

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

X
TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA. IN EQUITY.

Comes your Complainant, Ruth Y. Moorer, humbly com-
plaining against the Defendants hereinafter named, respectfully
represents and shows unto your Honor as follows:

FIRST:

That the Complainant is a resident of Bay Minette,
Baldwin County, Alabama, and is over the age of twenty-one years.

SECOND:

The Defendants to this cause are as follows:
J. S. Price, A. L. Heard and A. L. Head; all of whom are over
the age of twenty-one years and whose Post Office Addresses and
places of residence are unknown and cannot be ascertained after
reasonable diligence and effort on the part of your Complainant.

THIRD:

Complainant alleges that she is in the quiet and
peaceable possession of the following described lands in Baldwin
County, Alabama, claiming to own the same, to-wit:

The Southwest quarter (SW $\frac{1}{4}$) of Northwest quarter
(NW $\frac{1}{4}$), Section Thirty-six (36), Township Two (2)
South, Range Four (4) East, Baldwin County, Alabama.

FOURTH:

Complainant alleges that the Defendants hereinabove named claim, or are reputed to claim some right, title or interest in or encumbrance upon the said lands hereinabove described.

FIFTH:

Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the defendants or any one of them may have to said land.

Complainant therefore, calls upon the defendants and each of them separately and severally to set forth and specify his or her claim, right, title or interest in, or encumbrance upon said lands hereinabove described or any part thereof, and to show how and by what instrument or instruments the same is derived or created.

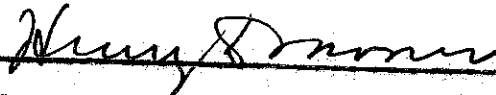
PRAYER FOR PROCESS:

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process make the said J. S. Price, A. L. Heard and A. L. Head, defendants to this bill of complaint and require each of them to plead, answer or demur to the same within the time and under the penalties prescribed by law or that the same be forever confessed.

PRAYER FOR RELIEF:

Complainant further prays that upon the final hearing of this cause your Honor will establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the Defendants

herein named, have no claim, right, title, or interest in, or encumbrance upon the lands hereinabove described, or any part thereof, and grant unto Complainant such other, further, or different relief as she may be in equity and good conscience entitled to receive and as in duty bound your Complainant will ever pray, etc.,



HENRY D. MOORER, ATTORNEY FOR COMPLAINANT.

FOOT NOTE:

The Defendants are required to answer each and every paragraph of the foregoing bill of complaint, numbered first to fifth, inclusive, but not under oath, answer under oath being hereby expressly waived.




HENRY D. MOORER, ATTORNEY FOR COMPLAINANT.

STATE OF ALABAMA,


BALDWIN COUNTY.

Before me, Margaret Huggins, a Notary Public, in and for said County and State, personally appeared Henry D. Moorer, Attorney for Complainant in the above styled cause, who, being by me first duly and legally sworn doth depose and say: that the statements and allegations contained in the foregoing bill of complaint are true and correct.

Dated this 24th day of July, A. D. 1931.



Subscribed and sworn to before me
this 24th day of July, 1931.


NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA.

+

BAY MINETTE, ALA.

M. J. W. Richardson *Clark.*

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

July 30. Legal notice - Ruth Y. Nooner vs.
J. S. Prier & A. L. Heard
209 words @ 4 1/2

9 41

Ruth Y. Moorer,	:	In the Circuit Court,
Complainant.	:	Baldwin County, Ala.
	:	In Equity.
VS	:	
	:	
J. S. Price, A. L.	:	
Heard and A. L.	:	
Head.	:	

~~This~~ This cause coming on to be heard was submitted ~~interm time~~ upon the Original Bill, Decree Pro Confesso, and note of testimony made by the Register, and the Court having considered the evidence in this cause, it is the opinion of the Court that the Complainant Ruth Y. Moorer, is entitled to the relief prayed for in her bill of complaint.

It is therefore, hereby ordered, adjudged, and decreed that the Complainant, Ruth Y. Moorer, have judgment as prayed for in the complaint filed herein against the defendants and each and all of them; that all adverse claims of the defendants and each of them, and all persons claiming or to claim said premises or any part thereof, through or under said defendants, or either of them, are hereby adjudged and decreed to be invalid and of no force and effect and that the Complainant, Ruth Y. Moorer, be and she is hereby declared and adjudged to be the true and lawful owner of the said land described in the bill of complaint and every part and parcel thereof, said land being described as follows:

The Southwest quarter of the Northwest quarter, Section Thirty-six, Township Two South, Range Four East, Baldwin County, Alabama.

