

2499

BILL OF COMPLAINT

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Complainant, C. A. Thompson, presents this Bill of Complaint against the following described real property situated in Baldwin County, Alabama, to-wit:

Northwest Quarter of Northwest Quarter of Section 36, Township 3 South, Range 4 East of St. Stephens Meridian in Alabama; Northwest Quarter of Section 23, Township 4 South, Range 4 East of St. Stephens Meridian in Alabama,

and against O. M. Gordon, Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of the Baldwin-Escambia Land Company, a Corporation, Martin, Buchmann and Redding, Carrie G. Buchmann, Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, Josiah V. Thompson, Mary Thompson, Alex C. Blount, Jr., Clara G. Blount, Perdido Land Company, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation, W. A. Reed, John H. Gabrielson, Anna Gabrielson, Ralph Skidmore, Harriet S. Skidmore, Frederick A. Wilson, Emma Wils on, and against the heirs, devisees and personal representatives of such of said parties as may be dead, and against 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 Complainant complains and shows unto the Court and your Honor as follows:

1. Your Complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama.
2. The Respondents, if living, are over the age of twenty-one years, but their places of residence and post office addresses are unknown and cannot be ascertained after diligent effort and inquiry to ascertain the facts with regard thereto.
3. Your Complainant is in the actual, peaceable possession of all of the above described real property and owns and claims to own the said property in his own right, absolutely and in fee simple; title to all of said lands stands upon the records of Baldwin County, Alabama, the County where the said lands are situated in the name of your Complainant; no suit is pending to test your Com-

plainant's title to or the right to possession of the said lands or any part thereof. No persons, firms or corporations other than your Complainant and those through whom he claims title to the said property are known to your Complainant to have any possession of the said lands or any part thereof within ten years next preceding the filing of this Bill of Complaint and no persons, firms or corporations other than your Complainant and those through whom he claims title to the said lands have paid any taxes on the said lands or any part thereof or any interest therein within ten years next preceding the filing of this Bill of Complaint.

4. Your Complainant has, and claims to have, the absolute, unencumbered fee simple title to all of the said real property hereinabove described by and through the following instruments of writing, 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:

a. Patent from United States of America to Muscogee Lumber Company, dated May 4, 1885, filed February 27, 1886, and recorded in Deed Book 0, page 134.

b. Patent from United States of America to William H. Taylor, dated February 6, 1899, filed November 13, 1902, and recorded in Deed Book 5, page 503.

c. Deed from Randolph McGowan and Mary Maude McGowan, his wife, to C. A. Thompson, dated August 15, 1935, filed August 16, 1935, and recorded in Deed Book 57, page 445.

d. Deed from Carrie G. Buchman, individually and as Executrix of the Estate of Fred J. Buchman, Deceased, to Mitchell Naval Stores Company, dated April 4, 1936, filed May 6, 1936, and recorded in Deed Book 59, page 179.

e. Deed from C. B. Mitchell, R. F. Mitchell, Jr., and J. L. Tucker, an unmarried man, doing business as Mitchell Naval Stores Company, and Jessie H. Mitchell, wife of C. B. Mitchell, and Dorothy F. Mitchell, wife of R. F. Mitchell, Jr., to J. R. Duncan, dated January 24, 1941, filed January 24, 1941, and recorded in Deed Book 75, page 25.

f. Deed from C. B. Mitchell, R. F. Mitchell, Jr., J. L. Tucker, unmarried, doing business as Mitchell Naval Stores Company, and Jessie H. Mitchell and Dorothy F. Mitchell, wives of C.B. Mitchell and R. F. Mitchell, Jr., to J. R. Duncan, dated January 24 1941, filed April 18, 1941, and recorded in Deed Book 75, page 25.

g. Deed from J. R. Duncan and Margaret Duncan, his wife, to C. A. Thompson, dated July 30, 1942, filed August 4, 1942, and recorded in Deed Book 77, page 523.

h. Deed from C. A. Thompson and Jessie L. Thompson, his wife, to Stapleton Insurance and Realty Corporation, dated August 3, 1942, filed August 4, 1942, and recorded in Deed Book 77, page 523.

i. Deed from Stapleton Insurance and Realty Corporation, a Corporation, to C. A. Thompson, dated May 20, 1947, filed June 7, 1947, and recorded in Deed Book 120, page 342.

j. Deed from C. A. Thompson and Jessie L. Thompson, his wife, to Albert M. Thompson, dated December 1, 1948, filed July 12, 1949, and recorded in Deed Book 143, page 188.

k. Deed from Albert M. Thompson, unmarried, to C. A. Thompson, dated February 4, 1949, filed July 20, 1949, and recorded in Deed Book 143, page 315.

Your Complainant has made and has caused a diligent search to be made in the community where the said property is located and in Baldwin County, Alabama, to ascertain the names, ages and places of residence of all persons, firms and corporations claiming any title to, interest in, lien or encumbrance on said lands or any part thereof. These inquiries have continued faithfully and diligently for the past two years, and approximately eighteen months ago your Complainant employed an abstracter to make an examination of the records of Baldwin County, Alabama, for the purpose of securing all possible information about the title to the said property. He employed an attorney to also examine the records of Baldwin County, Alabama, and to make inquiry about the title to said property and all persons claiming any interest therein, their ages and places of


residence. All information having any bearing on the title to the said property and all information so secured as to prior ownership and possession of the said property, the ages and places of residence of the individual Respondents named herein is as hereinabove set out.

PRAYER FOR PROCESS

Your Complainant prays that the lands hereinabove described, the Respondents named herein and the unknown heirs, devisees personal representatives and next of kin of the Respondents named herein who are dead, and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, be made parties Respondent to this Bill of Complaint and brought into Court by the usual and proper process.

PRAYER FOR RELIEF

Your Complainant prays that each and all of the Respondents names herein, the unknown heirs, devisees, legal representatives and next of kin of such of the Respondents named herein who are dead, and any and all persons, firms or corporations who claim to own the 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, right, title, interest, lien or encumbrance and how and by what instrument the same is derived and created; that upon the final hearing of this cause it be Ordered, Adjudged and Decreed that your Complainant has the fee simple title to all of the above described lands and that none of the Respondents herein specifically named, or any other person, firm or corporation has any right or title to, interest in, lien or encumbrance thereon; that all doubts and disputes concerning the said property be cleared up and that your Complainant's title to the said lands be fully and completely quieted. Your Complainant prays for such other, further and general relief as he may be equitably entitled to, the premises considered.


Solicitor for Complainant.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

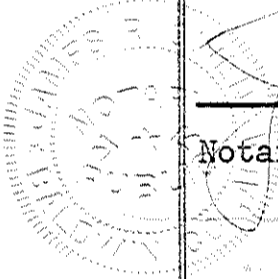
Before me, the undersigned authority, within and for said County in said State, personally appeared C. A. Thompson, who, after being by me first duly and legally sworn, deposes and says: That he has read over the foregoing Bill of Complaint and that the facts stated therein are true.

C. A. Thompson

Sworn to and subscribed before me on
this the 29th day of June, 1950.

James R. Owen

Notary Public, Baldwin County, Alabama.



