Know all men by these presents that we, Thomas J. T aylor, Aaron A Lowenstein, and Sidney Lowenstein, partners compssing the firm of Taylor, Lowenstein and Company, and Margaret B Taylor, the wife of Thomas J Taylor, Blanche M. Lowenstein, the wife of Aaron A. Lowenstein, and Clara Lowenstin, the wife of Sidney Lowenstein, for and in consideration of the sum of Eleven hundred seventy and 44/100 ($1170.44) dollars, to us in hand paid by Larkin E Edmondson, the receipt of which is hereby acknowledged have granted, bargained sold and conveyed and by these presents do grant, bargain, sell and convey unto the said Larkin E. Edmondson, his heirs and assigns forever, an undivided one-fifth interest in and to the following described real property lying and being in Baldwin County Alabama, viz:

South-east quarter of Section 9, township 5 Range 4. one hundred and sixty acres; east half of southwest quarter and south half of northwest quarter, section 9, township 5, range 4, one hundred and sixty acres; northwest quarter of northwest quarter, section 10, township 5, range 2, forty acres; northeast quarter of northwest quarter and northwest quarter of northwest quarter, section 9, township 5, range 2, eighty acres; west half of southeast quarter, section 16, township 5, range 2, eighty acres; west half of southwest quarter, section 21, township 5, range 2, eighty acres; one acre in section 20, beginning at the southeast corner of Calvin Adams lot, running thence south 100 rods, west 160 rods for a beginning, thence north 1.58½ chains, east 6 chains 34 links, south 1.58½ chains, thence west 5.34 chains to beginning, section 20, township 5 Range 2, one acre; five acres in the east half of northwest quarter of northwest quarter, section 20, township 5, range 2 five acres; seven and one-half acres in northeast quarter of north west quarter, section 20, township 5 Range 2, seven and one-half acres; fifteen acres in south half of southeast quarter of southeast quarter of southwest quarter, section 20, township 5 range 2. fifteen acres; fifteen acres in northeast quarter of southwest quarter, section 20, township 5 range 2, fifteen acres; a tract of land starting at northwest quarter section 20, thence south 100 rods, east 80 rods for a beginning corner, thence east 80 rods, south 60 rods, west 80 rods, north 60 rods to beginning in northwest quarter section 20, township 4 Range 2, thirty acres. number of acres improved forty; number of acres unimproved southeasu quarter section 20, township 5 range 2, one hundred sixty acres.

Also the following leases for turpentine purposes, viz:- Lease dated December 14, 1915 made by Charles Barclay to N. G. McKenzie and covering the following described lands in Baldwin County, Alabama, West half of northwest quarter, section 24, Township 6 South Range 2 East, containing eighty acres; all of section 23, township 6 south, range 2 east, except northeast quarter of southeast quarter sold to Anocker and containing six hundres acres; all of section 25, township 6 south, range 2 east, except northeast quarter of northeast quarter containing six hundred acres; all of section 26, township 6 south range 2 east, containing six hundred and forty acres; northeast quarter of section 36, township 6 south, range 2 east, one hundred sixty acres; total two thousand eighty acres; Lease dated January 8th, 1916, made by Mary Ann Bishop to N. G. McKenzie and covering the following described lands in Baldwin County, Alabama, sixty acres more or less, in northwest quarter of section 19, township 6 South range 3 East,. Lease dated January 11, 1916, made by Marcus Howard and Babe Bishop to N. G. McKenzie and covering the following described lands in Baldwin County, Alabama, that part belonging to each of the first named parties on and being in the northeast quarter of northeast quarter of section 25, township 6 south range 2 east, and the northwest quarter section 30, township 6 south range 3 east. The above described lands and leases being the same conveyed to Taylor Lowenstein and Company by Hiram C. Taylor, Trustee, by deed dated November 13th, 1916, and recorded in Record Book 25NS. page 300, of the Probate records of Baldwin County, Alabama.

Exhibit "3" to testimony of W. C. Mason
Commissioner.

Together with all and singular the tenements, hereditaments, rights, members, privileges and appurtenances unto the same belonging to in anywise appertaining.

To have and to hold unto the said Larkin E. Edmondson, his heirs and assigns forever.

In witness whereof, the said Thomas J. Taylor, Aaron A. Lowenstein and Sidney Lowenstein, partners composing the firm of Taylor-Lowenstein and Company, and said Margaret B. Taylor, the wife of Thomas J Taylor, Blanche M. Lowenstein, the wife of Aaron A. Lowenstein, and Clara Lowenstein, the wife of Sidney Lowenstein, have hereunto set their hands and seals on this the 15th day of October, 1917.

