

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Gladys Scott, Marshall Scott, Walter G. Scott, and G. Wells Scott

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

Walter A. Beegle

against Lands as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (and any other person or persons claiming any interest in and to the said land)

Herein fail not. Due return make of this writ as the law directs.

Witness this 28th day of March, 19 51

Verice J. Leuch, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

No. 3317

Page       

# The State of Alabama

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY

WALTER A. BENDIS

VS.

CHAS. H. LADD

## SUMMONS

Returned by the Sheriff and filed in office, this

the        day of       , 19      

      , Register.

Received in office, this the        day of

      , 19      

      , Sheriff.

I have executed the within by leaving a copy

thereof with       

defendant named herein, on this the       

day of       , 19      

      , Sheriff.

By       , Deputy.

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Clayde Scott, Marshall Scott, Walter G. Scott, and G. Wells Scott

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

Walter A. Boogie

against lands as described in this bill, and CLAYDE SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (and any other person or persons claiming any interest in and to the said land)

Herein fail not. Due return make of this writ as the law directs.

Witness this 18th day of March, 1951

Wesley J. Hester, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

Code 1923-6528-6529

No. 3219

Page

# The State of Alabama

Calhoun COUNTY.

IN CIRCUIT COURT, IN EQUITY

WALTER A. DEWILL

vs.

CELESTINE LAMON

## SUMMONS

Returned by the Sheriff and filed in office, this

the day of , 19

, Register.

Received in office, this the day of

, 19

, Sheriff.

I have executed the within by leaving a copy

thereof with.

defendant named herein, on this the

day of , 19

, Sheriff.

By, Deputy.



The State of Alabama, Madison County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Clayton Scott, Marshall Scott, Walter G. Scott, and G. Wells Scott

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

Walter A. Beagle  
against lands as described in this bill, and CLAYTON SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assigns, if they be dead, (and any other person or persons claiming any interest in and to the said land)

Herein fail not. Due return make of this writ as the law directs.

Witness this 16th day of March, 1951

Wesley J. Smith, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

No. 3219

Page

# The State of Alabama

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY

WALTER A. BEETLE

vs.

CERTAIN LANDS

## SUMMONS

Returned by the Sheriff and filed in office, this

the day of , 19.

, Register.

Received in office, this the day of

, 19.

, Sheriff.

I have executed the within by leaving a copy

thereof with.

defendant named herein, on this the

day of , 19.

, Sheriff.

By, Deputy.

The State of Alabama, \_\_\_\_\_ County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon ~~George B. Smith, Marshall Smith, Walter C.~~

~~Smith, and G. W. Smith~~

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

~~Walter L. Smith~~

against ~~lands as described in this bill, and the said GEORGE B. SMITH, MARSHALL SMITH, and all other heirs and next of kin of GEORGE B. SMITH, deceased, if they be living, or their heirs, devisees, next of kin or assigns, if they be dead, (and any other person or persons claiming any interest in and to the said land)~~

Herein fail not. Due return make of this writ as the law directs.

Witness this 14th day of March 1922  
Walter L. Smith, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

ORIGINAL BILL

3219

WALTER A. BEEGLE,

Complainant,

-vs-

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY, IN REM.

NUMBER \_\_\_\_\_

lands as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assigns, if they be dead, ( and any other person or persons claiming any interest in and to the said land).

Respondents,

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

Now comes Walter A. Beegle, your complainant in the above styled cause, and respectfully represents and shows unto Your Honor as follows:

ONE

That your complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama.

TWO

That the land in controversy is located in Baldwin County, Alabama, and is more particularly described as follows:

Tract # 8, being the Southeast (SE $\frac{1}{4}$ ) quarter of the Northeast (NE $\frac{1}{4}$ ) quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less,

and the complainant in his own right claims to own all of the rights, title and interest to said land in its entirety. Complainant avers that he is in actual and peaceful possession of said land and has been in such possession since, to-wit, the 3rd day of March 1937, and brings this bill under the provisions of Chapter 32, Article 2, Title 7 of the 1940 Code of Alabama as amended, to quiet the title to said described property and to resolve, determine and clear up all doubts and disputes concerning the said land.

THREE

The title to said land stands upon the records of the office of the Judge of Probate of Baldwin County, Alabama, in the name of said complainant by virtue of that certain quitclaim deed dated March 3rd, 1937, and recorded in Deed Book 62 N. S. Page 177, of the Probate Court records of Baldwin County, Alabama, executed by H. G. Peterson in favor of your complainant; and complainant alleges that the said H. G. Peterson acquired title to said parcel of real property by virtue of that certain quitclaim deed dated February 3rd, 1937, and recorded in Deed Book 61 N. S. Page 401, of the Probate Court records of Baldwin County, Alabama, and executed by John Henry Buechler and in favor of H. G. Peterson; and complainant further avers that John Henry Buechler acquired title to said parcel of real property by virtue of that certain quitclaim deed in his favor dated August 10th, 1925, and recorded in Deed Book 36 N. S. Page 550, executed by Walter G. Scott and his wife, Cecil Maud Scott, and also by another quitclaim deed dated August 12th, 1925, executed by George W. Scott in favor of John Henry Buechler, which deed is recorded in Deed Book 36 N. S. Page 549, both deeds of record in the office of the Judge of Probate of Baldwin County, Alabama; and complainant further avers and shows that George W. Scott and Walter G. Scott acquired their interest in that certain parcel of real property by virtue of being heirs at law, next of kin and distributees of one George W. Scott, deceased, who died intestate on, to-wit, December 18th, 1921; and complainant further avers and shows that the said George W. Scott, deceased, acquired title to said parcel of real property by virtue of that certain warranty deed dated February 8th, 1921, and recorded in Deed Book 30 N. S. Page 452, of the Probate Court records of Baldwin County, Alabama, and executed by Southern Plantation Development Co., by and through its president, C. M. Souther, and its secretary, P. G. Baker, in favor of the said George W. Scott, Deceased.

FOUR

Complainant further shows that he and the parties from whom he derived title have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property more than ten years next immediately preceding the filing of the bill of complaint in this cause.

FIVE

Complainant further shows that he and those through whom he claims title have regularly assessed the said parcel of real property and paid taxes thereon more than ten consecutive years next immediately preceding the filing of this bill of complaint in this cause, and that no one else has paid the taxes on said property or any part thereof within said period.

SIX

Complainant further shows that no person has had possession of any part of said property either actually or constructively for more than ten years immediately preceding the filing of this bill of complaint other than himself and those through whom he has derived title.

SEVEN

Complainant further shows and avers that he does not know of anyone or any person who claim said land, any title to, interest in, lien or encumbrance thereon, or any part thereof; complainant has obtained an abstract of title which shows that the only possible claimants according to said abstract, are the heirs at law, next of kin and distributees of George W. Scott, deceased, if they be living, or their heirs at law, next of kin, devisees and legatees, if they be deceased.

So far as complainant can determine by diligent search and inquiry: Gladys Scott, widow, 2437 W. Jackson Boulevard, Chicago, Illinois; Marshall Scott, a son, 2437 W. Jackson Boulevard, Chicago, Illinois; Walter G. Scott, a son, 2418 W. Jackson Boulevard, Chicago, Illinois; and G. Wells Scott, (also believed

to be known as George W. Scott,) a son, 2437 W. Jackson Boulevard, Chicago, Illinois, all of whom are over the age of twenty-one years are the heirs at law of George W. Scott, deceased.

EIGHT

Complainant further shows that there is no suit pending to test their title to, interest in or right to possession of the lands herein described.

THE PREMISES CONSIDERED, Complainant files this his verified bill of complaint against all the possible claimants hereinbefore set out and against the said land as described herein, and against any and all persons claiming any title to, interest in, lien or encumbrance upon said land, or any part thereof, and to establish his right or title to said land, and to clear up all doubts or disputes concerning the same; and complainant prays that the said parties hereinabove named shall be made respondents to this bill of complaint and that process be served on them or publication be made requiring them to plead, answer or demur to the same within the time required by law or decrees pro confesso may be entered against them; and complainant further prays that a guardian ad litem be appointed to defend the interests of all the respondents whose identity is unknown; and prays that this Court will make and enter all orders, judgments and decrees that may be meet and proper in the premises, and that upon a final hearing of this cause, will decree that the complainant, Walter A. Beegle, is the owner of said lands, and has a fee simple title thereto free and clear of all liens and encumbrances, and that no other person or persons has any estate or interest in or encumbrance on such land or any part thereof.

