

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

We command you that without delay you execute this Writ, and due return thereof how you have executed the same make to us immediately.

To ... FRANK BOYKIN, JOHN T. COCHRANE, J.C. PRINE and FRANK BOYKIN

as Administrator of the estate of John Everett, deceased

WHEREAS, MATTIE S. LOWELL

has on this day filed a Bill of Complaint in said Court against FRANK BOYKIN, JOHN T. COCHRANE,

J.C. PRINE and FRANK BOYKIN, as Administrator of the estate of John Everett, deceased

praying, among other things, that Frsnk Boykin, John T. Cochran, J.C. PRINE,

and Frank Boykin as administrator of the estate of John Everett,

deceased, and all agents, servants, or employees of any or either of them be restrained from cutting or removing any pine timber from any part of said land upon the execution by the complainant of such bond as this Honorable Court might require in the premises,

And whereas, on said Bill of Complaint being exhibited to the Hon. F.W. Hare

Judge of the Circuit Court of BALDWIN County, of the State of Alabama, on the

20th day of January, 1933, he did order that, upon Complainant entering

into bond, with sureties, in the sum of FIVE HUNDRED & 00/100 Dollars,

payable to the Defendant and approved by the Clerk of this Court, and conditioned according to law, a

Writ of Injunction issue out of said Court, according to the prayer of said Bill; and whereas, bond has

been given, as required by said order.

These, therefore, are to command and strictly enjoin you from and all servants, or employees or any of them be restrained from cutting or removing any pine timber from any part of said land upon the execution by the complainant of such bond as this Honorable Court might require in the premises

until further order of this Court. And this you will in nowise omit, under penalty.

WITNESS, T.W. Richerson, as Clerk of said Court, at office, in

Bay Minette Alabama, this 21st day of January, 1933.

T.W. Richerson
Clerk.

The State of Alabama, }
Baldwin County

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon FRANK BOYKIN, JOHN T. COCHRANE,

J.C. PRINE and FRANK BOYKIN, as administrator of the Estate of
JOHN EVERETT, deceased

of MOBILE County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
CROSS

MATTIE I. LOWELL

against said FRANK BOYKIN, JOHN T. COCHRANE, J.C. PRINE & FRANK BOYKIN
AS ADMINISTRATOR OF THE ESTATE OF JOHN EVERETT, Deceased.

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

WITNESS, T. W. Richerson, Register of said Circuit Court, this 10th day of

December 193 2

T. W. Richerson Register.

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

The State of Alabama, ^{BALDWIN} ~~Mobile~~ County

Frank W. Boykin, John T. Cochrane,
J.C. Prine, Frank W. Boykin, as Admr.,
of Estate of John Everett, deceased,
Complainant

^{BALDWIN}
Circuit Court of ~~Mobile~~ County
IN EQUITY

No. VS.

Mattie I. Lowell, Defendant

The complainants

requests the oral examination of the following named witnesses

on their behalf, viz.:

Frank W. Boykin, John Ryder, Ryder and Ed. Smith

said witnesses reside in the County of Baldwin, State of Alabama, excepting
Frank W. Boykin, who resides in Mobile County, Alabama,
State of Alabama

Celia Gerhardt

who resides at Mobile, Alabama.

is suggested as a suitable person to be appointed Commissioner to take deposition
of said witnesses on such oral examination.

.....GAILLARD & GAILLARD.....

Solicitor for ...COMPLAINANTS.....

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA SITTING IN EQUITY.

