

J. H. REICHERT,
Plaintiff.

-vs-

JEROME H. SHEIP, INC.,
Defendant.

CIRCUIT COURT OF BALDWIN COUNTY.

AT LAW.

INTERROGATORIES PROPOUNDED BY PLAINTIFF
TO MARY O. THOMAS, A MATERIAL WITNESS FOR
THE PLAINTIFF, WHO IS A WOMAN, RESIDING AT
NUMBER 369 BASIL STREET, IN THE CITY OF
MOBILE, ALABAMA.

1. Please state your name, age, and place of residence. What was the name of your father, and is he living or dead? If dead, when did he die? What was the name of your father's father, and is he living or dead? If dead, when did he die? What was the name of the father of your grandfather, Joseph Duret, Sr.? If you say that the father of your grandfather was named Louis Duret or Louis Durette, then please state whether he is living or dead. Please give the names of all the children of Joseph Duret, Sr. and of Joseph Duret, Jr.

2. If you have said that Joseph Duret, Jr. was your father and was one of the children of Joseph Duret, Sr., the son of your great grandfather, Louis Duret, you will then please state whether he is living or dead. If he is dead, then please state when he died. Please state whether he was married or unmarried, and if married, give the name of his wife and state whether she is living or dead. If dead, when

did she die? Please state whether or not he left any children, and if he did, then please give a list of them and state as to each whether they are living or dead. If dead, state when each of them died.

3. If you have said that Catherine Duret was one of the children of Joseph Duret, Jr., the son of Joseph Duret, Sr., who was the son of your great grand-father, Louis Duret, you will then please state whether she is living or dead. If she is dead, when did she die? Please state whether or not she ever married. Did she leave any child or children surviving her? If so, by what name was such child or children called or known? If you say that Agnes Coleman was the daughter of Catherine Duret, then please state whether she is living or dead, and if dead, when she died. Is she married or unmarried, if married please give the name of her husband.

4. If you have said that one of the children of Joseph Duret, Jr., the son of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, was named Charles or Charley Duret or Durette, you will then please state whether he is living or dead, and state whether he was married or unmarried, and if married, give the name of his wife and state whether she is living or dead. If dead, when did she die?

5. If you have said that one of the children of Joseph Duret, Sr., the son of your great grandfather, Louis Duret, was named Regis Duret, you will then please state whether he is living or dead. If he is dead, when did he die? Please state whether he was married or unmarried. If married, please give the name of his wife and state whether she is living or dead. If dead, when did she die? You will please give the name of each of the children of Regis Duret.

6. Is Edward Duret, the son of Regis Duret, the son of your great grand-father, Louis Duret, living or dead? If dead, when did he die? Was he married or unmarried, and if married, please state the name of his wife, and whether she is living or

or dead. If dead, when did she die? If Edward Duret is dead, then give the names of his children, if any, and state as to each whether they are living or dead, and if dead, when they died.

7. Is Louis Duret, the son of Regis Duret, the son of your great-grand-father, Louis Duret, living or dead? If dead, when did he die? Was he married or unmarried, and if married, please state the name of his wife, and whether she is living or dead.

8. Is Ignacious Duret, the son of Regis Duret, the son of your great grandfather, Louis Duret, living or dead? If dead, when did he die? Was he married or unmarried, and if married, please state the name of his wife, and whether she is living or dead. If dead, when did she die?

9. If you have said that Eugenia or Jennie Tipp was one of the children of Regis Duret, the son of Joseph Duret, Sr., the son of your great grandfather, Louis Duret, you will please state whether she is living or dead. If dead, when did she die? Was she ever married, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die?

10. If you have said that Hosephine Tanner was one of the children of Regis Duret, the son of Joseph Duret, Sr., the son of your great grandfather, Louis Duret, you will please state whether she is living or dead. If dead, when did she die? Was she ever married, and if so, give the name of her husband, and state whether he is living or dead. If dead, when did he die?

11. If you have said that Clara Denton was one of the children of Regis Duret, the son of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, you will please state whether she is living or dead. If dead, when did she die? Was she ever married, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die? If Clara Denton is dead, then please give the names of each of her children, if any, and state, as to each, whether he is

living or dead and if dead, when each of them died.

12. If you have said that Mary J. Tipp was one of the children of Regis Duret, the son of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, you will please state whether she is living or dead. If dead, when did she die? Was she ever married, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die?

13. If you have said that Anna Leland was one of the children of Joseph Duret, Sr., the son of your great-grand-father, Louis Duret, you will then please state whether she is living or dead. If she is dead, when did she die? Did she ever marry, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die?

14. If you have said that Eugini Duret or Durette was one of the children of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, you will then please state whether she is living or dead. If she is dead, when did she die? Did she ever marry, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die?

15. If you have said that Peter Duret was one of the children of Joseph Duret, Sr., the son of your great grand-father Louis Duret, you will then please state whether he is living or dead. If he is dead, when did he die? Did he ever marry, and if so, give the name of his wife, and state whether she is living or dead. If dead, when did she die? If Peter Duret is dead, then please give the names of his children, if any, and state as to each whether they are living or dead. If dead, when did each die?

16. If you have said that Vincent Duret was one of the children of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, you will then please state whether he is living or dead. If he is dead, when did he die? Did he ever marry, and if so, give the name of his wife, and state whether she is living or dead.. If dead, when did she die? If Vincent Duret is dead, then please give the names of his children and state as to each

whether they are living or dead. If dead, when did each of them die?

17. If you have said that Isabel or Isabella Duret was one of the children of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, you will please state whether she is living or dead. If she is dead, when did she die? Did she ever marry, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die? If Isabella Duret is dead, then please give the name of her children and state as to each whether they are living or dead. If dead, when did they die?

18. If you have said that Pauline Duret was one of the children of Joseph Duret, Sr., the son of your great grand-father, Louis Duret, you will then please state whether she is living or dead. If she is dead, when did she die? Did she ever marry, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die? If Pauline Duret is dead, then please give the name of her children, if any, and state as to each whether they are living or dead. If dead, when did they die?

19. If you have said that Lucienne Duret was one of the children of Joseph Duret, Sr., the son of your great-grand-father, Louis Duret, you will then please state whether she is living or dead. If she is dead, when did she die? Did she ever marry, and if so, give the name of her husband and state whether he is living or dead. If dead, when did he die? If Lucienne Duret is dead leaving children, then please give the names of her children, if any and state as to each whether they are living or dead. If dead, when did they die?

Harry J. Smith
Attorneys for Plaintiff.

STATE OF ALABAMA)
COUNTY OF MOBILE)

Personally appeared before me Lillie B. Grandahl

a Notary Public in and for said State and County, Wm. G. Caffey, who, upon oath, deposes and says that he is one of the attorneys for the plaintiff in the above entitled cause, and that Mary O. Thomas is a woman and is a material witness for the plaintiff in the above entitled cause.

Wm. G. Caffey

Subscribed and sworn to before me,
this 25th day of October, 1922.

Lillie B. Grandall
Notary Public, Mobile County, Ala.

We suggest C. A. Strain, who, together with the above named witness, Mary O. Thomas, resides in the City of Mobile Alabama, as a proper and suitable person to act as commissioner in taking said deposition.