Complainant further prays for such other, further and different relief as it may appear to this Honorable Court to be just and equitable.

*Walter A. Beegle*  
Walter A. Beegle, Complainant

STATE OF Ohio

COUNTY OF Meigs

Before me, Frank Cleland a notary public  
in and for said county and State, personally appeared Walter A.  
Beegle, who is known to me and who being by me first duly sworn,  
deposes and says that he is the complainant in the above styled  
cause, that he has read the above bill, knows the contents thereof,  
and that the statements of facts contained therein are true.

Walter A. Beegle  
Walter A. Beegle, Complainant.

Sworn to and Subscribed before me  
this 12 day of Feb 1954.

Frank Cleland  
Notary Public.

My commission expires 12 day of Feb 1957.

21  
63  
22



No. 3219

Page.....

# The State of Alabama

Baldwin COUNTY.

## IN CIRCUIT COURT, IN EQUITY

WALTER A. BEEGLE

vs.

CERTAIN LANDS

## SUMMONS

Returned by the Sheriff and filed in office, this

the.....day of....., 19.....

....., Register.

Received in office, this the..... day of

....., 19.....

....., Sheriff.

I have executed the within by leaving a copy  
thereof with.....

defendant named herein, on this the.....

day of....., 19.....

....., Sheriff.

By....., Deputy.

ALICE J. DUCK, Circuit Clerk

*Baldwin County*  
BAY MINETTE, ALA.

RETURN RECEIPT REQUESTED

Deliver to Addressee Only

REGISTERED

FOR DELIVERY ONLY TO PERSON  
TO WHOM ADDRESSED

RETURN RECEIPT REQUESTED

REGISTERED

4366

Mr. Marshall Scott  
2437 W. Jackson Boulevard  
Chicago, Illinois

RETURNED TO SENDER  
FROM  
MID-WEST STA.  
CHICAGO, ILL.

Unclaimed

4/16

NR-NL71DDH-455  
(35)







ALICE J. DUCK, Circuit Clerk

*Baldwin County*

BAY MINETTE, ALA.

4/16



NOT THERE 120

RETURN RECEIPT REQUESTED

Deliver to Addressee Only

Mr. Walter G. Scott  
2418 W. Jackson Boulevard  
Chicago, Illinois

REGISTERED

FOR DELIVERY ONLY TO PERSON  
TO WHOM ADDRESSED

RETURN RECEIPT REQUESTED

REGISTERED  
4367

Directory Service Given

NOTIFIED  
APR 5 1954





ORIGINAL BILL

WALTER A. BEEGLE,

Complainant,

- vs -

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY, IN REM.

NUMBER \_\_\_\_\_

Lands as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, ( and any other person or persons claiming any interest in and to the said land).

Respondents,

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

Now comes Walter A. Beegle, your complainant in the above styled cause, and respectfully represents and shows unto Your Honor as follows:

ONE

That your complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama.

TWO

That the land in controversy is located in Baldwin County, Alabama, and is more particularly described as follows:

Para # 3, being the Southeast (SE $\frac{1}{4}$ ) quarter of the Northeast (NE $\frac{1}{4}$ ) quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less,

and the complainant in his own right claims to own all of the rights, title and interest to said land in its entirety. Complainant avers that he is in actual and peaceful possession of said land and has been in such possession since, to-wit, the 3rd day of March 1937, and brings this bill under the provisions of Chapter 32, Article 2, Title 7 of the 1940 Code of Alabama as amended, to quiet the title to said described property and to resolve, determine and clear up all doubts and disputes concerning the said land.

THREE

The title to said land stands upon the records of the office of the Judge of Probate of Baldwin County, Alabama, in the name of said complainant by virtue of that certain quitclaim deed dated March 3rd, 1937, and recorded in Deed Book 62 N. S. Page 177, of the Probate Court records of Baldwin County, Alabama, executed by H. C. Peterson in favor of your complainant; and complainant alleges that the said H. C. Peterson acquired title to said parcel of real property by virtue of that certain quitclaim deed dated February 3rd, 1937, and recorded in Deed Book 61 N. S. Page 401, of the Probate Court records of Baldwin County, Alabama, and executed by John Henry Buechler and in favor of H. C. Peterson; and complainant further avers that John Henry Buechler acquired title to said parcel of real property by virtue of that certain quitclaim deed in his favor dated August 10th, 1925, and recorded in Deed Book 36 N. S. Page 550, executed by Walter G. Scott and his wife, Cecil Maud Scott, and also by another quitclaim deed dated August 12th, 1925, executed by George W. Scott in favor of John Henry Buechler, which deed is recorded in Deed Book 36 N. S. Page 549, both deeds of record in the office of the Judge of Probate of Baldwin County, Alabama; and complainant further avers and shows that George W. Scott and Walter G. Scott acquired their interest in that certain parcel of real property by virtue of being heirs at law, next of kin and distributees of one George W. Scott, deceased, who died intestate on, to-wit, December 18th, 1921; and complainant further avers and shows that the said George W. Scott, deceased, acquired title to said parcel of real property by virtue of that certain warranty deed dated February 8th, 1921, and recorded in Deed Book 30 N. S. Page 452, of the Probate Court records of Baldwin County, Alabama, and executed by Southern Plantation Development Co., by and through its president, G. H. Souther, and its secretary, P. G. Baker, in favor of the said George W. Scott, Deceased.

FOUR

Complainant further shows that he and the parties from whom he derived title have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property more than ten years next immediately preceding the filing of the bill of complaint in this cause.

FIVE

Complainant further shows that he and those through whom he claims title have regularly assessed the said parcel of real property and paid taxes thereon more than ten consecutive years next immediately preceding the filing of this bill of complaint in this cause, and that no one else has paid the taxes on said property or any part thereof within said period.

SIX

Complainant further shows that no person has had possession of any part of said property either actually or constructively for more than ten years immediately preceding the filing of this bill of complaint other than himself and those through whom he has derived title.

SEVEN

Complainant further shows and avers that he does not know of anyone or any person who claim said land, any title to, interest in, lien or encumbrance thereon, or any part thereof; complainant has obtained an abstract of title which shows that the only possible claimants according to said abstract, are the heirs at law, next of kin and distributees of George W. Scott, deceased, if they be living, or their heirs at law, next of kin, devisees and legatees, if they be deceased.

So far as complainant can determine by diligent search and inquiry: Gladys Scott, widow, 2437 W. Jackson Boulevard, Chicago, Illinois; Marshall Scott, a son, 2437 W. Jackson Boulevard, Chicago, Illinois; Walter G. Scott, a son, 2418 W. Jackson Boulevard, Chicago, Illinois; and G. Valls Scott, (also believed



to be known as George W. Scott,) a son, 2437 W. Jackson Boulevard, Chicago, Illinois, all of whom are over the age of twenty-one years are the heirs at law of George W. Scott, deceased.

EIGHT

Complainant further shows that there is no suit pending to test their title to, interest in or right to possession of the lands herein described.

THE PREMISES CONSIDERED, Complainant files this his verified bill of complaint against all the possible claimants hereinbefore set out and against the said land as described herein, and against any and all persons claiming any title to, interest in, lien or encumbrance upon said land, or any part thereof, and to establish his right or title to said land, and to clear up all doubts or disputes concerning the same; and complainant prays that the said parties hereinabove named shall be made respondents to this bill of complaint and that process be served on them or publication be made requiring them to plead, answer or demur to the same within the time required by law or decree pro confesso may be entered against them; and complainant further prays that a guardian ad litem be appointed to defend the interests of all the respondents whose identity is unknown; and prays that this Court will make and enter all orders, judgments and decrees that may be just and proper in the premises, and that upon a final hearing of this cause, will decree that the complainant, Walter A. Beegle, is the owner of said lands, and has a fee simple title thereto free and clear of all liens and encumbrances, and that no other person or persons has any estate or interest in or encumbrance on such land or any part thereof.