C. A. THOMPSON,)	IN THE CIRCUIT COURT OF
Complainant,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY.
THE LANDS HEREINAFTER DESCRIBED,)	NO.
O. M. GORDON, ET ALS.,)	
Respondents.)	

MOTION FOR DECREE PRO CONFESSO.

Motion is hereby made for Decree Pro Confesso against the Respondents, O. M. Gordon, Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of the Baldwin-Escambia Land Company, a Corporation, Martin, Buchmann and Redding, Carrie G. Buchmann, Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, Josiah V. Thompson, Mary Thompson, Alex C. Blount, Jr., Clara G. Blount, Perdido Land Company, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation, W. A. Reed, John H. Gabrielson, Anna Gabrielson, Ralph Skidmore, Harriet S. Skidmore, Frederick A. Wilson, Emma Wilson, and against the heirs, devisees and personal representatives of such of said parties as may be dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the following described property situated in Baldwin County, Alabama, to-wit:

Northwest Quarter (NW $\frac{1}{4}$) of Northwest Quarter (NW $\frac{1}{4}$) of Section 36, Township 3 South, Range 4 East of St. Stephens Meridian in Alabama;
 Northwest Quarter (NW $\frac{1}{4}$) of Section 23, Township 4 South, Range 4 East of St. Stephens Meridian in Alabama,

on the ground that the Respondents are, if living, over the age of twenty-one years, the addresses of the said parties being unknown and the Notice of Pendency of the Bill of Complaint filed in this cause on the 29th day of June, 1950, which is dated June 29, 1950, was published once a week for four successive weeks in the Baldwin

Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, the first of said notices appeared in the issue of said paper published on June 29, 1950, and that on the said date a copy thereof was posted at the front door of the courthouse of Baldwin County, Alabama, and another copy was filed for record in the office of the Judge of Probate of Baldwin County, Alabama, and each and all of the said parties have failed to appear and plead, answer or demur to the said Bill of Complaint filed against them in this cause.

WHEREFORE, the Complainant moves the Register to make and enter a Decree Pro Confesso against each and all of the above named Respondents.

DATED this the ^{24th}~~3rd~~ day of ^{October}~~August~~, 1950.

J. B. Blackburn

Solicitor for Complainant.

C. A. THOMPSON,

Complainant

VS.

CERTAIN LANDS, and O. M. GORDON,
ET ALS.,

Respondents.

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

DECREE.

This cause being at issue it is ordered, adjudged and decreed by the court that the testimony of the Complainant, C. A. Thompson, and of J. S. Lowrey, a witness for the Complainant, be taken orally in open court in the manner provided by Equity Rule 56 as amended, at 2 o'clock P. M. on November 7, 1950.

Ordered, Adjudged and Decreed on this the 7th day
of November, 1950.

J. J. M. [Signature]

Judge.

DECREE # 2499

C. A. THOMPSON, Complainant

RECORDED

VS.

CERTAIN LAND, and O. M. GORDON
ET ALS.,

Respondents.

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

Filed 11-10-20
Alex French

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C. A. THOMPSON,
 VS. Complainant,
 THE LANDS HEREINAFTER DESCRIBED,
 O. M. GORDON, ET ALS,
 Respondents.

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA
 IN EQUITY. NO. 2499

DECREE PRO CONFESSO

In this cause it being made to appear to the Register that the Respondents, O. M. Gordon; Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of the Baldwin-Escambia Land Company, a Corporation; Martin, Buchmann and Redding; Carrie G. Buchmann; Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation; Josiah V. Thompson; Mary Thompson; Alex C. Blount, Jr.; Clara G. Blount; Perdido Land Company, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation; W. A. Reed; John H. Gabrielson; Anna Gabrielson; Ralph Skidmore; Harriet S. Skidmore; Frederick A. Wilson and Emma Wilson, are, if living, over the age of twenty-one years and their respective places of residence and post office addresses are unknown and cannot be ascertained after diligent inquiry, or are non-residents of the State of Alabama, whose exact places of residence and post office addresses are unknown; that a copy of the Notice of Pendency of the Bill of Complaint in this cause, dated the 29th day of June, 1950, was published once a week for four successive weeks in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, the first of said notices being published on June 29, 1950, the second of said notices being published on July 6, 1950, the third of said notices being published on July 13, 1950 and the fourth of said notices being published on July 20, 1950; and that copies thereof were posted at the front door of the courthouse in Baldwin County, Alabama and filed for record in the office of the Judge of

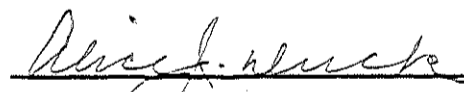
Probate of Baldwin County, Alabama on June 29, 1950 and that to date hereof each of the said Respondents and the heirs, devisees and personal representatives of such of said parties as may be dead, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the following described property situated in Baldwin County, Alabama, to-wit:

Northwest Quarter of the Northwest Quarter
of Section 36, Township 3 South, Range 4
East of St. Stephens Meridian in Alabama;
Northwest Quarter of Section 23, Township
4 South, Range 4 East of St. Stephens Merid-
ian in Alabama,

have failed to appear and plead, answer or demur to the Bill of Complaint filed against them in this cause.

It is, therefore, on motion of the Complainant, Ordered, Adjudged and Decreed by the Register that the said Bill of Complaint be and it hereby is in all things taken as confessed against each and all of the above named Respondents and the heirs, devisees and personal representatives of such said parties as may be dead and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the lands above described, or any part thereof.

ORDERED, ADJUDGED AND DECREED this 24th day of October, 1950.



Register.

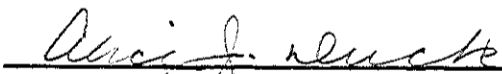
C. A. THOMPSON, VS. THE LANDS HEREINAFTER DESCRIBED, O. M. GORDON, ET ALS, Respondents.)))))	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY. NO. 2499
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CERTIFICATE

STATE OF ALABAMA)
 *
 BALDWIN COUNTY)

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that a copy of the Notice of Pendency of the Bill of Complaint in the above styled cause was published once a week for four successive weeks in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, the first of which said notices appeared in the issue of said paper published on June 29, 1950, and that on the said date a copy of the said notice was posted at the front door of the courthouse of Baldwin County, Alabama, and a copy thereof was filed for record in the office of the Judge of Probate of Baldwin County, Alabama.

Dated on this the 24th day of October, 1950.



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

CERTIFICATE

C. A. THOMPSON, **RECORDED**

Complainant,

VS.

THE LANDS HEREINAFTER DESCRIBED,
O. M. GORDON, ET ALS,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY. NO. 2499

NOTICE OF PENDENCY OF BILL OF COMPLAINT

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C. A. THOMPSON,

Complainant,

VS.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) IN EQUITY.