Harry J. Smith
Attorneys for Plaintiff.

Interrogatories

Present

OR

Jerome H. Ship

(Ind.)

No. 1462

Filed Oct 26/92

W. H. H. H.
Clerk

HARRY T. SMITH & CAFFEY

ATTORNEYS AT LAW

716 - 722 NATIONAL CITY BANK BUILDING

MOBILE, ALA.

STATE OF ALABAMA)
COUNTY OF MOBILE)

④
Plaintiff Ex D
12/1/20/7202

KNOW ALL MEN BY THESE PRESENTS, That We, (Jule Durette, Eugeni Durette, Cecilia Boudan, John J. Boudan, Cecilia Leland, Onorine Trenier, Simon Trenier, Sr., Mary C. Dickerson, William Dickerson, Reubin Trenier, Eva H. Fields, George Leland, Marie Leland, A. J. Leland, Edward Fields, Emile Leland, Georgia H. Leland, Adele Martin, John D. Martin, Lecetta Durette, Simon Collins, Stephen Collins, Agnes Collins, Seymour Durette, Josephine Tanner, Archie Tanner, Ignatius Durette, Phoebe Wells, Estella Le Borrás, Chas. Laurendine, Bertha Laurendine, Julia Ponquinette, Cecilia Borrás, Camilla Reny, Mary O. Thomas, Aristide Laurendine, M. J. Wells, Agnes Coleman, Odile M. Collins, Ernest A. Collins, Alice L. Collins, Laurida Chastang, Nettie V. Collins, Maggie M. Collins, Olivia M. Collins, Mary Chastang, John Chastang, Matilda Collins, Clemencias Durette, Richard Coleman, Clotilda Collins, Walter Chastang, Dennis Collins, Alex Leland, Hortense Leland, Rupert A. Collins, Polixand Elley, Regina Durette, Aleada Glaude, Odile J. Collins, Charley Durette, John P. Collins, Alice Bordan, Eugenia Tipp, Ruben J. Tipp, Mary J. Tipp, Percy A. Collins, Perry J. Collins, and William Remy,) acting through Anna Leland, our attorney in fact; and Anna Leland, individually, for and in consideration of the sum of One Dollar (\$1.00) and other good and valuable consideration, do hereby grant, bargain, sell and convey unto Max Collins, all and singular, the following described real property situate, lying and being in the County of Baldwin, State of Alabama, and more particularly described as follows:

"Beginning at a post, being the southeast corner of the claim of the representatives of James Caller, and running thence South 78 degrees, 37 minutes East, 99.10 chains to an elm marked XIII on four sides, thence South 50.25 degrees West 80.60 chains to a post at the mouth of Bayou, thence with meanders of the north boundary of Tensaw as follows:- North 36 degrees West 3.00 chains, North 55-1/4 degrees West 7.50 chains, North 76 degrees West 7.00 chains, North 86° West 7.00 chains South 89 degrees West 8.00 chains, South 87 1/2 degrees West 15.00 chains, South 89 degrees

West 7.50 chains, North 89 degrees West 8.00 chains, North 85 1/4 degrees West 8.00 chains, North 79 3/4 degrees West 6.50 chains, North 83 degrees West 3.50 chains, North 69 degrees West 3.50 chains, North 71 1/2 degrees West 2.00 chains North 68 degrees West 3.50 chains, North 55 3/4 degrees West 2.00 chains, North 61 degrees West 3.00 chains, North 36 degrees West 4.00 chains, North 29 1/4 degrees West 3.00 chains to a post, a water oak bearing S 10 E 16 L XIII. A sweet gum bearing S 77 E 14 L XIII. A sweet gum bearing N 37 E 7.00 L XIII, thence North 50.25 degrees East 80.60 chains to the place of beginning; said lands being in Section 43, Township 1 North, Range 1 East, containing 639.89 acres;

Being the same property conveyed by the Spanish Government to Louis Durette; and conveyed by the heirs and legal representatives of the said Louis Durette to Anna Leland, as attorney in fact for said heirs and legal representatives;

Also, the following described real property, adjoining the above described tract on the South, viz:

Beginning on the left bank of Tensaw River, at a point in the mouth of a small bayou, being the lower corner of Durette's upper claim, and running thence down the East margin of said river, or its meanders, South 60 degrees East 3.50 chains; South 47 degrees East 14.00 chains; South 20 degrees East 3.00 chains; South 30 degrees East 5.00 chains; South 14 degrees East 1.50 chains; South 26 degrees East 3.50 chains; South 12 degrees East 10.00 chains; South 5 degrees East 12.00 chains; South 12.50 chains; South 7 degrees East 5.38 chains, from Section post on the parallel between Sections 11 and 14, South 84 degrees East 9.60 chains to a post from which N 11 1/2 W 11 L a maple marked XIII, South 76 East 13 L a birch marked XIII; thence North 50 degrees 25 minutes East at 14.83 chains crossed the parallel between Sections 12 and 13 at a distance of 2.50 chains due East from Southwest corner Section 12, 96.98 to a post, from which S 69 W 18 L tupelo marked XIII, S 72 3/4 E 25 L a maple marked XIII; thence N 18.18 degrees West at 10.00 a lake bearing E 50 L wide, 17.25 crossed a lagoon 75 L wide, bearing SE 76.00 to a post from which 19 1/2 W 25 L sweet gum marked XIII, N 42 1/2 W 30 L Sourwood XIII; thence S 50.25 degrees West at 16.72 a red elm, marked as the NE corner of Durette's upper claim, 96.98 chains to the place of beginning; containing 640 acres and being known ^{by some} as Section 37, T. 1 N., R. 1 E, but being Sec. 50 of said Twp.

Being the same property conveyed by the heirs and legal representatives of Louis Durette to Anna Leland, as attorney in fact for them."

TOGETHER WITH all the rights, members, privileges and appurtenances thereunto belonging, or in any wise appertaining.

TO HAVE AND TO HOLD the same unto the said Max Collins, his heirs and assigns forever.

IN WITNESS WHEREOF, we have hereunto set our hands and seals this 24 day of September, A. D., 1918.

+ Julie Durette (SEAL).

+ Eugenie Durette (SEAL).

+ Cecilia Baudou (SEAL).

+ John J Baudou (SEAL).

+ Cecilia Leland (SEAL).

+ Onorine Grenier (SEAL).

+ Simon Grenier sr (SEAL).

+ Mary C. Dickson (SEAL).

+ William Dickson (SEAL).

? Rubin Grenier (SEAL).

? Eva H. Fields (SEAL).

+ Emile Leland (SEAL).

+ Georgie H. Leland (SEAL).

+ Maria Leland (SEAL).

? A. J. Leland (SEAL).

? Abner Fields (SEAL).

+ George Leland (SEAL).

? Asiel Martin (SEAL).

? John S Martin (SEAL).

? Lecetta Durette (SEAL).

+ Simons Collins (SEAL).

✓ Stephen Collins (SEAL).

+ Agnes Collins (SEAL).