Thomas J. Taylor.	SEAL.
Aaron A. Lowenstein.	SEAL.
Sidney Lowenstein.	SEAL.
Margaret B. Taylor.	SEAL.
Blanche M. Lowenstein.	SEAL.
Clara Lowenstein.	SEAL.

State of Alabama,)
County of Mobile.)

I, Maurice Brigance, a Notary Public in and for the above State and County, hereby certify that Thomas J. Taylor and Margaret B. Taylor, his wife; Aaron A. Lowenstein and Blanche M Lowenstein, his wife; Sidney Lowenstein and Clara Lowenstein, his wife; whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day, that being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand this the 19th day of November, A.D. 1917.

(SEAL)

Maurice Brigance, Notary Public,
Mobile County, Ala.,

Filed for Record November 21st, 1917 at 1 P.M. Recorded November 26th, 1917.

Jas M. Voltz, Judge of Probate.

-----oowoo-----

STATE OF ALABAMA, BALDWIN COUNTY.

I, G. W. Robertson, Judge of Probate for said County, in said State do hereby certify that the above and foregoing constitutes a full, true, accurate and complete copy of the Deed given by Taylor Lowenstein & Company to Larkin E. Edmondson, dated October 15th, 1917, as the same appears of record in my office in Deed book #26 NS at page 489 thereof.

Given under my hand and official seal this the 21st day of June, A.D. 1943.

G. W. Robertson

Judge of Probate, Baldwin County,
Alabama.

Know all men by these Presents, that whereas, Roland Edmondson, did by his deed of Trust, dated the 21st day of February, 1916, and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Mortgage book 15, pages 468-471, convey the lands hereinafter described to Hiram C. Taylor as Trustee, to secure a loan made to him by Taylor, Lowenstein & Co. a partnership composed of Thos. J. Taylor, Aaron A. Lowenstein and Sidney Lowenstein, all of Mobile, Alabama;

And Whereas in and by said Deed of Trust, the said trustee is authorized and empowered upon default in the payment of the notes or any of them secured by said Deed of trust, to sell said property at public auction after having given notice by advertisement once a week for three successive weeks of the time, place and terms of sale in a newspaper published in the County of Baldwin, State of Alabama;

And whereas default was made in the payment of said notes and said Taylor, Lowenstein & Co. having declared all of the indebtedness secured by said Deed of Trust to be presently due and payable, and have requested said Trustee to proceed to sell said property under the power of sale contained in said Deed of Trust, and in obedience to said request said Trustee did give notice of the time, place and terms of sale as required by said deed of Trust, by advertisement once a week for three successive weeks in The Baldwin Times, a newspaper published in the County of Baldwin, State of Alabama. By the terms of said notice said sale was to take place on the 3rd day of October 1916, at the Court House door of Baldwin County, in the Town of Bay Minette, Alabama, but shortly before the day of said sale at the request of said Roland Edmondson and by consent of the other parties to said Deed of Trust, said sale was postponed to the 6th day of November, 1916; notice of such postponement was given by advertisement in the said, The Baldwin Times of September 28th, 1916, notice of such postponement was also given by public announcement at the Court House door of Baldwin County, Alabama, on the 3rd day of October 1916;

And Whereas on the 6th day of November, 1916, the day to which said sale was postponed, at the Court House Door of Baldwin County, Alabama, in the town of Bay Minette, Alabama, said lands described in said Deed of Trust were sold by me at Public auction to the highest bidder for cash, and at said sale said Taylor, Lowenstein & Co. became the purchasers for the sum of Eleven hundred and forty-seven 18/100 dollars, that being the highest and best Bid for cash at said sale.

Now Therefore, I, Hiram C. Taylor, the Trustee named in said Deed of Trust, by virtue of and in execution of the powers contained in said Deed of Trust, in consideration of the premises and the sum of Eleven hundred and forty-seven 18/100 dollars to me in hand paid, do grant, bargain, sell and convey unto the said Taylor, Lowenstein & Co. a partnership composed of Thos. J. Taylor, Aaron A. Lowenstein and Sidney Lowenstein, their heirs and assigns forever, the following described property, situate, lying and being in Baldwin County, Alabama, to-wit:

