AMENDED COMPLAINT

STATE OF ALABAMA)
)
)
)
)
BALDWIN COUNTY)

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5a day of September, 1941.

Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED,
Complainant

vs.

W.L. LEE, W.C. LEE, BERTHA CURRY, B.B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE
Defendants

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

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Pake Realty and Investme nt Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the City of Mobile, Alabama: that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of Twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said B ertha Curry is over the age of twenty-one (21) years and a resident of

363 South Conception Street, Mobile, Mobile, County, Alabama: that B.B. Lee os pver the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular stree address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the plaae of beginning, being partly in lot 19 of the survey of the Old Twon of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4 N.S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claims or are reputed to claim some right, title, interest in, claim or encumbrances upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforee the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of hem has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable

Court.

Complainant further prays that upon the hearing of the cause made by bill of complaint this Honorable Court will make and enter a decree adjudging and decreeding that the said respondents and each of them have no right title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By _____
Solicitors for Complainant

STAT E OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee,, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Stree, Houston, Texas and each is over the age of twenty-one (21) years.

_____

Sworn to and subscribed before me, this the _____ day of September , 1941.

_____
Notary Public, Baldwin County,
Alabama.

Received in Sheriff's Office
this 22 day of Oct, 1941
W. R. STUART, Sheriff

Original

Filed September 5, 1941

Solicitors for Complainant

BY

AMENDED BILL OF COMPLAINT

JESSE E. LEE, ET AL.,
RESPONDENTS

vs

LAKE REALTY AND INVESTMENT CO.,
COMPLAINANT

BALDWIN COUNTY
EQUITY NO. 749

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and

Amended Complaint.

Aubry Lee & B. B. Lee.

Complainant further prays that upon the hearing of the cause made by bill of complaint this Honorable Court may make and enter a decree adjudging and decreeding that the said respondents and each of them have no right title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further different relief in equity and good conscience it shall be entitled to in the premises.

Dec 4/
Dec 4/

AMENDED COMPLAINT

STATE OF ALABAMA }
}
}
}
BALDWIN COUNTY }

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. G. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jennie Lee, Elwood Lee, Winfred Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Fake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

Register

FAKE REALTY AND INVESTMENT COMPANY, INCORPORATED,
Complainant

vs.

}
}
}
}
}

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

365 South Conception Street, Mobile, Mobile, County, Alabama; that N.B. Lee os over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular stree address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between N. J. Wilkins and Manette D. Booth lots, 159 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4 M.S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claims or are reputed to claim some right, title, interest in, claim or encumbrances upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of hem has or claims to have, and how andly what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, N.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable

Court.

Complainant further prays that upon the hearing of the cause made by bill of complaint this Honorable Court will make and enter a decree adjudging and decreeding that the said respondents and each of them have no right title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By _____
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared M. O. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B.M. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee,, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

_____

Sworn to and subscribed before me, this the _____ day of September , 1941.

_____
Notary Public, Baldwin County, Alabama.

AMENDED COMPLAINT

STATE OF ALABAMA }
}
}
BALDWIN COUNTY }

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Fake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

Register

FAKE REALTY AND INVESTMENT COMPANY, INCORPORATED,
Complainant

vs.

W.L. LEE, W. C. LEE, BERTHA CURRY, B.B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE
Defendants

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

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Fake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of Twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of

367 South Conception Street, Mobile, Mobile, County, Alabama; that E.E. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular stree address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Nanette D. Booth lots, 159 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4 M.S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claims or are reputed to claim some right, title, interest in, claim or encumbrances upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of hem has or claims to have, and how andby what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, E.E. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable

Court.

Complainant further prays that upon the hearing of the cause made by bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BRIER & HALL

By _____
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Burbo, who, being by me duly sworn, says that he is agent and attorney for Pine Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee,, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

_____

Sworn to and subscribed before me, this the _____ day of September , 1941.

_____
Notary Public, Baldwin County,
Alabama.

AMENDED COMPLAINT

STATE OF ALABAMA))))) BALDWIN COUNTY)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

R. L. Deal
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant vs. W.L. LEE, W. C. LEE, BERTHA CURRY, B.B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE Defendants	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Pake Realty and Investme nt Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of Twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said B ertha Curry is over the age of twenty-one (21) years and a resident of

363 South Conception Street, Mobile, Mobile, County, Alabama; that B.B. Lee os over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular stree address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the plame of beginning, being partly in lot 19 of the survey of the Old Twon of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4 N.S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claims or are reputed to claim some right, title, interest in, claim or encumbrances upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of hem has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable

Court.

Complainant further prays that upon the hearing of the cause made by bill of complaint this Honorable Court will make and enter a decree adjudging and decreeding that the said respondents and each of them have no right title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By _____
Solicitors for Complainant

STAT E OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee,, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Stree, Houston, Texas and each is over the age of twenty-one (21) years.

_____

Sworn to and subscribed before me, this the _____ day of September , 1941.

_____
Notary Public, Baldwin County, Alabama.

Form 3877
Rev. 6-16-39

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

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

The undersigned sender hereby applies for the registration of the articles described on this sheet and certifies that the amounts of the declared values set forth on the sheet are the ful values of the articles listed, or the known or estimated cost of duplication in the case of nonnegotiable securities and that the amounts of commercial insurance placed on the matter to b registered as stated on this sheet are also correct.

(Signature of sender)

RECEIVED from R. L. Hicks, Assist Clerk *the following-described pieces of* Registered *mail.*
(Insert "Registered" or "Registered C. O. D.")

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 indorsed, 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) CLASS	(4) Postage (exclusive of other charges or fees)	(5) Registry fee	(6) Fee paid for return receipt	(7) Special delivery fee	(8) Amount due sender if C. O. D.	(9) *Indorsement on article if fragile	(10) Delivery restricted—Fee paid	(11) Value of any contents on which surcharge is based on value only or value and length of haul instead of cost of duplication. If of no value, so state	(12) Known or estimated cost of duplication of contents on which surcharge is based on cost of duplication, as distinguished from the full value	(13) Total of items 11 and 12	(14) Total surcharge on entire contents of article	(15) Total contents covered by commercial insurance in amount of—	(16) Remarks
3032 1	Edward Lee														
2	2603½ Louisiana St														
3	Houston Texas	1	3	15	3				10						
3033 4	Winfred Lee														
5	2603½ Louisiana St														
6	Houston Texas	1	3	15	3				10						
3034 7	Leonard Lee														
8	2603½ Louisiana St														
9	Houston Texas	1	3	15	3				10						
3035 10	Jessie Lee														
11	2603½ Louisiana St														
12	Houston Texas	1	3	15	3				10						
13															
14															
15															

* Mark "F" if "Fragile."
NOTE.—Diagonal mark must be drawn through lines not used.

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

Total number of pieces received at post office 4 *Postmaster, per* Earl Barber
(Name of receiving employee)

Affix stamp here for additional copies of this bill

BAY MINETTE, ALA. SEP 5 1941 REGISTERED

Postmark and date of receipt

U. S. GOVERNMENT PRINTING OFFICE c16—8792

STATE OF ALABAMA	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY	)	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 27 day of August, 1941.

A. S. Duck
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED Complainant	)	IN THE CIRCUIT COURT OF
vs. 9/5	)	BALDWIN COUNTY, ALABAMA
W. L. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE Defendant	)	IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, and humbly complaining against W. L. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, and respectfully shows unto your Honor as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603 1/2 Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By W. C. Beebe
Solicitors for Complainant

PAKE REALTY AND INVESTMENT COMPANY, INC.	)	THE STATE OF ALABAMA
	)	BALDWIN COUNTY
vs.	)	CIRCUIT COURT, IN EQUITY
JESSIE LEE, ELWOOD LEE, WINFRED LEE, LEONARD LEE, et al	)	This the twenty-seventh day of August, 1941.

In this cause it being made to appear to the Register of this Court by the affidavit of W. C. Beebe, agent and attorney for complainant, Pake Realty and Investment Company, Inc., that the Defendants Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama residing in Houston, Texas, their post office address being unknown and further, that, in the belief of said Affiant the Defendants are each 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 each of the said defendants, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to answer or demur to the Bill of Complaint in this cause by the twenty-ninth day of September, 1941, or after thirty days therefrom a decree Pro Confesso may be taken against them.

R. S. Peck
Register.

PAKE REALTY AND INVESTMENT COMPANY, INC.	)	THE STATE OF ALABAMA
	)	BALDWIN COUNTY
VS.	)	CIRCUIT COURT, IN EQUITY
JESSIE LEE, ELWOOD LEE, WINFRED LEE, LEONARD LEE, et al	)	This the twenty-seventh day of August, 1941.