2. Seymour Durette (SEAL).
+ Josephine Lamer (SEAL).
+ Archie Lamer (SEAL).
+ Ignatius Durette (SEAL).
? Phoebe Wells (SEAL).
? Estella Leporras (SEAL).
+ Chas Laurendine (SEAL).
Bertha Laurendine (SEAL).
+ Julia Ponysimette (SEAL).
+ Cecilia Barros (SEAL).
? Cornellie Remy (SEAL).
+ Mary A Thomas (SEAL).
+ Aristide Laurendine (SEAL).
? M. J. Wells (SEAL).
+ Agnes Coleman (SEAL).
? Artile Mrs Collins (SEAL).
+ Ernest A Collins (SEAL).
? Alice L. Collins (SEAL).
+ Laurinda Chastang (SEAL).
+ Pettie U. Collins (SEAL).
+ Maggie M. Collins (SEAL).
+ Clivia M Collins (SEAL).

+ Mary Chastong (SEAL).

+ John Chastong (SEAL).

+ Matilda Collins (SEAL).

+ Clemencia Durette (SEAL).

? Richard Coleman (SEAL).

+ Clatilde Collins (SEAL).

? Walter Chastong (SEAL).

+ Jennie Collins (SEAL).

+ Alex Lalond (SEAL).

+ Hortense Lalond (SEAL).

+ Rupert A. Collins (SEAL).

+ Polixena Elley (SEAL).

+ Regina Durette (SEAL).

+ Aleardo Glauco (SEAL).

+ Utile J. Collins (SEAL).

+ Charles Durette (SEAL).

? John B. Collins (SEAL).

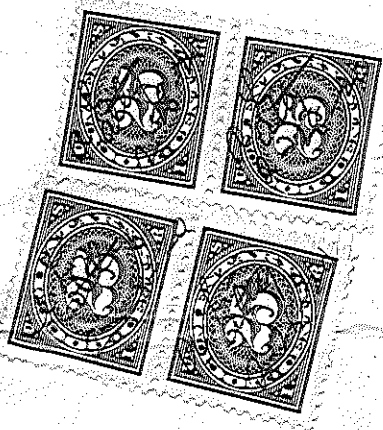
+ Alice Randon (SEAL).

+ Regina Lipp (SEAL).

? Robin J. Lipp (SEAL).

? Mary J. Lipp (SEAL).

+ Percy A. Collins (SEAL).



+ Perry J. Collins (SEAL).

William Reny (SEAL).

By Anna Leland (SEAL).
THEIR ATTORNEY IN FACT.

Anna Leland
individually (SEAL).
Individually.

STATE OF ALABAMA)
COUNTY OF MOBILE)

I, W P Roberts, a Notary Public

in and for said County in said State, hereby certify that Anna Leland, whose name is signed to the foregoing conveyance as attorney in fact for Jule Durette, Eugini Durette, Cecilia Boudan, John J. Boudan, Cecilia Leland, Onorine Trenier, Simon Trenier, Sr., Mary C. Dickerson, William Dickerson, Reubin Trenier, Eva H. Fields, George Leland, Marie Leland, A. J. Leland, Edward Fields, Emile Leland, Georgia H. Leland, Adele Martin, John D. Martin, Lecetta Durette, Simon Collins, Stephen Collins, Agnes Collins, Seymour Durette, Josephine Tanner, Archie Tanner, Ignatius Durette, Phoebe Wells, Estella Le Borrás, Chas. Laurendine, Bertha Laurendine, Julia Ponquinette, Cecilia Borrás, Camilla Reny, Mary O. Thomas, Aristide Laurendine, M. J. Wells, Agnes Coleman, Odile M. Collins, Ernest A. Collins, Alice L. Collins, Laurida Chastang, Nettie V. Collins, Maggie M. Collins, Olivia M. Collins, Mary Chastang, John Chastang, Matilda Collins, Clemencias Durette, Richard Coleman, Clotilda Collins, Walter Chastang, Dennis Collins, Alex Leland, Hortense Leland, Rupert A. Collins, Polixand Elley, Regina Durette, Aleada Glaude, Odile J. Collins, Charley Durette, John P. Collins, Alice Bordan, Eugenia Tipp, Ruben J. Tipp, Mary J. Tipp, Percy A. Collins, Perry J. Collins, William Reny, and who is known to me, acknowledged before me on this day, that, being informed of the contents of the conveyance, she, as such attorney in fact for said grantors,

executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 24 day
of Sept, 1918.

W R Roberts
Notary Public, Mobile County, Alabama.

STATE OF ALABAMA)
COUNTY OF MOBILE)

I, W R Roberts, a Notary Public
in and for said County in said State, hereby certify that Anna
Leland, whose name is signed to the foregoing conveyance, indi-
vidually, and who is known to me, acknowledged before me on this
day, that, being informed of the contents of the conveyance, she
executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 24 day
of Sept, 1918.

W R Roberts
Notary Public, Mobile County, Alabama.

Dec 8 11/24/18
 11 a.m.
 11/24/18

11/24/18
 11 a.m.
 11/24/18

Dec 8 11/24/18
 11 a.m.
 11/24/18

STATE OF ALABAMA, County of ...
 James M. Holtz, Judge of said County, do hereby certify that the within
 November 20 11
 A.M.
 276x7
 30th Nov.
 20
 Geo. M. Holtz

11/24/18

This Indenture Made the fourth day of September in the year of our Lord one thousand Eight hundred and thirty four Between Claire Duret with the consent of Oreste Lelande her husband testified by his being party hereto of the first part and Joseph Y Crozat all of the City of Mobile in the State of Alabama of the Second part Witnesseth that the Said party of the first part for and in consideration of the Sum of Four hundred and fifty dollars lawful money of the United States of America to her in hand paid by the said party of the Second part at or before the en- sealing and delivery of these presents the receipt whereof is hereby ac- knowledged and the Said party of the Second part his heirs executors and administrators forever released and discharged from the Same by these presents has granted bargained sold ^c ~~aleined~~ remised released enfeoffed con- veyed and confirmed and by these presents does grant bargain sell ^c ~~alein~~ remise release enfeoff convey and confirm unto the said party of the Second part his heirs and assigns forever all that certain lot piece or parcel of land lying and being in the city of Mobile and described as follows to wit Situated on the west side of Royal Street containing a front of forty four feet thereon and a depth of one hundred and fifty four feet therefrom Bounded Southwardly by a lot belonging to Mr Miguel D Eslava Northward by a lot now or formerly belonging to Capt Joseph Twi- ler on the Eastward by Royal Street and on the Westward by a line run- ning parallel with Royal Street at the distance of one hundred and fifty Eight feet therefrom Together with all and singular the tenements here- ditaments rights Members privileges and appurtenances unto the above men- tioned and described premises belonging or in any wise appertaining to have and to hold the above granted and described premises with the appur- tenances unto the said party of the Second part his heirs and assigns to the sole and only proper use benefit and behoof of the Said party of the Second part his heirs and assigns forever And the said Claire and Oreste her husband for themselves and their heirs the above described and hereby granted and released premises and every part and parcel thereof with the hereditaments and appurtenances unto the said party of the Sec- ond part his heirs and assigns against the said parties of the first part

and their heirs and against all and every person or persons whomsoever lawfully claiming or to claim the Same Shall and will warrant and by these presents forever defend - In witness whereof the parties to these presents have hereunto set their hands and Seals the day and year first above written .

