

J. C. WRIGHT,

COMPLAINANT,

VS

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62, 63, and 64 OF HAVARD'S ADD-
ITION TO THE TOWN OF PERDIDO, as
recorded in the Probate Office of
Baldwin County, Alabama, In Map Book
No. 1, on Page 5, except a strip twenty
(20) feet wide along the South line of
Lots 61, 62, 63 and 64 HENRY HAVARD, MRS.
GEORGIA HAVARD, JOHN PARRISH, MRS. GEORGIA
PARRISH, and PERDIDO GROCERY COMPANY, if
they be living, and if they be dead, their
unknown heirs, devisees, or personal repre-
sentatives of them and each of them, and
any and all persons, firms, or corporations
claiming any interest in or title to the
above described lands,

RESPONDENTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

FINAL DECREE

This cause coming on to be heard was submitted for final decree upon the pleadings, decree pro confesso and proof as noted by the Register, and it appearing to the satisfaction of the court that the Complainant is the owner in fee simple of, is now and was at the time of the filing of the bill of complaint in this cause, in the actual and peaceable possession of the said land, and each and every part and parcel thereof; that the Respondents, Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish, and Perdido Grocery Company, if living are non-residents of the State of Alabama, and over twenty-one years of age, and that if dead their heirs, devisees, grantees, personal representatives and assigns are non-residents of the State of Alabama and over twenty-one years of age; that service was perfected upon the Respondents herein by publication in The Fairhope Courier, a newspaper published at Fairhope, in Baldwin County, Alabama, for four consecutive weeks commencing on the 29th day of October, 1953; that service was also perfected by publication in the Fairhope Courier, a newspaper published at Fairhope, in Baldwin County, Alabama, for four consecutive weeks commencing on the 29th day of October, 1953, against the unknown heirs, devisees, grantees, personal representatives and assigns of Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company and against Larry W. Dunbar, Mrs. Catherine Lepo, Pete Lepo, Rebecca Hincote, R. E. Hincote, Mrs. Geneva L. Phillips, Joseph W. Flynn, Ella Mae Flynn, Mathilda Dyess, Cecil Isaiah Dyess, Mrs. Ann Marcella Dunbar, William H. Dunbar, Marie Jane Bennett, Everett Marion Bennett, Daisy

Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar, Mabel Dunbar, William R. Harmon, Mrs. Alice G. Harmon, D. M. Courtney, Raymond Richard Hinote, Evelyn D. Hinote, Burton Julius Dunbar, Alma Mae Dunbar, Ira Hinote, Elodia Inez Hinote, Eleanor M. Forehand, William L. Forehand, Myrtle Golletts, Alice Kern, Silda Levins, Arthur Levins, Annie Merchant, Ellis W. Merchant, as heir, devisees, personal representatives and assigns of Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, and any and all other persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof; that notice of the pendency of said suit was given by the filing of a lis pendens notice in the Office of the Probate Judge of Baldwin County, Alabama, and by posting at the court house door in Bay Minette, Alabama; that the Respondents and each of them, having failed to appear and plead, answer or demur to the bill of complaint, as required by law, a decree pro confesso was entered against them and each of them; That Wilson Hayes, a practicing attorney at law, in Bay Minette, Baldwin County, Alabama, was appointed as Guardian ad Litem to represent the Respondents whose names were unknown, and duly filed his appearance agreeing to act as Guardian ad Litem, and filed answer denying all the material allegations of the Complaint, and appeared and cross examined the witnesses for the Complainant; that the title of the Complainant has been duly and legally established by legal and competent evidence, the court is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED, by the court, that the Respondents, Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company and Larry W. Dunbar, Mrs. Catherine Lepo, Pete Lepo, Rebecca Hinote, R. E. Hinote, Mrs. Geneva L. Phillips, Joseph W. Flynn, Ella Mae Flynn, Mathilda Dyess, Cecil Isaiah Dyess, Mrs. Ann Marcelle Dunbar, William H. Dunbar, Maxie Jane Bennett, Everett Marion Bennett, Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar, Mabel Dunbar, William R. Harmon, Mrs. Alice G. Harmon, D. M. Courtney, Raymond Richard Hinote, Evelyn D. Hinote, Burton Julius Dunbar, Alma Mae Dunbar, Ira Hinote, Elodia Inez Hinote, Eleanor M. Forehand, William L. Forehand, Myrtle Golletts, Alice Kern, Silda Levins, Arthur Levins, Annie Merchant, Ellis W. Merchant, and the unknown heirs, devisees, grantees, personal representatives and assigns of Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, and also any and all persons, firms or corporations claiming any right, title to, interest in, lien or encum-

branches upon the said land, or any part or parcel thereof, have no right, estate, claim, interest in or encumbrance upon the following described lands or any part or parcel thereof in Baldwin County, Alabama, to-wit:

Lots 15, 16, 17, 31, 32, 33, 34, and 20 feet on the West side of Lot 61 and all of Lot 62 except 20 feet on the West side of said lot, 63 and 64 of Havard's addition to the Town of Perdido, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62, 63 and 64.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the Court, that the full fee simple title to the said land in Baldwin County, Alabama, to-wit:

Lots 15, 16, 17, 31, 32, 33, 34, and 20 feet on the West side of Lot 61, and all of Lot 62 except 20 feet on the West side of said lot, 63 and 64 of Havard's addition to the Town of Perdido, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62, 63 and 64.

is vested absolutely in the Complainant, J. C. Wright.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that a certified copy of this decree be recorded in the office of the Probate Judge of Baldwin County, Alabama, in the direct index in the names of Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, and in the indirect index in the name of J. C. Wright.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, BY THE COURT, that the Register shall within thirty days from the rendition of this decree filed a certified copy hereof in the office of the Judge of Probate of Baldwin County, Alabama, and that the costs thereof be taxed in the costs of this cause.


IT IS FURTHER ORDERED that the Complainant pay the costs of this cause for which execution may issue.

Dated at Bay Minette, Alabama, Baldwin County, this the 2nd day of

June, 1951.

J. Hubert M. Hall

JUDGE

J. C. WRIGHT, 

COMPLAINANT,

VS

LOTS 15, 16, 17, 18, 31, 32, 33, 34
61, 62, 63 and 64 OF HAVARD'S ADDI-
TION TO THE TOWN OF PERDIDO, as re-
corded in the Probate Office of
Baldwin County, Alabama, in Map Book
No. 1, on Page 5, except a strip
twenty (20) feet wide along the South
line of lots 61, 62, 63 and 64 HENRY
HAVARD, MRS. GEORGIA HAVARD, JOHN
PARRISH, MRS. GEORGIA PARRISH and
PERDIDO GROCERY COMPANY; if they be
living, and if they be dead, their
unknown heirs, devisees, or personal
representatives of them and each of
them, and any and all persons, firms
or corporations claiming any interest
in or title to the above described
lands,

RESPONDENTS.

FINAL DECREE

FILED

APR 2 1954

AIDE L. BULL, Registrar

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

*Recorded in Probate
next Book 208 - page 67 - 9*

J. C. WRIGHT,

Complainant,

VS.

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62 and 63 OF HAVARD'S ADDITION TO
THE TOWN OF PERDIDO, as recorded in the
Probate Office of Baldwin County, Alabama,
In Map Book No. 1, on Page 5, except a
strip twenty (20) feet wide along the
South line of Lots 61, 62 and 63, HENRY
HAVARD, MRS. GEORGIA HAVARD, JOHN PARRISH,
MRS. GEORGIA PARRISH, and PERDIDO GROCERY
COMPANY, if they be living, and if they be
dead, their unknown heirs, devisees, or
personal representatives of them and each
of them, and any and all persons, firms,
or corporations claiming any interest in
or title to the above described lands,

Defendants.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Comes your complainant, J. C. Wright, and brings this his bill of com-
plaint against the following described real property situated in Baldwin
County, Alabama, to-wit:

Lots 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 of
Havard's Addition to the Town of Perdido, as recorded
in the Probate Office of Baldwin County, Alabama, in
Map Book No. 1, on page 5, except a strip twenty (20)
feet wide along the South line of Lots 61, 62 and 63.