Comes your complainants, Frank Boykin, John T. Cochrane, J. C. Prine and Frank Boykin as administrator of the estate of John Everett, deceased, who are all over the age of twenty one years and resident citizens of Mobile County, Alabama and respectfully exhibits this their bill of complaint against Mattie I. Lowell who is over the age of twenty one years and a resident citizen of Mobile County, Alabama. And complainants respectfully show unto the court as follows:

1. That they are in the actual, peaceable possession of the following tracts of land in the County of Baldwin, State of Alabama, described as follows:

Southeast Division A, Division B, fractional Section 7;
Southwest Division B, fractional Section 8;
West Half of Southwest Quarter, Northeast Quarter of Northeast Quarter Section 10;
Southeast Quarter of Southwest Quarter, Section 11;
West Half and Northeast Quarter Section 14;
West Half of Northwest Quarter, South Half and East half of Northwest Quarter, Section 15;
Northeast Quarter and South half, Section 16;
Divisions B, C, D, E, F or A, B, C and East half of Southwest quarter, fractional Section 18;
East Division A, or Northwest quarter fractional Section 19;
Northeast Quarter, East half of Northwest Quarter Section 21;
Northeast Quarter, except Northeast Quarter of Northeast Quarter and two acres in northwest corner of Southeast Quarter of Northeast Quarter known as 'John Graveyard' Section 22;
All of Section 21 except North half of Southeast Quarter Section 17, All being in Section 41;
Northwest Quarter of Northwest Quarter less two and a half acres along the South boundary line, Section 21.
All of the above lying in Township 3 South Range 2 East.

2. That the complainants own said land in their own right, in fee simple, and that their title thereto is denied or disputed by the respondent to this bill of complaint, and said respondent claims or is reputed to own or claim the same or some part thereof, or some right, title or interest therein, or to hold some lien or encumbrance thereon.

3. No suit is pending to enforce or test the validity of such title, claim or encumbrance of the said respondent, and that, therefore, the complainants bring this suit to settle the title to said land and to clear up all doubt or dispute concerning the same.

4. The complainants further show unto the court that they own the entire fee simple title to said property, and that the respondent claims or is reputed to claim some right, title or interest in or encumbrance upon said lands, and the complainants call upon her to set forth and specify her title, claim, interest or encumbrance, and how and by what instrument the same is derived and created.

5. The complainants further show unto the court that on, to-wit, September 24th, 1932, the Auditor of the State of Alabama issued a deed to Jere Austill, Attorney, conveying to him the above described lands, and that said Austill has transferred and assigned his alleged interest in said lands acquired by said deed to the respondent herein, neither of which two instruments are of record.

PRAYER FOR PROCESS.

The premises considered complainants pray the court to take jurisdiction of this cause and have its process issue to the respondent commanding her to plead, answer or demur

to this bill of complaint within the time required by law.

PRAYER FOR RELIEF.

And complainants further pray that upon a final hearing of this cause the court will be pleased to ascertain and settle the title to said lands and clear up all doubt or disputes concerning the same, and decree that the complainants own said lands in fee simple and that the respondent has no estate or interest in, or encumbrance upon said lands, or any part thereof, and complainants further pray that the court will decree that said deeds from the State Auditor to Jere Austill, Attorney, and his assignment thereof to the respondent are null and void and of no effect and constitute a cloud upon complainants' title to said lands, and will order said deeds cancelled and removed as a cloud upon complainants' title to said lands. And complainants pray for all such other, further and different relief as they may be entitled to receive the premises considered.

S. P. Gaillard Sr. and George Sossamon
Solicitor for Complainants.

FOOT NOTE:- The Respondent is required to answer each and every allegation of the foregoing bill of complaint, from paragraphs one to five inclusive, but not under oath, answer under oath being hereby expressly waived.

S. P. Gaillard Sr. and George Sossamon
Solicitor for Complainants.

FRANK BOLKIN, ET AL,

Complainants,

.vs.

MATTIE I. LOWELL,

Defendant.

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

IN EQUITY.

I hereby appear for the respondent in this
cause and reserve the right to plead, answer or demur
to the bill of complaint.

Gene Justice

FRANK BOYKIN, ET AL.,
COMPLAINANTS,

VS.

MATTIE S. LOWELL,
RESPONDENT.