An undivided one fifth interest in and to the following described lands, SE¼ of Sec 9, Tp 5 Range 4, one hundred and sixty acres; E½ of SW¼ & S½ of NW¼ Sec 9, Tp 5 Range 4, one hundred and sixty acres; NW¼ of NW¼ Sec 10 Tp 5 Range 2, forty acres; NE¼ of NW¼ & NW¼ of NW¼ Sec 9, Tp 5 Range 2, eighty acres; W½ of SE¼ Sec 16, Tp 5 Range 2; eighty acres; W½ of SW¼ Sec 21, t 5 Range 2, eighty acres; One acre in sec 20, beginning at the SE cor. Calvin Adams lot running thence S 100 rds. W 160 rds for a beginning, thence North 1.58½ chs, E 6 chs 34 lks. S 1.58½ chs. thence W 6.34 chs to beginning Sec 20 tp 5 Range 2, one acre; five acres in the E½ of NW¼ of NW¼ Sec 20, Tp 5 Range 2, five acres; Seven and one half acres in NE¼ of NW¼ Sec 20, Tp 5 Range 2, 7½ acres; Fifteen acres in S½ of SE¼ of SE¼ of SW¼ sec 20, Tp 5, Range 2 fifteen acres; fifteen acres in NE¼ of SE¼ Sec 20, Tp 5 R 2, fifteen acres; a tract of land starting at NW¼ Sec 20, thence S 100 rods, E 80 rods for a

Exhibit "2" to testimony of W. C. Mason
Ora J. Nelson
Commissioner.

NOTICE OF PENDENCY OF BILL OF COMPLAINT

ROY T. LEMON and G. D. NELSON,
Complainants,

vs.

THE LANDS HEREINAFTER DESCRIBED AND THE UNKNOWN HEIRS OF THOMAS CYPERT, Deceased, et als,
Respondents.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 801

Notice is hereby given to the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Mary Pickett, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or emcumbrance on the lands hereinafter described; that on the 19th day of February, 1942, Roy T. Lemon and G. D. Nelson filed in the Circuit Court of Baldwin County, Alabama, Equity Side, a verified Bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

Southeast Quarter of Section Twenty (20), Township Five (5) South Range Two (2) East;

That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: From the Northwest Corner of said Section Twenty (20), run South Forty (40) rods, East Forty (40) rods, South Twenty (20) rods for a beginning corner, thence East 130 rods, South 40 rods, West 130 rods, North 40 rods to the point of beginning, containing 32.50 acres, more or less;

That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: Beginning at a point in the West line of the Southeast Quarter of Northwest Quarter of said Section 20, which is 5 chains South from the Northwest Corner of said Quarter Quarter, running thence South along said West line 17.30 chains to a point which is 37.70 chains North from the South boundary line of said Section 20; thence East 20 chains to the half section line of said Section 20; thence North 17.30 chains; thenne West 20.00 chains to point of beginning, containing 34.60 acres, more or less;

and against the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Mary Pickett, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, the said Bill of Complaint having been filed for the purpose of establishing the title of the said Complainants to all of the said lands for the purpose of quieting their title thereto and to clear up all doubts and disputes concerning the title to the said property.

The Complainants claim the absolute fee simple title in and to all of the said lands under, from, by and through the following conveyances, all of which are recorded in the office of the Probate Judge of Baldwin County, Alabama, the county where the said lands are situated to-wit:

(1). United States Patent to Thomas Cypert and Francis Cypert, dated July 10, 1839, and recorded in Deed Book Number 3 N. S. at pages 665-6, Baldwin County Records.

(2). United States Patent to Francis Cypert dated July 10, 1839, filed May 22, 1901, and recorded in Deed Book Number 1 N. S. at page 666.

(3). Deed from Annie E. Mason and W. C. Mason, her husband, to Roy T. Lemon and G. D. Nelson, dated February 4, 1942 and filed for record in the probate office of Baldwin County, Alabama, on February 18th, 1942.

(4). Deed from W. C. Mason and wife to Roy T. Lemon and G. D. Nelson dated February 4, 1942 and filed for record on February 18th, 1942.

(5). Deed from L. E. Edmondson and wife, Harold E. Edmondson and wife and Annie E. Mason and husband, to Roy T. Lemon and G. D. Nelson dated February 4, 1942, which was filed for record on February 18th, 1942.

The Complainants in and by their said Bill of Complaint allege and aver that they are in the actual, peaceable possession of all of the said lands; that they, together with those through whom they claim title to the said lands have held color of title thereto for a period of twenty or more consecutive years preceding the filing of their Bill of Complaint, during all of which time they have paid taxes on all of the said lands; that no suit is pending to test Complainants' title to interest

JAMES H. FAULKNER
EDITOR AND PUBLISHER

the BALDWIN TIMES

ST COUNTY'S- BEST NEWSPAPER

BAY MINETTE, ALABAMA

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

Roy T. Lemon and G. D. Nelson
vs. Unknown heirs of
Thomas Cypert

COST STATEMENT

995 WORDS @ 4½ cents $44.78

I hereby certify this is correct, due and unpaid ~~(paid)~~.