The complainant further brings his complaint against any and all persons,
firms or corporations claiming any title to, interest in, or lien or encum-
brance upon the above described land or any part thereof or any interest
therein, and especially brings his bill of complaint against Henry Havard,
Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery
Company, and any and all persons, firms or corporations claiming any interest
in the above described land, and complainant respectfully shows unto your

Honor as follows:

FIRST:

That he is in the actual, peaceable, adverse possession of the above
described lands, claiming to own the same in fee simple and using the same
in every way that it is susceptible to use.

SECOND:

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

THIRD:

Complainant further shows unto your Honor that he claims the entire fee simple title in and to said land, having acquired the same as follows by quitclaim deed from the known heirs of John Parrish, deceased: Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by deed from Mahala P. Cooper, as heir at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 195; Lots 15, 16, 31, 34, 61, and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Larry W. Dunbar, Mrs. Catherine Lepo and Pete Lepo, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 202; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Rebecca Hinote and husband, R. E. Hinote, as heirs at law of John Parrish, deceased, dated September 29, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 201; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Geneva L. Phillips, Joseph W. Flynn and Ella Mae Flynn, as heirs at law of John Parrish, deceased, dated August 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 200; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mathilda Dyess and husband, Cecil Isiah Dyess, as heirs at law of John Parrish, deceased, dated October 2, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 199; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Ann Marcella Dunbar, William H. Dunbar, Maxie Jane Bonnett, Everett Marion Bonnett, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 189; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar

and Mabel Dunbar, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 190; Lots 15, 17, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from William R. Harmon and Mrs. Alice C. Harmon, dated August _____, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from D. M. Courtney, as heir at law of John Parrish, deceased, dated September 26, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190; page 192; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Raymond Richard Hinote and Evelyn D. Hinote, Burton Julious Dunbar and Alma Mae Dunbar, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Ira Hinote and Elodia Inez Hinote, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 194; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Eleanor M. Forehand, William L. Forehand and Myrtle Gollotte, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 196; Lots 15, 16, 31, 34, 61, and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Alice Kern, Hilda Levins, Arthur Levins, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 197; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Annie Merchant and husband, Ellis W. Merchant, as heirs at law of John Parrish, deceased, dated October 1, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 198. Complainant therefore shows unto your Honor that all the said property described herein, covering all of said heirs' interest in the property of John Parrish, deceased, stands in his name on the records of the office of the Judge of Probate of Baldwin County, Alabama.

FOURTH

Complainant further shows unto your Honor that he has made a diligent inquiry in the neighborhood of said lands as to the prior ownership of same and possession of same, the whereabouts of any and all persons who are or may be interested in the same or who claim any interest therein; that your Complainant in this investigation and inquiry has had an abstract of title to said real estate made from the records of Baldwin County, Alabama; that Complainant used diligence in trying to ascertain the names and residences and post office addresses of the defendants named herein and that he has been unable to do so.

FIFTH

That each of the said persons from whom complainant purchased the said lands were in possession of the same as heirs of John Parrish, deceased, claiming to own the same at the time of the purchase aforesaid; and that your complainant, immediately upon the purchase of the said lands, went into possession of the same, claiming to own the same, and has continuously each year, commencing with the purchase of said lands, had the same under fence and cultivation, or otherwise visible control; and that all of said possession has been actual, peaceable, continuous and adverse for more than twenty (20) years next preceding the filing of this bill of complaint; and that for more than ten (10) years next preceding the filing of this bill of complaint said property has under the alleged chain of title been annually assessed and taxes paid thereon.

The Complainant calls upon the several persons hereinabove named as defendants or any one else interested to set forth or specify his, hers or its interest in, title to, or lien or encumbrance upon said land and how and by what instrument or otherwise the same is derived or created.

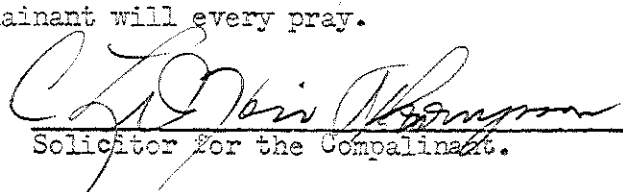
PRAYER FOR PROCESS

To the end, therefore, that equity may be had in the premises, Complainant prays that your Honor cause the usual writ of process to be issued to the following named defendants, viz:- Henry Havard, Georgia Havard, John Parrish, and Perdido Grocery Company, if they be living and if they be dead, their unknown heirs, devisees or personal representatives of them and each of them and to any and all persons, firms or corporations claiming any interest in the above described land

in the usual form and according to the practices of this Honorable Court, requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court and that your Honor will cause Notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by the laws of the State of Alabama, authorizing the quieting of title by proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint to the aforesaid defendants, whose residences and post office addresses are unknown, by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time as required by law.

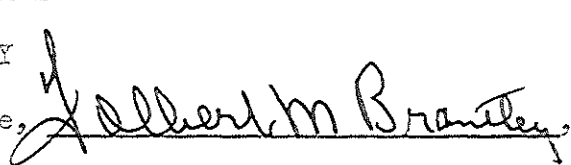
PRAYER FOR RELIEF

Complainant further prays that on hearing of this cause that your Honor will establish Complainant's right to title to said lands and will decree that the Complainant is the owner in fee simple of the land herein described and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said lands or any part thereof and especially that Henry Havard Georgia Havard, John Parrish, and Perdido Grocery Company, if they be living, and if they be dead, their unknown heirs, devisees, or personal representatives of them and each of them and all other persons, firms or corporations claiming any interest in the above described land have no right, title or interest in or lien or encumbrance upon said lands, and that in said decree your Honor will cause a certified copy of the decree to be filed in the Probate Office of Baldwin County, Alabama, and to be recorded therein and that in said decree your Honor will direct in whose name it shall be indexed in the direct and indirect indexes of the records thereof in said Probate Court of Baldwin County, Alabama; and Complainant further prays for such other, further, different and general relief as in equity may seem just and meet as Complainant will every pray.


Solicitor for the Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, , a Notary Public, in and for said County in said State, personally appeared C. LeNoir Thompson, who upon

oath deposes and says that he is the agent of, and the attorney for the Complainant in the above styled cause and is therefore duly authorized to make this oath; that in the belief of the affiant, all of the defendants named in the foregoing Bill of Complainant are over the age of twenty-one years and all are non-residents of the State of Alabama, their places of residence and post office addresses being unknown to your affiant; that he has made a diligent inquiry to ascertain the same and has been unable to do so; that if any of the above named persons are dead, the names of their heirs, devisees or grantees are unknown and that all, other matters and facts stated in the foregoing Bill of Complaint are upon knowledge true; that he is informed as to the facts stated upon information and belief and verily believes and so states that the same are true.

Sworn to and subscribed before me, a
Notary Public, on this, the 26th
day of October, 1953.

Robert M. Brantley
Notary Public, Baldwin County, Alabama.

Mo 3127
J. C. WRIGHT,
Complainant,

RECORDED

vs.

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62 and 63 OF HAVARD'S ADDITION TO
THE TOWN OF PERDIDO, as recorded in the
Probate Office of Baldwin County,
Alabama, In Map Book No. 1, on Page 5,
except a strip twenty (20) feet wide at
along the South line of Lots 61, 62
and 63, HENRY HAVARD, MRS. GEORGIA
HAVARD, JOHN PARRISH, MRS. GEORGIA
PARRISH, and PERDIDO DRCCERY COMPANY,
if they be living, and if they be
dead, their unknown heirs, devisees, or
personal representatives of them and
each of them, and any and all persons,
firms, or corporations claiming any
interest in or title to the above des-
cribed lands,

Defendants.