)
) IN THE CIRCUIT COURT OF

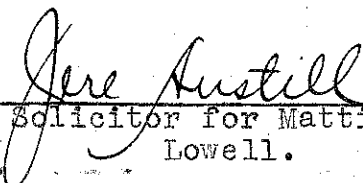
)
) BALDWIN COUNTY,

)
) ALABAMA.

) IN EQUITY. NO. _____

Comes the Respondent, Mattie S. Lowell, by her Solicitor of Record, Jere Austill, and respectfully moves the Court to strike the motion in this cause filed January 20, 1933, upon the following separate and several grounds, viz:-

1. Said motion is frivolous.
2. Said motion is impertinent.
3. Said motion is without equity.
4. For that the relief prayed for in said motion can be awarded the movant under the pleadings in this cause heretofore filed.
5. For that this Court is without jurisdiction of the matters and things prayed for in said motion.


Solicitor for Mattie S.
Lowell.

FRANK BOYKIN, ET AL,

Complainants,

.vs.

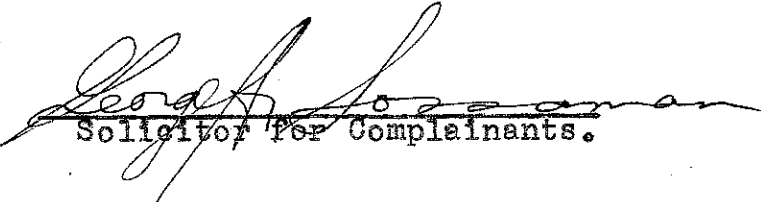
MATTIE I. LOWELL,

Respondent,

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA.

Comes the complainants and for answer to
respondent's cross-bill denies each and every allega-
tion thereof.


Solicitor for Complainants.

FRANK W. BOYKIN, ET AL.,
COMPLAINANTS,

-VS-

MATTIE S. LOWELL,
RESPONDENT.

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

)
) IN EQUITY.
)

NO. _____

Comes the Respondent, Mattie S. Lowell, and for answer to the Bill of Complaint in this cause filed, says as follows, viz:-

That the lands described in the Bill of Complaint were duly and regularly assessed for taxes to Frank W. Boykin, as Trustee, for himself and the other complainants, in Baldwin County, Alabama, and the taxes becoming due thereon for the year 1929 were not paid, and pursuant to said default, that said lands were duly and legally advertised for sale and sold and bid in by the State of Alabama. Respondent further alleges that thereafter two years expired, as provided by statute, during which time the said Frank W. Boykin, as Trustee, and the other Complainants in this cause, failed and refused to redeem said lands from the State of Alabama, and thereafter, on to-wit, September 24, 1932, the Respondent duly and legally purchased said lands from the State of Alabama and received a deed from John Brandon, State Auditor for the State of Alabama, which said deed, through error, was made to Jere Austill, Attorney, and that the said Jere Austill, as Attorney, has duly relinquished and released and conveyed any and all title which he received and took under said deed, as aforesaid, to this Respondent.

Respondent therefore alleges that she claims title to said land under a deed from the State of Alabama, as aforesaid.

Respondent alleges further that she did pay or cause to be paid to the said State of Alabama for a deed from said State, as aforesaid, the sum of Eleven Hundred Dollars (\$1100.00); but Respondent alleges that the taxes due from the Complainants to the State of Alabama, and for which said lands were sold to the State of Alabama, and the taxes which subsequently accrued thereon, and for which the State had a lien against said land, were largely in excess of said sum of Eleven Hundred Dollars (\$1100.00) and amounted in the aggregate to, to-wit, Three Thousand One Hundred Fifty Dollars (\$3150.00), and the Respondent further avers that said deed aforesaid has served to convey to her and vest in her, the lien of the State of Alabama for the full amount of

said delinquent taxes, penalties and interest, amounting in the aggregate to said sum of Three Thousand One Hundred Fifty Dollars (\$3150.00).