J. H. Faulkner
Publisher.

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

Date of 1st publication June 18, 1942 Vol. 53 No. 20

Date of 2nd publication " 25, 1942 Vol. 53 No. 21

Date of 3rd publication July 2, 1942 Vol. 53 No. 22

Date of 4th publication " 9, 1942 Vol. 53 No. 23

Subscribed and sworn before the undersigned this 15 day of July 1942.

Herbert Costas
Notary Public, Baldwin County.

J. H. Faulkner
Publisher.

R S Duck

BAY MINETTE, ALA., 4/17 1942

IN ACCOUNT WITH

G. W. ROBERTSON

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Recording	from	to	Privilege Tax	Rec. Fee	Total
Deed Roy & Lauma to Turk Hub Thos Coppert					1 35

Paid 4/19/42

STATE OF ALABAMA |
BALDWIN COUNTY |

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mary Pickett to appear within thirty days from the service of this writ in the Circuit Court Equity Side, to be held for said county at the place of holding same, and then and there demur, plead to or answer the Bill of Complaint of Roy T. Lemon and G. D. Nelson.

Witness my hand this 19th day of February, 1942.

R. L. Deuch

Register of the Circuit Court, Baldwin County, Alabama, in Equity.

The address of the said Defendant,
Mary Pickett, is Post Office Box 482-A,
Club House Road, Mobile, Alabama.

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

Your Orators, Roy T. Lemon and G. D. Nelson, present this Bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

> Southeast Quarter of Section Twenty (20), Township Five (5) South Range Two (2) East;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: From the Northwest Corner of said Section Twenty (20), run South Forty (40) rods, East Forty (40) rods, South Twenty (20) rods for a beginning corner, thence East 130 rods, South 40 rods, West 130 rods, North 40 rods to the point of beginning, containing 32.50 acres, more or less;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: Beginning at a point in the West line of the Southeast Quarter of Northwest Quarter of said Section 20, which is 5 chains South from the Northwest Corner of said Quarter Quarter, running thence South along said West line 17.30 chains to a point which is 37.70 chains North from the South boundary line of said Section 20; thence East 20 chains to the half section line of said Section 20; thence North 17.30 chains; thence West 20.00 chains to point of beginning, containing 34.60 acres, more or less,

and against the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased; Mary Picket, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and thereupon your Orators complain and show unto the Court and your Honor as follows:

1. Your Orator, the said Roy T. Lemon, is over twenty-one years of age and a resident of Mobile County, Alabama; your Orator, G. D. Nelson, is over twenty-one years of age and a resident of the State of Alabama.

2. The names, ages, places of residence and post office addresses of the heirs of Thomas Cypert, Deceased, are unknown and cannot be ascertained after diligent inquiry; the names, ages, places of residence and post office addresses of the heirs of Francis Cypert, Deceased, are unknown and cannot be ascertained after diligent

inquiry; Mary Pickett is over twenty-one years of age, a resident of Mobile County, Alabama, whose residence and post office address is Box 482-A, Club House Road, Mobile, Alabama; Cora Mitchell is over twenty-one years of age, a non-resident of the State of Alabama, whose residence is unknown and cannot be ascertained after diligent inquiry; the names, ages, places of residence and post office addresses of the heirs of Pompey Mitchell, Deceased, are unknown and cannot be ascertained after diligent inquiry.

3. Your Orators own the lands hereinabove particularly described in their own right absolutely and in fee simple, being the lands against which this proceeding is brought, and are in the actual, peaceable possession of the said lands. Your Orators, together with those through whom they claim title to the said lands have held color of title thereto for twenty or more consecutive years next preceding the filing of this Bill of Complaint and have paid taxes on the said lands during the whole of such period of time; that no suit is pending to test your Orators' title to, interest in or right to the possession of such lands or any part thereof; wherefore your Orators file this their verified Bill of Complaint in the Circuit Court of Baldwin County, Alabama, Equity Side, the county in which the said lands lie against the said lands and any and all persons claiming any title to, interest in, lien or encumbrance upon the said lands or any part thereof to establish their right or title to such lands and to clear up all doubts or disputes concerning the same.