COMPLAINT

FILED

OCT 26 1953

ALICE J. DUCK, Register

From the Law Office of
C. LeNoir Thompson
Attorney at Law

J. C. WRIGHT,

COMPLAINANT,

VS

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62, 63, and 64 OF HAVARD'S ADDI-
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63 and 64 HENRY HAVARD, MRS. GEORGIA HAVARD,
JOHN FARRISH, MRS. GEORGIA FARRISH, and
PERDIDO GROCERY COMPANY, if they be living
and if they be dead, their unknown heirs,
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sons, firms or corporations claiming any in-
terest in or title to the above described
lands,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

MOTION FOR DECREE PRO CONFESSO ON PUBLICATION

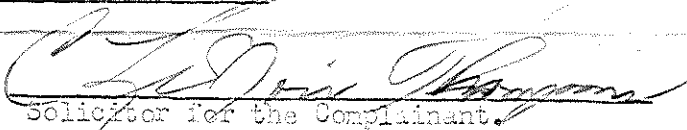
Now comes the Complainant in the above styled cause and shows unto the Court that an order of publication was made on the 26th day of October, 1953, which was duly published in The Fairhope Courier, a newspaper published in Fairhope, Alabama, in its issues of October 29th, November 5, November 12, and November 19th, 1953, and was directed to Henry Havard, Mrs. Georgia Havard, John Farrish, Mrs. Georgia Farrish, and Perdido Grocery Company and to Larry W. Dunbar, Mrs. Catherine Lepo, Pete Lepo, Rebecca Hinote, R. E. Hinote, Mrs. Geneva L. Phillips, Joseph W. Flynn, Ella Mae Flynn, Kathilda Dyess, Cecil Isaiah Dyess, Mrs. Ann Marcella Dunbar, William E. Dunbar, Maxie Jane Bennett, Everett Marion Bennett, Daisy Bell Waldrop, William Henry Farrish, S. V. Toller, Mrs. Mary Rebecca Toller, Esley R. Dunbar, Mabel Dunbar, William R. Harmon, Mrs. Alice G. Harmon, D. M. Courtney, Raymond Richard Hinote, Evelyn D. Hinote, Burton Julius Dunbar, Alma Mae Dunbar, Ira Hinote, Elodia Inez Hinote, Eleanor M. Forehand, William L. Forehand, Myrtle Colletts, Alice Kern, Silda Levins, Arthur Levins, Annie Merchant, Ellis W. Merchant, the unknown heirs, devisees, personal representatives and assigns of them and each of them, and any other persons, firms or corporations claiming any title to, right, interest in, lien or encumbrances upon the following described land situated in Baldwin County, Alabama, to-wit:

Lots 15, 16, 17, 31, 32, 33, 34, and 20 feet on the West side of Lot 61, and all of Lot 62 except 20 feet on the West side of said lot, 63 and 64 of Havard's Addition to the Town of Perdido, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62, 63 and 64.

As Respondents, which required the said Respondents to answer or demur to the bill of complaint within thirty days after the 29th day of November, 1953, which said respondents have to this day failed to do.

WHEREFORE, the Complainant moves the Court to grant a decree pro confesso against the said respondents.

Dated this the 19 day of March, 1954.


Solicitor for the Complainant.

J. C. WRIGHT,

RECORDED

COMPLAINANT, {

VS

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62, 63, and 64 of HAVARD'S ADDI-
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61, 62, 63 and 64, HENRY HAVARD, MRS.
GEORGIA HAVARD, JOHN PARLISH, MRS.
GEORGIA PARLISH, and PERDIDO GROCERY
COMPANY, if they be living, and if they
be dead, their unknown heirs, devisees
or personal representatives of them and
each of them, and any and all persons,
firms, or corporations claiming any
interest in or title to the above des-
cribed lands,

RESPONDENTS.

Motion For Decree Pro Confesso On
Publication

FILED

MAR 19 1954

ALICE J. DUCK, Register

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

The Fairhope Courier



ESTABLISHED 1894

E. B. GASTON ESTATE, PUBLISHERS

TELEPHONE 5201

This is to certify that the attached legal notice appeared in the Fairhope Courier, a newspaper printed in the City of Fairhope, County, County of Baldwin, State of Alabama, on the dates of Oct. 29, Nov. 5, 12 and 19, 1953.

Francis H. Crawford
Editor

State of Alabama
County of Baldwin

Sworn to and subscribed this 27th day of November, A.D. 1953, before me.

E. C. Cramer
Notary Public, Baldwin County

FAIRHOPE, ALABAMA

On Mobile Bay

Legal Notice

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

J. C. WRIGHT, COMPLAINANT,
vs.

LOTS 15, 16, 17, 18, 31, 32, 33, 34

61, 62 and 63 of Hayard's addition

Probate of Baldwin County, Ala.

1962, in Deed Book 190, page 201;

1962, and of record in the office of

the Clerk of the Circuit Court of

since purchasing title as set forth,

supra, your complainant has assessed

and paid taxes on the same, and

that he is in the quiet, peaceable,

open, notorious possession of said

land, claiming to own the same ab-

solutely and in fee simple.

that this the 26th

of November, 1953, the undersigned

Notary Public, Baldwin County, Ala.

has seen and known the complainant

and the defendant, and that the

complainant is the owner of the

land described in the foregoing

notice, and that the defendant is

the owner of the land described in

the foregoing notice, and that the

complainant is the owner of the

land described in the foregoing

notice, and that the defendant is

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land described in the foregoing

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the owner of the land described in

the foregoing notice, and that the

complainant is the owner of the

land described in the foregoing

FILED

NOV 13 1953

ALICE L. BUCK, Register

THE FAIRHOPE COURIER

E. B. GASTON ESTATE, PUBLISHER

Telephone
5201



Rates On
Application

Mrs. Alice Duck
Bay Minette
Ala.

Nov. 26, 1953

Legacature: 1360 words
Re: J. W. Knight.

Oct. 29, Nov. 5-12-19, 1953

88 40

J. C. WRIGHT,

Complainant,

VS.

LOTS 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 OF HAVARD'S ADDITION TO THE TOWN OF PERDIDO, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62 and 63, HENRY HAVARD, MRS. GEORGIA HAVARD, JOHN PARRISH, MRS. GEORGIA PARRISH, and PERDIDO GROCERY COMPANY, if they be living, and if they be dead, their unknown heirs, devisees, or personal representatives of them and each of them, and any and all persons, firms, or corporations claiming any interest in or title to the above described lands,

Defendants.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY

STATE OF ALABAMA, BALDWIN COUNTY
Filed 10-28-53 1:30 P.M.
Recorded *Lie Ford* back 4 page 17-21
Judge of Probate *MR. D. J. ...*

It having been made to appear in the above styled cause from the affidavit of C. LeNoir Thompson, the solicitor of record for the complainant in said cause, that the defendants above named, or their heirs or devisees are non-residents of the State of Alabama, their residences and post office addresses being unknown to complainant,

NOTICE IS HEREBY GIVEN to Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, if they be living, and if they be dead, their unknown heirs, devisees or personal representatives of them and each of them, and any and all persons, firms or corporations claiming any interest in or title to the above described lands, that on the 26th day of Oct., 1953, J. C. Wright filed in the equity side of the Circuit Court of Baldwin County, Alabama, his bill of complaint against the following described lands in Baldwin County, Alabama, viz:

Lots 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 of ^{ad 67} Havard's Addition to the Town of Perdido, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62 and 63,

and against the defendants hereinabove ^{and} named and all persons, firms, or corporations claiming any interest in, lien or encumbrance upon said land, and you are hereby notified to appear and plead, answer or demur within thirty (30) days of the 26th day of Oct., 1953, or a decree pro confesso will be

rendered against you; that said bill of complaint was and is filed for the purpose of quieting his title thereto and clearing up all doubts and disputes concerning the same; that title to said lands stands in the name of complainant on the records of the office of the Judge of Probate of Baldwin County, Alabama; that the complainant acquired title to Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mahala P. Cooper, as heir at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 195; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Larry W. Dunbar, Mrs. Catherine Lepo and Pete Lepo, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 202; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Rebecca Minote and husband, R. E. Minote, as heirs at law of John Parrish, deceased, dated September 29, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 201; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Geneva L. Phillips, Joseph W. Flynn and Ella Mae Flynn, as heirs at law of John Parrish, deceased, dated August 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 200; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mathilda Dyess and husband, Cecil Isiah Dyess, as heirs at law of John Parrish, deceased, dated October 2, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 199; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Ann Marcella Dunbar, William H. Dunbar, Maxie Jane Bonnett, Everett Marion Bonnett, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 189; Lots 15, 16, 31, 35, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar and Mabel Dunbar, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in

Deed Book 190, page 190; Lots 15, 17, 31, 35, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from William R. Harmon and Mrs. Alice O. Harmon, dated August _____, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from D. M. Courtney, as heir at law of John Parrish, deceased, dated September 26, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 192; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Raymond Richard Hinote and Evelyn D. Hinote, Burton Julious Dunbar and Alma Mae Dunbar, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Ira Hinote and Elodia Inez Hinote, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 194; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Eleanor M. Forehand, William L. Forehand and Myrtle Collette, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 196; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Alice Kern, Arthur Levins and Hilda Levins, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 197; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Annie Merchant and husband, Ellis W. Merchant, as heirs at law of John Parrish, deceased, dated October 1, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 198. Complainant further alleges that taxes were paid by the widow of the deceased John Parrish until her death, and that since purchasing title as set forth, supra, your complainant has assessed and paid taxes on the same, and that he is in the quiet, peaceable, open, notorious possession of said land, claiming to own the same absolutely and in fee simple.