Complainant further prays for such other, further and different relief as it may appear to this Honorable Court to be just and equitable.

Walter A. Beegle  
Walter A. Beegle, Complainant.

STATE OF Ohio  
COUNTY OF Meigs

Before me, Frank Cleland a notary public  
in and for said county and State, personally appeared Walter A.  
Beegle, who is known to me and who being by me first duly sworn,  
deposes and says that he is the complainant in the above styled  
cause, that he has read the above bill, knows the contents thereof,  
and that the statements of facts contained therein are true.

Walter A. Beegle  
Walter A. Beegle, Complainant.

Sworn to and Subscribed before me  
this 12 day of Mar 1954.

Frank Cleland  
Notary Public.

My commission expires 12 day of Feb 1957.

ALICE J. DUCK, Circuit Clerk

Baldwin County  
BAY MINETTE, ALA.

WIDOW - N  
4-5  
7-2

REGISTERED

FOR DELIVERY ONLY TO PERSON  
TO WHOM ADDRESSED

RETURN RETURN REQUESTED

RETURN RECEIPT REQUESTED

Deliver to Addressee Only



Mr. G. Wells Scott  
2437 W. Jackson Boulevard  
Chicago, Illinois

TRY 4-5



4/16

Unclaimed





**CONFIDENTIAL**

VALTER A. BERGLI,  
Complainant,  
-VS-  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY, IN REM.  
NUMBER

Lands as described in this bill, and CLAYNE SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, ( and any other person or persons claiming any interest in and to the said land).

## Neopentoids

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

Now comes Walter A. Beagle, your complainant in the above styled cause, and respectfully represents and shows unto Your Honor as follows:

**ORIGIN**

That your complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama.



That the land in controversy is located in Baldwin County, Alabama, and is more particularly described as follows:

Farm # 8, being the Southeast (SE $\frac{1}{4}$ ) quarter of the Northeast (NE $\frac{1}{4}$ ) quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less.

and the complainant in his own right claims to own all of the rights, title and interest to said land in its entirety. Complainant avers that he is in actual and peaceful possession of said land and has been in such possession since, to-wit, the 3rd day of March 1937, and brings this bill under the provisions of Chapter 32, Article 3, Title 7 of the 1940 Code of Alabama as amended, to quiet the title to said described property and to resolve, determine and clear up all doubts and disputes concerning the said land.

THREE

The title to said land stands upon the records of the office of the Judge of Probate of Baldwin County, Alabama, in the name of said complainant by virtue of that certain quitclaim deed dated March 3rd, 1937, and recorded in Deed Book 62 N. S. Page 177, of the Probate Court records of Baldwin County, Alabama, executed by H. C. Peterson in favor of your complainant; and complainant alleges that the said H. C. Peterson acquired title to said parcel of real property by virtue of that certain quitclaim deed dated February 3rd, 1937, and recorded in Deed Book 61 N. S. Page 401, of the Probate Court records of Baldwin County, Alabama, and executed by John Henry Buechler and in favor of H. C. Peterson; and complainant further avers that John Henry Buechler acquired title to said parcel of real property by virtue of that certain quitclaim deed in his favor dated August 10th, 1925, and recorded in Deed Book 36 N. S. Page 530, executed by Walter G. Scott and his wife, Cecil Maud Scott, and also by another quitclaim deed dated August 12th, 1925, executed by George W. Scott in favor of John Henry Buechler, which deed is recorded in Deed Book 36 N. S. Page 549, both deeds of record in the office of the Judge of Probate of Baldwin County, Alabama; and complainant further avers and shows that George W. Scott and Walter G. Scott acquired their interest in that certain parcel of real property by virtue of being heirs at law, next of kin and distributees of one George W. Scott, deceased, who died intestate on, to-wit, December 18th, 1921; and complainant further avers and shows that the said George W. Scott, deceased, acquired title to said parcel of real property by virtue of that certain warranty deed dated February 8th, 1921, and recorded in Deed Book 30 N. S. Page 452, of the Probate Court records of Baldwin County, Alabama, and executed by Southern Plantation Development Co., by and through its president, C. H. Souther, and its secretary, P. G. Baker, in favor of the said George W. Scott, Deceased.

FOUR

Complainant further shows that he and the parties from whom he derived title have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property more than ten years next immediately preceding the filing of the bill of complaint in this cause.

FIVE

Complainant further shows that he and those through whom he claims title have regularly assessed the said parcel of real property and paid taxes thereon more than ten consecutive years next immediately preceding the filing of this bill of complaint in this cause, and that no one else has paid the taxes on said property or any part thereof within said period.

SIX

Complainant further shows that no person has had possession of any part of said property either actually or constructively for more than ten years immediately preceding the filing of this bill of complaint other than himself and those through whom he has derived title.

SEVEN

Complainant further shows and avers that he does not know of anyone or any person who claim said land, any title to, interest in, lien or encumbrance thereon, or any part thereof; complainant has obtained an abstract of title which shows that the only possible claimants according to said abstract, are the heirs at law, next of kin and distributees of George W. Scott, deceased, if they be living, or their heirs at law, next of kin, devisees and legatees, if they be deceased.

So far as complainant can determine by diligent search and inquiry: Gladys Scott, widow, 2437 W. Jackson Boulevard, Chicago, Illinois; Marshall Scott, a son, 2437 W. Jackson Boulevard, Chicago, Illinois; Walter G. Scott, a son, 2418 W. Jackson Boulevard, Chicago, Illinois; and G. Wells Scott, (also believed



to be known as George W. Scott,) a son, 2437 W. Jackson Boulevard, Chicago, Illinois, all of whom are over the age of twenty-one years are the heirs at law of George W. Scott, deceased.

EIGHT

Complainant further shows that there is no suit pending to test their title to, interest in or right to possession of the lands herein described.

THE PREMISES CONSIDERED, Complainant files this his verified bill of complaint against all the possible claimants hereinbefore set out and against the said land as described herein, and against any and all persons claiming any title to, interest in, lien or encumbrance upon said land, or any part thereof, and to establish his right or title to said land, and to clear up all doubts or disputes concerning the same; and complainant prays that the said parties hereinabove named shall be made respondents to this bill of complaint and that process be served on them or publication be made requiring them to plead, answer or demur to the same within the time required by law or decrees pro confesso may be entered against them; and complainant further prays that a guardian ad litem be appointed to defend the interests of all the respondents whose identity is unknown; and prays that this Court will make and enter all orders, judgments and decrees that may be meet and proper in the premises, and that upon a final hearing of this cause, will decree that the complainant, Walter A. Beegle, is the owner of said lands, and has a fee simple title thereto free and clear of all liens and encumbrances, and that no other person or persons has any estate or interest in or encumbrance on such land or any part thereof.

Complainant further prays for such other, further and different relief as it may appear to this Honorable Court to be just and equitable.

Walter A. Beegle  
Walter A. Beegle, Complainant.



STATE OF Ohio

COUNTY OF Meigs

Before me, Frank Cleland a notary public  
in and for said county and State, personally appeared Walter A.  
Beagle, who is known to me and who being by me first duly sworn,  
deposes and says that he is the complainant in the above styled  
cause, that he has read the above bill, knows the contents thereof,  
and that the statements of facts contained therein are true.

Walter A. Beagle  
Walter A. Beagle, Complainant.

Sworn to and Subscribed before me  
this 12 day of Mar 1954.

Frank Cleland  
Notary Public.

My commission expires 12 day of Feb 1957.

ALICE J. DUCK, Circuit Clerk

*Baldwin County*

BAY MINETTE, ALA.

N1004-NR-NC

575



4/16

RETURN RECEIPT REQUESTED

Deliver to Addressee Only

RETURNED TO SENDER  
FROM  
MIDWEST STA.  
CHICAGO, ILL.