Claire ^{her} X Durette (Seal)
mark

Sealed and delivered in presence of
the word Charlotte erased and Clairre
enterlined before Signing .

Oreste ^{his} X Lelande (Seal)
mark

Henry Lewis Thomas Reid

The State of Alabama)
Mobile County.)

Be it remembered that the above named Oreste Lelande appeared personally before me Henry Lewis clerk of the County court of said County and acknowledged that he signed Sealed and delivered the foregoing deed on the day and year therein mentioned to the aforesaid Joseph y Cruzat and also appeared before me the said Clairre Durett wife of the said Oreste who being examined by me apart from her said husband acknowledged that she signed Sealed and delivered Said deed without any fear threats or compulsion of her said husband Given under my hand and Seal this fourth day of September 1834

H Lewis (Seal)

Received in office for record
Septn 4th 1834

STATE OF ALABAMA
MOBILE COUNTY

PR OTE COURT

I, PRICE WILLIAMS, Judge of the Probate Court in and for said State and County, hereby certify that
the within and foregoing one and one half pages contain a full, true
and complete copy of the certain Deed from Claire Durett and husband Oreste
Ielande to Joseph Y. Crozat

as the same appears of record in my office in Deed Book No. 11 N 11

Page 20

Given under my hand and seal of office, this 23rd day of November 192 0

Price Williams

Judge of Probate.

POWER OF ATTORNEY

We, the undersigned and only heirs at law, next of kin and legal representatives of Louis Durette, (deceased) and wives of such of said male heirs at law and next of kin as are married, do by these presents, nominate, constitute and appoint Anna Leland, our true and lawful attorney for us, and in our names and stead, to bargain, sell and convey or quit claim, either at public or private sale, and upon such terms as in their discretion they deem advisable. All real-estate or interest in real estate belonging to the said Louis Durette, (deceased) at the time of his death or which was afterwards patented or otherwise conveyed by the United States Government to his heirs and representatives collectively as such of the aforesaid Louis Durette, (deceased) and more particularly described as follows:-

Beginning at a post being the Southeast corner of the claim of the representatives of James Caller, heretofore described and running thence S 78. 37 E 99.10 chs. to an Elm marked XIII on four sides, then South 50.25 W 80.60 chs. to a post at the mouth of Bayou, thence with meanders of the North band of Tensaw as follows:- N 36 W 3.00 chs. N. 55 $\frac{1}{2}$ W. 7.50 chs. N. 76 W 7.00 chs. N. 86 W 7.00 chs. S 89 W 8.00 chs. S 87 $\frac{1}{2}$ W. 15.00 chs. S 89 W 7.50 chs. N. 89 W 8.00 chs. N 85 $\frac{1}{2}$ W 8.00 chs. N 79 $\frac{1}{2}$ W 6.50 chs. N 83 W 3.50 chs. N 69 W 3.50 chs. N 71 $\frac{1}{2}$ W 2.00 chs. N 68 W 3.50 chs. N 55 $\frac{3}{4}$ W 2.00 chs. N 61 W 3.00 chs. N 36 W 4.00 chs. N 29 $\frac{1}{4}$ W 3.00 chs. to a post, a water oak bearing S 10 E 16 L XIII. A sweet gum bearing S 77 E 14 L XIII. A sweet gum bearing N 37 E 7.00 L XIII, thence N 50.25 E. 80.60 chs. to the place of beginning, said land being described as Section 45, T 1 N. R 1 E, in Baldwin County, Alabama, containing 639.89 acres. This being the same property conveyed by the Spanish Government to my grandfather, Louis Durette, and being the same property as conveyed to me by Power Attorney, by the heirs and legal representatives of the said Louis Durette (deceased)

Also, one other tract of land, situated in Baldwin County, Ala., to-wit:- and joining the above described tract on the South, and more particularly described as follows:-

Beginning on the left bank of Tensaw River, at a point in the mouth of a small bayou, being the lower corner of Durette's upper claim, and running thence down the East margin of said river or its meanders S 60 E 3.50 chs; S 47 E 14.00 chs. S 20 E 3.00 chs. S 30 E 5.00 chs. S 14 E 1.50 chs. S 26 E 3.50 chs. S 12 E 10.00 chs. S 5 E 12.00 chs. S 12.50 chs. S 7 E 5.38 chs. From Section post on the parallel between Sections 11 and 14, S 84 E 9.60 chs. to a post from

which N $11\frac{1}{2}$ W 11 L a maple marked XIII (S 76 E 13 L a birch marked XIII. thence N 50 25 E at 14.83 chs. crossed the parallel between Sections 12 and 13 at a distance of 2.50 chs. due east from Southwest corner Section 12, 96.98 to a post, from which S 69 W 18 L tupelo marked XIII, S 72 E 25 L a maple marked XIII, thence N 18.18 W at 10.00 a lake bearing E 50 L wide, 17.25 crossed a lagoon 75 L wide, bearing S E 76.00 to a post from which $19\frac{1}{2}$ W 25 L sweet gum marked XIII, N $42\frac{1}{2}$ W 30 L Sourwood XIII, thence S 50.25 W at 16.72 a red elm, marked as the NE corner of Durette's upper claim, 98.98 to the place of beginning; containing 640 acres and is known as Section 37 T 1 N R 1 E. Baldwin County, Alabama and being also the same land as conveyed to me by Power Attorney, by the heirs and legal representatives of Louis Durette (deceased)

Said lands lying and being in Baldwin County, State of Alabama, and being at or near the junction of the Mobile & Tensaw Rivers. Our said Attorney is further authorized and empowered to sell said real-estate in parcels, separately or collectively, for cash or partly for cash and partly on credit or wholly on credit, according to his discretion, and is hereby authorized and empowered to make all necessary deeds, conveyances, quit claims, executory contracts and releases, and our said Attorney is further authorized to bargain, sell, convey or quit claim, make executory contracts for and release in and by such contracts, conveyances or quit claim, the dower interest or interests of the wives of the male signers of these presents to all or any part of said real-estate. Our said Attorney is further granted by these presents, full power and authority to demand, sue for or otherwise lawfully to recover from any person or persons, whatsoever any part of said lands as described above, in and to which we may have any right, title or interest, our Attorney is further authorized by these presents to amicably adjust ~~any suit or claim or equity that may be now or~~ hereafter pending in any of the courts of law or equity in this State, in this the Title to the above described property is involved, in and which we may have any right title or interest as heirs at law and next of kin and legal

representatives of the said Louis Durette, deceased, hereby ratifying and confirming all that our said Attorney may or shall lawfully do or cause to be done in the premises.

IN WITNESS whereof, we, the undersigned legal representatives and only heirs at law of Louis Durette, have hereunto set our hands on this 17th day of June 1918

L. S.

✓ Anna Leland L. S. U

✓ Julie Durette L. S. U

✓ ^{her}
Ermine X Durette L. S.
_{mark}

✓ Cecilia Boudon L. S.

✓ John J. Boudon L. S.