WITNESS my hand this the 26th day of Oct., 1953.

Alice O. Duck
As Register of the Circuit Court of
Baldwin County, Alabama

C. LeNOIR THOMPSON
Solicitor for Complainant

21
J. C. WRIGHT, ⁶⁵
Complainant,

vs.

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62 and 63 of HAVARD'S ADDITION
TO THE TOWN OF PERDIDO, as recorded
in the Probate Office of Baldwin
County, Alabama, in Map Book No. 1,
on Page 5, except a strip twenty
(20) feet wide along the South line
of Lots 61, 62 and 63, HENRY HAVARD,
MRS. GEORGIA HAVARD, JOHN PARRISH, ⁵²
MRS. GEORGIA PARRISH, and PERDIDO ¹⁹
GROCERY COMPANY, if they be living;
and if they be dead, their unknown
heirs, devisees, or personal repre-
sentatives of them and each of them,
and any and all persons, firms, or
corporations claiming any interest
in or title to the above described
lands,

Defendants.

4-17-21
NOTICE

R-3.00

C. LeNoy Thompson
Bm

FILED

OCT 26 1953

ALICE J. DUCK, Register

From the Law Office of
C. LeNoy Thompson,
Attorney at Law

J. C. WRIGHT,

Complainant,

VS.

LOTS 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 OF HAVARD'S ADDITION TO THE TOWN OF PERDIDO, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62 and 63, HENRY HAVARD, MRS. GEORGIA HAVARD, JOHN PARRISH, MRS. GEORGIA PARRISH, and PERDIDO GROCERY COMPANY, if they be living, and if they be dead, their unknown heirs, devisees, or personal representatives of them and each of them, and any and all persons, firms, or corporations claiming any interest in or title to the above described lands,

Defendants.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your complainant, J. C. Wright, and brings this his bill of complaint against the following described real property situated in Baldwin County, Alabama, to-wit:

Lots 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 of Havard's Addition to the Town of Perdido, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62 and 63.

The complainant further brings his complaint against any and all persons, firms or corporations claiming any title to, interest in, or lien or encumbrance upon the above described land or any part thereof or any interest therein, and especially brings his bill of complaint against Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, and any and all persons, firms or corporations claiming any interest in the above described land, and complainant respectfully shows unto your Honor as follows:

FIRST:

That he is in the actual, peaceable, adverse possession of the above described lands, claiming to own the same in fee simple and using the same in every way that it is susceptible to use.

SECOND:

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

THIRD:

Complainant further shows unto your Honor that he claims the entire fee simple title in and to said land, having acquired the same as follows by quitclaim deed from the known heirs of John Parrish, deceased: Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by deed from Mahala F. Cooper, as heir at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 195; Lots 15, 16, 31, 34, 61, and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Larry W. Dunbar, Mrs. Catherine Lepo and Pete Lepo, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 202; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Rebecca Hinite and husband, R. E. Hinite, as heirs at law of John Parrish, deceased, dated September 29, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 201; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Geneva L. Phillips, Joseph W. Flynn and Ella Mae Flynn, as heirs at law of John Parrish, deceased, dated August 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 200; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mathilda Dyess and husband, Cecil Isaiah Dyess, as heirs at law of John Parrish, deceased, dated October 2, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 199; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Ann Marcella Dunbar, William H. Dunbar, Marie Jane Bonnett, Everett Marion Bonnett, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 189; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar

and Mabel Dunbar, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 190; Lots 15, 17, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from William R. Harmon and Mrs. Alice G. Harmon, dated August _____, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from D. M. Courtney, as heir at law of John Parrish, deceased, dated September 26, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190; page 192; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Raymond Richard Hinote and Evelyn D. Hinote, Burton Julius Dunbar and Alma Mae Dunbar, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Ira Hinote and Elodia Inez Hinote, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 194; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Eleanor M. Forehand, William L. Forehand and Myrtle Collette, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 196; Lots 15, 16, 31, 34, 61, and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Alice Kern, Hilda Levins, Arthur Levins, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 197; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Annie Merchant and husband, Ellis W. Merchant, as heirs at law of John Parrish, deceased, dated October 1, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 198. Complainant therefore shows unto your Honor that all the said property described herein, covering all of said heirs' interest in the property of John Parrish, deceased, stands in his name on the records of the office of the Judge of Probate of Baldwin County, Alabama.

FOURTH

Complainant further shows unto your Honor that he has made a diligent inquiry in the neighborhood of said lands as to the prior ownership of same and possession of same, the whereabouts of any and all persons who are or may be interested in the same or who claim any interest therein; that your Complainant in this investigation and inquiry has had an abstract of title to said real estate made from the records of Baldwin County, Alabama; that Complainant used diligence in trying to ascertain the names and residences and post office addresses of the defendants named herein and that he has been unable to do so.

FIFTH

That each of the said persons from whom complainant purchased the said lands were in possession of the same as heirs of John Parrish, deceased, claiming to own the same at the time of the purchase aforesaid; and that your complainant, immediately upon the purchase of the said lands, went into possession of the same, claiming to own the same, and has continuously each year, commencing with the purchase of said lands, had the same under fence and cultivation, or otherwise visible control; and that all of said possession has been actual, peaceable, continuous and adverse for more than twenty (20) years next preceding the filing of this bill of complaint; and that for more than ten (10) years next preceding the filing of this bill of complaint said property has under the alleged chain of title been annually assessed and taxes paid thereon.

The Complainant calls upon the several persons hereinabove named as defendants or any one else interested to set forth or specify his, hers or its interest in, title to, or lien or encumbrance upon said land and how and by what instrument or otherwise the same is derived or created.

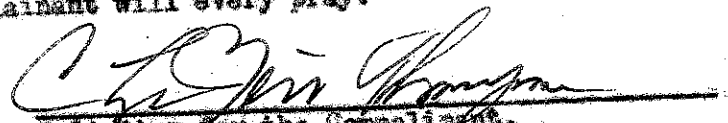
PRAYER FOR PROCESS

To the end, therefore, that equity may be had in the premises, Complainant prays that your Honor cause the usual writ of process to be issued to the following named defendants, viz:- Henry Havard, Georgia Havard, John Parrish, and Perdido Grocery Company, if they be living and if they be dead, their unknown heirs, devisees or personal representatives of them and each of them and to any and all persons, firms or corporations claiming any interest in the above described land

in the usual form and according to the practices of this Honorable Court, requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court and that your Honor will cause Notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by the laws of the State of Alabama, authorizing the quieting of title by proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint to the aforesaid defendants, whose residences and post office addresses are unknown, by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time as required by law.

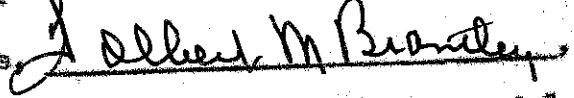
PRAYER FOR RELIEF

Complainant further prays that on hearing of this cause that your Honor will establish Complainant's right to title to said lands and will decree that the Complainant is the owner in fee simple of the land herein described and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said lands or any part thereof and especially that Henry Havard Georgia Havard, John Parrish, and Perdido Grocery Company, if they be living, and if they be dead, their unknown heirs, devisees, or personal representatives of them and each of them and all other persons, firms or corporations claiming any interest in the above described land have no right, title or interest in or lien or encumbrance upon said lands, and that in said decree your Honor will cause a certified copy of the decree to be filed in the Probate Office of Baldwin County, Alabama, and to be recorded therein and that in said decree your Honor will direct in whose name it shall be indexed in the direct and indirect indexes of the records thereof in said Probate Court of Baldwin County, Alabama; and Complainant further prays for such other, further, different and general relief as in equity may seem just and meet as Complainant will ever pray.