Mrs. Gladys Scott  
2437 W. Jackson Boulevard  
Chicago, Illinois

REGISTERED

FOR DELIVERY ONLY TO PERSON  
TO WHOM ADDRESSED

RETURN RECEIPT REQUESTED



Unclaimed!





ORIGINAL BILL

WALTER A. BEEGLE,

Complainant,

-vs-

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY, IN REM.

NUMBER \_\_\_\_\_

Lands as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, ( and any other person or persons claiming any interest in and to the said land).

Respondents,

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

Now comes Walter A. Beegle, your complainant in the above styled cause, and respectfully represents and shows unto Your Honor as follows:

ONE

That your complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama.

TWO

That the land in controversy is located in Baldwin County, Alabama, and is more particularly described as follows:

Farm # 8, being the Southeast (SE $\frac{1}{4}$ ) quarter of the Northeast (NE $\frac{1}{4}$ ) quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less,

and the complainant in his own right claims to own all of the rights, title and interest to said land in its entirety. Complainant avers that he is in actual and peaceful possession of said land and has been in such possession since, to-wit, the 3rd day of March 1937, and brings this bill under the provisions of Chapter 32, Article 2, Title 7 of the 1940 Code of Alabama as amended, to quiet the title to said described property and to resolve, determine and clear up all doubts and disputes concerning the said land.

THREE

The title to said land stands upon the records of the office of the Judge of Probate of Baldwin County, Alabama, in the name of said complainant by virtue of that certain quitclaim deed dated March 3rd, 1937, and recorded in Deed Book 62 N. S. Page 177, of the Probate Court records of Baldwin County, Alabama, executed by H. C. Peterson in favor of your complainant; and complainant alleges that the said H. C. Peterson acquired title to said parcel of real property by virtue of that certain quitclaim deed dated February 3rd, 1937, and recorded in Deed Book 61 N. S. Page 401, of the Probate Court records of Baldwin County, Alabama, and executed by John Henry Buechler and in favor of H. C. Peterson; and complainant further avers that John Henry Buechler acquired title to said parcel of real property by virtue of that certain quitclaim deed in his favor dated August 10th, 1925, and recorded in Deed Book 36 N. S. Page 550, executed by Walter G. Scott and his wife, Cecil Maud Scott, and also by another quitclaim deed dated August 12th, 1925, executed by George W. Scott in favor of John Henry Buechler, which deed is recorded in Deed Book 36 N. S. Page 549, both deeds of record in the office of the Judge of Probate of Baldwin County, Alabama; and complainant further avers and shows that George W. Scott and Walter G. Scott acquired their interest in that certain parcel of real property by virtue of being heirs at law, next of kin and distributees of one George W. Scott, deceased, who died intestate on, to-wit, December 18th, 1921; and complainant further avers and shows that the said George W. Scott, deceased, acquired title to said parcel of real property by virtue of that certain warranty deed dated February 8th, 1921, and recorded in Deed Book 30 N. S. Page 452, of the Probate Court records of Baldwin County, Alabama, and executed by Southern Plantation Development Co., by and through its president, G. N. Souther, and its secretary, P. G. Baker, in favor of the said George W. Scott, Deceased.

FOUR

Complainant further shows that he and the parties from whom he derived title have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property more than ten years next immediately preceding the filing of the bill of complaint in this cause.

FIVE

Complainant further shows that he and those through whom he claims title have regularly assessed the said parcel of real property and paid taxes thereon more than ten consecutive years next immediately preceding the filing of this bill of complaint in this cause, and that no one else has paid the taxes on said property or any part thereof within said period.

SIX

Complainant further shows that no person has had possession of any part of said property either actually or constructively for more than ten years immediately preceding the filing of this bill of complaint other than himself and those through whom he has derived title.

SEVEN

Complainant further shows and avers that he does not know of anyone or any person who claim said land, any title to, interest in, lien or encumbrance thereon, or any part thereof; complainant has obtained an abstract of title which shows that the only possible claimants according to said abstract, are the heirs at law, next of kin and distributees of George W. Scott, deceased, if they be living, or their heirs at law, next of kin, devisees and legatees, if they be deceased.

So far as complainant can determine by diligent search and inquiry: Gladys Scott, widow, 2437 W. Jackson Boulevard, Chicago, Illinois; Marshall Scott, a son, 2437 W. Jackson Boulevard, Chicago, Illinois; Walter G. Scott, a son, 2418 W. Jackson Boulevard, Chicago, Illinois; and G. Wells Scott, (also believed



to be known as George W. Scott,) a son, 2437 W. Jackson Boulevard, Chicago, Illinois, all of whom are over the age of twenty-one years are the heirs at law of George W. Scott, deceased.

EIGHT

Complainant further shows that there is no suit pending to test their title to, interest in or right to possession of the lands herein described.

THE PREMISES CONSIDERED, Complainant files this his verified bill of complaint against all the possible claimants hereinbefore set out and against the said land as described herein, and against any and all persons claiming any title to, interest in, lien or encumbrance upon said land, or any part thereof, and to establish his right or title to said land, and to clear up all doubts or disputes concerning the same; and complainant prays that the said parties hereinabove named shall be made respondents to this bill of complaint and that process be served on them or publication be made requiring them to plead, answer or demur to the same within the time required by law or decrees pro confesso may be entered against them; and complainant further prays that a guardian ad litem be appointed to defend the interests of all the respondents whose identity is unknown; and prays that this Court will make and enter all orders, judgments and decrees that may be meet and proper in the premises, and that upon a final hearing of this cause, will decree that the complainant, Walter A. Beegle, is the owner of said lands, and has a fee simple title thereto free and clear of all liens and encumbrances, and that no other person or persons has any estate or interest in or encumbrance on such land or any part thereof.

Complainant further prays for such other, further and different relief as it may appear to this Honorable Court to be just and equitable.

Walter A. Beegle  
Walter A. Beegle, Complainant.

STATE OF Ohio

COUNTY OF Meigs

Before me, Frank Cleland a notary public  
in and for said county and State, personally appeared Walter A.  
Beegle, who is known to me and who being by me first duly sworn,  
deposes and says that he is the complainant in the above styled  
cause, that he has read the above bill, knows the contents thereof,  
and that the statements of facts contained therein are true.

Walter A. Beegle  
Walter A. Beegle, Complainant.

Sworn to and Subscribed before me  
this 12 day of Mar 1954.

Frank Cleland  
Notary Public.

My commission expires 12 day of Feb. 1957.

46  
w  
c  
1  
as



IN COMMISSION EXPIRES 15<sup>th</sup> OCT 1935.

*[Signature]*

WITN 15 OCT 1935

SWORN TO AND SUBSCRIBED before me

FILED  
MAR 18 1935  
CLERK

Ready oath

and the statement of facts contained therein are true.

Witness my hand and seal this 15th day of October 1935.

Subscribed and sworn to before me at the County of ...

County of ...

in my presence and state of ...

before me.

DEPUTY CLERK

STATE OF ...

*[Signature]*

WALTER A. BEEGLE,	↑	IN THE CIRCUIT COURT
Complainant,	↑	OF BALDWIN COUNTY,
-vs-	↑	ALABAMA, IN EQUITY,
LANDS as described in this	↑	IN REM. No. <u>3219</u>
bill and GLADYS SCOTT,	↑	
MARSHALL SCOTT, and all other	↑	
heirs and next of kin of	↑	
GEORGE W. SCOTT, Deceased;	↑	
if they be living, or their	↑	
heirs, devisees, next of kin	↑	
or assignees, if they be dead,	↑	
(and any other person or persons	↑	
claiming any interest in and to	↑	
said land.)	↑	
Respondents,	↑	

DECREE

This cause coming on to be heard upon the Bill of Complaint; the answer of the Guardian ad litem and Attorney ad litem; the testimony of Walter A. Beegle, George W. Engel and E. S. Tunstall; proof of publication and decree pro confesso; and more than sixty days having elapsed from the publication of notice, a certified copy of said notice having been filed in the Probate Court of Baldwin County, Alabama; and the same being at issue and being a cause IN REM against certain lands in the County of Baldwin, State of Alabama, and against the Respondents named in said Bill of Complaint, whose addresses are unknown and cannot be ascertained after diligent search, and against any and all person or persons, firms or corporations, claiming any title to, interest in, lien or encumbrance on, said real property or any part thereof.