Respondent denies that the Complainants are in such peaceable possession of said lands as entitles them to file a Bill to Quiet Title thereto against this Respondent, and avers on the contrary that the possession of said land is now in dispute and scrambling between the Complainants and this Respondent, and that this Respondent is in such constructive possession thereof as authorizes her to have this Court Quiet her title thereto against the claim, title and demand of the Complainants.

WHEREFORE, Respondent prays that this answer might also be taken as a Cross-Bill against the Complainants and that this Court will be pleased to decree the title of the Respondent thereto is good and complete and that the Complainants have no further right, title, interest, claim or demand in or to the same.

And Respondent further prays that should she be mistaken in this, that this Court might be pleased to enter its decree giving this Respondent a lien upon said land to the full extent of the taxes, penalties, costs and interest due the said State of Alabama at the time said land was sold by said State of Alabama to this Respondent, and such other, further or different relief as Respondent might be entitled to in the premises.


Solicitor for Respondent.

STATE OF ALABAMA,)

COUNTY OF MOBILE.)

The undersigned, MATTIE S. LOWELL, as Principal,
 and *G.M. Otto* and *J. Tyler Turner*, as
 Sureties, do hereby acknowledge themselves liable for any such
 damages as might accrue, not to exceed \$500⁰⁰, to Frank Boykin,
 John T. Cochran, J. C. Prine, and Frank Boykin, as Administrator
 of the Estate of John Everett, Deceased, and Wallace McMillan, on
 account of a preliminary injunction issued in the Honorable Circuit
 Court of Baldwin County, Alabama, Sitting in Equity, wherein and
 whereby the said Frank Boykin, John T. Cochran, J. C. Prine, and
 Frank Boykin, as Administrator of the Estate of John Everett, De-
 ceased, and Wallace McMillan, are enjoined from going upon and cutting
 any pine timber from the following described lands in Baldwin County,
 Alabama, pending the hearing of the Petition for said injunction on
 its merits and the final decree of said court thereon, viz:-

SE Division A. Division B, Frac. Sec. 7, Township 3s, Range 2e,
 SW Division E. Frac. Sec. 8, Township 3s, Range 2e.
 $W\frac{1}{2}$ of $SW\frac{1}{4}$, $NE\frac{1}{4}$ of $NW\frac{1}{4}$, Sec. 10, Township 3s, Range 2e.
 $SE\frac{1}{4}$ of $SW\frac{1}{4}$ Sec. 11, Township 3s, Range 2e.
 $W\frac{1}{2}$ and $NE\frac{1}{4}$, Sec. 14, Township 3s, Range 2e.
 $W\frac{1}{2}$ of $NW\frac{1}{4}$, $S\frac{1}{2}$ and $E\frac{1}{2}$ of $NW\frac{1}{4}$ Sec. 15, Township 3s, Range 2e.
 $NE\frac{1}{4}$ and $S\frac{1}{2}$, Sec. 16, Township 3s, Range 2e.
 Div. B, C, D, E, F, or A, B, C, and $E\frac{1}{2}$ of $SW\frac{1}{4}$. frac. Sec. 18,
 Township 3s, Range 2e.
 E. Div. A, or $NW\frac{1}{4}$, Frac. Sec. 19, Township 3s, Range 2e,
 $NE\frac{1}{4}$, $E\frac{1}{2}$ of $NW\frac{1}{4}$, Sec. 21, Township 3s, Range 2e.
 $NE\frac{1}{4}$ except $NE\frac{1}{4}$ of $NE\frac{1}{4}$ & 2 Acres in NW corner of $SE\frac{1}{4}$ of $NE\frac{1}{4}$,
 known as John Grave Yard, Sec. 22, Township 3s, Range 2e.
 All of Sec. 21, except $N\frac{1}{2}$ of $SE\frac{1}{4}$, Sec. 17, all being in Sec.
 41, Township 3s, Range 2e.
 $NW\frac{1}{4}$ of $NW\frac{1}{4}$ less $2\frac{1}{2}$ acres along South boundary line, Sec. 21,
 Township 3s, Range 2e.

