

743

CHARLES J. EBERT, Complainant,

VS.

SAML. JESSUP, ADLOE ORR, GEORGE E. MCEWIN, S. P. GAILLARD, JR., BALDWIN LAND-HOLDING COMPANY, INC., A CORPORATION, AND AMERICAN SECURITIES CORPORATION, A CORPORATION, if they be living, of if dead, the unknown heirs, devisees and Grantees of them, and each of them, and any and all other persons, firms, or corporations claiming any title to, interest in, lien or encumbrances upon said land or any part thereof, and the following described lands in Baldwin County, Alabama, to-wit: The Southwest quarter of the Northwest quarter of Section 14, Township 7 South of Range 3 East, Respondents.

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

No. 743.

FINAL DECREE

This cause coming on to be heard was submitted for final decree upon the pleadings, decrees pro confesso and proof as noted by the Register and it appearing to the Court that the Complainant is the owner of and in the actual possession of the said lands and each and every parcel thereof, and that the title of the Complainant has been duly and fully proven by legal and competent evidence, the Court is of the opinion that the Complainant is entitled to relief prayed for.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the Respondents, SAML. JESSUP, ADLOE ORR, GEORGE E. MCEWIN, S. P. GAILLARD, JR., BALDWIN LAND-HOLDING COMPANY, INC. A CORPORATION, AND AMERICAN SECURITIES CORPORATION, A CORPORATION, and each of them and any and all other persons, firms or corporations claiming any title to, interest in, lien or encumbrances upon said lands, or any part or parcel thereof have no estate, right, claim, interest in, or encumbrance upon the following described land or any part or parcel thereof, in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 14, Township 7 South of Range 3 East, in Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the full fee simple title to said lands, to-wit:

The Southwest quarter of Northwest quarter of Section 14, Township 7 South of Range 3 East, in Baldwin County, Alabama,

is vested absolutely in the Complainant, Charles J. Ebert.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that a certified copy of this decree be recorded in the office of the Judge of Probate

of Baldwin County, Alabama, in the Direct Index in the name of Saml. Jessup, S. P. Gaillard, Jr., Adloe Orr, George E. McEwin, Baldwin Land-Holding Company, Inc., a corporation, and American Securities Corporation, a corporation, and in the Indirect Index in the name of Charles J. Ebert.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register shall within thirty days from the rendition of this decree file a certified copy thereof in the office of the Judge of Probate in Baldwin County, Alabama, for record, and that the cost thereof be taxed in the costs of this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs in this cause for which execution may issue.

Dated at Monroeville, Monroe County, Alabama, on this the 11<sup>th</sup> day of November, 1941.

A. W. Hare  
Judge of 21st Judicial Circuit of Alabama.

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 SAM'L JESSUP, BALDWIN LAND-HOLDING COMPANY, a corporation, AMERICAN SECURITIES CORPORATION, a corporation, S. P. GAILLARD, JR., ADLOE ORR, GEORGE E. MCFEEN, 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 CHARLES J. EBERT against said above named, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondents 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, R. S. DUCK, Register of the said Circuit Court, this 29th day of July, 1941.

*R. S. Duck*

Register.

CHARLES J. EBERT,  
Complainant,  
VS.  
SAM'L JESSUP, ET AL.,  
Respondents.

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

TO HONORABLE E. W. HARRIS, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,  
IN EQUITY:

Comes your Complainant CHARLES J. EBERT and presents this, his Bill of Complaint, against the following described lands in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 14, Township 7 South of Range 3 East;

and against SAM'L JESSUP, twenty-one years of age and a non-resident of the state of Alabama, and whose address is unknown; S. P. GAILLARD, over twenty-one years of age and a resident of Mobile County, Alabama; ADLOE ORR and GEORGE E. MCFEEN, both over twenty-one years of age and non-residents of the State of Alabama, their addresses being unknown; BALDWIN LAND-HOLDING COMPANY, INC, a Corporation, and AMERICAN SECURITIES CORPORATION, a corporation, both having their principal places of business in Mobile County, Alabama, and against each of them separately and severally, and if one or any of them be dead then against their, and each of their, heirs, devisees, and grantees, separately and severally, and against any and all of the persons, firms or corporation claiming any title to, interest in, lien, or encumbrances upon the said land and any part of parts thereof, and respectfully represents and

of the state of Alabama.