4. Your Orators have and claim to have jointly the absolute fee simple title to all of the following described real property situated in Baldwin County, Alabama, to-wit:

> Southeast Quarter of Section Twenty (20), Township Five (5) South Range Two (2) East;
>
> That part of Section Twenty (20), Township Five (5) South, Range Two (2) East of St. Stephens Meridian, described as follows: From the Northwest Corner of said Section Twenty (20), run South Forty (40) rods, East Forty (40) rods, South Twenty (20) rods for a beginning corner, thence East 130 rods, South 40 rods, West 130 rods, North 40 rods to the point of beginning, containing 32.50 acres, more or less;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: Beginning at a point in the West line of the Southeast Quarter of Northwest Quarter of said Section 20, which is 5 chains South from the Northwest Corner of said

Quarter Quarter, running thence South along said West line 17.30 chains to a point which is 37.70 chains North from the South Boundary line of said Section 20; thence East 20 chains to the half section line of said Section 20; thence North 17.30 chains; thence West 20.00 chains to point of beginning, containing 34.60 acres, more or less.

Such title so held and claimed by your Orators in and to all of the said lands was obtained from the persons and through the instruments as will hereinafter appear. Your Orators further show that the title to all of the said land stands upon the records in the Probate Court of Baldwin County, Alabama, the county where the lands are situated, in the names of your Orators; that no person, firm or corporation, other than your Orators and those through whom they claim title to said lands have at any time within twenty years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands or any interest therein, or any part thereof except Cora Mitchell, who has assessed the following described lands in Baldwin County, Alabama, to-wit:

Start at the Northeast Corner of the Southwest Quarter of the Southeast Quarter and run South 8.43 chains, thence West 171 feet to point of beginning, thence West 68 feet, North 317 feet, East 68 feet, South 317 feet to beginning in Section Twenty (20), Township Five (5) South, Range Two (2) East, containing One and one-half acres,

for the years of 1937, 1938, 1939, 1940, 1941, and 1942 and paid the taxes thereon, nor has any person, firm or corporation, other than your Orators and those through whom they claim title, known to your Orators to have had possession of the said lands or any part thereof and that no person or persons, including the said Cora Mitchell, are known to your Orators to claim the said lands or any interest therein or any part thereof or any encumbrance thereon.

5. Your Orators claim the absolute fee simple title in and to all of the said lands under, by and through the following instruments of writing, all being recorded in the probate office of Baldwin County, Alabama, the county where the said lands are situated viz:

(a) United States Patent to Thomas Cypert and Francis Cypert dated July 10, 1839 and recorded in Deed Book Number 3 N. S. at pages 665-6, Baldwin County Records.

(b) United States Patent to Francis Cypert dated July 10, 1839, filed May 22, 1901 and recorded in Deed Book Number 1 N. S. at page 666.

(c) Deed from Annie E. Mason and W. C. Mason, her husband, to Roy T. Lemon and G. D. Nelson, dated February 4, 1942 and filed for record in the probate office of Baldwin County, Alabama on February 18th, 1942.

(d) Deed from W. C. Mason and wife to Roy T. Lemon and G. D. Nelson dated February 4, 1942, and filed for record on February 18th, 1942.

(e) Deed from L. E. Edmondson and wife, Harold E. Edmondson and wife and Annie E. Mason and husband, to Roy T. Lemon and G. D. Nelson dated February 4, 1942, which was filed for record on February 18th, 1942.

6. Your Orators aver that they have made and caused to be made a diligent search to ascertain the names, ages and addresses of all of heirs of the parties named herein who are now deceased and also to see if anyone was making claim to or in the possession of the said lands or any part thereof. Your Orators further aver that in an effort to ascertain these facts they had complete abstracts of title made to all of the above described property by a competent abstractor; that they then employed an attorney to examine the same and ascertain to whom the record showed to have some claim to or encumbrance on this property; that they also caused a thorough inquiry to be made in the community where the lands are situated for the purpose of ascertaining any claimants to it or any other information having any bearing on the title to the property; that these efforts and searches by your Orators, their agents and attorney, have continued diligently for a period of more than three months and that all of the information so secured as to the said heirs prior ownership and possession of the said property is as hereinabove set out.

PRAYER FOR PROCESS

Your Orators pray that the lands hereinabove described, the Defendants named herein and the unknown heirs, devisees, personal