In this cause it being made to appear to the Register of this Court by the affidavit of W. C. Beebe, agent and attorney for complainant, Pake Realty and Investment Company, Inc., that the Defendants Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas, and further, that in the belief of said Affiant the Defendants are each 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 each of the said defendants, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to answer or demur to the Bill of Complaint in this cause by the twenty-ninth day of September, 1941, or after thirty days therefrom a decree Pro Confesso may be taken against them.

R. S. Duck
Register.

Notice of Publication

ZNotice of Publication

Issued August 27, 1941
R. S. Deal, Register

STATE OF ALABAMA	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY	)	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 27 day of August, 1941.

R. S. Dick
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED Complainant	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
W. L. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE Defendants	)	IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, and humbly complaining against W. L. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, and respectfully shows unto your Honor as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said Bertha Curry is over the qge of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is [illegible]

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By W C Beebe
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W. C. Beebe

Sworn to and subscribed before me, this the 27th day of August, 1941.

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

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W. C. Beebe

Sworn to and subscribed before me, this the 27th day of August, 1941.

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

AMENDED COMPLAINT

STATE OF ALABAMA)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY)	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

R. S. Duck
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA
W. L. LEE, W. C. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, Defendants)	IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4 N. S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By W. P. Beebe
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W C Beebe

Sworn to and subscribed before me, this the 4th day of September, 1941.

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

MOBILE COUNTY

EQUITY NO. 749

PAKE REALTY AND INVESTMENT CO.
COMPLAINANT,

372
9/2/41

VS.

JESSIE LEE, ET ALS.,
RESPONDENTS

BILL OF COMPLAINT

Filed August 27, 1941

R. E. Dick Jr.
Register

3 P.

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

Received 2 Day of Sept 41
and on 5 Day of Sept 41
I served a Copy of the within Complaint & Summons
on Bertha Lewis

by service on

W. H. NOLCOMBE, Sheriff
By J. H. Hargett D.S.

RECORDED

BALDWIN COUNTY

EQUITY NO. 749

PAKE REALTY AND INVESTMENT CO.,
COMPLAINANT

VS.

JESSIE LEE, ET ALS.,
RESPONDENTS

BILL OF COMPLAINT

Record

Filed August 27, 1941.

R. L. Quisenberry
Register

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

Executed 8-29 1941
by serving ~~subpoena~~ Copy of the within Bill of Complaints on W. Lee

W. R. Stuart Sheriff
By M. B. Hamilton Deputy Sheriff

749 Baldwin

Amended Bill of Complaint

RECORDED

Received in Sheriff's Office
this 5 day of Sept, 1941
W. R. STUART, Sheriff

Executed September 6th, 1941 by serving a copy of the within Amended Bill of Complaints on W.L.Lee.

W.R.Stuart Sheriff

By [signature]
Deputy Sheriff

Pake Realty & Investment Company

vs

W.L.Lee et als

Record

Filed September 5 1941
R.E. Sink, Register

STATE OF ALABAMA BALDWIN COUNTY	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Your are hereby commanded to summon W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 27 day of August, 1941.

R. S. Hurst
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED Complainant vs. W. L. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE Defendants	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, and humbly complaining against W. L. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, and respectfully shows unto your Honor as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEUBE & HALL

By _____
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Bube, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, Bertha Gurry, B. B. Lee, Robert Lee, Aubry Lee, Jennie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jennie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W. C. Bube

Sworn to and subscribed before me, this the 27th day of August, 1941.

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

Filed August 27, 1941
Ruby C. Graham
Register

Recorded in Deed Book 22 Vol. 22 Page 14
This 12 day of AUG 27 A.D.

OPP, ALABAMA

EQUITY NO. 749

PAKE REALTY AND INVESTMENT CO.
COMPLAINANT

VS.

JESSIE LEE, ET ALS.,
RESPONDENTS.

BILL OF COMPLAINT

Filed August 27, 1941

R. L. Duck
Register

Received in Sh
this 29 day of Au
W. R. STUART,

Executed by serving a copy of this Bill of Complaint — Robert Lee this Sept. 1st. 1941
Tom E. Head Sheriff
Covington County Ala
By W C Hart
D.S.

AMENDED COMPLAINT

STATE OF ALABAMA	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY	)	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

R. L. Duck
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
W. L. LEE, W. C. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, Defendants	)	IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By W C Beebe
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W C Beebe

Sworn to and subscribed before me, this the 4th day of September, 1941.

Notary Public, Baldwin County,
Alabama.

AMENDED COMPLAINT

STATE OF ALABAMA	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY	)	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

R. S. Duck
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
W. L. LEE, W. C. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, Defendants	)	IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 158 et seq. all of record in the office of the Judge o f Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By W C Beebe
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W. C. Beebe

Sworn to and subscribed before me, this the 4th day of September, 1941.

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

Received in Sheriff's Office
this 5 day of Sept., 1941
W. R. STUART, Sheriff

Executed by serving a copy of the amended Bill of Complaint on Robt Lee - This Sept 8 - 1941
Tom E Wood Sheriff
Covington County Ala
By W E Hart -
D.S.
Rec'd $[illegible]

Equity 749 Opp, Ala -

Amended Bill of Complaint

Pake Realty & Investment Company
vs
W. L. Lee et als

Filed September 5, 1941
R. S. Deck, Register

Received in Sheriff's Office
this 5 day of Sept., 1941
W. R. STUART, Sheriff

Received 6 Day of Sept 1941
and on 10 Day of Sept 1941
I served a Copy of the within Complaint & Summons
on Gulf Lee & Wife & W. L. Lee
by service on Bertha Lee
W. H. MOLCOMBE, Sheriff
By [illegible] D.S.

375 - Mobile County
Equity 749

Amended Bill of Complaint

Cake Realty & Investment Company

vs

W. L. Lee et als

4 D

Filed September 5, 1941
R. S. Lynch, Register

AMENDED COMPLAINT

STATE OF ALABAMA BALDWIN COUNTY	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Fake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5 day of September, 1941.

R S Deck
Register

FAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant vs. W.L. LEE, W. C. LEE, BERTHA CURRY, B.B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE Defendants	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Fake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of Twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of

363 South Conception Street, Mobile, Mobile, County, Alabama; that B.B. Lee os over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular stree address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Twon of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4 N.S., page 158 et seq. all of record in the office of the Judge of Probate of Baldwin, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claims or are reputed to claim some right, title, interest in, claim or encumbrances upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of hem has or claims to have, and how andby what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. O. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable

Court.

Complainant further prays that upon the hearing of the cause made by bill of complaint this Honorable Court will make and enter a decree adjudging and decreeding that the said respondents and each of them have no right title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By _____
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. O. Beebe, who, being by me duly sworn, says that he is agent and attorney for Fake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, B.B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee,, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Stree, Houston, Texas and each is over the age of twenty-one (21) years.

_____

Sworn to and subscribed before me, this the _____ day of September , 1941.

_____
Notary Public, Baldwin County, Alabama.

AMENDED COMPLAINT

STATE OF ALABAMA	IN THE CIRCUIT COURT OF
	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Fake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

R. S. Deuch
Register

FAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant	IN THE CIRCUIT COURT OF
vs.	BALDWIN COUNTY, ALABAMA
W. L. LEE, W. C. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, Defendants	IN EQUITY SITTING

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Fake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. G. Lee is over the age of twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between N. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 156 et seq. all of record in the office of the Judge o f Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BEEBE & HALL

By W C Beebe
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bartha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W C Beebe

Sworn to and subscribed before me, this the 4th day of September, 1941.

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

Winfield Sheehan
Copy

Field Systems 5/1941
P.S. Rhett, Reporter

AMENDED COMPLAINT

STATE OF ALABAMA	IN THE CIRCUIT COURT OF
	BALDWIN COUNTY, ALABAMA
BALDWIN COUNTY	IN EQUITY SITTING

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee to appear within thirty (30) days from the service of this writ in the Circuit Court in equity to be held in the said County at the place of holding the same, then and there to answer the bill of complaint of Pake Realty and Investment Company, Incorporated.

WITNESS my hand, this the 5th day of September, 1941.