THE LANDS HEREINAFTER DESCRIBED, and
O. M. GORDON, BALDWIN-ESCAMBIA LAND
COMPANY, a Corporation, and the offi-
cers, directors and stockholders of the
Baldwin-Escambia Land Company, a Cor-
poration, MARTIN, BUCHMANN, and REDDING,
CARRIE G. BUCHMANN, MOBILE and GIRARD
RAILROAD COMPANY, a Corporation, and the
officers, directors and stockholders of
the Mobile and Girard Railroad Company,
a Corporation, JOSIAH V. THOMPSON, MARY
THOMPSON, ALEX C. BLOUNT, JR., CLARA G.
BLOUNT, PERDIDO LAND COMPANY, a Corpora-
tion, and the officers, directors and
stockholders of the Perdido Land Company,
a Corporation, W. A. REED, JOHN H. GAB-
RIELSON, ANNA GABRIELSON, RALPH SKIDMORE,
HARRIET S. SKIDMORE, FREDERICK A. WILSON,
EMMA WILSON, ET ALS.,

) Respondents.

Notice is hereby given to O. M. Gordon, Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of the Baldwin-Escambia Land Company, a Corporation, Martin, Buchmann and Redding, Carrie G. Buchmann, Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, Josiah V. Thompson, Mary Thompson, Alex C. Blount, Jr., Clara G. Blount, Perdido Land Company, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation, W. A. Reed, John H. Gabrielson, Anna Gabrielson, Ralph Skidmore, Harriet S. Skidmore, Frederick A. Wilson, Emma Wilson, and the heirs, devisees and personal representatives of such of said parties as may be dead, 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 29th day of June, 1950, the said Complainant, C. A. Thompson, 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:

Northwest Quarter of Northwest Quarter of
Section 36, Township 3 South, Range 4 East
of St. Stephens Meridian in Alabama;
Northwest Quarter of Section 23, Township
4 South, Range 4 East of St. Stephens
Meridian in Alabama,

and against O. M. Gordon, Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of Baldwin-Escambia Land Company, a Corporation, Martin, Buchmann and Redding, Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, Josiah V. Thompson, Mary Thompson, Alex C. Blount, Jr., Clara G. Blount, Perdido Land Company, a Corporation, and the officers, directors and stockholders of Perdido Land Company, a Corporation, W. A. Reed, John H. Gabrielson, Anna Gabrielson, Ralph Skidmore, Harriet S. Skidmore, Frederick A. Wilson, Emma Wilson, and the heirs, devisees and personal representatives of such of the said parties as may be dead, and against 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 Complainant to all of the said lands, for the purpose of quieting his title thereto, and to clear up all doubts and disputes concerning the title to the said property.

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

1. Patent from United States of America to Muscogee Lumber Company, dated May 4, 1885, filed February 27, 1886, and recorded in Deed Book 0, page 134.
2. Patent from United States of America to William H. Taylor, dated February 6, 1899, filed November 13, 1902, and recorded in Deed Book 5, page 503.
3. Deed from Randolph McGowan and Mary Maude McGowan, his wife, to C. A. Thompson, dated August 15, 1935, filed August 16, 1935, and recorded in Deed Book 57, at page 445.

4. Deed from Carrie G. Buchmann, individually and as Executrix of the Estate of Fred J. Buchmann, Deceased, to Mitchell Naval Stores Company, dated April 4, 1936, filed May 6, 1936, and recorded in Deed Book 59, page 179.
5. Deed from C. B. Mitchell, R. F. Mitchell, Jr., and J. L. Tucker, an unmarried man, doing business as Mitchell Naval Stores Company, and Jessie H. Mitchell, wife of C. B. Mitchell, and Dorothy F. Mitchell, wife of R. F. Mitchell, Jr., to J. R. Duncan, dated January 24, 1941, filed January 24, 1941, and recorded in Deed Book 75, page 25.
6. Deed from C. B. Mitchell, R. F. Mitchell, Jr., J. L. Tucker, unmarried, doing business as Mitchell Naval Stores Company, and Jesse H. Mitchell and Dorothy F. Mitchell, wives of C. B. Mitchell and R. F. Mitchell, Jr., to J. R. Duncan, dated January 24, 1941, filed April 18, 1941, and recorded in Deed Book 75, page 25.
7. Deed from J. R. Duncan and Margaret Duncan, his wife, to C. A. Thompson, dated July 30, 1942, filed August 4, 1942, and recorded in Deed Book 77, page 523.
8. Deed from C. A. Thompson and Jessie L. Thompson, his wife, to Stapleton Insurance and Realty Corporation, dated August 3, 1942, filed August 4, 1942, and recorded in Deed Book 77, page 523.
9. Deed from Stapleton Insurance and Realty Corporation, a Corporation, to C. A. Thompson, dated May 20, 1947, filed June 7, 1947, and recorded in Deed Book 120, page 342.
10. Deed from C. A. Thompson and Jessie L. Thompson, his wife, to Albert M. Thompson, dated December 1, 1948, filed July 12, 1949, and recorded in Deed Book 143, page 188.
11. Deed from Albert M. Thompson, unmarried, to C. A. Thompson, dated February 4, 1949, filed July 20, 1949, and recorded in Deed Book 143, page 315.

The Complainant, in and by his said Bill of Complaint, alleges and avers that he owns the said lands in his own right, absolutely and in fee simple; that he is in the actual, peaceable possession of all of the said lands; that title to the said lands stands upon the records of Baldwin County, Alabama, the County where the said lands are situated, in the name of the Complainant; that no suit is pending to test Complainant's title to, interest in, or right to the possession of the said lands, or any part thereof; that no persons, firms or corporations, other than the Complainant and those through whom he claims title, are known to the Complainant to have any possession of the said lands, or any part thereof, within ten years next prior to the filing of the said Bill of Complaint, and that no persons, firms or corporations, other than the Complainant and those through whom he claims title to the said

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lands, are known to the Complainant to have paid any taxes on the said lands, or any part thereof, or any interest therein, within ten years next prior to the filing of the said Bill of Complaint.

The said parties named above and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, must appear in this Court and plead, answer or demur to the said Bill of Complaint before August 29, 1950, or on the said date Decrees Pro Confesso will be taken against them, testimony will be thereafter taken and the said cause submitted for a final decree quieting Complainant's title to the said lands.

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 29th day of June, 1950.

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

J. B. BLACKBURN
Solicitor for Complainant.

STATE OF ALABAMA, BALDWIN COUNTY
Filed 6-30-50 10 AM
Recorded *Deed* Book 155 page 117-20
..... *W. S. Stewart*
Judge of Probate *3*

C. A. THOMPSON,)	
)	
Complainant,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
)	
CERTAIN LANDS and O. M.)	IN EQUITY
GORDON ET ALS,)	NO. 2499
)	
Respondents.)	

FINAL DECREE

This cause coming on to be heard on this date is submitted for final decree on the original Bill of Complaint, Notice of Pendency of Bill of Complaint, Proof of Publication of Notice of Pendency of Bill of Complaint, Motion for Decree Pro Confesso against Respondents, Decree Pro Confesso against Respondents, Decree Ordering Testimony Taken in Case, as required by Equity Rule Number 56, as amended, the testimony of Complainant's witnesses taken in open court, as provided in Equity Rule Number 56, as amended, upon consideration of all of which, it appears to the Court that the Complainant is entitled to the relief prayed for by him in his said Bill of Complaint; WHEREUPON, it is, therefore, Ordered, Adjudged and Decreed by the Court as follows:

1. The Complainant, C. A. Thompson, is the true and lawful owner in fee simple of the following described real property situated in Baldwin County, Alabama, to-wit:

Northwest Quarter of Northwest Quarter of Section 36, Township 3 South, Range 4 East of St. Stephens Meridian in Alabama; Northwest Quarter of Section 23, Township 4 South, Range 4 East of St. Stephens Meridian in Alabama.