And it further appearing to the satisfaction of the Court from the pleadings and proof that Complainant is entitled to the relief sought by said bill; IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by this Court that the Complainant, Walter A. Beegle, is the owner in fee simple in and to the following described real property in the County of Baldwin, State of Alabama, to-wit:

Farm No. 8, being the Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast (NE $\frac{1}{4}$ ) Quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by this Court that neither Gladys Scott, Marshall Scott, Walter G. Scott and G. Wells Scott; nor

any other person or persons, firm or corporation, have any title to, interest in, lien or encumbrance on, said real property or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by this Court that a certified copy of this decree be recorded in the Probate Court of Baldwin County, Alabama, and that the direct Indices in said Court show the names of Gladys Scott, Marshall Scott, Walter G. Scott and G. Wells Scott; and that said Decree shall be listed in the Indirect Indices in the name of Walter A. Beegle.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by this Court that the sum of \$25.00 is a reasonable fee to be allowed to Edmund R. Cannon, Jr., as Guardian ad Litem and Attorney ad Litem in the within cause, which shall be taxed as costs, and the Complainant is hereby taxed with the cost of this proceeding, including the cost of recording a copy of this Decree in the Probate Court of Baldwin County, Alabama, for which costs let execution issue.

IN TERM TIME, this 27th day of August, 1954.

Hubert M. Hall

JUDGE

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in above stated cause, which said decree is on file and enrolled in my office.

WITNESS MY HAND AND SEAL THIS THE 27th day of Aug, 1954

*Alice J. Duck*  
Register of Circuit Court, in Equity

Clerk.

Date

STATE OF ALABAMA, BALDWIN COUNTY

Filed 9-2-54

3 P M

Recorded Deed

book 211

page 581-2

W. R. Stewart  
Judge of Probate



JIMMY FAULKNER  
PUBLISHER

# THE BALDWIN TIMES

BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

## Legal Notice

NOTICE  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALA-  
BAMA, IN EQUITY,

Case No. 3219

WALTER A. BEEGLE, Complainant, vs. the Bill of George W. Scott, deceased, 2437 W. Jackson Boulevard, Chicago, Illinois, and Marshall Scott, 2437 W. Jackson Boulevard, Chicago, Illinois, and all other heirs and next of kin of George W. Scott, deceased, if they be living and against their heirs, devisees, next of kin or assignees, if they be dead, and any other person or persons claiming any title to, interest in, lien or encumbrance on said property or any part thereof, Respondents.

Notice is hereby given that Walter A. Beegle on the 18th day of March, 1954, filed a bill of complaint in the Circuit Court of Baldwin County, Alabama, in Equity, claiming to be in the exclusive, actual, peaceable, undisturbed, adverse possession of and claiming to own absolutely and in fee simple the following described land situated in Baldwin County, Alabama, to-wit:

Farm No. 8, being the Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast Quarter of Thirty-four (34), Town (6) South, Range Four East, containing forty acres more or less,

Complainant alleges in his bill of complaint that he acquired title to the above described property by and through the following conveyances, viz:

(1) Warranty deed from Southern Plantation Development Co., by and through its president, C. N. Souther, and its secretary, P. G. Baker, to George W. Scott, dated February 8, 1921 and recorded in Deed book 30 N.S. page 452. (2) Quitclaim deed from Walter G. Scott and wife, Cecil Maud Scott, to John Henry Buechler dated August 10, 1925 and recorded in Deed Book 36 N.S. page 550. (3) Quitclaim deed from George W. Scott to John Henry Buechler dated August 12, 1925 and recorded in Deed Book 36 N.S. page 549. (4) Quitclaim deed from John Henry Buechler to H. C. Peterson dated February 3, 1937 and recorded in Deed Book 61 N.S. page 401. (5) Quitclaim deed from H. C. Peterson to Walter A. Beegle dated March 3, 1937 and recorded in Deed Book 62 N.S. page 177. All of said references being to the office of the Judge of Probate of Baldwin County, Alabama.

Complainant now avers and states that no person, firm or corporation has at any time for more than ten (10) years next preceding the filing of this bill of complaint, other than your complainant, and his predecessors in title, paid any taxes upon said land or had any interest therein, nor has any person firm or corporation had any possession of any part of said land, other than your complainant and his

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

E. R. Mammelle, Jr., 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

Walter A. Beegle vs. Per-  
Lands

### COST STATEMENT

859 WORDS @ 6 $\frac{1}{2}$  cents — — — \$ 55-83

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

E. R. Mammelle Jr.  
Editor Publisher

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

Date of 1st publication Apr. 1, 1954 Vol. 65 No. 11

Date of 2nd publication Apr. 8, 1954 Vol. 65 No. 12

Date of 3rd publication Apr. 15, 1954 Vol. 65 No. 13

Date of 4th publication Apr. 22, 1954 Vol. 65 No. 14

Subscribed and sworn before the undersigned this 11 day of May, 1954.

Darwin Martin  
Notary Public, Baldwin County.

E. R. Mammelle Jr.  
Editor Publisher



Case No. 3219

WALTER A. BEEGLE, Complainant,  
vs.  
The Bill of George W. Scott, deceased, and  
Marshall Scott, 2437 W. Jackson  
Boulevard, Chicago, Illinois, and  
all other heirs and next of kin  
of George W. Scott, deceased, if  
they be living and against their  
heirs, devisees, next of kin or as-  
signees, if they be dead, and any  
other person or persons claiming  
any title to, interest in, lien or  
encumbrance on said property or  
any part thereof, Respondents.

Notice is hereby given that  
Walter A. Beegle on the 18th day  
of March, 1954, filed a bill of  
complaint in the Circuit Court of  
Baldwin County, Alabama, in Equ-  
ity, claiming to be in the exclu-  
sive, actual, peaceable, undis-  
turbed, adverse possession of and  
claiming to own absolutely and  
in fee simple the following de-  
scribed land situated in Baldwin  
County, Alabama, to-wit:

Farm No. 8, being the  
east (SE $\frac{1}{4}$ ) Quarter of the  
Northeast Quarter of  
Thirty-four (34), Town  
(6) South, Range Four East,  
containing forty acres more or  
less,

Complainant alleges in his bill  
of complaint that he acquired title  
to the above described prop-  
erty by and through the follow-  
ing conveyances, viz:

(1) Warranty deed from South-  
ern Plantation Development Co.,  
by and through its president, C.  
N. Souther, and its secretary, P.  
G. Baker, to George W. Scott,  
dated February 8, 1921 and re-  
corded in Deed book 30 N.S. page  
452. (2). Quitclaim deed from  
Walter G. Scott and wife, Cecil  
Maud Scott, to John Henry  
Buechler dated August 10, 1925  
and recorded in Deed Book 36  
N.S. page 550. (3). Quitclaim  
deed from George W. Scott to  
John Henry Buechler dated Au-  
gust 12, 1925 and recorded in  
Deed Book 36 N.S. page 549. (4).  
Quitclaim deed from John Henry  
Buechler to H. C. Peterson dated  
February 3, 1937 and recorded in  
Deed Book 61 N.S. page 401. (5).  
Quitclaim deed from H. C. Peter-  
son to Walter A. Beegle dated  
March 3, 1937 and recorded in  
Deed Book 62 N.S. page 177. All  
of said references being to the  
office of the Judge of Probate of  
Baldwin County, Alabama.

Complainant now avers and  
states that no person, firm or cor-  
poration has at any time for more  
than ten (10) years next preced-  
ing the filing of this bill of com-  
plaint, other than your complain-  
ant, and his predecessors in title,  
paid any taxes upon said  
land or had any interest there-  
in, nor has any person firm or  
corporation had any possession  
of any part of said land, other  
than your complainant and his  
predecessors in title, and your  
complainant further says and  
avers that no person, firm or  
corporation is known to him to  
claim said land or any part there-  
of, or any interest therein, within  
a period of more than ten (10)  
years next preceding the filing  
of the bill of complaint, except  
your complainant and his pre-  
decessors in title.