R. S. Dusch
Register

PAKE REALTY AND INVESTMENT COMPANY, INCORPORATED, Complainant	IN THE CIRCUIT COURT OF
vs.	BALDWIN COUNTY, ALABAMA
W. L. LEE, W. C. LEE, BERTHA CURRY, B. B. LEE, ROBERT LEE, AUBRY LEE, JESSIE LEE, ELWOOD LEE, WINFRED LEE and LEONARD LEE, Defendants	IN EQUITY SITTING

TO THE HON. F. W. HANE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes the complainant in the above styled cause and amends his bill of complaint by making W. C. Lee a party defendant thereto and so that his complaint shall read as follows:

FIRST:

That your complainant, Pake Realty and Investment Company, Incorporated, is a corporation organized under the laws of the State of Alabama, with its principal place of business in the

City of Mobile, Alabama; that the said W. L. Lee is over the age of twenty-one (21) years and a resident of Bay Minette, Baldwin County, Alabama; that the said W. C. Lee is over the age of twenty-one (21) years and a resident of Mobile, Mobile County, Alabama; that the said Bertha Curry is over the age of twenty-one (21) years and a resident of 363 South Conception Street, Mobile, Mobile County, Alabama; that B. B. Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Robert Lee is over the age of twenty-one (21) years and is a resident of Opp, Alabama; that Aubry Lee is over the age of twenty-one (21) years and is a resident of the City of Mobile, Mobile County, Alabama; that Jessie Lee, Elwood Lee, Winfred and Leonard Lee are each over the age of twenty-one years and residents of Houston, Texas, their particular street address is 2603½ Louisiana Street.

SECOND:

That your complainant is the owner of and in the peaceable possession of the following described land, situated in the County of Baldwin, State of Alabama, to-wit:

> Beginning at the Northwest corner of Oak and Pine Streets in the Town of Bay Minette, Alabama, run thence in a Westerly course on the North side of Oak Street 160 feet to a post, thence in a Northerly course along the line between M. J. Wilkins and Manette D. Booth lots, 139 feet to a post on the South side of First Street, thence in an Easterly direction along the South side of First Street to a post on the West side of Hall Avenue, thence in a Southerly direction on the West side of Hall Avenue and Pine Street to the place of beginning, being partly in lot 19 of the survey of the Old Town of Bay Minette as shown by Miscellaneous Book 1, page 106 and partly in that unnumbered lot lying immediately North of said lot 19, which said unnumbered lot is shown on Hand Land Company's map of the Town of Bay Minette, map of which is recorded in Book 4, N. S., page 156 et seq. all of record in the office of the Judge o f Probate of Baldwin County, Alabama.

THIRD:

Complainant further shows unto your Honor that the said respondents claim or are reputed to claim some right, title,

interest in, claim or encumbrance upon the aforesaid lands or some part thereof; and that there is no suit pending to test or enforce the validity of such right, title, interest in, claim or encumbrance upon said property or any part thereof; and complainant calls upon the said respondents and each of them to set forth and specify what right, title, interest in, claim or encumbrance upon the said property or any part thereof, each of them has or claims to have, and how and by what instrument or instruments the same is derived or created.

Wherefore your complainant prays that the aforesaid W. L. Lee, W. C. Lee, Bertha Curry, B. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee be made parties respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the hearing of the cause made by this bill of complaint this Honorable Court will make and enter a decree adjudging and decreeing that the said respondents and each of them have no right, title, interest in, claim or encumbrance upon the said lands or any part thereof, and that the title of your complainant in and to the said land and each and every part thereof be established and quieted against the said respondents and each of them; and complainant prays for such other further or different relief as in equity and good conscience it shall be entitled to in the premises.

BENDER & HALL

By W C Bender
Solicitors for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Beebe, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated, in that certain cause in the Circuit Court of Baldwin County, Alabama in equity, against W. L. Lee, W. C. Lee, Bertha Curry, D. B. Lee, Robert Lee, Aubry Lee, Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee; affiant further says that Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and each is over the age of twenty-one (21) years.

W C Beebe

Sworn to and subscribed before me, this the 4th day of September, 1941.

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

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, this day personally appeared W. C. Bebbo, who, being by me duly sworn, says that he is agent and attorney for Pake Realty and Investment Company, Incorporated. In that certain cause in the Circuit Court of Baldwin County, Alabama in equity, styled W. L. Lee, W. C. Lee, before Court, W. L. Lee, Robert Lee, Ashby Lee, Josie Lee, Elwood Lee, Wilfred Lee and Leonard Lee; affiant further says that Josie Lee, Elwood Lee, Wilfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas and are over the age of twenty-one (21) years.

Filed September 5, 1941
R. L. Beck, Register

Elwood Lee
copy

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

LEGAL NOTIE
PAKE REALTY AND INVESTMENT COMPANY, Inc.
VS.
JESSIE LEE, ELWOOD LEE, WINFRED LEE, LEONARD LEE, et al
THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

This the twenty-seventh day of August, 1941.

In this cause it being made to appear to the Register of this Court by the affidavit of W. C. Beebe, agent and attorney for complainant, Pake Realty and Investment Company, Inc., that the Defendants Jessie Lee, Elwood Lee, Winfred Lee and Leonard Lee are non-residents of the State of Alabama, residing at 2603½ Louisiana Street, Houston, Texas, and further, that in the belief of said Affiant the Defendants are each 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 each of the said defendants, Jessie Lee, Elwood Lee, Winifred Lee and Leonard Lee to answer or demur to the Bill of Complaint in this cause by the twenty-ninth day of September, 1941, or after thirty days therefrom a decree Pro Confesso may be taken against them.

R. S. DUCK, Register. 31-4tc

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

J. H. Faulkner, 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

Pake Realty Co. Vs Lees

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

Date of first publication August 28, 1941 Vol. 52 No. 31

Date of second publication September 4, " Vol. 52 No. 32

Date of third publication " 11 Vol. 52 No. 33

Date of fourth publication " 1 Vol. ..... No. .....

Subscribed and sworn before the undersigned this 19th day of September 1941

Nellie Hanson, Deputy Circuit Clerk

Notary Public

Baldwin County

J. H. Faulkner
Publisher

Applicant's
Publication

Filed September 29, 1941
R. S. Beck, Register

Statement

The Baldwin Times

Bay Minette, Alabama

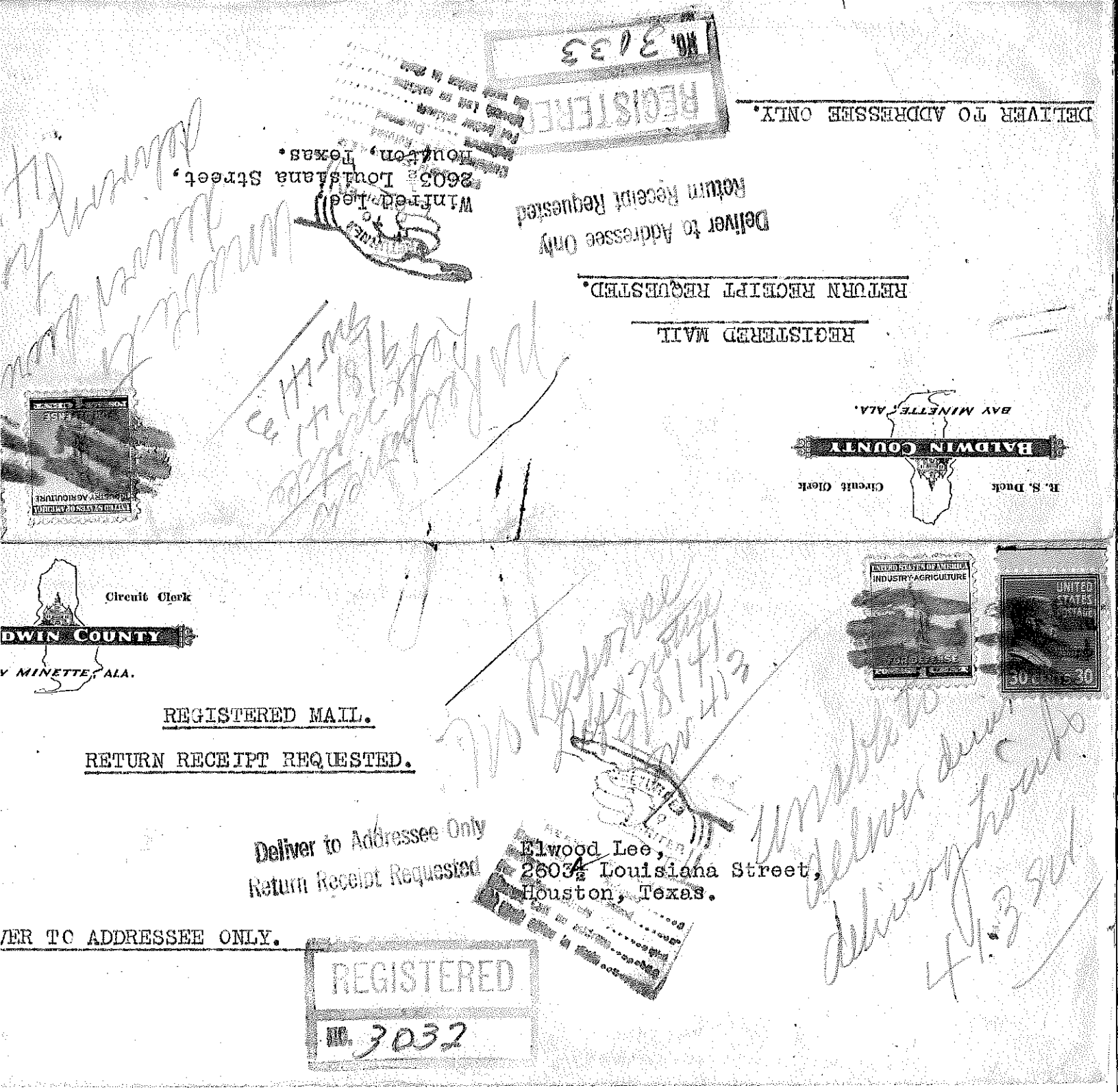
9-19, 194 1

Hon. R. S. Duck

Job Printing:

Advertising: Lake Realty Co. Vs. Lus

198 Words @ 4½¢ — 8.91



DELIVER TO ADDRESSEE ONLY.

REGISTERED

NO. 3133

Wilfred Lee,
2603½ Louisiana Street,
Houston, Texas.

Deliver to Addressee Only
Return Receipt Requested

REGISTERED MAIL

RETURN RECEIPT REQUESTED.

R. S. Duck
Circuit Clerk

BALDWIN COUNTY
BAY MINETTE, ALA.

Circuit Clerk

DWIN COUNTY

Y MINETTE, ALA.

REGISTERED MAIL.

RETURN RECEIPT REQUESTED.

Deliver to Addressee Only
Return Receipt Requested

Elwood Lee,
2603½ Louisiana Street,
Houston, Texas.

VER TO ADDRESSEE ONLY.

REGISTERED

NO. 3032

RECEIPT FOR REGISTERED ARTICLE No. [illegible]

15 fee paid. 1 class postage paid. 8-29, 1941
(Date)

Declared value, $ [illegible] Surcharge paid, $

From R. L. Dixon - Circuit Clerk
(Sender)
Bay Minette, Ala.
(Street and number) (Post office and State)

Addressed to Wilfred Lee
(Addressee)
Houston, Tex - 2603½ Louisiana St
(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee .05 in person [illegible] Special delivery fee
Delivery restricted to addressee in order Postmaster, per [illegible]
Fee paid 10

GPO 16—12666

POSTMARK

RECEIPT FOR REGISTERED ARTICLE No. [illegible]

15 fee paid. 1 class postage paid. 8-29, 1941
(Date)

Declared value, $ [illegible] Surcharge paid, $

From R. L. Dixon - Circuit Clerk
(Sender)
Bay Minette, Ala.
(Street and number) (Post office and State)

Addressed to Edwood Lee
(Addressee)
2603½ Louisiana St. - Houston, Tex
(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee .05 in person [illegible] Special delivery fee
Delivery restricted to addressee in order Postmaster, per [illegible]
Fee paid 10

GPO 16—12666

POSTMARK

RECEIPT FOR REGISTERED ARTICLE No. [illegible]

15 fee paid. 1 class postage paid. 8-30, 1941
(Date)

Declared value, $ Letter Surcharge paid, $

From R. L. Dixon Cir. Clerk
(Sender)
(Street and number) (Post office and State)

Addressed to Jessie Lee
(Addressee)
2603½ Louisiana Houston, Texas
(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee [illegible] in person [illegible] Special delivery fee
Delivery restricted to addressee in order Postmaster, per [illegible]
Fee paid 10

GPO 16—12666

POSTMARK 30 1941

RECEIPT FOR REGISTERED ARTICLE No. [illegible]

15 fee paid. 1 class postage paid. 8-30, 1941
(Date)

Declared value, $ Surcharge paid, $

From R. L. Dixon Cir. Clerk
(Sender)
(Street and number) (Post office and State)

Addressed to Leonard Lee
(Addressee)
2603½ Louisiana St. Houston, Texas
(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee [illegible] in person [illegible] Special delivery fee
Delivery restricted to addressee in order Postmaster, per [illegible]
Fee paid 10

GPO 16—12666

POSTMARK 30 1941

Post Office Department
OFFICIAL BUSINESS

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

REGISTERED ARTICLE

No. _____

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE

DEFENSE SAVINGS BONDS AND STAMPS

AND DATE OF DELIVERY

Return to R. S. Dick, Register
(NAME OF SENDER)

Street and Number or Post Office Box _____

Post Office at Bay Minette

State Alabama

Rev. 8-24 DF—1010

Post Office Department
OFFICIAL BUSINESS

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

REGISTERED ARTICLE

No. 128

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE

DEFENSE SAVINGS BONDS AND STAMPS

AND DATE OF DELIVERY

Return to R. S. Dick, Register in Chancery
(NAME OF SENDER)

Street and Number or Post Office Box _____

Post Office at Bay Minette

State Alabama

Rev. 8-24 DF—1010

Post Office Department
OFFICIAL BUSINESS

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

REGISTERED ARTICLE

No. _____

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE

DEFENSE SAVINGS BONDS AND STAMPS

AND DATE OF DELIVERY

Return to R. S. Dick, Register in Chancery
(NAME OF SENDER)

Street and Number or Post Office Box _____

Post Office at Bay Minette

RETURN RECEIPT.

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

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery *192*

Form 3811.

RETURN RECEIPT.

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

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery *192*

Form 3811.

RETURN RECEIPT.

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

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery *192*

RETURN RECEIPT.

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

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery _____ 192

Form 3811

RETURN RECEIPT.

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

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery _____ 192

Post Office Department

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

OFFICIAL BUSINESS

REGISTERED ARTICLE

No.

INSURED PARCEL

No.

POSTMASTER OF DELIVERING OFFICE

DEFENSE SAVINGS BONDS AND STAMPS

AND DATE OF DELIVERY

Return to R. S. Buck, Registrar, Int. Chancery

(NAME OF SENDER)

Street and Number, or Post Office Box

Post Office at Bay Minette, Ala.

State

Rev. 6-24 6—11C

Post Office Department

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

OFFICIAL BUSINESS

REGISTERED ARTICLE

No.

INSURED PARCEL

No.

POSTMASTER OF DELIVERING OFFICE

DEFENSE SAVINGS BONDS AND STAMPS

AND DATE OF DELIVERY

Return to R. S. Buck, Registrar

(NAME OF SENDER)

Street and Number, or Post Office Box

Post Office at Bay Minette, Ala.

The Baldwin Times

PRINTERS AND PUBLISHERS

Dial 2511 Bay Minette, Ala.

Robt Lee
W L Lee
W.C Lee
Bertha Lee

750

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

HARRY DUGGER,
Complainant,
Vs.
IRA CRAPO,
Respondent.

In the Circuit Court.

In Equity No._____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent Ira Crapo

by the Sheriff of Fayette County, on the ____ day of _____, 194___.

And it further appears to the Register, that the said Ira Crapo

_____, the Respondent, 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 Orvis M. Brown Solicitors for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said Ira Crapo

This 15th day of December, 194 1.

Ra Deck
Register.

BILL OF COMPLAINT

HARRY DUGGER,	)	
	)	
Complainant	)	IN THE CIRCUIT COURT OF
	)	
vs	)	BALDWIN COUNTY, ALABAMA
	)	
IRA CRAPO,	)	IN EQUITY:
	)	
Defendant.	)	

Comes your Complainant and shows this his Bill of Complaint against Ira Crapo Respondent who claims same title, right, interest or lien or incumbrance upon the lands described as

> The Southwest Quarter (SW¼) of the Northeast Quarter (NE¼) of Section Four (4), Township Eight (8) South, Range Four (4) East in Baldwin County, Alabama.

And Complainant further respectfully shows unto your Honor as follows:

ONE

That he is in the actual peaceful possession of the said tract of land heretofore mentioned and has been for the past seven (7) months, claiming to own the same in his own right and fee simple for seven (7) months and that he has been in the actual peaceful possession under the former owner for the past two (2) years.

TWO

That no suit is pending to test title to, interest in or right to possession of said land.