✓ Cecilia Leland L. S.

✓ Onorine Grenier L. S.

Simon Grenier Sr
L. S.

✓ Mary E Ducker Sr L. S.

✓ William M. Durette L. S.



m	° ^{his} Benjamin Yennie	L.S.
m	° ^{mark} Eva H. Fields.	L.S.
m	° George Leland	L.S.
m	° Marie Leland	L.S.
m	° John A. Delonch	L.S.
m	° John Edward Fields	L.S.
m	° Emma Galardy	L.S.
m	° Georgia Leland	L.S.
m	° Adele Martin	L.S.
m	° John D. Martin	L.S.
m	° Lucetta Durette	L.S.
m	° Simon Collins	L.S.
m	° Stephen Collins	L.S.
m	° Agnes Collins	L.S.
m	° Seymour Durette	L.S.
m	° George Niezen	L.S.
m	° ^{his} Archie Turner	L.S.
m	° ^{his} John Durette	L.S.
m	° Phoebe Wells	L.S.
m	° Estella Le Boer	L.S.
m	° Chas. Laurendine	L.S.
m	° Bertha Laurendine	L.S.
m	° Julia Conquintette	L.S.
m	° Cecelia Barras	L.S.
m	° Lomilla Perry	L.S.

m ^{her} Mary C. Thomas L.S.
 m ^{Mark} Anastasia Laurendine L.S.
 m M. J. Wells L.S.
 or ✓ Agnes Coleman L.S.
 ✓ Odile M. Collins L.S.
 ✓ Ernest A. Collins L.S.
 ✓ Alice L. Collins L.S.
 ✓ Laurida Chastang L.S.
 ✓ Nettie V. Collins L.S.
 ✓ Maggie M. Collins L.S.
 ✓ Olivia M. Collins L.S.
 ✓ Mary Chastang L.S.
 ✓ John ^{this} Chastang L.S.
 ✓ ^{Mark} Matilda Collins L.S.
 ✓ Clemence J. Farrell L.S.
 ✓ Richard Coleman L.S.
 ✓ Matilda Collins L.S.
 ✓ Walter Chastang L.S.
 ✓ May Collins L.S.
 ✓ Berne Collins L.S.
 ✓ Ashley Lealand L.S.
 ✓ Hortense Lalonde L.S.
 ✓ Rupert A. Collins L.S.
 ✓ Polipand Eller L.S.
 ✓ Regina Durette L.S.
 ✓ Aleuda Glauke L.S.
 ✓ Odile J. Collins L.S.
 ✓ Charley ^{this} Durette L.S.
^{Mark}

✓ John P. Pelting Ls

✓ Liese Borden Ls

✓ Eugenia Telf Ls

✓ Rubens J. Telf Ls

✓ Mary J. Telf Ls

✓ Percy A. Collins Ls

✓ Le Perry J. Collins Ls

✓ William. Perry Ls

STATE OF ALABAMA)

COUNTY OF MOBILE)

I, W. R. Roberts

a Notary Public in and

for said State and County, hereby certify that, Jule Durette, Eugini Durette, Cecilia Boudon, John J. Boudan, Cecilia Leland, Onorine Trenier, Simon Trenier, Sr. Mary C. Dickerson, ^{WMA} William Dickerson, Reuben Trenier, ^H Eva Fields, George Leland, Marie Leland, A. J. Leland, Edward Fields, Emile Leland, Georgia H. Leland, Adele Martin, John D. Martin, Lecetta Durette, Simon Collins, Stephen Collins, Agnes Collins, Seymour Durette, Josephine Tanner, Archie Tanner, Ignatius Durette, Phoebe Wells, Estella Le Borrás, Chas. Laurendine, Berthan Laurendine, Julia Ponquinette, Ecélia Borrás, Camilla Remy, Mary O. Thomas, Aristide Laurendine, M. J. Wells, Agnes Coleman, Odile M. Collins, Ernest A. Collins, Alice L. Collins, Laurida Chastang, Nettie V. Collins, Maggie M. Collins, Olivia M. Collins, Mary Chastang, John Chastang, Matilda Collins, Clemencia Durette, Richard Coleman, Clotilda Collins, Walter Chastang, Max Collins, Dennis Collins, Alex Leland, Hortense Leland, Rupert A. Collins, Polix and Elley Regina Durette, Aleada Glaude, Odile J. Collins, Charley Durette, John E. Collins, Alice Bordan, Eugenia Tipp, Ruben J. Tipp, Mary J. Tipp, Percy A. Collins, Perry J. Collins, William Remy, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me 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, and official seal on this 17 day
of June, 1918.

W. R. Roberts

Notary Public, Mobile County, Ala.

THE STATE OF ALABAMA. } Office of the Probate Court,
BALDWIN COUNTY. }

I, JAMES M. VOLTZ, Judge of said Court in and for Baldwin County, do hereby certify that the within instrument was filed in this office for record on the

day of June 1918, at 8:45 o'clock

and I further certify that the same is duly recorded in Record Book No. 275-96

Page 2 and duly indexed.

Witness my hand this 23rd day of June 1918

James M. Voltz Judge of Probate Court

By Richard A. Clark

R. M. Rich
Attorney at Law
Grape Creek

Plan and Division of a lot of land in the City of Mobile Situate Between Washington Street and the River belonging to the Heirs and Representatives of Louis Durette

West Line 429-8 Fr. M. Washington Street	1 Chas Lelande } Sold to Hugh Munroe ²⁰⁰	43.6
	2 Geneverie Durett	42
	3 Babi Durette	42
	4 Margarette Durette	42
	5 Joseph Durette	42
	6 Nannette Durette } Sold to I. Antunez ¹⁶⁸	42
	7 Isidore Durette	42
	8 Oreste Lelande	42
	9 Charlotte Durette } I. A. Colin ¹²⁶	42
	10 Sold to Saml Acre	50

Royal Street

47.9	Joseph Durette Sold to Hugh Munroe	1
47.9	Babi Durette Sold to Hugh Munroe	2
47.9	Oreste Lelande	3
47.9	Isidore Durette	4
47.9	Chas Lelande Sold to McLoskey + Magee	5
47.9	Marquerette Durette Sold to Colthar + Morse	6
47.9	Charlotte Durette Sold to McLoskey + Magee	7
47.9	Geneviere Durette Sold to I. Antunez	8
47.9	Nannette Durette Sold to I. Antunez	9

We the undersigned legal heirs and Representatives of Louis Durette late of Mobile deceased do hereby give our free consent to the Division and sale of lots belonging to Said Estate as they are marked and numbered in the above plan.

his
Isidore X Durette
mark

her
Clarissa X Durette
mark

his
Joseph X Durette
mark

his
Felonise X Durette
mark

his
Oreste X Lelande
mark

her
Claire X Lelande
mark

her
Babe X Durette
mark

c c
Ch Lelande

her
Marguerette X Durette
mark

her
Nanette X Durette
mark

her
Charlotte X Durette
mark

In presence of us Moses Waring Jno A Stuart

Mobile 15th January
1834

Recd in office for record

Feby 19th 1835

TATE OF ALABAMA
OBILE COUNTY

PROBATE COURT

I, PRICE WILLIAMS, Judge of the Probate Court in and for said State and County, hereby certify that
the within and foregoing one and one 1/4 pages contain a full, true
and complete copy of the certain Plan and Division of property of Estate of
Louis Durette, deceased

as the same appears of record in my office in Deed Book No. " N "
Page 213

Given under my hand and seal of office, this 23rd day of November 1920

Price Williams

Judge of Probate.