The title to said land stands of  
record in the office of the Judge  
of Probate of Baldwin County,  
Alabama, in the name of your  
complainant, subject only to any  
claim Gladys Scott and Marshall  
Scott might have in and to said  
property by virtue of being heirs  
at law and next of kin of George  
W. Scott, deceased, and there ap-  
pearing no record title out of  
said persons.

If any person, firm or corpora-  
tion, or any of the persons nam-  
ed as respondents herein, or their  
heirs or devisees, claim any title  
to, interest in, lien or encum-  
brance upon said land or any part  
thereof, they must be and appear  
within the Circuit Court of Bald-  
win County, Alabama and plead  
to, answer or demur to the bill  
of complaint within sixty (60)  
days from the date of publication  
of this notice of the filing of said  
bill, which said sixty days expires  
on the 1st day of June, 1954, or  
suffer decrees pro confesso to  
be taken against them.

IN WITNESS WHEREOF, I  
the undersigned Alice J. Duck, as  
Register of the Circuit Court of  
Baldwin County, Alabama, have

E. R. Mansette, Jr., being duly sworn, deposes and says  
that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper pub-  
lished at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Walter A. Beegle vs. et al.  
Land

COST STATEMENT

859 WORDS @ 62 cents — — — \$ 53.83  
I hereby certify this is correct, due and unpaid (paid).

E. R. Mansette Jr.  
Editor Publisher

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

Date of 1st publication Apr. 1, 1954 Vol. 65 No. 11  
Date of 2nd publication Apr. 8, 1954 Vol. 65 No. 12  
Date of 3rd publication Apr. 15, 1954 Vol. 65 No. 13  
Date of 4th publication Apr. 22, 1954 Vol. 65 No. 14

Subscribed and sworn before the undersigned this 11 day of May, 1954.

Darwin Martin  
Notary Public, Baldwin County.

E. R. Mansette Jr.  
Editor Publisher



3219

Notary Public, Baldwin County.

*James M. Smith*

Subscribed and sworn before me the undersigned this 14th day of May 1954

Date of 4th publication	<u>Apr. 29</u>	19 <u>54</u>	Vol. <u>17</u>	No. <u>4</u>
Date of 3rd publication	<u>Apr. 12</u>	19 <u>54</u>	Vol. <u>17</u>	No. <u>3</u>
Date of 2nd publication	<u>Apr. 5</u>	19 <u>54</u>	Vol. <u>17</u>	No. <u>2</u>
Date of 1st publication	<u>Apr. 1</u>	19 <u>54</u>	Vol. <u>17</u>	No. <u>1</u>

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

*E. R. M. Smith*  
Publisher

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

829 WORDS @ 63 cents

COST STATEMENT

**FILED**  
MAY 12 1954  
ALICE J. DUCK, Register

*James M. Smith*

Witness my hand and seal this 14th day of May 1954 at Bay Minette, Baldwin County, Alabama

BALDWIN COUNTY,  
STATE OF ALABAMA.

### AFFIDAVIT OF PUBLICATION

BAY MINETTE, ALABAMA

Applicant's Post Office's Post Newspaper

BALDWIN COUNTY

# THE BALDWIN TIMES

HUNT, REGISTER

# W. R. STUART

PROBATE JUDGE

No 2804

Bay Minette, Ala., 4-1-54, 19

Received of Engel & Weissinger

No.		Deed Tax		Mortgage Tax		Recording Fees		Total	
		\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
	Walter A. Beebe, us:							1	50
	Certain Lands								

FOR RECORD

TOTAL \$ 1.50

W.R. Stuart

Judge of Probate.



ENGEL & WEISSINGER

ATTORNEYS AT LAW

~~203XX PARKX BUILDING~~

MOBILE, ALABAMA

VAN ANTWERP BUILDING

March 27, 1954

Mrs. Alice J. Duck  
Register of the Circuit Court  
Baldwin County  
~~Bay Minette, Alabama~~

Re: Walter A. Beegle -vs-  
Certain Lands et al.  
Case # 5219

Dear Mrs. Duck:

Receipt of your letter dated March 23rd, 1954, in re the  
above matter is hereby acknowledged.

In regard to the service to be had on this matter I here-  
with enclose two more copies of the bill to be served on  
the respondents whose addresses are known and also the  
lis pendens for publication in a newspaper in Baldwin  
County to effect service on all respondents whose addresses  
are unknown as well as all unknown parties.

The service on the respondents whose addresses are known  
is to be by registered mail.

Yours very truly,

ENGEL & WEISSINGER

  
MYLAN R. ENGEL

HPE/jg.

NOTICE

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY, CASE NO. 5219, WALTER A. BEEGLE, Complainant, -vs- Lands as described in the Bill of Complaint, and against Gladys Scott, 2437 W. Jackson Boulevard, Chicago, Illinois, and Marshall Scott, 2437 W. Jackson Boulevard, Chicago, Illinois, and all other heirs and next of kin of George W. Scott, deceased, if they be living and against their heirs, devisees, next of kin or assignees, if they be dead, and any other person or persons claiming any title to, interest in, lien or encumbrance on said property or any part thereof, Respondents.

Notice is hereby given that Walter A. Beegle on the 18<sup>th</sup> day of March, 1954, filed a bill of complaint in the Circuit Court of Baldwin County, Alabama, in Equity, claiming to be in the exclusive, actual, peaceable, undisturbed, adverse possession of and claiming to own absolutely and in fee simple the following described land situated in Baldwin County, Alabama, to-wit:

Farm # 8, being the Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast (NE $\frac{1}{4}$ ) Quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less,

Complainant alleges in his bill of complaint that he acquired title to the above described property by and through the following conveyances, viz:-

(1) Warranty deed from Southern Plantation Development Co., by and through its president, C. W. Souther, and its secretary, P. G. Baker, to George W. Scott, dated February 8, 1921 and recorded in Deed Book 50 W.S. page 452. (2). Quitclaim deed from Walter G. Scott and wife, Cecil Maud Scott, to John Henry Buechler dated August 10, 1925 and recorded in Deed Book 56 W.S. page 550. (3). Quitclaim deed from George W. Scott to John Henry Buechler dated August 12, 1925 and recorded in Deed Book 56 W.S. page 549. (4). Quitclaim deed from John Henry Buechler to H. C. Peterson dated February 3, 1937 and recorded in Deed Book 61 W.S. page 401. (5). Quitclaim deed from H. C. Peterson to Walter A. Beegle dated March 5, 1937 and recorded in Deed Book 62 W.S. page 177. All of said references being to the office of the Judge of Probate of Baldwin County, Alabama.

Complainant now avers and states that no person, firm or corporation has at any time for more than ten (10) years next

preceding the filing of this bill of complaint, other than your complainant, and his predecessors in title, paid any taxes upon said land or had any interest therein, nor has any person firm or corporation had any possession of any part of said land, other than your complainant and his predecessors in title, and your complainant further says and avers that no person, firm or corporation is known to him to claim said land or any part thereof, or any interest therein, within a period of more than ten (10) years next preceding the filing of the bill of complaint, except your complainant and his predecessors in title.

The title to said land stands of record in the office of the Judge of Probate of Baldwin County, Alabama, in the name of your complainant, subject only to any claim Gladys Scott and Marshall Scott might have in and to said property by virtue of being heirs at law and next of kin of George W. Scott, deceased, and there appearing no record title out of said persons.

If any person, firm or corporation, or any of the persons named as respondents herein, or their heirs or devisees, claim any title to, interest in, lien or encumbrance upon said land or any part thereof, they must be and appear within the Circuit Court of Baldwin County, Alabama and plead to, answer or demur to the bill of complaint within sixty (60) days from the date of publication of this notice of the filing of said bill, which said sixty days expires on the 1st day of June, 1954, or suffer decrees pro confesso to be taken against them.