THREE

Complainant further shows that he claims the entire fee simple title in and to the said lands having acquired the same as per attached copy of Deed which is marked and made exhibit "A" and made a part of the same;

FOUR

Complainant further shows unto your Honor that the title of said land at this time stands in the name of Harry Dugger which said Deed is marked exhibit "A" and is held in escrow by Orvis M. Brown, Attorney, Robertsdale, Alabama on behalf of your Complainant and that the title of the said lands stands on the record of the Probate Court of Baldwin County, Alabama in the name of Laura Donaldson who conveyed to your Complainant. Your Complainant further shows unto your Honor that previous to Laura Donaldson this property was owned by J. P. Carroll and Fannie Carroll who conveyed by Warranty Deed

to Laura Donaldson on October 13th, 1934, an abstract sheet of such deed is hereto attached and marked exhibit "B" and made a part hereof. Your Complainant further shows unto your Honor that J. P. Carroll was the previous owner of this property and purchased the same by Warranty Deed from Frances Crapo and Martha Crapo by Warranty Deed dated February 2nd, 1932, an abstract sheet of which is hereto attached and marked exhibit "C" and made a part hereof. Your Complainant further shows unto your Honor that during the time Frances Crapo and Martha Crapo owned this property they executed an agreement in writing, a copy of which agreement is hereto attached and marked exhibit "D" and is made a part hereof of this Complaint. Under the terms of said agreement between Frances Crapo and Martha Crapo and Ira Crapo, Respondent, Ira Crapo is t reputed to claim some right, title or interest or incumbrance upon the said land of your Complainant. And your Complainant respectfully calls upon the said Ira Crapo, Respondent to set forth and specify his right, title, claim,interest or incumbrance upon the said land above described and how and by what instrument the same was derived and created;

FIVE

Complainant further shows unto your Honor that the above named individual, Ira Crapo, Respondent has not assessed or paid taxes upon the aforesaid land during the past ten (10) years and during the past ten (10) years taxes were paid and assessed on this property in the name of Frances, Crapo, J. P. Carroll and Laura Donaldson and since 1935 this land has been assessed by Laura Donaldson and the taxes paid on this property in the name of Laura Donaldson and no one else. And your Complainant shows further that during the past ten (10) years no one has been in the actual possession of this land aforesaid under any claim or title from or in the name of the Respondent to this Bill of Complaint and that your Complainant has been in the actual peaceful possession of the same and those under whom he claims for the past ten (10) years.

SIX

Complainant further shows unto your Honor that he knows of no one other than himself who has been in actual possession of said land and that no one is known to your Complainant to claim this land or any part thereof or any interest therein except the Complainant and the Respondent in this proceeding and your Complainant calls upon the Respondent herein to set forth

issue to the above name Respondent in the usual form and according to the practice of this Honorable Court require him to plead, answer or demur to the same within the time required by law and the practice of this Honorable Court

EXHIBIT "B"

J. P. CARRELL and FANNIE CARRELL,
husband and wife,

-To-

LAURA DONALDSON

WARRANTY DEED
DATED: October 13th & 15th, 1934
ACKNOWLEDGED by J. P. Carrell 15th day of October, 1934 before Lloyd An Magney, Notary Public, Baldwin County, Alabama. Seal
ACKNOWLEDBED by Fannie Carrell on October 13th, 1934 before Mabel Kirkpatrick, Notary Public, Howell County, Missouri. Seal. Homestead acknowledgment by wife.
FILED: November 10th, 1934
RECORDED IN DEED BOOK 56 NS PAGE 234
CONSIDERATION: $800.00

Conveys;-

". . . . . all of the following described real estate in Baldwin County, Alabama, to-wit:

The Southwest Quarter (SW¼) of the Northeast Quarter (NE¼) of Section Four (4) Township Eight (8) South, Range Four (4) East, containing Forty (40) acres, more or less . . . . . ."

T A X E S

SW¼ of NE¼ of 4 - 8 - 4

1936:	Marked Paid,	Assessed Mrs. Laura Donaldson #2,	Beat 14,	Page	198
1937:	Marked Paid,	Assessed Mrs. Laura Donaldson,#2,	Beat 14,	Page	223
1938:	Marked Paid,	Assessed Mrs. Laura Donaldson #2,	Beat 14,	Page	219
1939:	Marked Paid,	Assessed Mrs. Laura Donaldson #2,	B eat 14,	Page	233
1940:	Paid 12/31/40	Assessed Mrs. Laura Donaldson #2,	Beat 14,	Page	247

AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Personally appeared before me, John J. Ganus, a Notary Public in and for said state and county, Orvis M. Brown who, upon oath deposes and says; that he is the solicitor or agent for Harry Dugger, Complainant in the above styled cause and is therefore duly authorized to make this oath; that the facts stated in the foregoing Bill of Complaint upon his knowledged are true; that he is informed upon the facts stated upon information and belief as therein stated and verily believes and so states that the same are true.

Orvis M. Brown

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed this 4th day of ~~August~~ September, 1941.

John J. Ganus
Notary Public, Baldwin County, Alabama
My Commission Expires

No. 75-0

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY

HARRY DUGGER

Complainant,

Vs.

IRA CRAPO

Respondent.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

Issued this 5 day of Dec, 194/.

Register.

Baldwin Times Print

Received in Sheriff's Office
this 4 day of Sept, 1941
W. R. STUART, Sheriff

I have executed this writ by serving a copy of this within writ, on IRA CRAPO, Defendant in this case, this, September, 6th 1941.

Sheriff of Fayette County, Alabama.

By..... D.S.

Equity 6250

Lands on Ira Crapo 1½ miles West of Bluff's small rural community, Route 1, Fayette Ala.

HARRY DUGGER,

Complainant.

-vs-

IRA CRAPO,

Defendant.

BILL OF COMPLAINT

RECEIVED IN OFFICE
This 6th of Sept. 1941.
W. P. Gordon Sheriff
By..... D. S.

Filed September 4, 1941
R. S. Duck, Register

ORVIS M. BROWN
ATTORNEY AT LAW
Robertsdale, Alabama

RECORDED

SUMMONS—ORIGINAL. Baldwin Times—

The State Of Alabama
Baldwin County } Circuit Court of Baldwin County, In Equity.

To Any Sheriff of the State of Alabama—GREETINGS:

WE COMMAND YOU, That you summon

IRA CRAPO

of Route One, Fayette, Alabama
1½ miles West of Bluff County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

HARRY DUGGER,

against said IRA CRAPO

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

WITNESS, R. S. Duck, Register of said Circuit Court, this 4th day of September, 194 1.

R. S. Duck, Register

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

Serve On _____

Circuit Court of Baldwin County

IN EQUITY

No. _____

Summons

_____

VS.

_____

_____ Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
Baldwin County

Received in office this _____

day of _____, 194____

_____ Sheriff.

Executed this _____ day of

_____, 194____

by leaving a copy of the Summons with

_____

_____ Defendant

_____ Sheriff

By _____ Deputy Sheriff

ORAL DEPOSITION

Baldwin Times 10-27-39 ¼M

THE STATE OF ALABAMA
Baldwin County

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

HARRY DUGGER COMPLAINANT

VS.

IRA CRAPO RESPONDENT

I, Mina Lee Whitley

as Register and Commissioner

have called and caused to come before me Harry Dugger, Laura Donaldson and J. P. Carroll

witness~~es~~ named in the Requirement for Oral Examination, on the 17th day of December

19 41, at the office of Orvis M. Brown, Attorney at Law

in Robertsdale, Alabama, and having first sworn said witness~~es~~ to speak the truth,

the whole truth, and nothing but the truth, the said Harry Dugger, Laura Donaldson and