The absolute and fee simple title to the said lands and to each and every part thereof and all interest therein is in the said Complainant, C. A. Thompson, free and clear of and from the claim or claims of any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, or any interest therein; that the Complainant have and he is hereby given judgment against the said lands and against any and all persons, claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof.

2. The Complainant's title to the said lands is hereby quieted against O. M. Gordon; Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of the Baldwin-Escambia Land Company, a Corporation; Martin, Buchmann and Redding; Carrie G. Buchmann; Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation; Josiah V. Thompson; Mary Thompson; Alex C. Blount, Jr.; Clara G. Blount; Perdido Land Company, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation; W. A. Reed; John H. Gabrielson; Anna Gabrielson; Ralph Skidmore; Harriet Skidmore; Frederick A. Wilson; Emma Wilson and against the heirs, devisees and personal representatives of such of the said parties as may be dead and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, and any and all such claim or claims are hereby adjudged and decreed to be invalid, groundless and of no effect.

3. The register of this Court shall file a certified copy of this decree for record in the office of the Judge of Probate of Baldwin County, Alabama, and tax the expense of such recording as a part of the costs of this proceeding.

4. The Judge of Probate of Baldwin County, Alabama, shall record the said certified copy of this decree in the same book and manner in which deeds are recorded and shall index the same in the direct index in the names of O. M. Gordon; Baldwin-Escambia Land Company, a Corporation; Martin, Buchmann and Redding; Carrie G. Buchmann; Mobile and Girard Railroad Company, a Corporation; Josiah V. Thompson; Mary Thompson; Alex C. Blount, Jr.; Clara G. Blount; Perdido Land Company, a Corporation; W. A. Reed; John H. Gabrielson; Anna Gabrielson; Ralph Skidmore; Harriet Skidmore; Frederick A. Wilson and Emma Wilson, and shall index the same in the indirect or reverse index of the said records in the name of C. A. Thompson.

5. The title hereby decreed to be in the said Complainant, C. A. Thompson, shall inure to the benefit of all persons who derive title to the said lands, or any part thereof, or any interest therein, from or through the said C. A. Thompson and such title or interest shall be at all times treated and considered as though it had been established in favor of the persons so procuring or deriving title from the said Complainant.

6. The costs of this proceeding are hereby taxed against the Complainant, for which execution may issue.

ORDERED, ADJUDGED AND DECREED on this the 14th day of November, 1950.

Jeffrey J. Madhewy Jr.
Judge.

C. A. THOMPSON,
Complainant,
VS.
CERTAIN LANDS and
O. M. GORDON, ET ALS,
Respondents.

Testimony \$ 2.50
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 2499.
November 7, 1950.

Appeared:

For Complainant

HON. J. B. Blackburn

Respondents not in Court.

Mr. C. A. Thompson, being first duly and legally sworn, testified as follows:

ON DIRECT EXAMINATION

By Mr. Blackburn

First, we want to offer in evidence certified copy of Patent from the United States to the Muscogee Lumber Company, dated May 4, 1885 and ask that it be identified as Complainant's Exhibit "1".

(Exhibit "1" attached to this transcript)

Next, we want to offer in evidence certified copy of Patent from the United States to William H. Taylor dated February 6, 1899 and ask that it be identified as Exhibit "2".

(Exhibit "2" attached to this transcript)

Next, we offer deed from Randolph McGowan and wife to C. A. Thompson dated August 15, 1935 and ask that it be identified as Exhibit "3".

(Exhibit "3" attached to this transcript).

Next, we offer deed from Carrie G. Buchmann, individually and as Executrix of the Estate of Fred J. Buchmann, to Mitchell Naval Stores Company, dated April 4, 1936 and ask that it be identified as Exhibit "4".

(Exhibit "4" attached to this transcript)

Next, we offer certified copy of deed from C. B. Mitchell, R. F. Mitchell, Jr., and J. L. Tucker, operating and doing business as Mitchell Naval Stores Company, together with the wives of the two Mitchells, to J. R. Duncan, dated January 24, 1941 and ask that it be identified as Exhibit "5".

(Exhibit "5" attached to this transcript)

Next, we offer certified copy of deed from J. R. Duncan and wife to C. A. Thompson dated July 30, 1942 and ask that it be identified as Exhibit "6".

(Exhibit "6" attached to this transcript)

Next, certified copy of deed from C. A. Thompson and wife to Stapleton Insurance and Realty Corporation dated August 3, 1942 and ask that it be identified as Exhibit "7".

(Exhibit "7" attached to this transcript)

Next, certified copy of deed from Stapleton Insurance and Realty Corporation to C. A. Thompson, dated May 20, 1947 and ask that it be identified as Exhibit "8".

(Exhibit "8" attached to this transcript)

Certified copy of deed from C. A. Thompson and wife to Albert M. Thompson, dated December 1, 1948 and ask that it be identified as Exhibit "9".

(Exhibit "9" attached to this transcript)

Certified copy of deed from Albert M. Thompson, unmarried to C. A. Thompson dated February 4, 1949 and ask that it be identified as Exhibit "10".

(Exhibit "10" attached to this transcript)

Q. Are you C. A. Thompson?

A. Yes sir.

Q. You are the Complainant in this suit?

A. Yes.

Q. Mr. Thompson, I will ask you if you filed this suit against the

the Northwest Quarter of the Northwest Quarter of Section 36, Township 3 South Range 4 East, and the Northwest Quarter of Section 23, Township 4 South Range 4 East, in Baldwin County, Alabama?

A. Yes.

Q. Mr. Thompson, limiting your testimony first to the Northwest Quarter of Section 23, Township 4 South Range 4 East, who did you get that land from?

A. Got it from Randolph McGowan.

Q. Under the deed we introduced a copy of?

A. Yes.

Q. More than ten years ago, was it not?

A. Yes, fifteen.

Q. Since you acquired title to that hundred and sixty acres from McGowan, I will ask you have you regularly assessed and paid taxes on it?

A. I have.

Q. Has anyone else during the past ten years, that you know of, assessed or paid taxes on this property?

A. They have not.

Q. Has anyone else had possession?

A. Not a particle.

Q. What has your possession of that hundred and sixty acres consisted of?

A. Constantly went there each year and burt fire lines, put up my signs all over it.

Q. Did you cut any timber from it?

A. Cut a small amount of timber.

Q. Were your operations disturbed in any way by anyone?

A. Not at all.

Q. In buring fire lines did you plow two furrows around the property?

A. Yes, plowed around the lines.

Q. Is that such that anyone going there could tell that anyone was taking that precaution in it?

A. They could.

Q. The Northwest Quarter of the Northwest Quarter of Section 36,

A. It was.

Q. The facts relative to what you have done you feel that the information about the parties claiming any interest in it truly set out in the bill?