representatives, next of kin of the Defendants hereinabove named who are dead and all persons, firms or corporations claiming title to, interest in, lien or encumbrance on the said lands or any part thereof be made parties respondents to this Bill of Complaint and be brought into Court by the usual and proper process to the end that all such Defendants or other persons, firms or corporations who claim said lands or any interest therein or any lien or encumbrance thereon may be required to appear, plead, answer or demur to this Bill of Complaint within the time prescribed by law and under the rules and practice of this honorable Court; that notice of the pendency of this Bill of Complaint be published; that certified copies thereof be filed thereof as required by law and that such other notice or notices be given as may be required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Your Orators pray that each and all of the Defendants named and the unknown heirs, devisees, legal representatives and next of kin of such Defendants herein named who are dead and all other persons, firms or corporations who claim to own said lands or any part thereof or any interest therein or any lien or encumbrance thereon be required to set forth and specify such claim, title, right, interest, lien or encumbrance and how and by what instrument the same is derived and created and that upon the final hearing of this cause it be Ordered, Adjudged and Decreed that your Orators at the time of the filing of this Bill of Complaint had the legal title to all of the above described lands and that none of the Defendants herein specifically named or any other person, firm or corporation has any right, title or interest therein or any part thereof or any lien or encumbrance thereon and that all doubts and disputes concerning the said property may be cleared up and your Orators' title to the said lands be fully and completely quieted. Your Orators further pray for such other, further and general relief as they may be equitably entitled to the premises considered.

J. B. Blackburn

Solicitor for Complainants.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says: That he is solicitor for the Complainants named in the foregoing Bill of Complaint; that he has read over and is fully acquainted with all matters and facts set forth and that the same are true.

J. B. Blackburn

Sworn to and subscribed before me on
this the 19th day of February, 1942.

Ora S. Nelson

Notary Public, Baldwin County, Alabama.

NOTICE OF PENDENCY OF BILL OF COMPLAINT

ROY T. LEMON AND G. D. NELSON, Complainants, VS. THE LANDS HEREINAFTER DESCRIBED AND THE UNKNOWN HEIRS OF THOMAS CYPERT, DECEASED, et als, Respondents.	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY. NUMBER 801.

Notice is hereby given to the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Mary Pickett, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the lands hereinafter described; that on the 19th day of February, 1942, Roy T. Lemon and G. D. Nelson filed in the Circuit Court of Baldwin County, Alabama, Equity Side, a verified Bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

> Southeast Quarter of Section Twenty (20), Township Five (5) South Range Two (2) East;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: From the Northwest Corner of said Section Twenty (20), run South Forty (40) rods, East Forty (40) rods, South Twenty (20) rods for a beginning corner, thence East 130 rods, South 40 rods, West 130 rods, North 40 rods to the point of beginning, containing 32.50 acres, more or less;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: Beginning at a point in the West line of the Southeast Quarter of Northwest Quarter of said Section 20, which is 5 chains South from the Northwest Corner of said Quarter Quarter, running thence South along said West line 17.30 chains to a point which is 37.70 chains North from the South boundary line of said Section 20; thence East 20 chains to the half section line of said Section 20; thence North 17.30 chains; thence West 20.00 chains to point of beginning, containing 34.60 acres, more or less;

and against the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Mary Pickett, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or

encumbrance on the said lands or any part thereof, the said Bill of Complaint having been filed for the purpose of establishing the title of the said Complainants to all of the said lands for the purpose of quieting their title thereto and to clear up all doubts and disputes concerning the title to the said property.

The Complainants claim the absolute fee simple title in and to all of the said lands under, from, by and through the following conveyances, all of which are recorded in the office of the Probate Judge of Baldwin County, Alabama, the county where the said lands are situated to-wit:

(1). United States Patent to Thomas Cypert and Francis Cypert, dated July 10, 1839 and recorded in Deed Book Number 3 N. S. at pages 665-6, Baldwin County Records.

(2). United States Patent to Francis Cypert dated July 10, 1839, filed May 22, 1901 and recorded in Deed Book Number 1 N. S. at page 666.

(3). Deed from Annie E. Mason and W. C. Mason, her husband, to Roy T. Lemon and G. D. Nelson, dated February 4, 1942 and filed for record in the probate office of Baldwin County, Alabama, on February 18th, 1942.

(4). Deed from W. C. Mason and wife to Roy T. Lemon and G. D. Nelson dated February 4, 1942 and filed for record on February 18th, 1942.

(5). Deed from L. E. Edmondson and wife, Harold E. Edmondson and wife and Annie E. Mason and husband, to Roy T. Lemon and G. D. Nelson dated February 4, 1942, which was filed for record on February 18th, 1942.

The Complainants in and by their said Bill of Complaint allege and aver that they are in the actual, peaceable possession of all of the said lands; that they, together with those through whom they claim title to the said lands have held color of title thereto for a period of twenty or more consecutive years preceding the filing of their Bill of Complaint, during all of which time they have paid taxes on all of the said lands; that no suit is pending to test Complainants' title to, interest in or right to the possession of such lands or any part thereof; that no person, firm or corporation other than the said Complainants and those through whom they claim title, have at any time within twenty years next preceding the filing of the said Bill of Complaint, known to your Complainants, to have had possession of or made any claim to the said lands or any part thereof.