J. P. Carroll doth depose and say as follows:

TESTIMONY OF
Harry Dugger

My name is Harry Dugger. I am a resident of Foley, Baldwin County, Alabama and have been residing at this place since 1912. I am the present owner of the land described as the Southwest¼ of the Northeast¼, Section 4, Township 8 South, Range 4 East, Baldwin County, Alabama. I purchased this property from Laura Donaldson and her husband, David Donaldson, on February 19th, 1941. The deed to this property is held in Escrow by Orvis M. Brown, Attorney at Law, Robertsdale, Alabama. There is still a balance due on the purchase price on the property, therefore, the record title still shows in Laura Donaldson and David Donaldson, but I am in the actual peaceable possession of this property and have been since December 4, 1937, and during the time that I have been in the actual possession of this property no one has, at any time, come on the property or in anyway interfered with my possession thereto. It has at this time come to my knowledge by an Affidavit which was filed by Ira J. Crapo on May 26, 1941 in the Deed Records of Baldwin County, Alabama, that Ira Crapo is claiming some interest in the above described property under a certain instrument between himself and Francis and Martha Crapo, his father and mother, which said instrument of Agreement appears of record in the Probate Records of Baldwin County, Alabama in Book 49 NS, at page 321, which said instrument is set forth in my Complaint as Exhibit "D". At the time this Agreement was made, Francis Crapo, Martha Crapo and their son, Ira Crapo, were residing in Missouri according to this agreement, and owned property in this place and this Agreement was made and pertained to property in the State of Missouri. At a later date, the property in the State of Missouri was sold and land was purchased in Baldwin County, Alabama, which land was purchased on August 22, 1930, and is the land now under consideration. This land was purchased from J. C. Haggard and Sarah F. Haggard, which said deed is recorded in Deed Book 49 NS, page 318, of the Deed Records of Baldwin County, Alabama. Later, during the year 1932, namely, on February 2, 1932, Francis Crapo and Martha Crapo, his wife, conveyed this property by Warranty Deed to J. P. Carroll and, at this time, Ira Crapo was present and knew all the details of the transaction. Later on this deed is set forth in my Bill of Complaint as Exhibit "C". Later on, namely, October 13, 1934, J. P. Carroll and Fannie Carroll conveyed this property by Warranty Deed to Laura Donaldson which said deed is recorded in Deed Book 56 NS, page 234, and is marked Exhibit "B" of my Complaint and Laura Donaldson and her husband conveyed to me by the

ORAL EXAMINATION

I, Mina Lee Whitley, 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 Orvis M. Brown 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 17th day of December, 19 41.

Mina Lee Whitley (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

HARRY DUGGER
Complainant

Vs.

IRA CRAPO
Respondent

ORAL DEPOSITION

Filed _____, 19____, Register

RECORDED IN

Vol. _____ Page _____ Record _____, Register

deed already referred to which is marked Exhibit "A" in my Complaint and held in Escrow as above set forth. The Affidavit referred to in my Testimony as being recorded on May 26th, 1941, a copy of which is herewith attached to my Testimony and marked Exhibit "A", the purpose of which is to show the contents of the affidavit in full and also to show to the Court a more recent Affidavit which shows that the signature of this Exhibit "A" of my Testimony was obtained by misrepresentation by the son of Francis Crapo, namely, Ira Crapo, for the purpose of making a cloud on my title. A copy of the last Affidavit is hereto attached and marked Exhibit "B" of my Testimony. There is no suit pending to test the title to this property or the right of purchase to this land at this time.

The taxes on this property for the last ten years have been paid by J. P. Carroll and Laura Donaldson and no one else has, at any time, assessed or paid taxes on this property or been in possession of the same.

Harry Dugger

TESTIMONY OF

Laura Donaldson

My name is Laura Donaldson. I am a resident of Foley, Baldwin County, Alabama and have been for the last thirty years. Until February 19, 1941, I was the owner of the land described as the Southwest¼ of the Northeast¼, Section 4, Township 8 South, Range 4 East, Baldwin County, and have been in possession of this property since I purchased the same from J. P. Carroll and Fannie Carroll on October 13th, 1934. A copy of the deed from Carroll to me is shown by Exhibit "B" of Harry Dugger's Complaint and a copy of my deed to Dugger is shown as Exhibit "A" in Harry Dugger's Complaint against Ira Crapo. During the time which I have been in possession of this property no one has, at any time, interfered with my possession and no one has assessed or paid taxes on this property during the time which I have owned the same, but since I have owned this property, in October, 1934, I have continuously assessed and paid taxes thereon as shown by Exhibit "E" to the Complaint of Harry Dugger. I was acquainted with Francis Crapo and Martha Crapo and know of my own personal knowledge that often times Francis Crapo signed his name as Frank Crapo, and I know of my own personal knowledge that Francis and Frank Crapo are one and the same, and the husband of Martha Crapo. I knew the Crapos at the time they resided in Baldwin County, Alabama and at the time they owned this property. I know further that during the time that I owned the property no suit was pending to test my right of possession or the legal title thereto and, at the time, I purchased the property, I obtained a Warranty Deed thereto and, at the time I sold the property to Harry Dugger, I conveyed to him all my rights of possession and I had given him possession of this property three years previously to the time I executed the deed conveying the legal title.

Laura Donaldson

TESTIMONY OF

J. P. CARROLL

My name is J. P. Carroll. I am a resident of Baldwin County, Alabama and have been for the last ten years, and I reside at Foley, Alabama. I am familiar with the property described as the Southwest¼ of the Northeast¼, Section 4, Township 8 South, Range 4 East, Baldwin County, Alabama, and at one time, owned this property. I purchased this property from Francis Crapo and Martha Crapo by Warranty Deed which is filed in Book 52 NS, page 226 of the Deed Records of Baldwin County, Alabama, which deed was filed for record April 12, 1932. At the time I purchased this property from Francis and Martha Crapo, there was present the son of Francis and Martha Crapo named Ira Crapo. Ira Crapo made all the arrangements for the sale of the property to me as his father's health was not so good and his mother was practically helpless, therefore, Ira Crapo did all the contacting of me and made the definite arrangements for the time at which the deed should be executed and, at this time, nothing was said by Ira Crapo as to his having any claim on this land but, on the contrary, I inquired if the title to this property was good and Ira Crapo informed me that the title was good, free and clear of all encumbrances except the mortgage which was held by J. C. Haggard and Sarah F. Haggard and that said mortgage was cancelled by J. C. Haggard and Sarah F. Haggard on February 26, 1932, which was twenty-four days after I purchased the property. At the time I purchased this property, Ira Crapo told me that it was free from all claims and he did not mention at the time anything about an agreement which he had with his father concerning the

land that his father might ~~owne~~after he died and as to any title that might pass to him after his father's death, but he was present and made all arrangements for the sale of this property and told me that all the rights were being conveyed at this time. I immediately went into possession of this property and paid taxes on the same until I sold it to Laura Donaldson on October 13, 1934, and during the time which I owned the land I had actual possession of this land and at no time did any person claim any right, title or interest therein and my possession was not interfered with at any time. When I conveyed the property Laura Donaldson, I immediately delivered possession to her and I know that she remained in possession of this property until she delivered the actual possession to Harry Dugger and that he has remained in actual possession of this property until this date, peaceably and undisturbed.

F P Brandl

"E X H I B I T A"

THE STATE OF MISSOURI)
) SS.
COUNTY OF HOWELL.)

Before me, Judge and Ex-Officio Clerk of the Probate Court, a Notary Public, in and for said County, in said State, personally appeared, Francis Crapo, who is known to me, who being by me, first duly sworn, on oath deposes and says that his name is Francis Crapo, that he now resides in the City of West Plains in the County of Howell and State of Missouri, where he has lived for the past several years; that one Ira J. Crapo, who residing in Fayette County, Alabama, is his son; that prior to and on the 25th day of June, 1929, affiant owned and was in the possession of certain farm lands located in Howell County, Missouri and that at that date and prior thereto, affiant and his son, Ira J. Crapo, both resided in said last named County.

Affiant further deposes and says that on the 25th day of June, 1929, affiant and his wife, Martha Crapo, executed to his son, in the presence of O. P. A. Heinrich and L. M. Hyder, as witnesses, a certain instrument in writing agreeing to and conveying unto said son, the lands owned and possessed by affiant in said Howell County, in consideration of said son caring for, attending and supporting him and his wife, said Martha Crapo, which said contract or conveyance is now in the custody of said Ira Crapo; that said son did care for him and his wife in an entirely satisfactory and agreeable manner under this agreement until affiant later traded his farm in Howell County, Missouri, for a forty acre tract of land in Baldwin County, Alabama, described as follows, viz:

> The SW$\frac{1}{4}$ of the NE$\frac{1}{4}$, Section 4, Township 8 South, Range 4 East, situated, lying and being in Baldwin County, Alabama, and containing 40 acres, more or less.

After said trade above mentioned was made, and at the same time, or in anticipation thereof, that affiant and his wife executed a deed to the man who got his land in Missouri and received one from him to the lands above described, lying in said Baldwin County, affiant and his wife executed a similar instrument to his said son, under date of August 27, 1930, and containing practically the same stipulations and purpose of my wife and I executing the second instrument to my son being that it was made for application to the recently acquired lands in the State of Alabama.

Affiant further deposes and says that he, his wife, and his said son, Ira J. Crapo, and his wife, in September of the said year, 1930, moved to said Baldwin County, Alabama, and resided on this parcel of land above described; that his said son, Ira J. Crapo, cared for, attended to and supported affiant and his wife as long as they remained on the above described land, in a manner completely satisfactory to affiant and his wife, both,

(Signed) Francis Crapo

Sworn to and subscribed
before me, this 21st day of May,
1941.
My Commission expires December 31st,
1942.