A. It is.

Q. The parties who are made defendants are those you found who might have had some interest in it?

A. Yes.

Mr. J. S. Lowrey, having been first duly and legally sworn, testified as follows:

ON DIRECT EXAMINATION

By Mr. Blackburn

Q. Are you Mr. J. S. Lowrey?

A. Yes.

Q. Mr. Lowrey, are you familiar with the Northwest Quarter of the Northwest Quarter of Section 36, Township 3 South Range 4 East?

A. Yes.

Q. How long have you known this particular forty acres of land?

A. Well, I would say about fifteen years.

Q. When you first knew it, Mr. Lowrey, who was claiming it?

A. Russ and Duncan, I think, Russ bought it himself, Duncan bought it.

Q. Did you know it when Mitchell had it?

A. Well, I didn't know it until, not very well until Duncan -

Q. When Duncan had it what did he do with it?

A. Well, Mitchell turpented it, Duncan just had it about a year.

Q. Let me ask you this question. Did Mitchell own it prior to Duncan?

A. Yes.

Q. They turpented it?

A. Yes.

Q. Know how long their operations continued?

A. I think five or six years.

Q. After Duncan got it did he do anything with it until he sold it to Mr. Thompson?

A. I don't think he operated on it.

Q. Were you familiar with it when Mr. Thompson cut the timber?

A. Yes.

Q. Have you seen it during the past ten years?

A. Yes.

Q. During the past ten years has anyone other than Mr. Thompson and those through whom he claims title had any possession of that property?

A. No.

Q. Ever heard of his possession or ownership being disturbed in any way

A. No.

Q. You also familiar with the Northwest Quarter of Section 23, Township Four South Range Four East are you not?

A. Yes.

Q. During the past ten years who has had possession of that?

A. Mr. C. A. Thompson.

Q. What did he do to evidence that possession?

A. He plowed around it, made fire lines and put up notices "No Trespassing".

Q. None of it has improvements?

A. No.

Q. Over all known as wild land?

A. Yes.

I, Ora S. Nelson, Court Reporter, hereby certify that the above and foregoing is a true and correct copy of the evidence as given ^{by the} and witnesses transcribed by me on a hearing of said cause on November 7, 1950.

This 8th day of November, 1950.

Ora S. Nelson
Court Reporter

Township 3 South Range 4 East, where did you get title to that?

- A. Got it through Stapleton. It came through Mitchell Naval Stores Company.
- Q. That was conveyed to you by Duncan in the deed we just mentioned?
- A. Duncan, yes.
- Q. After you got it you conveyed it back to Stapleton?
- A. Yes, I did.
- Q. Stapleton conveyed it back?
- A. Back to me.
- Q. During the past ten years prior to filing this suit, I will ask you if you and those under whom you claim title have regularly assessed and paid taxes on this property?
- A. Have.
- Q. Has anyone else paid taxes in that period of time?
- A. Not at all.
- Q. What possession, Mr. Thompson, have you had of that forty?
- A. Constantly, pretty much the same as the other, only I cut the timber closer. It had been turpented and I cut out all the timber, and I wasn't molested at all.
- Q. Has anyone had any possession of any of that property for the last ten years?
- A. Not at all.
- Q. I believe you said you burnt the fire lines?
- A. Yes.
- Q. And posted it?
- A. Yes.
- Q. At the time this suit was filed was any other suit pending to test title to this property in any way?
- A. No.
- Q. I will ask you before this suit was filed if you made a diligent search to ascertain anybody claiming any interest in this property?
- A. I have asked people and haven't found any.
- Q. You had abstracts prepared?
- A. I did.
- Q. Had the abstracts examined?
- A. I did.
- Q. After the examination was made suit was filed?

DEED.

BOOK 143 - 315

STATE OF ALABAMA

BALDWIN COUNTY

THIS INDENTURE, made and entered into on this the 4th day of February, 1949, by and between Albert M. Thompson, unmarried, hereinafter referred to as the party of the first part, and C. A. Thompson, hereinafter referred to as the party of the second part, WITNESSETH:

The party of the first part, for and in consideration of the sum of One Dollar (\$1.00) and other valuable consideration to him in hand paid by the party of the second part, the receipt whereof is hereby acknowledged, has GRANTED, BARGAINED AND SOLD and by these presents does GRANT, BARGAIN, SELL AND CONVEY unto the said party of the second part, the following described property situated in Baldwin County, Alabama, to-wit:

Northwest Quarter of Northwest Quarter of Section 36, Township 3 South, Range 4 East;

Northwest Quarter of Section 23, Township 4 South, Range 4 East.

TO HAVE AND TO HOLD unto the said party of the second part, his heirs and assigns, together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

IN WITNESS WHEREOF, the said party of the first part has hereunto set his hand and affixed his seal on this the day and year first above written.

Albert M. Thompson (SEAL)

STATE OF ALABAMA

BALDWIN COUNTY

I, Betty R. Buck, a Notary Public, within and for said County in said State, hereby certify that Albert M. Thompson, unmarried, whose name is signed to the foregoing conveyance and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand on this the 4th day of February, 1949.

Betty R. Buck
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA, BALDWIN COUNTY

Filed 7-20-49 9:20 AM

Recorded _____ book _____ page _____
and I certify that the following Privilege Tax has been paid.

Deed Tax _____ 50

Mortgage Tax _____

M. C. Stewart
Judge of Probate

By [Signature]

STATE OF ALABAMA, }
Baldwin County.

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify

that the within and foregoing _____ pages

contain a full, true and complete copy of the Deed

Albert M. Thompson - C. A. Thompson

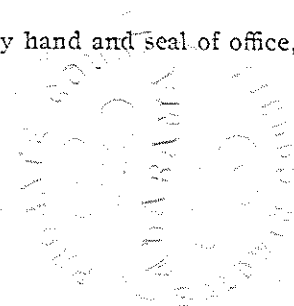
as the same appears of record in my office in Deed Book No. 143

Page 315

Given under my hand and seal of office, this 1 day of August, 19 50

W R Stuart

Judge of Probate



Filed 7-12-49 2 P.M.

Recorded _____ book _____ page _____
and I certify that the following Privilege Tax
has been paid.

BOOK 143 - 188

DEED.

Deed Tax _____ 50

Mortgage Tax _____

STATE OF ALABAMA

BALDWIN COUNTY

J. B. Stuart
Judge of Probate

By G.

THIS INDENTURE, made and entered into on this the 1st day of December, 1948, by and between C. A. Thompson and Jessie L. Thompson, his wife, hereinafter referred to as the parties of the first part, and Albert M. Thompson, hereinafter referred to as the party of the second part, WITNESSETH:

The parties of the first part, for and in consideration of the sum of One Dollar (\$1.00) and other valuable consideration to them in hand paid by the party of the second part, the receipt whereof is hereby acknowledged, have GRANT, BARGAINED AND SOLD and by these presents do GRANT, BARGAIN, SELL AND CONVEY unto the said party of the second part, the following described property situated in Baldwin County, Alabama, to-wit:

Northwest Quarter of Northwest Quarter of Section 36, Township 3 South, Range 4 East;

Northwest Quarter of Section 23, Township 4 South, Range 4 East.