That none of the said Defendants are in the Military or Naval Service of the United States of America.

Therefore your Complainant prays that your Honor will by appropriate process make the said SAM'L JESSUP, S. P. GAILLARD, ADLOE ORR, GEORGE E. MCEWEN, BALDWIN LAND-HOLDING COMPANY, INC., a corporation, and AMERICAN SECURITIES CORPORATION, a corporation and each of them, and the unknown heirs, devisees and grantees of them, if either of or any of them should be dead and any other person, firm, or corporation claiming any right, title to, interest in, lien, or encumbrances upon said land, to-wit: The Southwest quarter of the Northwest quarter of Section 14, Township 7 South of Range 3 East, in Baldwin County, Alabama; or any part thereof to be made parties respondent to this Bill of Complaint and by appropriate process require them and each of them separately and severally to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing of this cause this Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of encumbrances to the said lands and to each part and parcel thereof is vested in your Complainant CHARLES J. EBERT as against SAM'L JESSUP, S. P. GAILLARD, ADLOE ORR, GEORGE E. MCEWEN, BALDWIN LAND-HOLDING COMPANY, INC., a corporation, and AMERICAN SECURITIES CORPORATION, a corporation, if they be living and if dead then each of their unknown heirs, devisees and grantees and any and all persons, firms and corporations claiming any title to, interest in, lien or encumbrances upon the said land and any part thereof and that any and all doubts and disputes concerning the same be cleared up. And your Complainant prays for such other, further, different and general relief as in equity and good conscience shall seem mete and proper.

BREBE & HALL

By: 

Solicitors for Complainant.

STATE OF ALABAMA, )  
 )  
BALDWIN COUNTY. )

Before me, the undersigned authority, in and for said County, in said State, personally appeared H. M. HALL, who is known to me, and who having been by me first duly sworn deposes and says: That he is a member of the firm of BEEBE & HALL, Solicitors at record and agents of the Complainant, CHARLES J. EBERT in the above styled cause and duly authorized by him to make this affidavit and that the facts stated in the foregoing bill of Complaint are from all information obtained are true and from such information obtained I verily believe and so state that the same are true.

*H. M. Hall*

Sworn to and subscribed before me this 25th day of July, 1941.

*Ruby C. Graham*  
Notary Public, Baldwin County, Alabama.

360  
7/31  
7430  
Equity

RECORDED

Mobile County

Received in Sheriff's Office  
this 29 day of July, 1941  
W. R. STUART, Sheriff

CHARLES J. EBERT,

Complainant,

Vs.

SAM'L JESSUP, ET AL.,

Respondents.

SUMMONS

&

COMPLAINT

Filed July 29, 1941  
R. S. Auch, Register

Received 27/ Day of July 19 41  
and on 31 Day of July 19 41  
I served a Copy of the within to Complainant  
or J. P. Phillips and Jay American Securities  
Corp. a Corporation by license or R. J. Wilburn  
the servant of Charles T. or Phillips and or John  
B. A. Corporation by license or J. P. Phillips  
President H. H. COLACORNE, Sheriff

By, M. Beante D.S.

BEEBE & HALL  
LAWYERS  
BAY MINETTE, ALABAMA

CHARLES J. EBERT,

Complainant,

VS.

SAM'L JESSUP, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

No. 743.

It having been made to appear in the above cause, by the affidavit of Hubert M. Hall, Solicitor of record and agent of Charles J. Ebert, Complainant in the above cause, that S. P. Gaillard, Jr. is a resident of Mobile County, Alabama, that Baldwin Land-Holding Company, Inc., a corporation, and American Securities Corporation, a corporation, are Alabama corporations with their principal places of business in Mobile County, Alabama, and that Sam'l Jessup, Adloe Orr, and George E. McEwen, if they be living, or if they be dead, their heirs, devisees and grantees, are non-residents of the state of Alabama, their addresses being unknown; that the said Complainant owns in fee simple the following described land in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 14,  
Township 7 South of Range 3 East,

having acquired the same by conveyances from the State Land Commissioner of Alabama, and J. S. Lowrey; that the title to said land stands on the records of the Probate Court of Baldwin County, Alabama, the County in which said land lies in the names of Charles J. Ebert, Sam'l Jessup, S. P. Gaillard, Jr., Adloe Orr, George E. McEwen, Baldwin Land-Holding Company, Inc., a corporation, and American Securities Corporation, a corporation; that no person is known to have paid taxes upon said land or to have been in possession of said land or any part thereof within ten years next prior to the filing of this Bill of Complaint except Charles J. Ebert.

