resides in Escambia County, Florida; that the respondent Donald Couch is eighteen years of age and resides in Escambia County, Florida.

2. That your complainant has been in actual, open, hostile, notorious, exclusive and continuous possession for more than ten years before the commencement of this action and has annually listed and paid in your complainant's name the taxes for more than ten years before commencing this action on the following described real property in Baldwin County, Alabama, to-wit:

The West Half (W½) of the Southeast Quarter (SE¼) of the Southeast Quarter, (SE¼) of Section 24, Township seven (7) South, Range five (5) East.

3. That your complainant as one of six heirs to said property on June 2, 1937 redeemed said property in her name by paying back taxes on said property for the years 1932-33-34-35- and 36, since which time she has annually assessed and paid the taxes on said property in her name; that immediately upon redemption of said property your complainant claimed said property exclusively as her own and as against all other claims; that she took immediate possession which has been actual, open, notorious, exclusive and continuous possession since said redemption.

4. That your complainant claims all right, interest and title in fee simple to said property as against the named respondents who claim or are reputed to claim some right, title or interest in the above described lands.

5. That no suit is pending to enforce or test the validity of such title or claim.

The premises considered, your orator prays that your Honor will take jurisdiction of the parties and subject matter above set out that the named respondents may be made defendants to this

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
Complainant

VS.

FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGANS, EDNA MAE EZELL, RUEBIN ARD, LEON COUCH and DONALD COUCH,
Respondents

****

BILL OF COMPLAINT

****

FILED
DEC 29 1953
ALICE J. COOK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

bill of complaint and proper process may issue from your Honor's Court requiring said respondents to plead answer or demur to this bill within the time required by law, and the rules of your Honor's Court. That said respondents be required to set forth and specify title, claim or interest in said lands and how the same is derived and created. That your Honor will determine such title, claim or interest and will by decree vest title to the above described lands in your complainant, and if your complainant is mistaken as to the relief to which she is entitled your complainant prays for such other, further and different relief as to your Honor may seem meet and proper.

Arthur C. Epperson
Solicitor for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared, Arthur C. Epperson, who first being by me duly sworn, deposes and says, that he is informed and believes the facts set forth in said bill of complaint and that such information and belief says that the allegations therein contained are correct and true.

Arthur C. Epperson

Sworn to and subscribed before me this the 29th day of December, 1953.

Deric French
Clerk of the Circuit Court

VESTER E. FICK COMPLAINANT VS. FRANK ARD, LEON ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERAS, AGNES HOGANS, EDNA MAE EZELL, and RUBIN ARD. RESPONDENTS	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY NO. 3159

This cause coming on to be heard is submitted for final decree upon the complainant's bill of complaint, decree pro confesso on service by registered mail and testimony as noted by the Register; and upon consideration thereof the Court is of the opinion that the complainant is entitled to the relief prayed for in her bill of complainat. It is therefore, ordered, adjudged and decreed by the Court:

1. That the complainant Vester E. Fick, is the owner of the real estate described in the original bill in this cause, and which real estate is situated in the County of Baldwin, State of Alabama; and more particularly described as follows:

> The West Half (W½) of the Southeast Quarter (SE¼) of Southwest Quarter (SW¼) of Section Twenty-four (24), Township Seven (7) South, Range Five (5) East.

2. That Frank Ard, Leon Ard, Sidney Ard, Raymond Ard, Wilhelmina Godwin, Georgia Porras, Bessie Liberas, Agnes Hogans, Edna Mae Ezell ad Rubin Ard, the respondents in this cause, have no right, title, or interest in to or upon said lands described above, or any part thereof.

3. That the Register within thirty days from this date, file a certified transcript of this decree for record in the Probate Court of Baldwin County, Alabama, the County in which said lands lie; and that the Probate Judge record and index said decrees as required by law.

4. That the complainant pay the costs of this suit to be taxed by the Register, for which let execution issue.

DONE THIS 1st DAY OF July, 1954.

Hubert M. Hall
CIRCUIT JUDGE

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in above stated cause, which said decree is on file and enrolled in my office.
WITNESS MY HAND AND SEAL THIS THE 12 day of July, 1954

STATE OF ALABAMA, BALDWIN COUNTY
Filed 8-25-54 2 P.M.
Recorded Decl by 311 page 363

VESTER E. FICK
Complainant

VS.
AGNES HOGAN, EDNA MAE EZELL,
FRANK ARD, LEON ARD, SIDNEY ARD,
RAYMOND ARD, WILHELMINA GODWIN,
GEORGIA PORRAS, BESSIE LIBERIS,
RUBIN ARD, LEON COUCH, DONALD COUCH

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

STATE OF ALABAMA)
)
BALDWIN COUNTY)

AFFIDAVIT OF NONRESIDENCE & MINORITY

Personally appeared before me. Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, Arthur C. Epperson, solicitor of record for the complainant in the above entitled cause who being duly sworn, deposes and says that he is informed and verily believes that the follwoing respondents are non-residents and their residence and address is shown opposite of their names:

1. Frank Ard, Rt. 2, Box 616, Pensacola, Florida.
2. Leon Ard, Rt. 2, Box 616, Pensacola, Florida.
3. Sidney Ard, Rt. 2, Box 369, Pensacola, Florida.
4. Raymond Ard, Rt. 2, Box 620, Pensacola, Florida.
5. Wilhelmina Godwin, 1008 North 2 Street, Pensacola, Florida.
6. Georgia Porras, 132½ West Chase Street, Pensacola, Florida
7. Bessie Liberis, 8 North G Street, Pensacola, Florida.
8. Agnes Hogans, (Mrs. Don. L. Hogan) Saufley Fld. Rd. Pensacola, Fla.
9. Edna Mae Ezell, Rt. 2, Box 318, Pensacola, Florida.
10. Ruebin Ard, Rt. 2, Box 318, Pensacola, Florida.
11. Leon Couch % Don Hogan, Saufley Field, Rd., Pensacola, Florida.
12. Donald Couch % Bessie Liberis, 8 North G. Street, Pensacola, Fla.

and that all of said respondents are over the age of twenty-one years, except, Leon Couch, who is a minor over the age of eighteen years, and Donald Couch, who is a minor over the age of sixteen years.

Arthur C. Epperson
Affient

Sworn to and subscribed before me, this the _____ day of December, 1953.

Alice J. Duck, Clerk of the Circuit Court, Baldwin County, Alabama.

3159

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

****

VESTER E. FICK
COMPLAINANT

VS.

FRANK ARD, LEON, ARD, SIDNEY ARD, RAYMOND ARD, WILHELMINA GODWIN, GEORGIA PORRAS, BESSIE LIBERIS, AGNES HOGAN, EDNA MAE EZELL, RUEBIN ARD, LEON COUCH, AND DONALD COUCH.
RESPONDENTS

****

AFFIDAVIT OF NONRESIDENCE

****

FILED
29 1953
ck, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

MYRTLE GROVE FLA. DEC 31 5 PM 1953

Return to Alice J Duck
(NAME OF SENDER)

Street and Number, or Post Office Box,

REGISTERED ARTICLE
No. 4312 Post Office Bay Minette, Ala.

INSURED PARCEL
No. 16—12421 State

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

MYRTLE GROVE FLA. DEC 31 5 PM 1953

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(NAME OF SENDER)

Street and Number, or Post Office Box,

REGISTERED ARTICLE
No. 4308 Post Office Bay Minette, Ala.

INSURED PARCEL
No. 16—12421 State

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

MYRTLE GROVE FLA. JAN 8 7 AM 1954

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Street and Number, or Post Office Box,

REGISTERED ARTICLE
No. 4314 Post Office Bay Minette, Ala.

INSURED PARCEL
No. 16—12421 State

Post Office Department
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PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

PENSACOLA, FLA. JAN 5 5-PM 1954

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No. 4309 Post Office Bay Minette, Ala.

INSURED PARCEL
No. 16—12421 State

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Rev. 1-52

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1 Edna Mae Esbell
(Signature or name of addressee)

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Date of delivery 12-31, 19 53

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Form 3811
Rev. 1-52

RETURN RECEIPT

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1 Raymond Ard
(Signature or name of addressee)

2 Deliver to Addressee Only
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery Raymond, 19

FILED JAN 1954 ALICE L. BECK, Registrar

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Rev. 1-52

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1 Reuben Ard
(Signature or name of addressee)

2 Deliver to Addressee Only
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 1-8, 19 54

Filed 1-14-54 Quinfrey Ry.

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Form 3811
Rev. 1-52

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1 Wilhelmina Bodwin
(Signature or name of addressee)

2 Deliver to Addressee Only
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Date of delivery JAN 6 1954, 19

FILED JAN 6 1954 ALICE L. BECK, Registrar

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Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

PENSACOLA, FLA.
JAN 9
430PM
1954

POSTMARK OF DELIVERING OFFICE

INFANTILE PARALYSIS
JOIN MARCH OF DIMES

Return to Alice J Duck
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE
No. 4311
Post Office Bay Minette, Ala.
Bay Minette, Ala.

INSURED PARCEL
No.

State

16—12421

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

MYRTLE GROVE
JAN 6
12 M
1954
FLA.

Return to Alice J Duck
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE
No. 4307
Post Office Bay Minette, Ala.

INSURED PARCEL
No.

State

16—12421

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

MYRTLE GROVE
DEC 11
5PM
1954
FLA.

Return to Alice J Duck
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE
No. 4316
Post Office Bay Minette, Ala.

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

MYRTLE GROVE
DEC 11
5PM
1954
FLA.

Return to Alice J Duck
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE
No. 4306
Post Office Bay Minette, Ala.