IN WITNESS WHEREOF, I the undersigned Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, have hereto set my hand and seal on this the 30th day of March, 1954.

Alice J. Duck  
AS REGISTER OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Walter K. Kuyler  
SOLICITOR FOR COMPLAINANT

STATE OF ALABAMA, BALDWIN COUNTY  
Filed 4-8-54 100 M  
Recorded 4 534 PAGES  
MR. Stewart  
Judge of Probate 5

Probate

3-30-54

APR 1954

4-53-4

R 150

Filed 3-18-54  
Annie French  
Register

ENGEL & WEISSINGER  
ATTORNEYS AT LAW  
VAN ANTWERP BUILDING  
MOBILE, ALABAMA

MYLAN R. ENGEL  
ALAN B. WEISSINGER

August 6, 1954

TELEPHONE  
8-3566

Mrs. Alice J. Duck  
Register in Chancery  
Bay Minette, Alabama

Re: Walter A. Beegle -vs-  
Certain Lands, et al etc.  
5219

Dear Mrs. Duck:

Inclosed herewith is the answer of the guardian ad litem as well as interrogatories and cross-interrogatories to be submitted to Walter A. Beegle. I have made arrangements with the court reporter at Meigs County Courthouse, Pomeroy, Ohio to take the complainant's testimony. Her name is Jean Jones and I request that a commission issue to her for that purpose. Will appreciate it very much if you can get this material off to her right away.

Thanking you, I remain,

Yours very truly,

ENGEL & WEISSINGER

  
MYLAN R. ENGEL

MRE/jg.

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT, IN EQUITY

No. 3219, Term, 19 54

WALTER A. BEEGLE,

Complainant

Vs.

LANDS as described in this bill, and GLADYS SCOTT,  
MARSHALL SCOTT, and all other heirs and next of kin of  
~~GEORGE W. SCOTT, Deceased; if they be living, or their~~ Defendant's  
heirs, devisees, next of kin or assignees, if they be dead,  
(and any other person or persons claiming any interest in said land)

Motion is hereby made for a Decree Pro Confesso against  
Gladys Scott, Marshall Scott, and all other heirs and next of kin of George  
W. Scott, Deceased; if they be living, or their heirs, devisees, next of kin  
or assignees, if they be dead, and against any other person Defendant's  
or persons claiming any interest in and to said land.

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfec-  
tion of publication was made under the order of this Court; and it having been shown by due proof to  
the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer,  
plead or demur to the Bill in this cause, to the date hereof.

This 12th day of August, 19 54.

746 Code

For Complainant

Solicitor.



No. 3219

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT, IN EQUITY**

WALTER A. BEEGLE

Complainant \_\_\_\_\_

**Vs.**

CERTAIN LANDS, et al, eto.

Defendant S

**Motion for Decree Pro Confesso**  
**On Publication**

Filed 8-12, 1954

Deice J. French  
Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

WALTER A. BEEGLE,

Complainant,

No. 3219 VS.

LANDS as described in  
this bill, et al, etc.

Respondents,

ORDER OF SUBMISSION

This cause coming on to be heard, is submitted for decree on the pleadings and on the proof  
as noted.

Dated,

NOTE OF EVIDENCE

At the hearing of this cause the following note of evidence was taken to wit:

FOR COMPLAINANT

1. Original Bill of Complaint
2. Testimony of Walter A. Beegle, George W. Engel and  
E. S. Tunstall.
3. Proof of Publication
4. Decree pro confesso

FILED,

8-25-34

*Walter A. Beegle*

Register

ENGEL & WEISSBARGER

BY:

*Walter A. Engel*  
Solicitor-for Complainant

Answer of Guardian ad Litem and Attorney ad Litem.

FOR RESPONDENT

*Edmund R. Cannon, Jr.*  
Edmund R. Cannon, Jr.

"NONE"

*Edmund R. Cannon, Jr.*  
Solicitor-for Respondent

*Guardian ad Litem  
v. aing ad Litem.*

WALTER A. BEEGLE,

Complainant,

-vs-

LANDS as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (and any other person or persons claiming any interest in and to said Land.)

Respondents,

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA, IN EQUITY,

IN REM. NO. 5219

Comes Edmund R. Cannon, Jr., attorney, and accepts the appointment by this Court of him as guardian ad litem for all unknown defendants in this proceeding and also as attorney ad litem for any defendants in this proceeding who may be in the Armed Forces of the United States of America.

Edmund R. Cannon, Jr.

Comes Edmund R. Cannon, Jr., attorney, as guardian ad litem for all unknown defendants in this cause, and attorney ad litem for any defendants in this cause who may be in the Armed Forces of the United States of America, and for answer to the bill of complaint filed in this cause says: He denies each and every allegation of the bill of complaint and demands strict proof thereof.

Edmund R. Cannon, Jr.

FILED

8-9-54

ALICE J. DUCK, Register

FILED  
AUG 9 1954  
ALICE J. DUCK, Register

The State of Alabama, Baldwin County

## IN CIRCUIT COURT, IN EQUITY

## To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Gladys Scott, Marshall Scott, Walter G. Scott, and G. Wells Scott

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

Walter A. Beegle

against lands as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (and any other person or persons claiming any interest in and to the said land)

Herein fail not. Due return make of this writ as the law directs.

Witness this 18th day of March, 1954

Walter A. Beegle, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

Code 1923-6528-6529

202K 015 PAGE 328



# The State of Alabama

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY

WALTER A. BEEGLE

vs.

CERTAIN LANDS

## SUMMONS

Returned by the Sheriff and filed in office, this

the 18th day of March, 1914.

W. A. Beeogle, Register.

Received in office, this the \_\_\_\_\_ day of

19\_\_\_\_

\_\_\_\_\_, Sheriff.

I have executed the within by leaving a copy thereof with \_\_\_\_\_

defendant named herein, on this the \_\_\_\_\_

day of \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff.

By \_\_\_\_\_, Deputy.

WALTER A. BEEGLE,

Complainant,

-vs-

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY, IN REM.

NUMBER \_\_\_\_\_.

Lands as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assigns, if they be dead, ( and any other person or persons claiming any interest in and to the said land).

Respondents,

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

Now comes Walter A. Beegle, your complainant in the above styled cause, and respectfully represents and shows unto Your Honor as follows:

## ONE

That your complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama.

## TWO

That the land in controversy is located in Baldwin County, Alabama, and is more particularly described as follows:

Farm # 6, being the Southeast (SE $\frac{1}{4}$ ) quarter of the Northeast (NE $\frac{1}{4}$ ) quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less,

and the complainant in his own right claims to own all of the rights, title and interest to said land in its entirety. Complainant avers that he is in actual and peaceful possession of said land and has been in such possession since, to-wit, the 3rd day of March 1937, and brings this bill under the provisions of Chapter 32, Article 2, Title 7 of the 1940 Code of Alabama as amended, to quiet the title to said described property and to resolve, determine and clear up all doubts and disputes concerning the said land.

## WHEREAS

The title to said land stands upon the records of the office of the Judge of Probate of Baldwin County, Alabama, in the name of said complainant by virtue of that certain quitclaim deed dated March 3rd, 1937, and recorded in Deed Book 62 W. S. Page 177, of the Probate Court records of Baldwin County, Alabama, executed by H. C. Peterson in favor of your complainant; and complainant alleges that the said H. C. Peterson acquired title to said parcel of real property by virtue of that certain quitclaim deed dated February 3rd, 1937, and recorded in Deed Book 61 W. S. Page 401, of the Probate Court records of Baldwin County, Alabama, and executed by John Henry Buechler and in favor of H. C. Peterson; and complainant further avers that John Henry Buechler acquired title to said parcel of real property by virtue of that certain quitclaim deed in his favor dated August 10th, 1925, and recorded in Deed Book 56 W. S. Page 550, executed by Walter G. Scott and his wife, Cecil Maud Scott, and also by another quitclaim deed dated August 12th, 1925, executed by George W. Scott in favor of John Henry Buechler, which deed is recorded in Deed Book 56 W. S. Page 549, both deeds of record in the office of the Judge of Probate of Baldwin County, Alabama; and complainant further avers and shows that George W. Scott and Walter G. Scott acquired their interest in that certain parcel of real property by virtue of being heirs at law, next of kin and distributees of one George W. Scott, deceased, who died intestate on, to-wit, December 18th, 1921; and complainant further avers and shows that the said George W. Scott, deceased, acquired title to said parcel of real property by virtue of that certain warranty deed dated February 8th, 1921, and recorded in Deed Book 50 W. S. Page 452, of the Probate Court records of Baldwin County, Alabama, and executed by Southern Plantation Development Co., by and through its president, C. M. Souther, and its secretary, P. G. Baker, in favor of the said George W. Scott, Deceased.