IT IS THEREFORE ORDERED and notice is hereby given that the said Respondents, Sam'l Jessup, S. P. Gaillard, Jr., Adloe Orr, George E. McEwen, Baldwin Land-Holding Company, Inc, a corporation, and American Securities Corporation, a corporation, if they be living, or if they be dead, their heirs, devisees and grantees and any other person, firm or corporation claiming any right, title to, interest in, or encumbrance upon the said land herein described in Baldwin County, Alabama, or any part or parcel thereof, appear in this Court and plead, answer or demur to the Bill of Complaint in this cause filed, on or before the 1st day of September, 1941, or upon their having failed to do so at the expiration of thirty days after date, a decree pro confesso be taken against them.

IT IS FURTHER ORDERED that this order and notice be published in the Foley Onlooker, a newspaper published at Foley, in Baldwin County, Alabama, once a week for four consecutive weeks.

IN WITNESS WHEREOF, I, R. S. DUCK, as Register, have hereunto set my hand and seal on this 29th day of July, 1941.

R. S. Duck  
Register of the Circuit Court of Baldwin  
County, Alabama.

BEEBE & HALL,  
Solicitors for Complainant.

STATE OF ALABAMA, )  
                                  )  
BALDWIN COUNTY.    )

I, R. S. DUCK, Register of the Circuit Court of Baldwin County, Alabama, in equity, hereby certify that the above is a full, true, correct and complete copy of notice given by publication in the Foley Onlooker, a newspaper published at Foley, Alabama, in the cause of Charles J. Ebert, Complainant, vs. Sam'l Jessup, et al., Respondents, and filed in the office of the Probate Judge of Baldwin County, Alabama, the County in which said lands lie, in accordance with the provisions of Article 2, Chapter 32 of the 1941 Code of Alabama.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office on this 29th day of July, 1941.

R. S. Duck  
Register of the Circuit Court of Baldwin  
County, Alabama.



CHARLES J. EBERT,

Complainant,

VS.

SAM'L JESSUP, ET AL.,

Respondents.

Expenditure Notice

STATE OF ALABAMA, BALDWIN COUNTY

Filed JUL 2 1941 10556

Recorded Expenditure book 1 page 196  
and I certify that the following Privilege Tax has  
been paid:

Deed Tax .....

Mortgage Tax .....

W. Robertson  
Judge of Probate

By .....

Filed July 29, 1941  
R. S. Duck, Register

BEEBE & HALL  
LAWYERS  
BAY MINETTE, ALABAMA

R. S. Duck 140

## THE STATE OF ALABAMA

KNOW ALL MEN BY THESE PRESENTS:

THAT WHEREAS, on 8th day of June, A. D. 1931, the Probate Court of Baldwin County rendered a decree for the sale of lands hereinafter described and conveyed, for the payment of State and County taxes then due from Baldwin Land Holding Co, the owner of said lands, and for the payment of the fees, costs, and expenses of and under said decree, and the sale had in execution thereof.

AND WHEREAS, thereafter, to-wit, on the 8th day of July, 1931, under and in pursuance of said decree, said lands were regularly offered for sale by the Tax Collector of Baldwin County for said taxes, fees, costs, and expenses, and no person having bid a sufficient sum for said lands to pay the same, said lands were bid in for the State for the sum of said taxes, fees, costs, and expenses.

AND WHEREAS, the time allowed by law for the redemption of said lands has elapsed since said sale, and the same not having been redeemed, the title thereto under said sale is still in the State.