Form 3811
Rev. 1-52

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

1 Mrs. Bessie Liberman
(Signature or name of addressee)

2 Deliver to Addressee Only
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 1/9, 19 54

FILED JAN 1 1954 REG. REGISTER

U. S. GOVERNMENT PRINTING OFFICE 16—12421-2

Form 3811
Rev. 1-52

RETURN RECEIPT

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1 Sidney Ord
(Signature or name of addressee)

2 Deliver to Addressee Only
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery JAN 16 - 1954, 19

Mail 1-16-54 Rec'd Liberman Gray

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Form 3811
Rev. 1-52

RETURN RECEIPT

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1 Frank Ortiz
(Signature or name of addressee)

2 Deliver to Addressee Only
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 12-31, 19 53

FILED DEC 31 1953 REG. REGISTER

Form 3811
Rev. 1-52

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

1 Sean and
(Signature or name of addressee)

2 Deliver to Addressee Only
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 12-31, 19 53

FILED JAN 2 1954 REG. REGISTER

Post Office Department
OFFICIAL BUSINESS

PENSACOLA, FLA. JAN 4 3 30 PM 1954

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

Return to Alice J Duck
(NAME OF SENDER)

Street and Number, or Post Office Box,

REGISTERED ARTICLE
No. 4317 Post Office Bay Minette, Ala.

INSURED PARCEL
No. State

16—12421

Post Office Department
OFFICIAL BUSINESS

PENSACOLA, FLA. DEC 31 3-PM 1953

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

Return to Alice J Duck
(NAME OF SENDER)

Street and Number, or Post Office Box,

REGISTERED ARTICLE
No. 4310 Post Office Bay Minette, Ala.

INSURED PARCEL
No. State

16—12421

3159

Form 3811
Rev. 1-52

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

1 Donald Couch
(Signature or name of addressee)

Deliver to Addressee Only

2 _____
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 1/4/54, 19____

U. S. GOVERNMENT PRINTING OFFICE 16—12421-2

FILED JAN 5 1954 ALICE L. BECK, Registrar

Form 3811
Rev. 1-52

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

1 Denise Carrier
(Signature or name of addressee)

Deliver to Addressee Only

2 _____
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 12/31/53, 19____

U. S. GOVERNMENT PRINTING OFFICE 16—12421-2

FILED JAN 2 1954 ALICE L. BECK, Registrar

POST OFFICE DEPARTMENT

POST OFFICE, Bay Minette, Ala.

OFFICIAL BUSINESS

(No. 4)

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300 (PMGC)

BAY MINETTE
DEC 30
1 PM
1953
ALA.

1

Alice J Duck

Bay Minette, Ala.

15-
44 5-
44 5-
44 9 5-

3159

Form 3877
Rev. 6-46

APPLICATION FOR REGISTRATION AND CERTIFICATE OF DECLARED VALUE OF MATTER SUBJECT TO POSTAL SURCHARGE

(No collection of surcharge is required on international registered mail)

Alice J Duck Circuit Clerk. hereby applies for the registration of the articles described below
(Name of sender)
and certifies that the amounts of the declared values set forth on the sheet are the full values of the articles listed or the known or estimated cost of duplication in the case of nonnegotiable securities.

NOTE.—Additional receipted copies of this bill will be furnished as certificates of mailing only, upon payment of one cent for each article listed on each additional copy of the bill. Claims for indemnity may not be paid unless articles are properly packed and endorsed, and unless claims are filed within the prescribed time limits. (See postmaster for detailed information.)

	(1) NUMBER OF ARTICLE	(2) NAME OF ADDRESSEE, STREET, AND POST OFFICE ADDRESS	(3) Postage (exclusive of other charges or fees)	(4) Registry fee	(5) Fee paid for return receipt	(6) Delivery restricted—Fee paid	(7) Full value or cost of duplication if nonnegotiable securities*	(8) Surcharge on entire contents of article	(9) REMARKS †
1	4306	Leon Ard Rt 2 box 616 Pensacola Fla							
2	4307	Sidney Ard Rt 2. box 369. "							
3	4308	Raymond Ard Rt 2. box 620 "							
4	4309	Wilhelmina Hodson 1008 N. Z. St. "							
5	4310	Georgia Porras 1324 West Chase St. "							
6	4311	Bedell Liberis 8 N. H St. "							
7	4312	Edna Mae Egell Rt 2 box 318 "							
8	4313	Agnes Hogans Sandlin Fld. Rd "							
9	4314	Albert Ard Rt 2. box 318 "							
10	4315	Lion Couch Sandlin Fld. Rd "							
11	4316	Frank Ard. Rt 2 box 616 "							
12	4317	David Couch 8. No. H. St. "							
13									
14									
15									

* When an article contains matter declared for full value and that for which the cost of duplication is declared, enter in column (7) the sum of the declarations for "full value" and "cost of duplication."

† Show in "Remarks" column (9) class postage paid if other than first or if international mail. Also use this column to indicate "F" if "Fragile"; "SD" if "Special-Delivery"; "AM" if "Air Mail"; and "C. O. D." and amount due sender if registered C. O. D. mail.

12.00

Total number of pieces listed by sender Twelve
(Write number here in words)

Total number of pieces received at post office Twelve

Postmaster, per M J Reed

Affix stamp here if receipted copies of this bill

BAY MINETTE ALA. DEC 30 1953