The State of Alabama

DEPARTMENT OF STATE

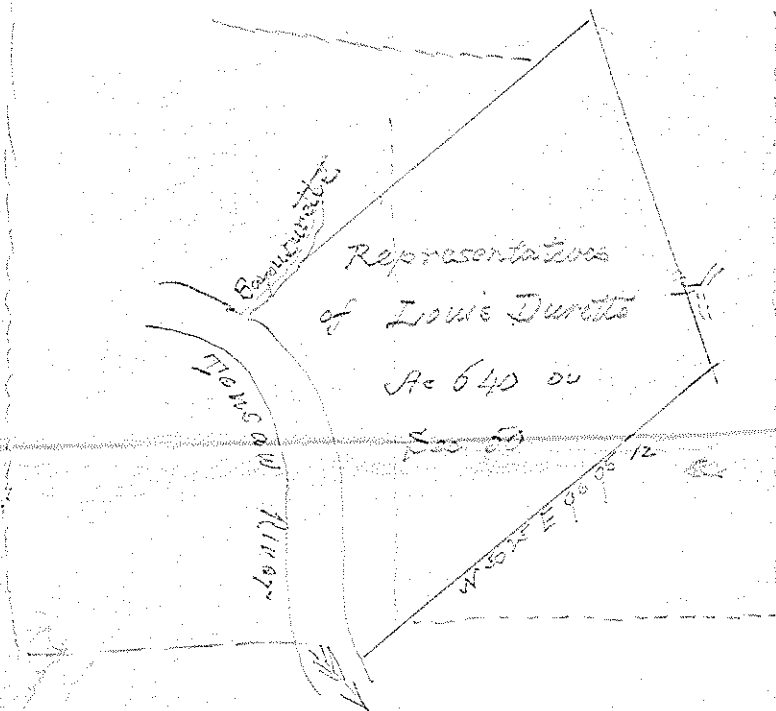
I, WM. P. COBB, Secretary of State, do hereby certify that the pages hereto attached, contain a true, accurate and literal copy of Survey of Sec. 50 (Louis Durette's private claim) Tp. No. 1 North, Range No. 1 East, St. Stephens Meridian, dated Nov. 3, 1843,

as the same appears on file and of record in this office.



In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the City of Montgomery, this 30th day of November One Thousand Nine Hundred and Twenty.

Wm P Cobb
Secretary of State



Pursuant to an order of survey dated October 5th, 1843, issued by the Register and Receiver of the land office at St. Stephens, Alabama, we have surveyed for the legal representatives of Louis Durette a tract of land situate below the junction of Mobile and Tensaw rivers in Township No. 1 North, Range No. 1 East, bounded and described as follows, viz: beginning on the left bank of the Tensaw River at a post in the mouth of a small bayou being the lower corner of Durette's upper claim and running thence down the east margin of the said river as it meanders; S 60 E 3.50, S 47 E 14.00, S 20 E 3.00, S 30 E 5.00, S 14 E 1.50, S 26 E 3.50, S 12 E 10.00, S 5 E 12.00, South 12.50, S 7 E 5.38, fractional section post on the parallel between sections No. 11 and 14 S 81 E 9.60 to a post from which N 11 1/2 W 0.11, maple marked X 111, S 76 E 3.13, birch marked X 111, Thence N 50 25 E at 14.83 crossed the parallel between sections No. 12 and 13 at the distance of 2.50 due east from the SW corner of Section No. 12 96.98 to a post from which S 69 west 0.18 tupelo gum marked X 111 N 72 3/4 E 0.25 maple marked X 111; thence N 18.18 W at 10.00 lake bearing east 0.50 wide, 17.25 crossed a lagoon 0.75 wide bearing southeast 76.00 to a post from which S 19 1/2 W 0.25 sweet gum marked X 111 N 42 1/4 west 0.20 horn wood marked X 111; thence S 50 25 W at 16.72 a red elm marked as the northeast corner of Durette, upper claim, 98.98 to the place of beginning, containing 640-acres, and having such shape form and marks natural and artificial as are represented in the above plat and description.

Nov. 3, 1843

Surveyor's office Florence, Ala.,
23 March 1844 examined and approved
James H. Weakley, Surveyor Gen'l
of the public land in Alabama

Jonathan M. Cunningham
John James Deputy Surveyor

SUMMONS AND COMPLAINT.

The State of Alabama
Baldwin County

No.

Circuit Court

..... Fall Term, 191. 8

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon..... Jerome H. Scheis, Inc. a Corporation
organized under the laws of the State of Alabama, and Fannie I. Becker,

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Cir-
cuit Court of Baldwin County, State of Alabama, at Bay Minette, against..... them

..... the Defendant..... by..... Jacob H. Balchert.....

Plaintiff

Witness my hand this..... 24th day of September 191. 8

J. W. Richardson

Clerk.

Complaint

.....

..... Plaintiff Versus

The plaintiff claims of the defendant

..... Dollars due by

.....
Plaintiff's Attorney.

Deputy Sheriff.

We have your
 safe - please
 find
 you
 of

JACOB H. REICHERT,
Plaintiff.

-VS-

JEROME H. SHEP, INC., a cor-
poration organized under the
laws of the State of Alabama,
and FANNIE I. BECKER,
Defendants.

CIRCUIT COURT OF BALDWIN
COUNTY.

1. The plaintiff sues to recover possession of the
following tract of land:

"Beginning at a post, being the southeast corner of
the claim of the representatives of James Caller, and run-
ning thence S 78 degrees, 57 minutes E. 99.10 chains to an
elm marked XIII on four sides, thence South 50.25 degrees,
West 80.60 chains to a post at the mouth of Bayou, thence
with meanders of the north boundary of Tensaw as follows:
North 36 degrees West 3.00 chains, North 55 1/4 degrees
West 7.50 chains, North 76 degrees West 7.00 chains, North
86 degrees West 7.00 chains, South 89 degrees West 8.00
chains, South 87 1/2 degrees West 15.00 chains, South 89
degrees West 7.50 chains, North 89 degrees West 8.00 chains,
North 85 1/4 degrees West 8.00 chains, North 79 3/4 degrees
West 6.50 chains, North 83 degrees West 3.50 chains, North
69 degrees West 3.50 chains, North 71 1/2 degrees West 2.00
chains, North 68 degrees West 3.50 chains, North 55 3/4 de-
grees West 2.00 chains, North 61 degrees, West 3.00 chains,
North 36 degrees West 4.00 chains, North 29 1/4 degrees West
3.00 chains to a post, a water oak bearing S 10 E 16 L XIII.
A sweet gum bearing S 77 E 14 L XIII. A sweet gum bearing
N 37 E 7.00 L XIII, thence North 50.25 degrees East 80.60
chains to the place of beginning; said lands being in Sec-
tion 43, T. 1 N., R. 1 E., and containing 639.89 acres;

Being the same property conveyed by the Spanish Gov-
ernment to Louis Durette and conveyed by the heirs and le-
gal representatives of the said Louis Durette to Anna Le-
land, as attorney in fact for said heirs and legal repre-
sentatives."

of which he was in possession, and upon which, pending such po-
ssession, and before the commencement of this suit, the defend-
ants entered and unlawfully withhold, together with Five Thou-
sand Dollars for the detention thereof.