AND WHEREAS, said lands having been entered upon the books of the State Land Commissioner, and the State Land Commissioner of the State of Alabama, with the approval of the Governor, has fixed the price of said land, and ascertained that the sum of Ninety-six and No/100 (\$96.00) Dollars is sufficient to cover and satisfy all claims of the State and County against said lands for or on account of taxes, interest, fees, and costs, and officers' fees which were due upon or have accrued against said lands, as provided for by law.

AND WHEREAS, application has been made to the State Land Commissioner of the State of Alabama by Charles J. Ebert to purchase said lands, and said sum of Ninety-six and No/100 (\$96.00) Dollars therefor has been paid into the State Treasury.

NOW THEREFORE, The State Land Commissioner of the State of Alabama, by virtue of and in accordance with the authority in him vested by law, with the approval of the Governor of Alabama, and in consideration of the premises above set out, has this day granted, bargained, sold, and conveyed, and by these presents does grant, bargain, sell, and convey unto the said Charles J. Ebert, without warranty or covenant of any kind on the part of the State, express or implied, all right and title of the State of Alabama in and to said lands, described as follows:

SW $\frac{1}{4}$  of NW $\frac{1}{4}$  Sec. 14, Tp 7s, R 3e.

lying and being situate in said County and State, to have and to hold the same, the said right and title of the State in the lands aforesaid, unto Charles J. Ebert

and his heirs and assigns forever.

In testimony whereof I have hereunto set my hand and seal this the 21st day of October, 1936

Approved

STATE LAND COMMISSIONER OF ALABAMA,

*Robert R. [Signature]*  
Governor

By *Henry S. Long*  
State Land Commissioner.

THE STATE OF ALABAMA, MONTGOMERY COUNTY.

I, Mrs. Clay Willingham, a Notary Public in and for said County, in said State, hereby certify that Henry S. Long, whose name is signed to the foregoing conveyance as State Land Commissioner, and who is known to me, acknowledged before me on this day that, being informed of the contents of this conveyance, he, in his capacity as such State Land Commissioner, executed the same voluntarily on the day the same bears date.

Given under my hand this the 21st day of October, 1936

*Mrs. Clay Willingham*, Notary Public.

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That J. S. Lowrey, in Consideration of the sum of SIXTY and 00/100 DOLLARS to Me in hand paid by Chas. J. Ebert, the receipt whereof is hereby acknowledged, I do remise, release, quit-claim, and convey to the said Chas. J. Ebert all my right, title, interest and claim, in or to the following described real estate (or lands) to-wit:

The Southwest quarter of the Northwest quarter of Section 14,  
Township 7 South, Range 3 East in Baldwin County, Alabama.

TO HAVE AND TO HOLD, to the said Chas. J. Ebert and his heirs  
and assigns forever.

Given under my hand and seal this 15th day of July, 1941.

J. S. Lowrey (Seal)

STATE OF ALABAMA

BALDWIN COUNTY

I, Margherita Lewis, a Notary Public in and for said County, in said State, hereby certify that J. S. Lowrey, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of said conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 15th day of July, 1941.

Margherita Lewis  
Notary Public

(SEAL)

Filed November 7, 1941.



THE STATE OF ALABAMA,  
Baldwin County

}

CIRCUIT COURT

TO Frances Brantley

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

Chas. J. Ebert and H. M. Hall

as witnesses in behalf of Chas. J. Ebert in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Chas. J. Ebert

Complainant

and

Sam'l. Jessup, Et Al,

Defendant, s.

on oath to be by you administered, upon \_\_\_\_\_ to take and certify the deposition s of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 7th day of October 1941

*R. Duck*

REGISTER

Commissioner's Fee \$ 10.00

Witness' Fees, \$ \_\_\_\_\_

RECORDED

NO. \_\_\_\_\_

**THE STATE OF ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

CHAS. J. EBERT,

Complainant

VS.

SAM'L JESSUP, ET AL,

Defendant

**Commission To Take Deposition**

COMMISSIONER:

Witnesses:

# 743

RECORDED

Chas J Ebert

10

David Jessup et al

Note of Testimony

Filed Oct 11, 1941

" R. S. Deich  
" Register  
"

40 Acres N. W. of  
~~Wad to a...~~  
~~Trust to...~~  
THE STATE OF ALABAMA,

County.