Solicitor for the Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me,  a Notary Public, in and for said County in said State, personally appeared C. LeHoir Thompson, who upon

cath deposes and says that he is the agent of, and the attorney for the Complainant in the above styled cause and is therefore duly authorized to make this oath; that in the belief of the affiant, all of the defendants named in the foregoing Bill of Complaint are over the age of twenty-one years and all are non-residents of the State of Alabama, their places of residence and post office addresses being unknown to your affiant; that he has made a diligent inquiry to ascertain the same and has been unable to do so; that if any of the above named persons are dead, the names of their heirs, devisees or grantees are unknown and that all, other matters and facts stated in the foregoing Bill of Complaint are upon knowledge true; that he is informed as to the facts stated upon information and belief and verily believes and so states that the same are true.

Sworn to and subscribed before me, a
Notary Public, on this, the 26th
day of October, 1953.

Robert M. Brantley
Notary Public, Baldwin County, Alabama.

each depositor and says that he is the agent of, and the attorney for the Corporation

in the above signed cases and is therefore duly authorized to make this entry:

That in the belief of the officers, all of the statements made in the foregoing

Bill of Complaint are over the age of twenty-one years and all are non-residents

of the State of Alabama, their places of residence and most of their addresses

being unknown to your Honorable Court; that he has made a diligent inquiry to ascertain

the same and has been unable to do so; that if any of the above named persons

are dead, the names of their heirs, devisees or grantees are unknown to him; and

other persons and factors stated in the foregoing Bill of Complaint are now

living; that he is informed as to the facts stated upon information and belief

and verily believes and so states that the same are true.

Given under my hand and the seal of said Court at Montgomery, Alabama, this 16th day of October, 1933.

James M. McCall
County Judge, Baldwin County, Alabama.

J. C. WRIGHT,

COMPLAINANT,

VS

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62, 63, and 64 OF HAVARD'S ADD-
ITION TO THE TOWN OF PERDIDO, as recorded
in the Probate Office of Baldwin
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feet wide along the South line of Lots
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GEORGIA HAVARD, JOHN PARRISH, MRS.
GEORGIA PARRISH, and PERDIDO GROCERY
COMPANY, if they be living, and if they
be dead, their unknown heirs, devisees,
or personal representatives of them and
each of them, and any and all persons,
firms, or corporations claiming any
interest in or title to the above des-
cribed lands,

RESPONDENTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

DECREE PRO CONFESSO ON PUBLICATION

In this cause it appearing to the court that the order of publication heretofore made in this cause was published four consecutive weeks commencing on the 29th day of October, 1953, in The Fairhope Courier, a newspaper published in Fairhope, in Baldwin County, Alabama; that a copy of said order was posted at the Court House door in Baldwin County, Alabama, on the 29th day of October, 1953, and it now further appearing to the court that the said Larry W. Dunbar, Mrs. Catherine Lepo, Pete Lepo, Rebecca Hinote, R. E. Hinote, Mrs. Geneva L. Phillips, Joseph W. Flynn, Ella Mae Flynn, Mathilda Dyess, Cecil Isiah Dyess, Mrs. Ann Marcella Dunbar, William H. Dunbar, Maxie Jane Bennett, Everett Marion Bennett, Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar, Mabel Dunbar, William R. Harmon, Mrs. Alice G. Harmon, D. M. Courtney, Raymond Richard Hinote, Evelyn D. Hinote, Burton Julious Dunbar, Alma Mae Dunbar, Ira Hinote, Elodia Inez Hinote, Eleanor M. Forehand, William L. Forehand, Myrtle Golletts, Alice Kern, Silda Levins, Arthur Levins, Annie Merchant, Ellis W. Merchant, the unknown heirs, devisees, grantees, personal representatives, and assigns of Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish, and Perdido Grocery Company, respondents have to date hereof failed to plead, answer or demur to this bill of complaint in this cause.

It is therefore on motion of the Complainant, ordered and decreed, by the court, that the said bill of complaint be and it is hereby, in all things, taken

as confessed against the Respondents named in this cause.

Witness my hand this the 19th day of March, 1954.

Alice J. Muck
Register

3127 -
J. C. WRIGHT,

RECORDED

COMPLAINANT,

VS

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62, 63, and 64 OF HAVARD'S ADD-
ITION TO THE TOWN OF PERDIDO, as re-
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win County, Alabama, in Map Book No. 1,
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GEORGIA HAVARD, JOHN PARRISH, MRS.
GEORGIA PARRISH, and PERDIDO GROCERY
COMPANY, if they be living, and if they
be dead, their unknown heirs, devisees,
or personal representatives of them and
each of them, and any and all persons,
firms, or corporations claiming any
interest in or title to the above des-
cribed lands,

RESPONDENTS.

DECREE PRO CONFESSO ON PUBLICATION

FILED

MAR 19 1954

ALICE J. DUCK, Register

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

J. C. WRIGHT,

Complainant,

VS.

LOTS 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 OF HAVARD'S ADDITION TO THE TOWN OF PERDIDO, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on Page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62 and 63, HENRY HAVARD, MRS. GEORGIA HAVARD, JOHN PARRISH, MRS. GEORGIA PARRISH, and PERDIDO GROCERY COMPANY, if they be living, and if they be dead, their unknown heirs, devisees, or personal representatives of them and each of them, and any and all persons, firms, or corporations claiming any interest in or title to the above described lands,

Defendants.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your complainant, J. C. Wright, and brings this his bill of complaint against the following described real property situated in Baldwin County, Alabama, to-wit:

Lots 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 of Havard's Addition to the Town of Perdido, as recorded in the Probate Office of Baldwin County, Alabama, in Map Book No. 1, on page 5, except a strip twenty (20) feet wide along the South line of Lots 61, 62 and 63.

The complainant further brings his complaint against any and all persons, firms or corporations claiming any title to, interest in, or lien or encumbrance upon the above described land or any part thereof or any interest therein, and especially brings his bill of complaint against Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, and any and all persons, firms or corporations claiming any interest in the above described land, and complainant respectfully shows unto your Honor as follows:

FIRST:

That he is in the actual, peaceable, adverse possession of the above described lands, claiming to own the same in fee simple and using the same in every way that it is susceptible to use.

SECOND:

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

THIRD:

Complainant further shows unto your Honor that he claims the entire fee simple title in and to said land, having acquired the same as follows by quitclaim deed from the known heirs of John Parrish, deceased: Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by deed from Mahala P. Cooper, as heir at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 195; Lots 15, 16, 31, 34, 61, and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Larry W. Dunbar, Mrs. Catherine Lopo and Pete Lopo, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 202; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Rebecca Hixote and husband, R. E. Hixote, as heirs at law of John Parrish, deceased, dated September 29, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 201; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Geneva L. Phillips, Joseph W. Flynn and Ella Mae Flynn, as heirs at law of John Parrish, deceased, dated August 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 200; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mathilda Dyess and husband, Cecil Isaiah Dyess, as heirs at law of John Parrish, deceased, dated October 2, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 199; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Ann Marcella Dunbar, William H. Dunbar, Maxie Jane Bonnett, Everett Marion Bonnett, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 189; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley R. Dunbar

and Mabel Dunbar, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 190; Lots 15, 17, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from William R. Harmon and Mrs. Alice O. Harmon, dated August _____, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from D. E. Courtney, as heir at law of John Parrish, deceased, dated September 26, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190; page 192; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Raymond Richard Minote and Evelyn D. Minote, Burton Julius Dunbar and Alma Mae Dunbar, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Ira Minote and Elodia Inez Minote, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 194; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Eleanor M. Forehand, William L. Forehand and Myrtle Collette, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 196; Lots 15, 16, 31, 34, 61, and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Alice Kern, Hilda Levins, Arthur Levins, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 197; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Annie Merchant and husband, Ellis W. Merchant, as heirs at law of John Parrish, deceased, dated October 1, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 198. Complainant therefore shows unto your Honor that all the said property described herein, covering all of said heirs' interest in the property of John Parrish, deceased, stands in his name on the records of the office of the Judge of Probate of Baldwin County, Alabama.