Harry S. Smith & Coffey
Attorneys for Plaintiff.

Plaintiff demands a trial by jury.

Harry S. Smith & Coffey
Attorneys for Plaintiff.

OFFICE OF THE DEAN

Spring Hill College

Spring Hill, Ala.

1795

Isabella

Durett

Black

Free

Today, monday, second day of the month of February
of the year one thousand seven hundred and ninety
five, I, Mr. Constantino W. Kenna, parrochial priest
of the Church of our Lady of the Conception, of
Mobile, gave burial Ecclesiastical, to the deceased
body of Isabella Duret, black, free, that died about
the age of Forty five years, and that it may be known,
I sign with my hand in this day, month and year, as
above.

Constantino W. Kenna

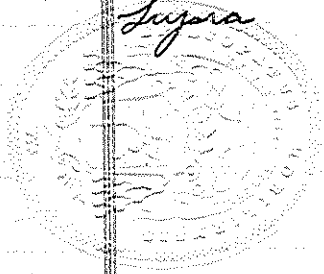
1795

Isabella
Durett
Negra
libre

O y Lunes dia dos del mes de Feb^o del
año de mil setecientos noventa y cinco yo
D^{no} Constantino Wkenna Cura Parroco de la
Iglesia de nuestra Sra de la Concepcion
de la Motila Di. Sepultura Catedralica al
cuerpo difunto de Isabella Durett negra
libre q^{ta} inurio Como de Edad de Quarenta
y Cinco An^{os} y para q^{ta} Conste lo firmo
a mi mano en otro dia mes y Año ut

Supra

Constantino Wkenna

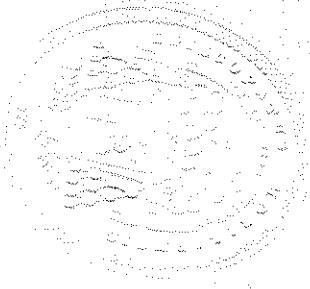


State of Alabama,)
)
Mobile County.)

I hereby certify that I am the custodian of the records of the Cathedral Parish of the Catholic Church in Mobile, Alabama; that Father Charles A. Evers is the assistant custodian of said records; that among said records are registers of births, baptisms, deaths and marriages for said parish, beginning long prior to the year 1750 and extending down to the present time; that for the period mentioned, and long prior thereto, there has existed, and still exists, a rule of the Catholic Church requiring a Priest of each parish to keep for his parish a record or register showing each burial with the name and date of the death of the deceased; also each marriage solemnized; and also the baptism, the date thereof, the date of birth, the name, the father and mother and the God-father and God-mother, of each child; that the aforesaid records of the parish aforesaid were kept in pursuance of said rule; that the document hereto attached is a true and correct transcript from the aforesaid Records in my custody as aforesaid as custodian of the records of said Cathedral Parish of Mobile, Alabama; and that I am authorized to certify the same.

Given under my hand and the seal of said Church, at Mobile, Alabama, this 26th day of May, 1924.

R. O. Terow
Custodian.



1790

Dn Luis Duret Teniente de Milicias de esta Plaza y natural de Granica
Dia ocho del mes de Julio del año de mil setecientos y noventa: yo el infra firmado Religioso de la observ^a de N^{ro} Padre S^m Francisco y Cura Parroco de Ciudad de la Motila: di Sepultura en el Camposanto de esta Iglesia de la Purissima Concepcion natural de dicha Ciudad de la Motila al Cuerpo de Granica de Dⁿ Luis Duret Teniente de Milicias de esta Plaza y natural de Granica el qual murio habiendo servido el Santo Sacramento de la Penitencia y el de la Extrema Uncion: y para que conste lo firmo en dicho dia, mes y año

Fr. Manuel Isordia



State of Alabama,)
Mobile County.)

I hereby certify that I am the custodian of the records of the Cathedral Parish of the Catholic Church in Mobile, Alabama; that Father Charles A. Evers is the assistant custodian of said records; that among said records are registers of births, baptisms, deaths and marriages for said parish, beginning long prior to the year 1750 and extending down to the present time; that for the period mentioned, and long prior thereto, there has existed, and still exists, a rule of the Catholic Church requiring a Priest of each parish to keep for his parish a record or register showing each burial with the name and date of the death of the deceased; also each marriage solemnized and also the baptism, the date thereof, the date of birth, the name, the father and mother and the God-father and God-mother of each child; that the aforesaid records of the parish aforesaid were kept in pursuance of said rule; that the document hereto attached is a true and correct transcript from the aforesaid Records in my custody as aforesaid as custodian of the records of said Cathedral Parish of Mobile, Alabama; that the words "la Penetencia y el de" interlined in the said transcript were so interlined before the making of this certificate and form a part of the original record; and that I am authorized to certify the said record.

Given under my hand and the seal of said Church, at Mobile, Alabama, this 26th day of May, 1924.

R. O. Terow
Custodian



Spring Hill College

Spring Hill, Ala.

OFFICE OF THE DEAN

1790

Mr. Luis Duret,

Lieutenant in the Army
of this Post, a native
of France.

On the eighth day of the month of July of the
year one thousand seven hundred and ninety, I,
the subscriber, a member of the order of our
Father St. Francis, Parrochial Curate of the
City of Mobile, gave burial, in the Cemetery
of this Church of the Immaculate Conception,
of said city of Mobile, to the body of Mr.
Luis Duret, a Lieutenant in the Army of this
Post, and a native of France, who died having
received the Blessed Sacrament of Penance and of
Extreme Unction, and that it may be known, I
sign it in the said day, month and year.

Fr. Manuel Garcia.

*Dpts Ex no 1
11/20/27 WOH*

J. H. Reichert,
Plaintiff,

-vs-

Jerome H. Sheip, Inc., and
Fannie I. Becker,
Defendants.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

Answering the interrogatories propounded to the defendants
by the plaintiff in the above stated cause, the defendant, Fannie
I. Becker, says:-

1. In answer to the first and second interrogatories, the
said Fannie I. Becker says that she is not able to trace the chain
of title under which she claims the land in controversy back of
1850, there appearing to be a break in such chain of title prior
to any acquisition of the property by the first grantor hereinafter
mentioned, in that she cannot find a deed into such grantor. That
the chain of deeds under which she claims is as follows:-

Deed from Elizabeth Barnett to Erastus S. Barnett and John
L. Barnett, dated March 18th, 1850, and recorded April 12th, 1851,
in Book "F", page 137, in the Baldwin County, Alabama, Deed Records.