Baldwin Land Holding Co

TO

Charles J. Elbert

10/21/36

**DEED**

THE STATE OF ALABAMA

OFFICE OF JUDGE OF PROBATE

I hereby certify that the within Deed was filed in  
this office for record on the \_\_\_\_\_ day of  
\_\_\_\_\_, 19\_\_\_\_, at  
\_\_\_\_\_ o'clock \_\_\_\_\_ M., and duly recorded in  
Book \_\_\_\_\_ of Deeds, page \_\_\_\_\_  
and examined.

Judge of Probate.

BROWN-PRINTING CO., MONTGOMERY, ALA., 1935  
Chas J. Elbert  
Joley  
R.R. 50  
P.O. 85  
1.35

State of Alabama,  
Baldwin County.

Probate Court.

Filed in office this 27 day of Oct  
1936, at 8:16 PM and duly recorded  
in Book No. 66 N.S. at page 397-8  
and I certify that \$ \_\_\_\_\_ Dues  
tax and \$ \_\_\_\_\_ Mfg. tax has  
been paid as required by law.

W. H. Robertson  
Judge of Probate.

J. S. Hawks



THE STATE OF ALABAMA }  
Baldwin County }

Circuit Court of Baldwin County, Alabama.  
(In Equity)

CHAS. J. EBERT COMPLAINANT

vs.

SAM'L JESSUP, ET AL, RESPONDENT

I, Frances Brantley

as ~~Register and~~ Commissioner

have called and caused to come before me

CHAS. J. EBERT and H. M. HALL

witnesses named in the requirement for Oral Examination, on the 7th day of October,

1941, at the office of BEEBE & HALL, LAWYERS

in Bay Minette, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said

Chas. J. Ebert doth depose and say as follows:

My name is Charles J. Ebert. I am over twenty-one years of age and a bona fide resident of Foley, in Baldwin County, Alabama.

I am the owner in fee simple and in actual possession of the following described land in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 14, Townshin

I, Frances Brantley as ~~Register and~~ Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ~~es~~ and read over to them and they signed the same in the presence of myself and Mr. H. M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ~~es~~ or had proof made before me of the identity of said witness ~~es~~; 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 the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 11<sup>th</sup> day of October 1941.

Frances Brantley (L. S.)

No. \_\_\_\_\_  
 THE STA  
 BAI  
 IN CIRCUIT  
 CHAS.  
 SAM'L J  
 ORAL  
 Filed \_\_\_\_\_  
 Vol. \_\_\_\_\_

records in the Probate Court of Baldwin County, Alabama, and that the only persons known to claim said land or any part thereof, or any interest therein, are Charles J. Ebert, the Complainant, and Saml. Jessup, S. F. Gaillard, Jr., Adloc Orr, George E. Edwin, Baldwin Land-Holding Company, Inc, a corporation, and the American Securities Corporation, a corporation; that he had made and caused to be made a diligent search and inquiry from persons in the vicinity of said lands, at Foley, in Baldwin County, Alabama, at Bay Minette, the Countyseat of Baldwin County, Alabama, and for the records at Bay Minette, the county seat of Baldwin County, Alabama, the County in which said lands lie to secure the present addresses of parties whose addresses are unknown and whether or not any of them are dead and if dead, the names, ages and addresses of their and each of their heirs; that it is his information gathered from all reports made that all the Respondents, except those upon whom service has been perfected, are non-residents of the State of Alabama and over twenty-one years of age; that none of the Defendants are in the military or naval services of the United States, of America;

That he employed the firm of Beebe & Hall, as Solicitors to examine the records and make inquiry relative to the said land and any claimants thereto and to file and prosecute this cause;

That he is by agent, in the actual possession of said lands on which there is a house and farm in actual cultivation and has been for the past several years.

Charles J. Ebert.