FOURTH

Complainant further shows unto your Honor that he has made a diligent inquiry in the neighborhood of said lands as to the prior ownership of same and possession of same, the whereabouts of any and all persons who are or may be interested in the same or who claim any interest therein; that your Complainant in this investigation and inquiry has had an abstract of title to said real estate made from the records of Baldwin County, Alabama; that Complainant used diligence in trying to ascertain the names and residences and post office addresses of the defendants named herein and that he has been unable to do so.

FIFTH

That each of the said persons from whom complainant purchased the said lands were in possession of the same as heirs of John Parrish, deceased, claiming to own the same at the time of the purchase aforesaid; and that your complainant, immediately upon the purchase of the said lands, went into possession of the same, claiming to own the same, and has continuously each year, commencing with the purchase of said lands, had the same under fence and cultivation, or otherwise visible control; and that all of said possession has been actual, peaceable, continuous and adverse for more than twenty (20) years next preceding the filing of this bill of complaint; and that for more than ten (10) years next preceding the filing of this bill of complaint said property has under the alleged chain of title been annually assessed and taxes paid thereon.

The Complainant calls upon the several persons hereinabove named as defendants or any one else interested to set forth or specify his, hers or its interest in, title to, or lien or encumbrance upon said land and how and by what instrument or otherwise the same is derived or created.

PRAYER FOR PROCESS

To the end, therefore, that equity may be had in the premises, Complainant prays that your Honor cause the usual writ of process to be issued to the following named defendants, viz:- Henry Havard, Georgia Havard, John Parrish, and Perdido Grocery Company, if they be living and if they be dead, their unknown heirs, devisees or personal representatives of them and each of them and to any and all persons, firms or corporations claiming any interest in the above described land

in the usual form and according to the practices of this Honorable Court, requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court and that your Honor will cause Notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by the laws of the State of Alabama, authorizing the quieting of title by proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint to the aforesaid defendants, whose residences and post office addresses are unknown, by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time as required by law.

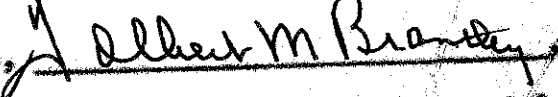
PRAYER FOR RELIEF

Complainant further prays that on hearing of this cause that your Honor will establish Complainant's right to title to said lands and will decree that the Complainant is the owner in fee simple of the land herein described and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said lands or any part thereof and especially that Henry Havard Georgia Havard, John Parrish, and Perdido Grocery Company, if they be living, and if they be dead, their unknown heirs, devisees, or personal representatives of them and each of them and all other persons, firms or corporations claiming any interest in the above described land have no right, title or interest in or lien or encumbrance upon said lands, and that in said decree your Honor will cause a certified copy of the decree to be filed in the Probate Office of Baldwin County, Alabama, and to be recorded therein and that in said decree your Honor will direct in whose name it shall be indexed in the direct and indirect indexes of the records thereof in said Probate Court of Baldwin County, Alabama; and Complainant farther prays for such other, further, different and general relief as in equity may seem just and meet as Complainant will every pray.


Solicitor for the Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, , a Notary Public, in and for said County in said State, personally appeared C. LeMair Thompson, who upon

oath deposes and says that he is the agent of, and the attorney for the Complainant in the above styled cause and is therefore duly authorized to make this oath; that in the belief of the affiant, all of the defendants named in the foregoing Bill of Complaint are over the age of twenty-one years and all are non-residents of the State of Alabama, their places of residence and post office addresses being unknown to your affiant; that he has made a diligent inquiry to ascertain the same and has been unable to do so; that if any of the above named persons are dead, the names of their heirs, devisees or grantees are unknown and that all, other matters and facts stated in the foregoing Bill of Complaint are upon knowledge true; that he is informed as to the facts stated upon information and belief and verily believes and so states that the same are true.

Sworn to and subscribed before me, a
Notary Public, on this, the 26th
day of October, 1953.

Arthur M. Brantley
Notary Public, Baldwin County, Alabama.

with respect and says that he is the agent of, and the attorney for the Commission
 in the above styled cause and is therefore duly authorized to make this oath;
 that in the belief of the affiant, all of the defendants named in the foregoing
 affidavits are over the age of twenty-one years and all are non-residents
 of the State of Alabama, their places of residence and most office addresses

being unknown to your affiant; that he has made a diligent inquiry
 the same and has been unable to do so; that in any of the laws relating
 to the same of such laws, statutes or decrees are known and available,
 other matters and facts stated in the foregoing will of Commission are now
 before him; that he is informed as to the laws stated upon information and belief
 and verily believes and so at the time.

[Signature]

Given to and subscribed before me,
 Notary Public, on this, the 12th
 day of October, 1933.

[Signature]
 Notary Public, Baldwin County, Alabama.

FILED
 OCT 12 1933
 BALDWIN COUNTY, ALA.

Nº 2672

Bay Minette, Ala.,

Received of Mrs. Webb

Bay Minette, Ala., 4-20, 1942

FOR RECORD

TOTAL \$.

Judge of Probate.

3127

J.C. Wright

vs

Certain Lands

J. C. WRIGHT,

Complainant,

VS.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62 and 63 OF HAVARD'S ADDITION TO
THE TOWN OF PERDIDO, as recorded in the
Probate Office of Baldwin County, Alabama,
in Map Book No. 1, on Page 5, except a
strip twenty (20) feet wide along the
South line of Lots 61, 62 and 63, HENRY
HAVARD, MRS. GEORGIA HAVARD, JOHN PARRISH,
MRS. GEORGIA PARRISH, and PERDIDO GROCERY
COMPANY, if they be living, and if they be
dead, their unknown heirs, devisees, or
personal representatives of them and each
of them, and any and all persons, firms,
or corporations claiming any interest in
or title to the above described lands,

Defendants.

It having been made to appear in the above styled cause from the
affidavit of C. LeVair Thompson, the solicitor of record for the complainant
in said cause, that the defendants above named, or their heirs or devisees
are non-residents of the State of Alabama, their residences and post office
addresses being unknown to complainant,

NOTICE IS HEREBY GIVEN to Henry Havard, Mrs. Georgia Havard, John
Parrish, Mrs. Georgia Parrish and Perdido Grocery Company, if they be living,
and if they be dead, their unknown heirs, devisees or personal representatives
of them and each of them, and any and all persons, firms or corporations
claiming any interest in or title to the above described lands, that on the
26th day of Oct., 1953, J. C. Wright filed in the equity side of the Circuit
Court of Baldwin County, Alabama, his bill of complaint against the following
described lands in Baldwin County, Alabama, viz:

Lots 15, 16, 17, 18, 31, 32, 33, 34, 61, 62 and 63 of
Havard's Addition to the Town of Perdido, as recorded in
the Probate Office of Baldwin County, Alabama, in Map
Book No. 1, on Page 5, except a strip twenty (20) feet wide
along the South line of Lots 61, 62 and 63,

and against the defendants hereinabove named and all persons, firms, or cor-
porations claiming any interest in, lien or encumbrance upon said land, and
you are hereby notified to appear and plead, answer or demur within thirty
(30) days of the 26th day of Oct., 1953, or a decree pro confesso will be

rendered against you; that said bill of complaint was and is filed for the purpose of quieting his title thereto and clearing up all doubts and disputes concerning the same; that title to said lands stands in the name of complainant on the records of the office of the Judge of Probate of Baldwin County, Alabama; that the complainant acquired title to Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Mahala P. Cooper, as heir at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 195; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Larry W. Dunbar, Mrs. Catherine Lepo and Pete Lepo, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 202; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Rebecca Minote and husband, R. E. Minote, as heirs at law of John Parrish, deceased, dated September 29, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 201; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Geneva L. Phillips, Joseph W. Flynn and Ella Mae Flynn, as heirs at law of John Parrish, deceased, dated August 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 200; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Mathilda Dyess and husband, Cecil Isaiah Dyess, as heirs at law of John Parrish, deceased, dated October 2, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 199; Lots 15, 16, 31, 34, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Mrs. Ann Marcella Dunbar, William H. Dunbar, Maxie Jane Bennett, Everett Marion Bennett, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 189; Lots 15, 16, 31, 35, 61 and 64 of Harvard Addition to the Town of Perdido, Alabama, by Deed from Daisy Bell Waldrop, William Henry Parrish, S. V. Toller, Mrs. Mary Rebecca Toller, Wesley H. Dunbar and Mabel Dunbar, as heirs at law of John Parrish, deceased, dated August 27, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in