And the title of the Complainant, Ruth Y. Moorer, is hereby adjudged to be quieted against all claims and demands of the Defendants or either of them, and that the title to the property herein described vest in the said Ruth Y. Moorer against the Defendants and each of them, or and one claiming through the defendants or either of them.

It is hereby further ordered, adjudged and decreed that the Complainant pay the cost of this proceeding and failing to do so let execution issue.

Dated this 1st day of October, 1931.

G. W. Hare

JUDGE OF THE TWENTY-FIRST JUDICIAL CIRCUIT, BALDWIN COUNTY, Alabama.

X

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Diary
Friend Oct 18/93
Rochester
Project

The Southwest quarter (SW $\frac{1}{4}$) of Northwest quarter (NW $\frac{1}{4}$), Section thirty-six (36), Township two (2) South, Range four (4) East, Baldwin County, Alabama.

County, Alabama, claiming to own the same, to-wit:
peaceable possession of the following described lands in Baldwin
Complainant alleges that she is in the quiet and

THIRD:

reasonable diligence and effort on the part of your Complainant.
places of residence are unknown and cannot be ascertained after
the age of twenty-one years and whose Post Office Addresses and
J. S. Price, V. T. Heard and A. T. Head; all of whom are over
The Defendants to this cause are as follows:

SECOND:

Baldwin County, Alabama, and is over the age of twenty-one years.
That the Complainant is a resident of Bay Minette,

FIRST:

represents and shows unto your Honor as follows:
pleading against the Defendants hereinafter named, respectfully
Comes your Complainant, Ruth Y. Moore, humbly com-
OF BALDWIN COUNTY, ALABAMA. IN EQUITY.
TO THE HONORABLE E. A. HARR, JUDGE OF THE CIRCUIT COURT

IN EQUITY.

BALDWIN COUNTY, ALABAMA,
IN THE CIRCUIT COURT,

BALDWIN COUNTY.
STATE OF ALABAMA,

Complainant further prays that upon the final hearing of this cause your Honor will establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the defendants

PRAYER FOR RELIEF:

wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process make the said J. S. Price, V. L. Heard and V. L. Head, defendants to this bill of complaint and require each of them to plead, answer or demur to the same within the time and under the penalties prescribed by law or that the same be forever confessed.

PRAYER FOR PROCESS:

Complainant therefore, calls upon the defendants and each of them separately and severally to set forth and specify his or her claim, right, title or interest in, or encumbrance upon said lands hereinabove described or any part thereof, and to show how and by what instrument or instruments the same is derived or created.

Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the defendants or any one of them may have to said land.

FIFTH:

Complainant alleges that the defendants hereinabove named claim, or are reputed to claim some right, title or interest in or encumbrance upon the said lands hereinabove described.

SIXTH:

Subscribed and sworn to before me
this 24th day of July, 1931.

Dated this 24th day of July, A. D. 1931.

Before me, Margaret Higgins, a Notary Public, in and for said
County and State, personally appeared Henry D. Moorhead, Attorney for
Complainant in the above styled cause, who, being by me first duly
and legally sworn to depose and say: that the statements and al-
legations contained in the foregoing bill of complaint are true and
correct.

BALDWIN COUNTY,
STATE OF ALABAMA,

HENRY D. MOORHEAD, ATTORNEY FOR COMPLAINANT.

Presby waived.

The defendants are required to answer each and every para-
graph of the foregoing bill of complaint, numbered first to fifth,
inclusive, but not under oath, answer under oath being hereby ex-

MOOR MOORE:

HENRY D. MOORHEAD, ATTORNEY FOR COMPLAINANT.

herein named, have no claim, right, title, or interest in, or en-
cumbrance upon the lands hereinabove described, or any part there-
of, and grant unto Complainant such other, further, or different
relief as she may be in equity and good conscience entitled to re-
ceive and as in duty bound your Complainant will ever pray, etc.,

Published Every Thursday

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. Vail
Editor and Proprietor

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail, being duly sworn, deposes and says that he is
the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of