TO HAVE AND TO HOLD unto the said party of the second part, his heirs and assigns, together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

IN WITNESS WHEREOF, the said parties of the first part have hereunto set their hands and affixed their seals on this the day and year first above written.

C. A. Thompson (SEAL)

Jessie L. Thompson (SEAL)

STATE OF ALABAMA

BALDWIN COUNTY

I, Betty R. Buck, a Notary Public, within and for said County in said State, hereby certify that C. A. Thompson and Jessie L. Thompson, 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.

I further certify that on the 1st day of December, 1948, came before me the within named Jessie L. Thompson, known to me to be the wife of the within named C. A. Thompson, who, being examined separate and apart from her husband, touching her signature to the conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraint or threats on the part of her husband.

Given under my hand on this _____ day of December, 1948.

Betty R. Buck
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA, }
Baldwin County.

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify
that the within and foregoing _____ pages

contain a full, true and complete copy of the Deed

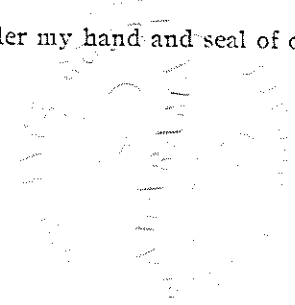
P. A. Thompson et al
Grant to M. Thompson

as the same appears of record in my office in Deed Book No. 143

Page 188

Given under my hand and seal of office, this 10th day of August, 1950

W. R. Stuart
Judge of Probate



STATE OF ALABAMA, BALDWIN COUNTY
Filed June 7, 1947 10:30 AM
Recorded _____ book _____ page _____
and I certify that the following Privilege Tax
has been paid.

BOOK 120 PAGE 342

Deed Tax _____ 1.00
Mortgage Tax _____
W. R. Stewart
Judge of Probate
By _____

STATE OF ALABAMA
BALDWIN COUNTY

THIS INDENTURE, made and entered into on this the 20th day of May, 1947, by and between Stapleton Insurance and Realty Corporation, a Corporation, hereinafter referred to as the party of the first part, and C. A. Thompson, hereinafter referred to as the party of the second part, WITNESSETH:

The party of the first part, for and in consideration of the sum of One Dollar (\$1.00) and other valuable consideration to it this day in hand paid by the party of the second part, the receipt whereof is hereby acknowledged, has GRANTED, BARGAINED AND SOLD and by these presents does GRANT, BARGAIN, SELL AND CONVEY unto the said party of the second part the following described property situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Northwest Quarter of Section 36, Township 3 South, Range 4 East.

TO HAVE AND TO HOLD unto the said party of the second part, his heirs and assigns, together with all and singular, the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

IN WITNESS WHEREOF the said Stapleton Insurance and Realty Corporation, a Corporation, has caused its corporate seal to be hereto affixed and this instrument to be executed by Leila Stapleton, as its President and attested by W. D. Stapleton, Jr., as its Secretary, on this the day and year first above written.

STAPLETON INSURANCE & REALTY CORPORATION, a Corporation

BY Leila H. Stapleton
As its President

ATTEST:
W. D. Stapleton, Jr.
As its Secretary

STATE OF ALABAMA
BALDWIN COUNTY

I, Wm. H. Hester, a Notary Public, within and for said County in said State, hereby certify that Leila Stapleton, whose name as President and W. D. Stapleton, Jr., whose name as Secretary of the Stapleton Insurance and Realty Corporation, a Corporation, 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, as such officers and with full authority, executed the same voluntarily for and as the act of said corporation.

Given under my hand and official seal on this the 20 day of May, 1947.

Wm. H. Hester
Notary Public, Baldwin County, Alabama



STATE OF ALABAMA, }
Baldwin County.

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify

that the within and foregoing _____ pages

contain a full, true and complete copy of the _____

Book
Statute Insurance & Realty Companies, Inc.

C. A. Thompson

as the same appears of record in my office in _____

Book Book No. 120

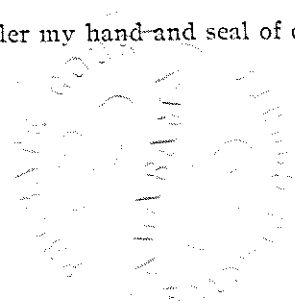
Page 342

Given under my hand and seal of office, this 100

day of August, 19 50

W. R. Stuart

Judge of Probate



(Money Seal)
My Commission expires Mar 1, 1936
Bonded by American Surety Co. of N.Y.

J. B. Blackburn, Notary Public,
Escambia County, Florida,
State of Florida at Large.

Filed Aug. 4, 1942 at 10 AM. Recorded Deed book 77 page 522-5 and I certify that \$2.00 deed tax has been paid as required by law.
C. W. Robertson, Judge of Probate.

STATE OF ALABAMA
BALDWIN COUNTY.

STATUTORY WARRANTY DEED.

THIS INSTRUMENT, made and entered into on this the 3rd day of August, 1942, by and between C. A. Thompson and Jessie L. Thompson, his wife, hereinafter referred to as the parties of the first part, and Stapleton Insurance and Realty Corporation, hereinafter referred to as the party of the second part, WHEREAS:

The parties of the first part, for and in consideration of the sum of one dollar (\$1.00) and other valuable consideration to them this day in hand paid by the party of the second part, the receipt whereof is hereby acknowledged, have granted, bargained and sold, and by these presents do grant, bargain, sell and convey unto the party of the second part, the following described property, situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Northwest quarter of Section Thirty-six (36), Township Three (3) South Range Four (4) East, West half of East half of Section Seventeen (17), Township four (4) South Range Five (5) East, East half of Northwest quarter of Northeast quarter of Section nineteen (19), Township four (4) South Range five (5) East.

TO HAVE AND TO HOLD, unto the said party of the second part, its successors and assigns, together with all and singular the tenements, hereditaments and appurtenances therunto belonging or in any wise appertaining.

IN WITNESS WHEREOF, the said parties of the first part have hereunto set their hands and affixed their seals on this the day and year first above written.

Given Under Seal
affixed & Cancelled.

C. A. Thompson (SEAL)
Jessie L. Thompson (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY.

I, J. B. Blackburn, a Notary Public within and for said County in said State, hereby certify that C. A. Thompson and Jessie L. Thompson, 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.

I further certify that on the 3rd day of August, 1942, came before me the within named Jessie L. Thompson, known to me to be the wife of the within named C. A. Thompson, who, being examined separate and apart from her husband, touching her signature to the foregoing conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints or threats on the part of her husband.

Given under my hand and official seal on this the 3rd day of August, 1942.

J. B. Blackburn, Notary Public,
Baldwin County, Alabama.

Filed Aug 4, 1942 at 10 AM. Recorded Deed book 77 page 523, and I certify that \$1.00 deed tax has been paid as required by law.
C. W. Robertson, Judge of Probate.

STATE OF ALABAMA, }
Baldwin County.