Deed Book 190, page 190; Lots 15, 17, 31, 35, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from William R. Harmon and Mrs. Alice C. Harmon, dated August _____, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from D. M. Courtney, as heir at law of John Parrish, deceased, dated September 26, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 192; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Raymond Richard Minots and Evelyn D. Minots, Burton Julius Dunbar and Alma Mae Dunbar, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book _____, page _____; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Iva Minots and Elodia Inez Minots, as heirs at law of John Parrish, deceased, dated August 21, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 194; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Eleanor E. Forehand, William E. Forehand and Myrtle Collette, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 196; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Alice Kern, Arthur Levins and Hilda Levins, as heirs at law of John Parrish, deceased, dated September 3, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 197; Lots 15, 16, 31, 34, 61 and 64 of Havard Addition to the Town of Perdido, Alabama, by Deed from Annie Merchant and husband, Ellis E. Merchant, as heirs at law of John Parrish, deceased, dated October 1, 1952, and of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 190, page 198. Complainant further alleges that taxes were paid by the widow of the deceased John Parrish until her death, and that since purchasing title as set forth, supra, your complainant has assessed and paid taxes on the same, and that he is in the quiet, peaceable, open, notorious possession of said land, claiming to own the same absolutely and in fee simple.

WITNESS my hand this the 26th day of Oct., 1953.

Alice L. Kern
As Register of the Circuit Court of
Baldwin County, Alabama

G. LeNOIR THOMPSON
Solicitor for Complainant

J. C. WRIGHT,
Complainant,

vs.

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62 and 63 of HAVARD'S ADDITION
TO THE TOWN OF PERDIDO, as recorded
in the Probate Office of Baldwin
County, Alabama, in Map Book No. 1,
on Page 5, except a strip twenty
(20) feet wide along the South line
of Lots 61, 62 and 63, HENRY HAVARD,
MRS. GEORGIA HAVARD, JOHN PARRISH,
MRS. GEORGIA PARRISH, and PERDIDO
GROCERY COMPANY, if they be living,
and if they be dead, their unknown
heirs, devisees, or personal repre-
sentatives of them and each of them,
and any and all persons, firms, or
corporations claiming any interest
in or title to the above described
lands.

Defendants.

NOTICE

From the Law Office of
C. LeNoir Thompson
Attorney at Law.

OCT 23 1953

ALICE I. DUCK, Register

1953 OCT 23 10:00 AM

[Handwritten signature]
To the Clerk of the Court
Baldwin County, Alabama

RECORDED
INDEXED

Mr. R. D. McKenzie, a witness for the Complainant, being first duly sworn deposes and says that:

My name is R. D. McKenzie, I have live at Perdido, Baldwin County, Alabama more than 50 years, I am personally acquainted with and have known the Complainant J. C. Wright since his birth. I know he is over the age of 21 years, and a resident of Baldwin County, Alabama, I know the property described in the Complaint as the property of the Late John Parrish, who was in peaceable possession of this property since he purchased it more than 30 years ago. I know that John Parrish and his late widow, Mrs. Georgia Parrish had no children of their own. Mrs. Georgia Parrish resided on the property as the widow of John Parrish during her life time and died without issue and so far as I know the heirs of John Parrish named in the bill of complaint were not contested in their right to the property by anyone. I have been on the property and have lived where I could see the property and at no time have I found any adverse claimants to the property known as the John Parrish property or the Georgia Parrish property during the time I have known it, which is more than 30 years.

J. C. Wright having bought the interest of the numerous heirs of John Parrish, deceased, now owns the property having been in full possession of this property since the purchase.

So far as I know no one has at any time within the past 10 years paid taxes on the property or claimed the property or had any possession of the property other than Georgia Parrish as the widow of John Parrish and J. C. Wright having purchased the property from the heirs of John Parrish or those through whom he claims by resna conveyances.

Cross Examination by Guardian ad litem:

Q: You knew John Parrish during his life time?

A: Yes Sir

Q: You knew his wife when they lived together as husband and wife in Perdido Alabama?

A: Yes Sir, I have known him all of my life

Q: Did you know whether or not Mr. Parrish ever sold the property?

A: No Sir, he never did.

Q: Did you know of Mrs. Parrish ever selling the property:

A: No Sir

Q: And you knew her up til she died?

A: Yes Sir

Q: Did you ever know of anyone else claiming the property or rumor of anyone claiming?

A: Never heard anyone claim it, or never heard any rumor of anyone claiming.

R D McKenzie

NOTE ON TESTIMONY

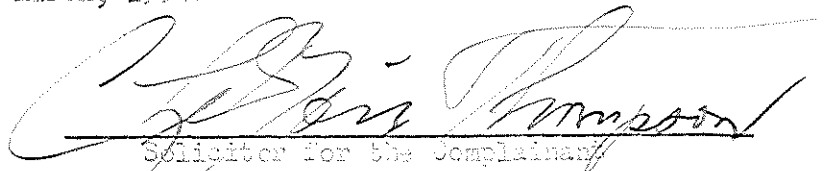
J. C. WRIGHT,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS)	IN EQUITY
CERTAIN LANDS AND HENRY)	
HAYWARD, ET AL.,)	
RESPONDENTS.)	

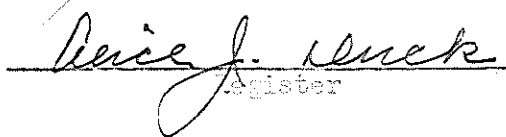
This cause is submitted on behalf of the Complainants upon the following:

1. Original summons and complaint.
2. Lis Pendens filed for record in the Probate Office.
3. Proof of publication of notice in the Baldwin Times.
4. Decree pro confesso by publication.
5. Decree pro confesso on publication.
6. Request for appointment of commissioner.
7. Appointment of commissioner
8. Commission to take deposition.
9. Notice of time of taking testimony.
10. Oral deposition of J. C. Wright and R. D. McKenzie with exhibits

attached.

Dated this the 20th day of March, 1954.


Solicitor for the Complainant


Register

W
IN THE CIRCUIT COURT OF
DADE COUNTY, ALABAMA

IN EQUITY

J. C. WRIGHT,

COMPLAINANT,

VS

CERTAIN LANDS AND HENRY HAVARD,
ET AL.,

RESPONDENTS.

Note Of Testimony

FILED
APR 1 1954
ALICE J. BAKER, Register

C. LeNoir Thompson
Attorney at Law
Ray Minette, Alabama

J. C. WRIGHT,

Complainant,

vs.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

LOTS 15, 16, 17, 18, 31, 32, 33, 34,
61, 62 and 63 OF HAVARD'S ADDITION TO
THE TOWN OF PERDIDO, as recorded in the
Probate Office of Baldwin County, Alabama,
in Map Book No. 1, on Page 5, except a
strip twenty (20) feet wide along the
South line of Lots 61, 62 and 63, HENRY
HAVARD, MRS. GEORGIA HAVARD, JOHN PARRISH,
MRS. GEORGIA PARRISH, and PERDIDO GROCERY
COMPANY, if they be living, and if they be
dead, their unknown heirs, devisees, or
personal representatives of them and each
of them, and any and all persons, firms,
or corporations claiming any interest in
or title to the above described lands,

Defendants.

It appearing to the Court that some of the respondents in the above styled cause are unknown, and that their names and addresses cannot be ascertained after a diligent search and inquiry.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, by the Court, that Wilson M. Hayes, a practicing attorney at Bay Minette, Baldwin County, Alabama, be and he is hereby appointed guardian ad litem to represent and protect the interest of the respondents, in the above styled cause, whose names and addresses are unknown, and cannot be ascertained after a diligent search and inquiry.