G. J. Farrell, Judge and Ex Office
Clerk of the Probate Court.

Filed: May 26th, 1941.
Recorded:
Seal:

"E X H I B I T B"

STATE OF MISSOURI,)
:
COUNTY OF HOWELL.)

Before me, Notary Public in and for said County in said State, personally appeared Frank Crapo, who is known to me and who being by me first duly sworn, on oath deposes and says that his name is Frank Crapo; that he now resides in the City of West Plains, in the County of Howell and State of Missouri, where he has lived for the past several years.

Affiant further deposes and says that on the 21st day of May, 1941, he signed an affidavit which was prepared by his son, Ira J. Crapo, who resides at Fayette, in Fayette County, Alabama, and which affidavit was mailed to the affiant for his signature, and the affiant believing that his son, Ira Crapo, had the affidavit prepared true and correct, signed and executed the affidavit through a misapprehension of the true facts and that it has now come to the affiant's attention that the affidavit was not correctly drawn to state the true facts and further, that your affiant did, by letter dated July 1st, 1941, addressed to Ira Crapo, Fayette, Alabama, request that IraCrapo see an attorney at once and straighten out the title to the land hereinafter described, in which letter affiant recited that Ira Crapo well knew that he had not contributed anything to the support of the affiant since he lived in Alabama, which date was around February, 1932; and, in which letter the affiant refreshed the memory of Ira Crapo that Ira Crapo had surrendered the contract which was executed August 27, 1930 and, at the same time, returned to your affiant the deed to the land hereinafter referred to. In my letter to Ira Crapo, Fayette, Alabama, dated July 1st, 1941, I called my son's attention to the fact that he had obtained my signature to the affidavit to the effect that he was still supporting or contributing to my support, which statement I did not understand and which facts are not true as my son, Ira Crapo, has not contributed to my support since I left Baldwin County, Alabama, in the Spring of 1932.

In the affidavit which I signed for my son, Ira J. Crapo, on May 31st, 1941, the facts recited in the second paragraph thereof to the effect that my son, Ira Crapo, performed satisfactorily under this agreement, are not true in their entirety. He did live with me but only partially supported me and when we moved to Missouri, this agreement between us was cancelled and still remains cancelled as of this date.

The land now in consideration,about which this affidavit pertains, is a certain forty acre tract of land in Baldwin County, Alabama, described as follows, to-wit:

> The Southwest Quarter of the Northeast Quarter (SW¼ of NE¼), Section Four, Township Eight South of Range Four East, containing 40 acres, more or less, in Baldwin County, Alabama.

On August 27, 1930, my wife and I being of the impression that my son, Ira Crapo and his wife would reside with us and take care of us for the balance of our lives, entered into an agreement which said agreement is of record in Baldwin County, Alabama, in Deed Book 49 N. S., page 321, and in which agreement, we recited that in consideration of the love and affection of my son, Ira Crapo, and care, attention and support to be given by Ira Crapo to us, that both personal and real property was to be under the control of Ira Crapo after our natural lives had expired but this agreement specificially provided in the fourth paragraph thereof that we should have complete control of our property regardless of wherever located and complete jurisdiction thereof, but that our son, Ira Crapo, could have the use of ten acres of ground to plant whatever kind of crops that he desired to raise. Later on it proved out that we could not make a success of farming in Baldwin County, Alabama, and on February 2, 1932, affiant and my wife, Martha Crapo, conveyed by warranty deed the property above referred to to one J. P. Carroll, which deed is recorded

in the Probate Records, Volume 52 of Deed Books, page 226. At the time of the execution of this deed, my son, Ira Crapo, was present and knew all about it and agreed at the time to the agreement referred to, recorded in Deed Book 49 N. S., page 321, of the Probate Records of Baldwin County, Alabama, bearing date of August 27, 1930, was set aside by us and we all agreed to and did move from Baldwin County, Alabama. We returned to reside in Missouri andlater my son, Ira Crapo, located at Fayette, Alabama, in Fayette County, Alabama, and from that date hence has contributed nothing whatsoever to my support, and the agreement which we had as to support was cancelled between us and was of no further force and effect.

While we resided in Baldwin County, Alabama, my son, Ira J. Crapo, did reside with us, but affiant supported himself and the mutual work of all the parties went to the support of the family, but my son, Ira J. Crapo, did not support me and my wife as he recited in the affidavit which he obtained my signature to under a mistake of facts, which affidavit is dated May 21st, 1941.

Frank Crapo
Francis Crapo

Sworn to and subscribed to before me, this 31st day of October, 1941.

S E A L

J. L. Bess
Notary Public
My Commission Expires: Jan. 12,1943

250
Testimony

Timothy S. (1941)
Rodnick
Pay

Commission To Take Depositions. Printed by The Baldwin Times, Bay Minette.

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT

TO Mina Lee Whitley

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

Harry Dugger, Laura Donaldson and J. P. Carroll

as witnesses in behalf of Harry Dugger in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Harry Dugger

Complainant

and Ira Crapo

Defendant,

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 the 16th day of December, 19 41.

R S Duck

REGISTER

Commissioner's Fee $7.50

Witness' Fees, $

D E C R E E

HARRY DUGGER,	)	
	)	
Complainant.	)	IN THE CIRCUIT COURT OF
	)	
vs.	)	BALDWIN COUNTY, ALABAMA
	)	
IRA CRAPO,	)	IN EQUITY.
	)	
Respondent.	)	

This cause is submitted on the original Bill of Complaint, notice by personal service, Motion for Decree Pro Confesso and Decree Pro Confesso against the Respondent named in said Bill and the testimony of Harry Dugger, Laura Donaldson and J. P. Carroll. The pleadings and evidence in this case show that the lands described as the Southwest Quarter of the Northeast Quarter of Section 4, Township 8 South, Range 4 East, in Baldwin County, Alabama, which said lands have been assessed by and the taxes paid by Laura Donaldson since 1935, and the two years previous to this, this land was assessed by and the taxes paid by J. P. Carroll; and that the said Harry Dugger received title to this property by Warranty Deed from Laura Donaldson, which said Warranty Deed is dated February 19, 1941, and is held in Escrow by Orvis M. Brown, Attorney at Law, until the balance of purchase price is paid in full. That the property described in this deed to Harry Dugger is the Southwest Quarter of the Northeast Quarter, Section 4, Township 8 South, Range 4 East, Baldwin County, Alabama, containing forty acres, more or less. That Laura Donaldson received title to this property from Warranty Deed dated October 13, 1934, which said deed is recorded in Deed Book 56 N. S., page 234, of the Probate Records of Baldwin County, Alabama, from J. P. Carroll and Fannie Carroll, husband and wife; that J. P. Carroll received title to this property from Francis Crapo and Martha Crapo by Warranty Deed dated February 2, 1932, which said deed is recorded in Deed Book 52 N. S., page 226, of the Probate Records of Baldwin County, Alabama; that at the time Francis Crapo and Martha Crapo executed this deed to J. P. Carroll, there was of record an Agreement between Francis Crapo, Martha Crapo, and Ira Crapo, which said Agreement was recorded in Deed Book 49 N. S., page 321, of the Probate Records of Baldwin County, Alabama.

By the terms of the said Agreement it provided "It is further agreed and understood that the parties of the first part shall have complete control of their property wherever located, during their natural lives, and shall have complete jurisdiction of the same until their deaths, excepting that first parties only reserve ten acres of ground out of the land he or they may have for his own use, and the balance is to be controlled by second party as to kind of crops to be raised on the same. Parties of the first part are to have possession of their property until their deaths with the party of the second part." The evidence shows that this instrument or agreement does not refer to, in any manner, the lands now under consideration. That was an Agreement of care and support entered into by the father, mother and son, specifying that ten acres of land was to be used for the sole purpose and desire of the father and mother, but with complete control to be vested in the son upon their death. The evidence shows that at the time the father and mother, Francis Crapo and Martha Crapo, sold this land to J. P. Carroll, in February, 1932, that the same son, Ira Crapo, was present and made all arrangements for the closing of the sale of this land and that the sale was made with his full knowledge and as arranged by him. The evidence shows that, at the time, Ira Crapo did not claim any right, title or interest in this property.