WITNESS OUR HANDS this 20 day of January, 1933.

3592 - *Mattie S Lowell* (SEAL)
 AS PRINCIPAL.

Filed Jan 24th 1933 5640 - *G.M. Otto* (SEAL)
 J.W. Richardson AS SURETY.
 Register

averred *J. Tyler Turner* (SEAL)
 15469 AS SURETY.

Approved & January 20, 1933
James Adams
 Register

| | | |
|----------------------|---|-------------------------|
| MATTIE S. LOWELL, |) | |
| Complainant, |) | IN THE CIRCUIT COURT OF |
| .vs. |) | BALDWIN COUNTY, ALABAMA |
| FRANK BOYKIN, ET AL, |) | <u>I N E Q U I T Y</u> |
| Respondents. |) | |

Come the respondents and respectfully show unto the Court that the complainant did not purchase from the State of Alabama the lands described in her bill of complaint, but that said lands were purchased by Jere Austill, attorney, from the State of Alabama on September 24th, 1932 for Eleven Hundred (\$1100.00) Dollars, but respondents understand and believe that since that time said Jere Austill, attorney, has conveyed to the complainant all of his interest in said lands, and respondents further aver that said lands purchased by said Austill were for taxes then due upon said property.

The respondents further admit that said lands were sold on, to-wit, May 26th, 1930, to the State of Alabama for the non-payment of the taxes for the year 1929 under an assessment to Frank W. Boykin, Trustee. Respondents further admit that there is now pending in this Court a suit to quiet title to this property between the parties hereto, and the pleadings in said cause are hereby made a part of this answer, and the Court is respectfully referred to said suit and the pleadings therein to show the exact status of that suit upon the docket of this Court.

The respondents admit that the lands herein in dispute in this suit have a valuable growth of pine timber thereupon, and that same constitutes a substantial part of the value of said lands, but respondents further aver

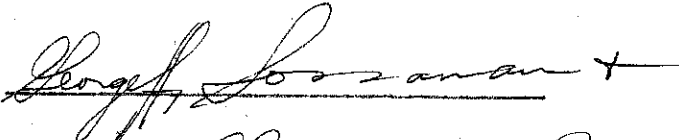

that they purchased said lands on, to-wit, December 30th, 1925, for the sum of Forty Seven Thousand One Hundred Twenty Three and 05/100 (\$47,123.05) Dollars, and aver that even now in these depressed times that said lands are reasonably worth Twenty Five Thousand (\$25,000.00) Dollars, and will probably be worth more within a short time, and even without the timber is now worth many times the claim of complainant. The respondents deny that they have trespassed upon said land, but upon the contrary, that they have been in the actual, peaceable possession of said lands ever since their purchase of same, and that the complainant had at various times since the sale of said lands to Austill attempted with force and arms to gain possession of said land, and to trespass upon same, and that each time they have been forcibly prevented therefrom by the tenants of your respondents who are in the actual possession of said land.

Respondents admit that they have made a contract with one Wallace McMillan for the removal of a small part of the timber upon said lands, and that the operations of said Wallace McMillan have been stopped by the injunction issued in this cause.

Wherefore respondents respectfully show unto the Court that there is no equity in the bill of complaint filed in this cause, that the complainant has a plain, adequate and complete remedy at law for any injuries which may be sustained for which she has obtained injunction, and respondents further show unto the Court that the complainant's interest in said lands consist only of Eleven Hundred (\$1100.00) Dollars plus interest, and that the value of said lands is at least Twenty Five Thousand (\$25,000.00) Dollars, and ^{even} without the timber it is worth many times the cost of the claim of the complainant, and that said interest is so small that said respondents should not be hampered or interfered with in their operations

upon said lands by reason of this small claim. And respondents further show unto the Court that there is no allegation in the bill for an injunction charging that the respondents or any of them are insolvent or in any way incapable of responding in damages to any judgment that may be obtained at law by reason of their operations upon said lands, and respondents aver that they are entirely solvent and fully capable of responding to any judgment that might be obtained in law against them, and respondents further show unto the Court that the only interest the complainant has in this cause is based upon the lien for taxes, which she has acquired under a void tax sale.