ORAL DEPOSITION

Baldwin Times 10-27-55 1M

THE STATE OF ALABAMA
Baldwin County

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

ROY T. LEMON AND G. D. NELSON COMPLAINANTS

VS.

CERTAIN LANDS AND THE UNKNOWN HEIRS OF THOMAS CYPERT, Deceased, et al RESPONDENT

I, Ora S. Nelson

as ~~Registerx and~~ Commissioner

have called and caused to come before me W. C. Mason, Gus Bertagnolli and T. E. Hanson

witness~~es~~ named in the Requirement for Oral Examination, on the 22nd day of June 1943, at the office of J. B. Blackburn in Bay Minette, Alabama, and having first sworn said witness~~es~~ to speak the truth, the whole truth, and nothing but the truth, the said W. C. Mason, Gus Bertagnolli and T. E. Hanson doth depose and say as follows:

ORAL EXAMINATION

I, Ora S. Nelson, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition s 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 _____ 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 22nd day of June, 1943.

Ora S. Nelson (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

ROY T. LEMON AND G. D. NELSON
Complainants

Vs.

CERTAIN LANDS AND THE UNKNOWN HEIRS OF THOMAS CYPERT, Deceased, et als
Respondents

ORAL DEPOSITION

Filed _____, 194_
_____, Register

RECORDED IN
_____ Record

Vol. _____ Page _____

_____, Register

The said Complainants in and by their said Bill of Complaint, further allege that no persons other than the Complainants and those through whom they claim title are known to them to have paid any taxes on the said lands or any part thereof during the last ten years, except Cora Mitchell, who has paid taxes for the years of 1937 to 1941, both inclusive, on the following described property, to-wit:

> Start at the Northeast Corner of the Southwest Quarter of the Southeast Quarter and run South 8.43 chains, thence West 171 feet to point of beginning, thence West 68 feet, North 317 feet, East 68 feet, South 317 feet to beginning in Section Twenty (20), Township Five (5) South, Range Two (2) East, containing One and one-half acres.

IN WITNESS WHEREOF, I have hereunto set my hand as Register of the Circuit Court of Baldwin County, Alabama, in Equity and affixed the seal of the said Court on this the 16th day of June, 1942.

Ruth D. [illegible]
Register of the Circuit Court
of Baldwin County, Alabama,
in Equity.

J. B. BLACKBURN,
Solicitor for
Complainants.

ROY T. LEMON AND G. D. NELSON, Complainants, VS. CERTAIN LANDS AND THE UNKNOWN HEIRS OF THOMAS CYPERT, et al, Respondents.	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY. NUMBER____.

MOTION FOR DECREE PRO CONFESSO

Motion is hereby made for a Decree Pro Confesso against the Respondent, Mary Picket, on the ground that a copy of the Bill of Complaint filed in this cause, together with a Summons requiring her to demur, plead to or answer the Bill of Complaint, was served on her by a deputy sheriff of Mobile County, Alabama, more than thirty days prior to this date and to date hereof she has failed to appear and plead to or answer the Bill of Complaint filed against her in this cause.

Motion is further made for Decrees Pro Confesso against the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased and any and all firms or corporations claiming any title to, interest in, lien or encumbrance on the following described lands situated in Baldwin County, Alabama, to-wit:

Southeast Quarter of Section Twenty (20), Township Five (5) South Range Two (2) East;

That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: From the Northwest Corner of said Section Twenty (20), run South Forty (40) rods, East Forty (40) rods, South Twenty (20) rods for a beginning corner, thence East 130 rods, South 40 rods, West 130 rods, North 40 rods to the point of beginning, containing 32.50 acres, more or less;

That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: Beginning at a point in the West line of the Southeast Quarter of Northwest Quarter of said Section 20, which is 5 chains South from the Northwest Corner of said Quarter Quarter, running thence South along said West line 17.30 chains to a point which is 37.70 chains North from

the South boundary line of said Section 20; thence East 20 chains to the half section line of said Section 20; thence North 17.30 chains; thence West 20 chains to point of beginning, containing 34.60 acres, more or less;

being the lands described in the Bill of Complaint and which form the basis of this suit, on the ground that more than sixty days have elapsed since the first publication of the notice of the pendency of the Bill of Complaint in this said cause, which said service was had by publication according to law and the said Respondents and each of them have failed to answer, plead to or demur to the Bill of Complaint in this cause to this date.

Dated this 14th day of June, 1943.

Solicitor for Complainants.