J. P. Carroll conveyed this property to Laura Donaldson as shown by the evidence, and Laura Donaldson at this time, conveyed the property to Harry Dugger and, at this time, Ira Crapo is claiming some right, title or interest in or cloud upon the title to this property by reasons of the instrument or agreement above referred to. The evidence shows that Ira Crapo has not , at any time, paid taxes or assessed or been in possession of this property, and further that no suit is pending to test Complainant's title to, interest in, or right of possession of said land, that said property stands in the name of Harry Dugger, the property being described as the Southwest Quarter of the Northeast Quarter, Section 4, Township 8 South, Range 4 East, containing forty acres, more or less.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the said Complainant, Harry Dugger, is the absolute owner of the following described

property: Southwest Quarter of the Northeast Quarter, Section 4, Township 8 South, Range 4 East, Baldwin County, Alabama, in his own right and fee simple; that no other person, firm or corporation has any interest, right or title, lien or encumbrance on said land. Liens or encumbrances on said land held by anyone other than the Complainant are hereby and herein declared null and void, and are decreed to be a cloud upon the title of Complainant and removed as such.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register of the Circuit Court of Baldwin County, Alabama, in Chancery, shall file a certified copy of this decree in the Probate Office of Baldwin County, Alabama, to be recorded therein, and that it is to be indexed upon the records in the Office of the said Judge of Probate in the name of Ira Crapo, and in the reverse index in the name of Harry Dugger, and title stands in his name on the record.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent pay the costs in this proceeding.

Dated this 26th day of December, 1941.

F. W. Hare

Judge of the 21st Judicial Circuit of Alabama

D E C R E E

HARRY DUGGER, Complainant.	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
IRA CRAPO, Respondent.	)	IN EQUITY.

This cause is submitted on the original Bill of Complaint, notice by personal service, Motion for Decree Pro Confesso and Decree Pro Confesso against the Respondent named in said Bill and the testimony of Harry Dugger, Laura Donaldson and J. P. Carroll. The pleadings and evidence in this case show that the lands described as the Southwest Quarter of the Northeast Quarter of Section 4, Township 8 South, Range 4 East, in Baldwin County, Alabama, which said lands have been assessed by and the taxes paid by Laura Donaldson since 1935, and the two years previous to this, this land was assessed by and the taxes paid by J. P. Carroll; and that the said Harry Dugger received title to this property by Warranty Deed from Laura Donaldson, which said Warranty Deed is dated February 19, 1941, and is held in Escrow by Orvis M. Brown, Attorney at Law, until the balance of purchase price is paid in full. That the property described in this deed to Harry Dugger is the Southwest Quarter of the Northeast Quarter, Section 4, Township 8 South, Range 4 East, Baldwin County, Alabama, containing forty acres, more or less. That Laura Donaldson received title to this property from Warranty Deed dated October 13, 1934, which said deed is recorded in Deed Book 56 N. S., page 234, of the Probate Records of Baldwin County, Alabama, from J. P. Carroll and Fannie Carroll, husband and wife; that J. P. Carroll received title to this property from Francis Crapo and Martha Crapo by Warranty Deed dated February 2, 1932, which said deed is recorded in Deed Book 52 N. S., page 226, of the Probate Records of Baldwin County, Alabama; that at the time Francis Crapo and Martha Crapo executed this deed to J. P. Carroll, there was of record an Agreement between Francis Crapo, Martha Crapo, and Ira Crapo, which said Agreement was recorded in Deed Book 49 N. S., page 521, of the Probate Records of Baldwin County, Alabama.

By the terms of the said Agreement it provided "It is further agreed and understood that the parties of the first part shall have complete control of their property wherever located, during their natural lives, and shall have complete jurisdiction of the same until their deaths, excepting that first parties only reserve ten acres of ground out of the land he or they may have for his own use, and the balance is to be controlled by second party as to kind of crops to be raised on the same. Parties of the first part are to have possession of their property until their deaths with the party of the second part." The evidence shows that this instrument or agreement does not refer to, in any manner, the lands now under consideration. That was an Agreement of care and support entered into by the father, mother and son, specifying that ten acres of land was to be used for the sole purpose and desire of the father and mother, but with complete control to be vested in the son upon their death. The evidence shows that at the time the father and mother, Francis Crapo and Martha Crapo, sold this land to J. P. Carroll, in February, 1932, that the same son, Ira Crapo, was present and made all arrangements for the closing of the sale of this land and that the sale was made with his full knowledge and as arranged by him. The evidence shows that, at the time, Ira Crapo did not claim any right, title or interest in this property.

J. P. Carroll conveyed this property to Laura Donaldson as shown by the evidence, and Laura Donaldson at this time, conveyed the property to Harry Dugger and, at this time, Ira Crapo is claiming some right, title or interest in or cloud upon the title to this property by reasons of the instrument or agreement above referred to. The evidence shows that Ira Crapo has not , at any time, paid taxes or assessed or been in possession of this property, and further that no suit is pending to test Complainant's title to, interest in, or right of possession of said land, that said property stands in the name of Harry Dugger, the property being described as the Southwest Quarter of the Northeast Quarter, Section 4, Township 8 South, Range 4 East, containing forty acres, more or less.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the said Complainant, Harry Dugger, is the absolute owner of the following described

property: Southwest Quarter of the Northeast Quarter, Section 4, Township 8 South, Range 4 East, Baldwin County, Alabama, in his own right and fee simple; that no other person, firm or corporation has any interest, right or title, lien or encumbrance on said land. Liens or encumbrances on said land held by anyone other than the Complainant are hereby and herein declared null and void, and are decreed to be a cloud upon the title of Complainant and removed as such.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register of the Circuit Court of Baldwin County, Alabama, in Chancery, shall file a certified copy of this decree in the Probate Office of Baldwin County, Alabama, to be recorded therein, and that it is to be indexed upon the records in the Office of the said Judge of Probate in the name of Ira Crapo, and in the reverse index in the name of Harry Dugger, and title stands in his name on the record.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent pay the costs in this proceeding.

Dated this 26th day of December, 1941.

F. W. Hare
Judge of the 21st Judicial Circuit of Alabama

I, R. S. 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 the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the 26th day of December, 1941.

R S Duck
Register of Circuit Court, in Equity

HARRY DUGGER,

Complainant.

Vs.

IRA CRAPO,

Respondent.

D E C R E E

File
Mortgages

12-26-41

Harry Dugger
vs
Ira Crapo

HARRY DUGGER, 75

Complainant.

Vs.

IRA CRAPO, 55

Respondent.

DECREE

Filed Dec 27th 1941
Register

STATE OF ALABAMA, BALDWIN COUNTY
Filed DEC 27 1941 9 A M
Recorded Deed book 76 page 379
and I certify that the following Privilege Tax has been paid.
Deed Tax
Mortgage Tax
Judge of Probate
By

R S Duck 1.95

8600 Motion for Decree Pro Confesso on Personal Service. 3107 Code

The State of Alabama,
Baldwin County.

No. _____ CIRCUIT COURT IN EQUITY.

HARRY DUGGER Complainant

vs.

IRA CRAPO Defendant

Motion is hereby made for a Decree Pro Confesso against Ira Crapo

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ____; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 15th day of December 19 41

Solicitor.

8550 REQUEST FOR DECREE IN VACATION. Moore Ptg. Co.

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Fall Term, 1941

HARRY DUGGER, Complainant

Vs.

IRA CRAPO, Defendant

To R. S. DUCK, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Orvis M. Brown _____ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Solicitor for Complainant.

Bay Minette, Ala., 12/27 1941

R S Clark

IN ACCOUNT WITH

G. W. ROBERTSON

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Recording	from	to	Privilege Tax	Rec. Fee	Total
Decree	Harry Kluegger	Ina Crapo			1 75
		Paid 12/27/41 GWR			

8581. NOTE OF TESTIMONY

MOORE PRINTING CO., BAY MINETTE, ALA.

HARRY DUGGER

vs.

IRA CRAPO

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 on personal service and testimony of Harry Dugger, Laura Donaldson and J. P. Carroll

and in behalf of Defendant upon

Register.

No. 750

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

HARRY DUGGER

VS.

IRA GRAPO

NOTE OF TESTIMONY

Filed in Open Court this 24th

day of Dec 1941

R. L. Duck

REGISTER

MOORE PRINTING CO., BAY MINETTE, ALA.

No. 750 Page

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY

HARRY DUGGER

Vs.

IRA CRAPO

REQUEST FOR DECREE IN VACATION

Filed Dec 24, 1944

Register.

Recorded in Record

Vol. Page

Register.

Moore Ptg. Co. Bay Minette

No. 258 Page

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY

HARRY DUGGER

vs.

IRA CRAPO

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE

Filed Aug 15 1941

Register.

Recorded in Record,

Vol. Page

Register.

Moore Printing Company, Bay Minette, Ala.