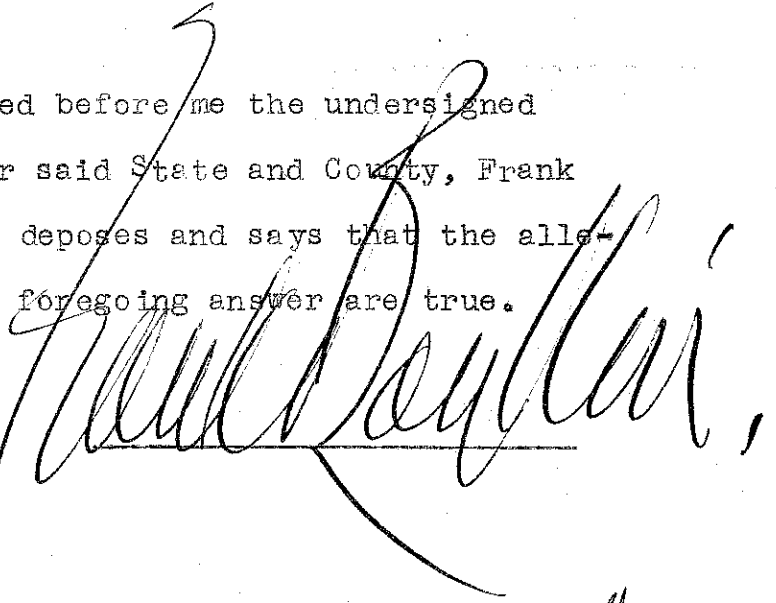
Wherefore, respondents pray that this be taken as an answer to said complaint, and further be taken as a motion to dissolve said injunction, and that upon a hearing of this cause, your Honors will be pleased to dissolve said injunction, and dismiss this cause from the docket, but that if your respondents are in error in this, then your respondents pray that the bond heretofore posted in this cause be increased to such an amount as will reasonably compensate your respondents for the damages which they have sustained, and which they will further sustain by reason of the stoppage of their timber operations upon said lands.


George Sossaman

S. P. Gaillard Sr.
Solicitors for Respondents.

STATE OF ALABAMA,

MOBILE COUNTY.

Personally appeared before me the undersigned
Notary Public, in and for said State and County, Frank
W. Boykin, who upon oath deposes and says that the alle-
gations contained in the foregoing answer are true.



A large, cursive handwritten signature, likely of Frank W. Boykin, is written over the text. The signature is written in dark ink and is quite stylized, with a long, sweeping underline that extends to the left and loops back up towards the top of the page.

Sworn and subscribed to before me this the 29th
day of January, 1933.



A cursive handwritten signature, likely of George Sossaman, is written over the notary's name. The signature is written in dark ink and is quite stylized, with a long, sweeping underline that extends to the left and loops back up towards the top of the page.

NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
SITTING IN EQUITY:-

Comes Mattie S. Lowell and respectfully shows unto this Honorable Court as follows, viz:-

That she has purchased from the State of Alabama, the following described land in Baldwin County, Alabama, viz:-