NOTICE OF PENDENCY OF BILL OF COMPLAINT

ROY T. LEMON AND G. D. NELSON, Complainants, VS. THE LANDS HEREINAFTER DESCRIBED AND THE UNKNOWN HEIRS OF THOMAS CYPERT, DECEASED, et als, Respondents.	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY. NUMBER 801.

Notice is hereby given to the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Mary Pickett, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the lands hereinafter described; that on the 19th day of February, 1942, Roy T. Lemon and G. D. Nelson filed in the Circuit Court of Baldwin County, Alabama, Equity Side, a verified Bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

> Southeast Quarter of Section Twenty (20), Township Five (5) South Range Two (2) East;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: From the Northwest Corner of said Section Twenty (20), run South Forty (40) rods, East Forty (40) rods, South Twenty (20) rods for a beginning corner, thence East 130 rods, South 40 rods, West 130 rods, North 40 rods to the point of beginning, containing 32.50 acres, more or less;
>
> That part of Section Twenty (20), Township Five (5) South Range Two (2) East of St. Stephens Meridian, described as follows: Beginning at a point in the West line of the Southeast Quarter of Northwest Quarter of said Section 20, which is 5 chains South from the Northwest Corner of said Quarter Quarter, running thence South along said West line 17.50 chains to a point which is 37.70 chains North from the South boundary line of said Section 20; thence East 20 chains to the half section line of said Section 20; thence North 17.50 chains; thence West 20.00 chains to point of beginning, containing 34.60 acres, more or less;

and against the unknown heirs of Thomas Cypert, Deceased, the unknown heirs of Francis Cypert, Deceased, Mary Pickett, Cora Mitchell, the unknown heirs of Pompey Mitchell, Deceased, and any and all persons, firms or corporations claiming any title to, interest in, lien or

encumbrance on the said lands or any part thereof, the said Bill of Complaint having been filed for the purpose of establishing the title of the said Complainants to all of the said lands for the purpose of quieting their title thereto and to clear up all doubts and disputes concerning the title to the said property.

The Complainants claim the absolute fee simple title in and to all of the said lands under, from, by and through the following conveyances, all of which are recorded in the office of the Probate Judge of Baldwin County, Alabama, the county where the said lands are situated to-wit:

(1). United States Patent to Thomas Cypert and Francis Cypert, dated July 10, 1839 and recorded in Deed Book Number 5 N. S. at pages 665-6, Baldwin County Records.

(2). United States Patent to Francis Cypert dated July 10, 1839, filed May 22, 1901 and recorded in Deed Book Number 1 N. S. at page 666.

(3). Deed from Annie E. Mason and W. C. Mason, her husband, to Roy T. Lemon and G. D. Nelson, dated February 4, 1942 and filed for record in the probate office of Baldwin County, Alabama, on February 18th, 1942.

(4). Deed from W. C. Mason and wife to Roy T. Lemon and G. D. Nelson dated February 4, 1942 and filed for record on February 18th, 1942.

(5). Deed from L. E. Edmondson and wife, Harold E. Edmondson and wife and Annie E. Mason and husband, to Roy T. Lemon and G. D. Nelson dated February 4, 1942, which was filed for record on February 18th, 1942.

The Complainants in and by their said Bill of Complaint allege and aver that they are in the actual, peaceable possession of all of the said lands; that they, together with those through whom they claim title to the said lands have held color of title thereto for a period of twenty or more consecutive years preceding the filing of their Bill of Complaint, during all of which time they have paid taxes on all of the said lands; that no suit is pending to test Complainants' title to, interest in or right to the possession of such lands or any part thereof; that no person, firm or corporation other than the said Complainants and those through whom they claim title, have at any time within twenty years next preceding the filing of the said Bill of Complaint, known to your Complainants, to have had possession of or made any claim to the said lands or any part thereof.

The said Complainants in and by their said Bill of Complaint, further allege that no persons other than the Complainants and those through whom they claim title are known to them to have paid any taxes on the said lands or any part thereof during the last ten years, except Cora Mitchell, who has paid taxes for the years of 1937 to 1941, both inclusive, on the following described property, to-wit:

> Start at the Northeast Corner of the Southwest Quarter of the Southeast Quarter and run South 8.48 chains, thence West 171 feet to point of beginning, thence West 66 feet, North 317 feet, East 66 feet, South 317 feet to beginning in Section Twenty (20), Township Five (5) South, Range Two (2) East, containing One and one-half acres.

IN WITNESS WHEREOF, I have hereunto set my hand as Register of the Circuit Court of Baldwin County, Alabama, in Equity and affixed the seal of the said Court on this the 16th day of June, 1942.

Register of the Circuit Court
of Baldwin County, Alabama,
in Equity.

J. D. BLACKBURN,
Solicitor for
Complainants.