Deed from Frederick B. Shepard to Charles B. Hopkinson, dated
May 8th, 1856, recorded May 24th, 1859, in Deed Book "G", pages
541-2, in the Deed Records of Baldwin County, Alabama.

Deed from John L. Barnett, Erastus S. Barnett and Margaret
Barnett to Charles B. Hopkinson, dated January 21st, 1857, and
recorded May 9th, 1857, in Book "G", pages 225-7, in the Deed
Records of Baldwin County, Alabama.

Deed from Samuel G. Barnett and Angeline D. Barnett to Charles
B. Hopkinson, dated May 8th, 1857, and recorded May 9th, 1857, in
Book "G", pages 227-9, in the Deed Records of Baldwin County, Alabama.

Deed from Charles B. Hopkinson to Frederick B. Shepard, not
dated, but acknowledged June 16th, 1860, and recorded on June 3rd,
1861, in Book "H", pages 245-7, in the Deed Records of Baldwin
County, Alabama.

Deed from Gerald B. Hall, as Sheriff of Baldwin County, Alabama,
selling out Charles B. Hopkinson to Thomas Ellison, dated June 3rd,
1861, and recorded June 5th, 1861, in Book "H", at pages 248-50, of
the Deed Records of Baldwin County, Alabama, the said sale having
been made under process issued out of the City Court of Mobile in
the case of Executors of James Perine, deceased, -vs- Charles B.
Hopkinson.

Deed from Thomas Ellison and wife to Frank David, dated June
8th, 1861, and recorded June 18th, 1861, in Book "H", pages 254-5,
of the Deed Records of Baldwin County, Alabama.

Deed from John M. Taylor, as Register and Master in Chancery,
selling under a decree of the Chancery Court in the case of Francis
Walker -vs- Frederick B. Shepard, Francis B. David, and others, to
William B. Sewall, dated May 7th, 1866, and recorded July 21st,
1866, in Book "H", pages 608-10, of the Deed Records of Baldwin

County, Alabama.

Deed from Frank David to John A. Cooper and Christian Becker, dated January 26th, 1870, and recorded February 26th, 1870, in Book "I", pages 362-3 of the Deed Records of Baldwin County, Alabama.

Deed from William B. Sewall to John A. Cooper and Christian Becker, dated January 26th, 1870, and recorded February 26th, 1870, in Book "I", pages 364-5, of the Deed Records of Baldwin County, Alabama.

Partition proceeding in the Probate Court of Baldwin County, Alabama, partitioning certain lands between the estate of John A. Cooper, deceased, represented by Harry T. Toulmin, as Administrator, and Christian Becker, wherein the lands in controversy were apportioned by the Commissioners to the said Christian Becker in a report which was approved by the Court on December 13th, 1882, the said proceedings appearing in Book "M", pages 651-5.

The last will and testament of Christian Becker, deceased, dated June 7th, 1905, and probated in Mobile County, Alabama, June 30th, 1906, and a certified transcript thereof from the office of the Judge of Probate of Mobile County, Alabama, recorded in the office of the Judge of Probate of Baldwin County, Alabama, on August 6th, 1917, in Book 26 N. S., pages 278-9, in and by which will the lands in controversy were devised by the said Christian Becker to this respondent, who is his widow.

The defendant, Jerome H. Sheip, Inc., has purchased the said property from the defendant, Fannie I. Becker, subject to the result of plaintiff's claim to the property, and under such purchase is occupying and using some of the property.

2. Answering the third interrogatory, the defendant, Fannie I. Becker, says that according to her information the taxes upon the said property were regularly paid by her deceased husband, Christian Becker, from the time that he acquired the same in 1882; that she believes that the said taxes were regularly paid by her said husband and John A. Cooper during the period that they owned, or claimed to own, the same jointly, which period began in 1870, and continued down to the partition proceeding above mentioned; that ever since the death of her said husband, and beginning with the year 1906, she has paid the taxes on the said property; that it is impossible for her at this time to give the date and amount of each of said payments, but, according to her information and belief, they embraced all taxes upon the said property and were made to the several Tax Collectors of Baldwin County in office at the several times in which the said payments were made.

3. Answering the fourth interrogatory, the defendant, Fannie I. Becker, says that as is hereinabove stated, she is unable to

trace the record title under which she claims back of the year 1850, and cannot connect it up with any patent from the United States.

4. Answering the fifth interrogatory, this defendant says that she and those under whom she claims to have acquired title to the property in question have been in the adverse possession of the said property ever since about the year 1870, and probably long before that time; that the said possession was by Christian Becker and John A. Cooper from the time that they acquired a deed to the property in 1870 up to the partition proceeding between the said Becker and the estate of the said Cooper in 1882; that the said Christian Becker continued to occupy and hold possession of the said property, and to claim the same adversely, up to the time of his death in 1906; that ever since that time this defendant has had adverse possession of the said property claiming it adversely and actually occupying a portion thereof; that throughout the periods of occupancy and possession so mentioned, there has been in cultivation about 80 acres of the said land which has been kept under fence and cultivated each year by, for or under the party or parties then claiming the land as hereinabove stated; that during the most of said periods there has been maintained on the said premises a house for the use of the laborers employed in cultivating the said land; that these cultivated lands consist of the portion of the tract which fronts upon the river, and embrace almost the entire river frontage and extend back several hundred yards; that the remainder of the said land is uncleared and is timbered land; that throughout the said periods of adverse possession hereinabove stated, the respective claimants during the respective periods of their respective claims have protected the same against trespass, exercised such acts of ownership thereover as such land was susceptible of, and occasionally have gotten timber therefrom.

5. Answering the 6th interrogatory, the defendant, Fannie I. Becker, says that her late husband, during his aforesaid possession of the land, caused the same to be surveyed in whole or in part by the late Dan Williams, but that she has not had any survey made.

6. The defendant, Jerome H. Sheip, Inc., answering through its officer having such knowledge of the facts inquired about as is

possessed by said defendant, says that it has no knowledge or information as to any of said matters except its arrangement with its co-defendant set forth in her foregoing answers; that this defendant believes the foregoing answers of its co-defendant to be true; and that it therefore adopts the same.

Fannie I. Becker

JEROME H. SHEIP, INC.

By Jerome H. Sheip

State of Alabama,

Mobile County.

Before me, Chas. L. Rehm, a Notary Public in and for said State and County, personally appeared Fannie I. Becker, who, being duly sworn, deposes and says that her foregoing answers to the interrogatories there being responded to are true.

Chas. Fannie I. Becker

Subscribed and sworn to before

me this 1st day of May, 1919.

Chas. L. Rehm
Notary Public, Mobile County, Alabama.

State of Alabama,

Mobile County.

Before me, H. Cooke, a Notary Public in and for said State and County, personally appeared Jerome H. Sheip, who, being duly sworn, deposes and says that he is the officer of Jerome H. Sheip, Inc., having whatever knowledge the said Company possesses relative to the matters inquired about in the interrogatories responded to in and by the foregoing answers; that as such officer he has the authority to make the said answers; and that the foregoing answers made by him for the said Company to the said interrogatories are true.

Jerome H. Sheip

Subscribed and sworn to before

me this 1st day of May, 1919.

H. Cooke
Notary Public, Mobile County, Alabama.