IT IS FURTHER ORDERED that the said Wilson M. Hayes be notified of his appointment, and of the time fixed to take testimony in the cause.

Dated this the 18 day of February, 1954.

Hubert M. Hayes

I hereby consent to act as guardian ad litem in the above styled cause for all parties whose names and addresses are unknown and cannot be ascertained after a diligent search and inquiry. I, as guardian ad litem for the unknown respondents, deny all the material allegations contained in the bill of complaint and demand strict proof of the same.

Dated this 18th day of February, 1954.

Wilson M. Hayes

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Lynne Nixon

KNOW YE: that we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine J. C. Wright and R. D. McKenzie

as witnesses in behalf of J. C. Wright in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

J. C. Wright

Complainant

and

Certain Lands and Henry Havard, et al

Respondent

on oath, to be by you administered, upon

to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 16 day of March, 1954

W. J. H. H. H.

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

J. C. WRIGHT

Complainant—

vs.

CERTAIN LANDS AND HENRY HAYDON,

ET AL

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

J. C. WRIGHT,

COMPLAINANT,

VS

CERTAIN LANDS AND HEIREY
HAYARD, ET AL.,

RESPONDENTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

REQUEST FOR APPOINTMENT OF COMMISSIONER

TO: Mrs. Alice J. Duck, Register of the Circuit Court of Baldwin County,
Alabama:

The Complainant wishes to take orally, on behalf of the Complainant the
testimony of the following witnesses:

J. C. Wright

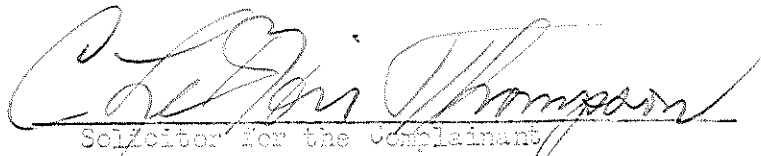
Bay Minette, Alabama

R. D. McKenzie

Perdido, Alabama.

It is hereby requested that they be given proper and legal notice and
that Lyrleene Nixon be appointed as Special Commissioner, to take testimony
of said witnesses, and that due and legal notice be given as required by law.

Dated this the 15 day of March, 1954.


Solicitor for the Complainant

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

J. C. Wright

Complainant

VS.

Certain Lands

Respondent

I, Ivyleene Nixonas ~~Register and~~ Commissionerhave called and caused to come before me J. C. Wright and R. D. McKenziewitness SS named in the Requirement for Oral Examination, on the 22nd day of March1954, at the office of C. LeNoir Thompsonin Bay Minette, Alabama, and having first sworn said Witness SS to speak thetruth, the whole truth, and nothing but the truth, the said J. C. Wright and R. D. McKenzie

doth depose and say as follows:

J. C. Wright a witness for the Complainant being duly sworn deposes and says:

That my name is J. C. Wright, I live in Bay Minette in Baldwin County, Alabama, I am over the age of 21 years, and have been a resident of Baldwin County, Alabama, all of my life, I made a full inquiry and thorough investigation and a wide inquiry as to any parties that might have a claim to the property described in the complaint, I employed C. LeNoir Thompson, an attorney at Bay Minette, Alabama, to search the records in the Office of the Probate Judge of Baldwin County, Alabama and to determine as to any claims the parties named in the bill of complaint as respondents are the only ones found that might have any claims against the said property, and any claim that any of the named respondents might have had has long since been barred by estoppel and the possession on the part of myself and those of whom I claim. The address of the Respondents as given in the original bill of complaint are true from all of the information obtainable. It was determined after a full inquiry that none of the Respondents were presently residents of the State of Alabama, but if there were unknown heirs, devisees, or personal representatives, they were either non-residents or were dead, none of the possible claimants being residents of the State of Alabama. The Complainant is the owner in fee simple and in actual possession of the following parcels of land as described in the bill of complaint which parcels are lots 15, 16, 17, 31, 32, 33, 34, and all of lot 61 except 20 feet on the west side of said lot and a strip 20 feet wide on the west side of lot 62 and lots 63 and 64 all of which lots being numbered in Harvard's Addition to the Town of Perdido, as recorded in the Office of Judge of Probate of Baldwin County, Alabama; and having acquired the same by conveyance from the individuals named in said bill of complaint and all taxes having been paid by J. C. Wright complainant in this cause or by his predecessors in title, to-wit; John Parrish now deceased, or his heirs at law, and no one has had any possession of this property except those under whom J. C. Wright claims by mesne conveyances. I know that during the said time, no one has claimed or attempted to exercise any claims or rights of possession of said lands other than the said J. C. Wright, your Petitioner, and those through whom he claims.

Cross Examination by Guardian ad litem:

- Q. Did you check in making your full inquiry to any State other than Alabama?
A. Yes, Mississippi and Florida.
Q. If and when you found any of the heirs of John Parrish did you obtain deeds from them?
A. Yes sir
Q. From each of the heirs? A. Yes sir.
Q. Do you know of any that you did not have deeds and could find? A. No sir.
Q. Do you know of any other person other than the heirs who may have claimed the property described in the complaint? A. No sir
Q. Have you heard of any in the inquiry? A. No sir.

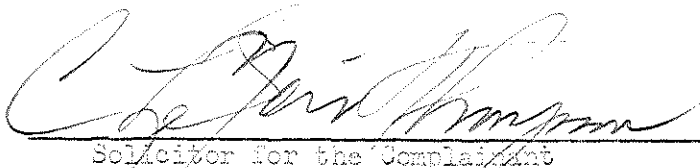
J. C. WRIGHT,
COMPLAINANT,
VS
CERTAIN LANDS AND HENRY
HAYARD, ET AL.,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

NOTICE OF DAY SET FOR TAKING TESTIMONY AND SUBMISSION
FOR FINAL DECREE

To Wilson Hayes, Guardian Ad Litem for the unknown parties.

You are hereby notified that testimony will be taken in the above styled cause orally in open court on Saturday, March 20, 1954, at 10:00 o'clock a. m. and that the above styled cause will be submitted for final decree on said date.

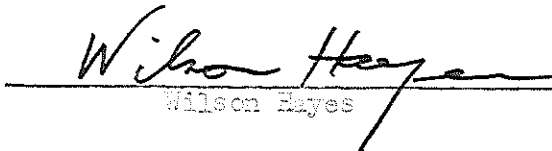

Solicitor for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

I, Wilson Hayes, the Guardian Ad Litem for the unknown parties in the above styled cause, do hereby accept service of a copy of the above notice and do hereby waive any further notice to me of the filing of said notice, the day set for taking testimony or the date of submission for final decree.

Dated the 16th day of March, 1954.


Wilson Hayes

J. C. WRIGHT,

COMPLAINANT,

VS

CERTAIN LANDS AND HENRY HAVARD,
ET AL.

RESPONDENT

NOTICE OF DAY SET FOR TAKING TESTI-
MONY AND SUBMISSION FOR FINAL DECREE

Filed 3.20.54
Alleged
Reg

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

J. C. WRIGHT,

COMPLAINANT,

VS

CERTAIN LANDS AND HENRI
HAVARD, ET AL.,

RESPONDENT.

IN THE CIRCUIT COURT OF

BAWDEN COUNTY, ALABAMA

IN TRUST.

TO: Henry Havard, Mrs. Georgia Havard, John Parrish, Mrs. Georgia Parrish
and Perdido Grocery Company,:

Notice is hereby given that the Complainant will on the 20th day of March,
1954, before Lyrleene Nixon, as Special Commissioner take the testimony of
the following witnesses:

J. C. Wright

Bay Minette, Alabama

R. D. McKenzie

Perdido, Alabama

Dated this the 16 day of March, 1954.

C. L. Davis Thompson
Solicitor for the Complainant

Lyrleene Nixon
Special Commissioner

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

J. C. WRIGHT,

COMPLAINANT,

VS

CERTAIN LANDS AND HARRY HAVARD,
ET AL.,

RESPONDENTS.

Notice of Time of Taking Testimony

Filed 3-20-54
Alleg. French
Rey

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

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