H. H. HALL, A WITNESS FOR THE COMPLAINANT BEING FIRST DULY SWORN DEPOSES AND SAYS:

My name is H. H. Hall. I live at Bay Minette, in Baldwin County, Alabama, and am a member of the firm of Beebe & Hall. We were some time ago employed by Charles J. Ebert of Foley, Alabama, to make an examination of the records at Bay Minette, Alabama as to the condition of the title to the Southwest quarter of the Northwest quarter of Section 14, Township 7 South of Range 3 East and to determine who, if any, are claimants on the records to the said property; that an examination of the records discloses that the only claimants of record to said land or any part thereof are Charles J. Ebert, Saml. Jessup, S. F. Gaillard, Jr., Adloc Orr, George E. Edwin, Baldwin Land-Holding Company, Inc., a corporation, and the American Securities Corporation, a corporation; that he also made an effort to determine the addresses of the Claimants to said land whose addresses are not known, but was unable to find out the same, however, from all information available they are non-



CHARLES J. BROWN, Complainant,  
VS.  
SAM L. JESSUP, ET AL, Respondents.

IN THE DISTRICT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY.  
No. 745.

MOTION FOR DECREE PRO CONFESSO OF FORFEITURE

Motion is hereby made for a decree pro confesso against Adloe Orr, George W. Martin, and Saml. Jessup, and against each of them and the unknown heirs, devisees and grantees of them, if either or any of them should be dead, and any other person, firm or corporation claiming any right, title to, interest in, lien or encumbrance upon said lands in Baldwin County, Alabama, to-wit:

The Northwest quarter of the Northwest quarter of Section 14,  
Township 7 South of Range 3 East,

Respondents, in the above stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Respondents are non-recipients of the State of Alabama, and have failed to answer, plead, or demur to the Bill in this cause, to the date hereof.

This the 3rd day of October, 1941.

ROBERT C. HALL

BY



Solicitors for Complainant.

CHARLES J. EDERT, Complainant,  
VS.  
SAUL JESSUP, ET AL, Respondents.

IN THE CIRCUIT COURT OF  
BALTIMOR COUNTY, ALABAMA,  
IN EQUITY.  
No. 743

DECREE PRO CONFESSO OF PERSONAL SERVICE

In this cause it appears to the Register, R. S. DUCK, that service was had on the respondents S. P. Gaillard, Jr, American Securities Corporation, a corporation and Baldwin Land-Holding Company, Inc, a corporation, on July 31, 1941, by the Sheriff of Mobile County, Alabama.

And it further appears to the Register, R. S. DUCK, that the said S. P. Gaillard, Jr., American Securities Corporation, a corporation, and Baldwin Land-Holding Company, Inc. a corporation, Respondents, having to the date hereof, failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now therefore on motion of Beebe & Hall, Solicitors for Complainant, ordered and decreed by the Register, R. S. DUCK, that the bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said S. P. Gaillard, Jr., American Securities Corporation, a corporation and Baldwin Land-Holding Company, a corporation.

This the 6th day of October, 1941.

  
\_\_\_\_\_  
Register.

STANLEY J. BRYANT, Complainant,  
VS.  
CARL J. JENSON, ET AL, Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY.  
No. 743.

NOTICE FOR DECREE PRO CONFESSE OF FINANCIAL SERVICE

Motion is hereby made for a decree pro confesso against S. P. Gaillard, Jr. Baldwin Land - holding Company, Inc., a corporation, and American Securities Corporation, a corporation, respondents in the above stated cause and on the ground that more than thirty days have elapsed since service of summons upon said respondents; and that said summons was duly served according to law and that the said respondents have failed to demur, plead to, or answer the bill of complaint in this cause, to this date.

Dated this 3rd day of October, 1941.

WALTER C. HALL

BY *Walter C. Hall*  
Solicitors for Complainant.

CHARLES J. EDGAR, Complainant,  
VS.  
SAML. JESSUP, ET AL, Respondents.

IN THE CIRCUIT COURT OF  
DALE COUNTY, ALABAMA,  
IN SUIT NO. 748.

RECITE PRO CONFESSO ON PUBLICATION.