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify

that the within and foregoing _____ pages

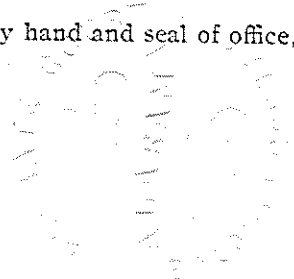
contain a full, true and complete copy of the Deed

C. A. Thompson et al.
Trustee Insurance & Realty Co., Inc.

as the same appears of record in my office in Deed Book No. 77

Page 523

Given under my hand and seal of office, this 1st day of August, 19 50



W. R. Stuart
Judge of Probate

Filed Aug. 3, 1942 at 11:30 AM. Recorded Aug. 24, 1942.

S. W. Robertson, Judge of Probate.

Notary Public, Robert Public, Baldwin County, Ala.

-----00000-----

STATE OF ALABAMA)
BALDWIN COUNTY.)

STATUTORY WARRANTY DEED.

THIS INDENTURE, made and entered into on this the 30th day of July, 1942, by and between J. B. Duncan and Margaret Duncan, his wife, hereinafter referred to as the parties of the first part, and C. A. Thompson, hereinafter referred to as the party of the second part,

The parties of the first part, for and in consideration of the sum of one dollar (\$1.00) and other good and valuable consideration to them this day in hand paid by the party of the second part, the receipt thereof is hereby acknowledged, have granted, warranted and sold and by these presents do grant, warrant, sell and convey unto the said party of the second part, the following described property situated in Baldwin County, Alabama, to-wit:

The Northeast quarter of Section twenty-four (24), Township three (3) South, Range four (4) East; the Northwest quarter of the Northeast quarter of Section thirty-six (36), Township three (3) South, Range four (4) East; the West half of the East half of Section seventeen (17), Township four (4) South, Range five (5) East; and the East half of the Northwest quarter of the Northeast quarter of Section nineteen (19), Township four (4) South, Range five (5) East.

do MAKE AND TO HOLD unto the said party of the second part, his heirs and assigns, forever.

The parties of the first part, for and in further consideration of the sum of one dollar (\$1.00) and other good and valuable consideration to them this day in hand paid by the party of the second part, the receipt whereof is hereby acknowledged, have had to her by release all of the above described property from all of the terms and provisions of that certain mortgage from C. S. Mitchell et al to West Florida Naval Stores Company, dated September 15, 1932, and recorded in Book Number 77 of Mortgages at page 181 Baldwin County records, which mortgage has been assigned to and which is now owned by the said J. B. Duncan.

IN WITNESS WHEREOF, the said parties of the first part have hereunto set their hands and affixed their seals on this the day and year above recited.

Witness: J. B. Russ Jr.
W. H. Crooke.

J. B. Duncan (SEAL)
Margaret Duncan (SEAL)

STATE OF ALABAMA)
BALDWIN COUNTY.)

I, J. J. Crooke, a Notary Public, within and for said County, in said State, hereby certify that J. B. Duncan and Margaret Duncan, his wife, whose names are signed to the foregoing conveyance and who are known to me, acknowledged before me on this day their being possessed of their respective parts of the conveyance, they executed the same voluntarily on the day and date above recited. That further certify that on the 30th day of July, 1942, came before me the within named Margaret Duncan, known to me to be the wife of the within named J. B. Duncan, who being examined separately and apart from her husband, touching her signature to the foregoing conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraint or duress on the part of her husband.

Notary Seal
Commission expires Nov. 5, 1946
Robertson American Surety Co. of Ala.

J. J. Crooke, Notary Public,
Baldwin County, Alabama
State of Alabama Seal

STATE OF ALABAMA, }
Baldwin County. }

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify

that the within and foregoing _____ pages

contain a full, true and complete copy of the Deed

J. R. Leonard & wife

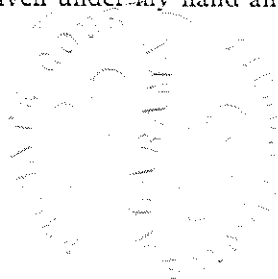
C. A. Thompson

as the same appears of record in my office in Deed Book No. 77

Page 522-3

Given under my hand and seal of office, this 1st day of August, 19 50

W. R. Stuart
Judge of Probate



W. R. STUART

Probate Judge

No. 9678

Bay Minette, Ala.,

4/30

, 19 50

Received of

Mrs. Duck

No.		Deed Tax		Mortgage Tax		Recording Fees		Total	
		\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
	<i>C. A. Thompson US - Certain Lands</i>					<i>2</i>	<i>25</i>	<i>2</i>	<i>25</i>

FOR RECORD

TOTAL \$ *2 25*

W. R. Stuart

19961 MARSHALL & BRUCE-BIRMINGHAM

Judge of Probate.

LEGAL NOTICE

LEGAL NOTICE

NOTICE OF PENDENCY OF BILL OF COMPLAINT

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

C. A. THOMPSON, Complainant,
VS

THE LANDS HEREINAFTER DESCRIBED, and O. M. GORDON, BALDWIN-ESCAMBIA LAND COMPANY, a corporation, and the officers, directors and stockholders of the Baldwin-Escambia Land Company, a Corporation, MARTIN, BUCHMANN, and REDDING, CARRIE G. BUCHMANN, MOBILE and GIRARD RAILROAD COMPANY, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, JOSIAH V. THOMPSON, MARY THOMPSON, ALEX C. BLOUNT, JR., CLARA G. BLOUNT, PERDIDO LAND COMPANY, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation, W. A. REED, JOHN H. GABRIELSON, ANNA GABRIELSON, RALPH SKIDMORE, HARRIET S. SKIDMORE, FREDERICK A. WILSON, EMMA WILSON, ET ALS. Respondents.

Notice is hereby given to O. M. Gordon, Baldwin-Escambia Land Company, a Corporation, and the officers, directors, and stockholders of the Baldwin-Escambia Land Company, a Corporation, Martin Buchmann and Redding, Carrie G. Buchmann, Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, Josiah V. Thompson, Mary Thompson, Alex C. Blount, Jr., Clara G. Blount, Perdido Land Company, a Corporation, and the officers, directors and stockholders of the Perdido Land Company, a Corporation, W. A. Reed, John H. Gabrielson, Anna Gabrielson, Ralph Skidmore, Harriet S. Skidmore, Frederick A. Wilson, Emma Wilson, and the heirs, devisees and personal representatives of such of said parties as may be dead, 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 29th day of June, 1950, the said Complainant, C. A. Thompson, 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:

Northwest Quarter of Northwest Quarter of Section 36, Township 3 South, Range 4 East of St. Stephens Meridian in Alabama; Northwest Quarter of Section 23, Township 4 South, Range 4 East of St. Stephens Meridian in Alabama, and against O. M. Gordon, Baldwin-Escambia Land Company, a Corporation, and the officers, directors and stockholders of Baldwin-Escambia Land Company, a Corporation, Martin, Buchmann and Redding, Mobile and Girard Railroad Company, a Corporation, and the officers, directors and stockholders of the Mobile and Girard Railroad Company, a Corporation, Josiah V. Thompson, Mary Thompson, Alex C. Blount, Jr., Clara G. Blount, Perdido Land Company, a Corporation, and the officers, directors and stockholders of Perdido Land Company, a Corporation, W. A. Reed, John H. Gabrielson, Anna Gabrielson, Ralph Skidmore, Harriet S. Skidmore, Frederick A. Wilson, Emma Wilson, and the heirs, devisees and personal representatives of such of the said parties as may be dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, for the purpose of establishing the title of the said Complainant to all of the said lands, for the purpose of quieting his title thereto, and to clear up all doubts and disputes concerning the title to the said property.