Ruth G. Moorer

J. S. Price & A. L. Heard and
A. J. Head

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<u>July 30 1931</u>	Vol. <u>42</u> No. <u>26</u>
Date of second publication	<u>August 6 1931</u>	Vol. <u>42</u> No. <u>27</u>
Date of third publication	<u>August 13 1931</u>	Vol. <u>42</u> No. <u>28</u>
Date of fourth publication	<u>August 20 1931</u>	Vol. <u>42</u> No. <u>29</u>

Subscribed and sworn before the undersigned this 20 day of

August 1931
T. W. Richerson
Notary Public

R. B. Vail
Publisher

FOR SALE—100 bushels clean, sound, Triumph seed potatoes. Field run, 1.50 per hundred pounds. Golds out, \$1.50 per hundred pounds. at John Barker farm, or address Box 457 Bay Minette, Alabama. 26-11p

GOLDEN HENRY—Warranted pure bred, \$1.25 per quart, \$1.25 per gallon post.

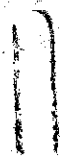
the Complainant, and further, that in the belief of said Affiant, the Defendants are over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said J. S. Price and A. L. Heard, and A. L. Head to answer or demur to the Bill of Complaint in this cause by the 29th day of August 1931, or after thirty days therefrom a decree Pro Confesso may be taken against them.

T. W. RICHERRSON, Register.
HENRY D. MOORER, Attorney for Plaintiff.



Dear Mr Moore
P.S. Please

Dear Aug 18th 1931
J. M. McKeown
Boston



The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY, Sept 29th,
No. 987. Bay Minette Ala/ 1931

Ruth Y. Moorer, Complainant.

vs. J.S. Price, A.L. Head and A.L. Heard, Defendant. S

In this cause it appears to the Register T.W. Richerson, that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 30th day of July, 1931, in the Baldwin Times, Baldwin Co, a newspaper published in Bay Minette Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 30th day of July, 1931, and posted at the Court House door of Baldwin County Alabama.

And it now further appearing to the Register, that the said J.S. Price, A.L. Head, and A.L. Heard,

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register T.W. Richerson that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said J.S. Price, A.L. Head and A.L. Heard,

This 29th day of September, 1931.

T.W. Richerson Register.

RECORDED

No. 987.

Page

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The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Ruth Y. Moorer,

vs.

J.S. Price, A.L. Head and

~~and~~ A.L. Head,

**DECREE PRO CONFESSO
OF PUBLICATION**

Issued Sept 29th 1931.

W.P. Williams
Register.

Recorded in Record

Vol. Page

Register.

Moore Printing Company, Bay Minette, Ala.

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin

County.

No. 987 Bay Minette Alabama 1931

Ruth Y. Moorer

Complainant.

vs.

J.S.Price, A.L.Head and A.L.Heard,

Defendant.

I, T.W. Richerson,

Register of said Court, hereby

certify that on the affidavit of Henry D. Moorer,

on the 30th day of July, 1931, an Order of Publication was made to

J.S.Price, A.L.Head and A.L.Heard,

who are

non-residents, whose places of residence are unknown,

and was published in the Baldwin Times

a newspaper published in Bay Minette Baldwin County Alabama,

Alabama, once a week for four consecutive weeks, requiring them the said

J.S.Price, A.L.Heard and A.L.Heard,

to demur, plead to or answer the Bill of Complaint in the above cause on or before the 29th day of

August, 1931, and failing to do so within thirty days a Decree Pro Confesso may be

taken against them in said cause;

and that one other copy of said order was posted at the Court House door of said County for four consecutive weeks.

Witness my hand, this 29th day of September, 1931

T.W. Richerson Register.

RECORDED

No. 287

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THE STATE OF ALABAMA,

Baldwin

County.

CIRCUIT COURT, IN EQUITY.

Ruth Y. Moorer,

vs.

J. S. Price, A. L. Head and A. L.

Heard,

REGISTER'S CERTIFICATE OF
PUBLICATION.

Issued Sept 29th

19 31.

J. P. Rice

Register.

Recorded in

Record

Vol.

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Register.

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8581 NOTE OF TESTIMONY

Ruth Y. Moorer,

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vs.

J.S.Price, A.L.Head, and A.L.Heard,

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.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
decree pro confesso, and note of testimony,

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and in behalf of Defendant upon

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.....

J. M. [Signature]

Register.

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RECORDED

No. 987.

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THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Ruth Y. Moorer,

VS

J.S.Price, A.L.Head and A.L.Heard,

NOTE OF TESTIMONY

Filed in Open Court this 1st

day of October, 1931.

W. H. ...

Register