In this cause it appears to the Register, R. S. DUCK, that the order of publication heretofore made in this cause, was published for four consecutive weeks commencing on the 30th day of July, 1941, in the Foley Bullocker, a newspaper published at Foley, in Baldwin County, Alabama; that a copy of said order was posted at the Court House door in Baldwin County, Alabama, on the 30th day of July, 1941;

and it now further appearing to the Register, R. S. DUCK, that the said Adloe Orr, George E. McWhin and Saml. Jessup, and each of them and the unknown heirs, devisees and Grantees of them, if any or either of them should be dead, and any other person, firm, or corporation claiming any right, title to, interest in, lien or encumbrance of the following described land, to-wit:

The Southwest quarter of the Northwest quarter of Section 14,  
Township 7 South of Range 3 East, Baldwin County, Alabama;

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, R. S. Duck, that the Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said above named..

This 6th day of October, 1941.

  
\_\_\_\_\_  
Register.







#743

RECORDED

Charles J. Ebert

vs

Janie Jessup, et al

Request for Commission to take  
testimony

Filed Oct 7<sup>th</sup> 1941

R. D. Duck

Register

# 743

**RECORDED**

Charles J. Ebers  
vs

Daniel Jessup et al

Notice of time of hearing  
testimony

Filed Oct 7<sup>th</sup> 1941

R. Deak  
Register

#743

RECORDED

Chas J Ebert  
" "

Laure Jessup et al

Decree pro Confesso on  
Publication

Filed Oct 2, 1941  
Resnick  
Regester

#743

RECORDED

Charles J Eber  
vs

Samie Jessup et al

Motion for Merces Pro  
Confesso on Premises Service

Filed Oct 3, 1941

R. S. Dyer  
Register

Chas J. [unclear] →

Samie Jessup et al

RECORDED

# 743

Deere pro Confess.

Filed Oct 6, 1941

R. J. Deere  
Register

RECORDED # 743

Charles J. Ebers  
vs  
Samuel Jessup et al

Motion for decree Pro Confesso  
after Publication

Filed Oct 3, 1941

R. L. Deuch  
Register



#743

RECORDS

Chas J Ebert  
13

Lamin Jusup et al

Request for final decree

Filed Oct 11, 1941

R. J. Decker  
Register

NOTICE

In the Circuit Court of Baldwin County, Alabama, in Equity No. 743.

CHARLES J. EBERT, Complainant, vs SAM'L JESSUP, ET AL., Respondents.

It having been made to appear in the above cause, by the affidavit of Hubert M. Hall, Solicitor of record and agent of Charles J. Ebert, Complainant in the above cause, that S. P. Gaillard, Jr., is a resident of Mobile County, Alabama, that Baldwin Land-Holding Company, Inc., a corporation, and American Securities Corporation, a corporation, are Alabama corporations with their principal places of business in Mobile County, Alabama, and that Sam'l Jessup, Adloe Orr, and George E. McEwen, if they be living, or if they be dead, their heirs, devisees and grantees are non-residents of the state of Alabama, their addresses being unknown; that the said Complainant owns in fee simple the following described land in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 14 Township 7 South of Range 3 East,

having acquired the same by conveyances from the State Land Commissioner of Alabama, and J. S. Lowrey; that the title to said land stands on the records of the Probate Court of Baldwin County, Alabama, the County in which said land lies in the names of Charles J. Ebert, Sam'l Jessup, S. P. Gaillard, Jr., Adloe Orr,

AFFIDAVIT OF PUBLICATION

I, Sidney Howell

employee of The Onlooker, published at Foley, Ala., do solemnly swear that a copy of the above notice, as per clipping attached, was published once each week in the regular and entire edition of said newspaper, and not in any

supplement thereof, for four (4) consecutive weeks, commencing with the issue dated July 31, 1941, and ending with the issue dated August 21, 1941.

Sidney Howell

Subscribed and sworn to before me this 2<sup>nd</sup> day of December, 1941.

Chas. J. Ebert.  
Notary Public.

*Robert Duke*  
*Clerk of Circuit Court*

Bay Minette, Ala., Nov. 12 1941

IN ACCOUNT WITH

**G. W. ROBERTSON**

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Recording	from	to	Privilege Tax	Rec. Fee	Total
<i>None</i>	<i>Charles J. Duke, Camp &amp; Boarding House</i>				<i>1.00</i>
<p><i>PAID</i></p> <p><i>11/12/41</i> <i>G. W. Robertson Judge</i> <i>L. K. ...</i></p>					