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

1. Patent from United States of America to Muscogee Lumber Company, dated May 4, 1885, filed February 27, 1886, and recorded in Deed Book 0, page 134
2. Patent from United States of America to William H. Taylor, dated February 6, 1899, filed November 13, 1902, and recorded in Deed Book 5, page 503.
3. Deed from Randolph McGowan and Mary Maude McGowan, his wife, to C. A. Thompson, dated August 15, 1935, filed August 16, 1935, and recorded in Deed Book 57, at page 445
4. Deed from Carrie G. Buchmann, individually and as Executrix of the Estate of Fred J. Buchmann, deceased, to Mitchell Naval Stores Company, dated April 4, 1936, filed May 6, 1936, and recorded in Deed Book 59, page 179.
5. Deed from C. B. Mitchell, R. F. Mitchell Jr., and J. L. Tucker, an unmarried man, doing business as Mitchell Naval Stores Company, and Jessie H. Mitchell, wife of C. B. Mitchell, and Dorothy F. Mitchell, wife of R. F. Mitchell, Jr., to J. R. Duncan, dated January 24, 1941, filed January 24, 1941, and recorded in Deed Book 75, page 25
6. Deed from C. B. Mitchell, R. F. Mitchell, Jr., J. L. Tucker, unmarried, doing business as Mitchell Naval Stores Company, and Jesse H. Mitchell and Dorothy F. Mitchell, wives of C. B. Mitchell and R. F. Mitchell, Jr., to J. R. Duncan, dated January 24, 1941, filed April 18, 1941, and recorded in Deed Book 75, page 25.
7. Deed from J. R. Duncan and Margaret Duncan, his wife, to C. A. Thompson, dated July 30, 1942, filed August 4, 1942, and recorded in Deed Book 77, page 523.
8. Deed from C. A. Thompson and Jessie L. Thompson, his wife, to Stapleton Insurance and Realty Corporation, dated August 3, 1942, filed August 4, 1942, and recorded in Deed Book 77, page 523.
9. Deed from Stapleton Insurance and Realty Corporation, a Corporation, to C. A. Thompson, dated May 20, 1947, filed June 7, 1947, and recorded in Deed Book 120, page 342.
10. Deed from C. A. Thompson and Jessie L. Thompson, his wife, to Albert M. Thompson, dated December 1, 1948, filed July 12, 1949, and recorded in Deed Book 143, page 188.
11. Deed from Albert M. Thompson, unmarried, to C. A. Thompson, dated February 4, 1949, filed July 20, 1949, and recorded in Deed Book 143, page

JIMMY FAULKNER
EDITOR AND PUBLISHER

BALDWIN

Times

BEST NEWSPAPER

OF BALDWIN COUNTY, ALABAMA

FIDAVIT OF PUBLICATION

I, Faulkner, being duly sworn, deposes and says I am the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published in Baldwin County, Alabama; that the notice hereto attached of

Chompson vs.

in lands

COST STATEMENT

COPYRDS @ 4 1/2 cents --- \$ 60 34

This is correct, due and unpaid (paid).

Jimmy Faulkner
Publisher.

This newspaper for 4 consecutive weeks in the following issues:

on June 29, 1950 Vol. 61 No. 23

on July 6, 1950 Vol. 61 No. 24

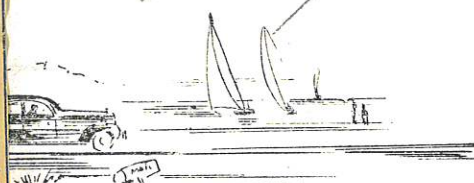
on July 13, 1950 Vol. 61 No. 25

on July 20, 1950 Vol. 61 No. 26

and before the undersigned this 20 day of July, 1950

J. Martin
in County.

Jimmy Faulkner
Publisher.



315.
The Complainant, in and by his said Bill of Complaint, alleges and avers that he owns the said lands in his own right, absolutely and in fee simple; that he is in the actual, peaceable possession of all of the said lands; that title to the said lands stands upon the records of Baldwin County, Alabama, the County where the said lands are situated, in the name of the Complainant; that no suit is pending to test Complainant's title to, interest in, or right to the possession of the said lands, or any part thereof; that no persons, firms or corporations, other than the Complainant and those through whom he claims title, are known to the Complainant to have any possession of the said lands, or any part thereof, within ten years next prior to the filing of the said Bill of Complaint, and that no persons, firms or corporations, other than the Complainant and those through whom he claims title to the said lands, are known to the Complainant to have paid any taxes on the said lands, or any part thereof, or any interest therein, within ten years next prior to the filing of the said Bill of Complaint.

The said parties named above and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, must appear in this Court and plead, answer or demur to the said Bill of Complaint before August 29, 1950, or on the said date Decrees Pro Confesso will be taken against them, testimony will be thereafter taken and the said cause submitted for a final decree quieting Complainant's title to the said lands.

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 29th day of June, 1950

ALICE J. DUCK

Register of the Circuit Court of
Baldwin County, Alabama in E-
quity.

J. B. BLACKBURN
Solicitor for Complainant.

23-4tc

JIMMY FAULKNER
EDITOR AND PUBLISHER

The BALDWIN

ALABAMA'S BEST COUNTY'S- *Times* BEST NEWSPAPER
BAY MINETTE, ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

Jimmy 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

C. A. Thompson vs.
Certain Lands

COST STATEMENT

..... 1341 WORDS @ 4 1/2 cents --- \$ 60 34

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

Jimmy Faulkner
Publisher.

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

Date of 1st publication June 29, 1940 Vol. 61 No. 23

Date of 2nd publication July 6, 1940 Vol. 61 No. 24

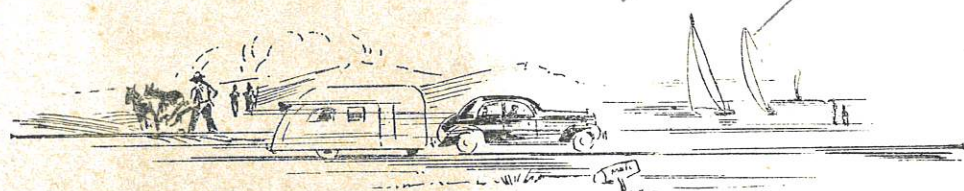
Date of 3rd publication July 13, 1940 Vol. 61 No. 25

Date of 4th publication July 20, 1940 Vol. 61 No. 26

Subscribed and sworn before the undersigned this 20 day of July, 1940.

Dorothy Martin
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



W. R. STUART

PROBATE JUDGE

No. **2013**

Bay Minette, Ala., 1-2, 1957

Received of Mr. D. Dub

No.		Deed Tax		Mortgage Tax		Recording Fees		Total	
		\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
	<u>C.A. Shimpert</u> <u>Partake Leno</u>					<u>1</u>	<u>75</u>	<u>1</u>	<u>75</u>

FOR RECORD

TOTAL \$ 1 75

W.R. Stuart

Judge of Probate.