SE Division A, Division B, Frac. Sec. 7, Township 3s, Range 2e,
SW Division E, Frac. Sec. 8, Township 3s, Range 2e.
 $W\frac{1}{2}$ of $SW\frac{1}{4}$, $NE\frac{1}{4}$ of $NE\frac{1}{4}$, Sec. 10, Township 3s, Range 2e.
 $SE\frac{1}{4}$ of $SW\frac{1}{4}$ Sec. 11, Township 3s, Range 2e.
 $W\frac{1}{2}$ & $NE\frac{1}{4}$, Sec. 14, Township 3s, Range 2e.
 $W\frac{1}{2}$ of $NW\frac{1}{4}$, $S\frac{1}{2}$ and $E\frac{1}{2}$ of $NW\frac{1}{4}$ Sec. 15, Township 3s, Range 2e.
 $NE\frac{1}{4}$ and $S\frac{1}{2}$, Sec. 16, Township 3s, Range 2e.
Div. B, C, D, E, F, or A, B, C, and $E\frac{1}{2}$ of $SW\frac{1}{4}$, frac. Sec. 18, Township 3s, Range 2e.
E Div. A, or $NW\frac{1}{4}$, Frac. Sec. 19, Township 3s, Range 2e,
 $NE\frac{1}{4}$, $E\frac{1}{2}$ of $NW\frac{1}{4}$, Sec. 21, Township 3s, Range 2e.
 $NE\frac{1}{4}$ except $NE\frac{1}{4}$ of $NE\frac{1}{4}$ & 2 Acres in NW corner of $SE\frac{1}{4}$ of $NE\frac{1}{4}$,
known as John Grave Yard, Sec. 22, Township 3s, Range 2e.
All of Sec. 21 except $N\frac{1}{2}$ of $SE\frac{1}{4}$, Sec. 17, all being in Sec. 41,
Township 3s, Range 2e.
 $NW\frac{1}{4}$ of $NW\frac{1}{4}$ less $2\frac{1}{2}$ acres along south boundary line, Sec. 21,
Township 3s, Range 2e.

That she paid the State of Alabama for said land the sum of
One Thousand One Hundred Dollars (\$1100.00).

That said land had theretofore been sold on to-wit, May 26,
1930 to the State of Alabama on account of non-payment of taxes thereon
for the year 1929, under an assessment to Frank W. Boykin, Trustee.

Complainant now shows that there has been filed in this Court
and is now pending in this Court, Cause No. 1040, in Equity, a Bill
by Frank Boykin, John T. Cochrane, J. C. Prine and Frank Boykin, as
Administrator of the Estate of John Everett, Deceased, to quiet the
title of the Complainant to said land, in which Bill of Complaint it
is alleged that the Complainant herein did purchase said land from
the Auditor of the State of Alabama, and calling upon her to set forth
and specify her right, title, claim and demand to said land.

Complainant now shows further that she has appeared in said
cause, filed an answer therein, in which she has set up her right, title
and interest in said land by virtue of the purchase thereof from the
Auditor of the State of Alabama, denying the peaceable possession of
said land by the Complainants in said cause, and praying that her answer
might be taken as a cross-bill and that this Court might enter its
decree that the Complainants therein have no further right, title or
interest in or to said land, and that if she be mistaken in this, that
the Court might decree a lien thereon in her favor to the extent of

said Frank Boykin, John T. Cochrane, J. C. Prine and Frank Boykin,
as Administrator of the Estate of John Everett, Deceased, and Wallace
McMillan, in and to said land in the original suit now pending in this
Honorable Court and herein referred to.

Mattie S. Lowell

Sworn to and subscribed before
me this 20th day of January,
1933, by Mattie S. Lowell.

Jere Anstall
Solicitor for Complainant,
Mattie S. Lowell.

Anita Friedlander
Notary Public, Mobile County,
Alabama.

Upon Complainant entering
into bond in the sum of \$5000.00 let
the writ of injunction issue as
prayed - This Jan. 20, 1933

J. W. Hare
Judge

State of Alabama,

Baldwin County,


To Hon Jere Austill, Solicitor for Complainant in the
cause of MattieSLowell, Complainant vs Frank Boykin et al,

Respondents, You are hereby notified a hearing will be had at
Brewton Alabama, Feb 20th, 1933, upon a motion filed by

Hon Geo Soosaman Solicitor for Respondents,

copy of petition and motion attached hereto.

Witness my hand this 30th day of January 1933.



Register.