Complainant further shows that he and the parties from whom he derived title have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property more than ten years next immediately preceding the filing of the bill of complaint in this cause.

## FIVE

Complainant further shows that he and those through whom he claims title have regularly assessed the said parcel of real property and paid taxes thereon more than ten consecutive years next immediately preceding the filing of this bill of complaint in this cause, and that no one else has paid the taxes on said property or any part thereof within said period.

## SIX

Complainant further shows that no person has had possession of any part of said property either actually or constructively for more than ten years immediately preceding the filing of this bill of complaint other than himself and those through whom he has derived title.

## SEVEN

Complainant further shows and avers that he does not know of anyone or any person who claim said land, any title to, interest in, lien or encumbrance thereon, or any part thereof; complainant has obtained an abstract of title which shows that the only possible claimants according to said abstract, are the heirs at law, next of kin and distributees of George W. Scott, deceased, if they be living, or their heirs at law, next of kin, devisees and legatees, if they be deceased.

So far as complainant can determine by diligent search and inquiry: Gladys Scott, widow, 2437 W. Jackson Boulevard, Chicago, Illinois; Marshall Scott, a son, 2437 W. Jackson Boulevard, Chicago, Illinois; Walter G. Scott, a son, 2418 W. Jackson Boulevard, Chicago, Illinois; and G. Wells Scott, (also believed

to be known as George W. Scott,) a son, 2437 W. Jackson Boulevard, Chicago, Illinois, all of whom are over the age of twenty-one years are the heirs at law of George W. Scott, deceased.

HIGHT

Complainant further shows that there is no suit pending to test their title to, interest in or right to possession of the lands herein described.

THE PREMISES CONSIDERED, Complainant files this his verified bill of complaint against all the possible claimants hereinbefore set out and against the said land as described herein, and against any and all persons claiming any title to, interest in, lien or encumbrance upon said land, or any part thereof, and to establish his right or title to said land, and to clear up all doubts or disputes concerning the same; and complainant prays that the said parties hereinabove named shall be made respondents to this bill of complaint and that process be served on them or publication be made requiring them to plead, answer or demur to the same within the time required by law or decrees pro confesso may be entered against them; and complainant further prays that a guardian ad litem be appointed to defend the interests of all the respondents whose identity is unknown; and prays that this Court will make and enter all orders, judgments and decrees that may be meet and proper in the premises, and that upon a final hearing of this cause, will decree that the complainant, Walter A. Beegle, is the owner of said lands, and has a fee simple title thereto free and clear of all liens and encumbrances, and that no other person or persons has any estate or interest in or encumbrance on such land or any part thereof.

Complainant further prays for such other, further and different relief as it may appear to this Honorable Court to be just and equitable.

Walter A. Beegle  
Walter A. Beegle, Complainant-



STATE OF Ohio )  
COUNTY OF Meigs )

BOOK 315 PAGE 327

Before me, Frank Cleland a notary public  
in and for said county and State, personally appeared Walter A.  
Beegle, who is known to me and who being by me first duly sworn,  
deposes and says that he is the complainant in the above styled  
cause, that he has read the above bill, knows the contents thereof,  
and that the statements of facts contained therein are true.

Walter A. Beegle  
Walter A. Beegle, Complainant.

Sworn to and Subscribed before me  
this 12 day of Mar 1954.

Frank Cleland  
Notary Public.

My commission expires 12 day of Feb 1957.

FILED

3-18-54

ALICE J. DUCK, Register

no 3219

FILED

MAR 18 1954

ALICE J. DUCK, Clerk

WALTER A. BEEGLE,

Complainant,

-vs-

LANDS as described in this  
bill, et al, etc.,

Respondents,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY, IN REM, NO. 3219.

ORDER APPOINTING GUARDIAN AD LITEM AND ATTORNEY AT LITEM

This cause is submitted on the Complainant's motion for the appointment of a Guardian Ad Litem and an Attorney Ad Litem, upon consideration, it is ordered, adjudged and decreed by the Register in Chancery of said Court that Edmund R. Cannon, Jr., who is a practicing attorney of the Mobile Bar, be and hereby is appointed Guardian Ad Litem for the unknown Defendants to represent them throughout this proceeding, and also Attorney Ad Litem for any of the Defendants who may be in the Armed Forces of the United States of America.

Dated Aug 2, 1954.

Deise J. Leuck  
Register in Chancery

WALTER A. BEEGLE,	{	IN THE CIRCUIT COURT
Complainant,	{	OF BALDWIN COUNTY,
-vs-	{	ALABAMA, IN EQUITY,
LANDS as described in this	{	IN REM. No. <u>3219</u> .
bill and GLADYS SCOTT,	{	
MARSHALL SCOTT, and all other	{	
heirs and next of kin of	{	
GEORGE W. SCOTT, Deceased;	{	
if they be living, or their	{	
heirs, devisees, next of kin	{	
or assignees, if they be dead,	{	
(and any other person or persons	{	
claiming any interest in and to	{	
said land.)	{	
Respondents,	{	

D E C R E E

This cause coming on to be heard upon the Bill of Complaint; the answer of the Guardian ad litem and Attorney ad Litem; the testimony of Walter A. Beegle, George W. Engel and E. S. Tunstall; proof of publication and decree pro confesso; and more than sixty days having elapsed from the publication of notice, a certified copy of said notice having been filed in the Probate Court of Baldwin County, Alabama; and the same being at issue and being a cause IN REM against certain lands in the County of Baldwin, State of Alabama, and against the Respondents named in said Bill of Complaint, whose addresses are unknown and cannot be ascertained after diligent search, and against any and all person or persons, firms or corporations, claiming any title to, interest in, lien or encumbrance on, said real property or any part thereof.

And it further appearing to the satisfaction of the Court from the pleadings and proof that Complainant is entitled to the relief sought by said bill; IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by this Court that the Complainant, Walter A. Beegle, is the owner in fee simple in and to the following described real property in the County of Baldwin, State of Alabama, to-wit:

Farm No. 8, being the Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast (NE $\frac{1}{4}$ ) Quarter of Section Thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by this Court that neither Gladys Scott, Marshall Scott, Walter G. Scott and G. Wells Scott; nor

any other person or persons, firm or corporation, have any title to, interest in, lien or encumbrance on, said real property or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by this Court that a certified copy of this decree be recorded in the Probate Court of Baldwin County, Alabama, and that the direct Indices in said Court show the names of ~~Gladys Scott, Marshall Scott, Walter G. Scott and G. Wells Scott~~; and that said Decree shall be listed in the Indirect Indices in the name of Walter A. Beegle.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by this Court that the sum of \$25.00 is a reasonable fee to be allowed to Edmund R. Cannon, Jr., as Guardian ad Litem and Attorney ad Litem in the within cause, which shall be taxed as costs, and the Complainant is hereby taxed with the cost of this proceeding, including the cost of recording a copy of this Decree in the Probate Court of Baldwin County, Alabama, for which costs let execution issue.

IN TERM TIME, this 27 day of August, 1954.

Hubert M. Wiley, JUDGE.

FILED  
AUG 27 1954

ALICE J. DUCK, Register



ENGEL & WEISSINGER  
ATTORNEYS AT LAW  
VAN ANTWERP BUILDING  
MOBILE, ALABAMA

MYLAN R. ENGEL  
ALAN B. WEISSINGER

July 30, 1954

TELEPHONE  
8-3566

Mrs. Alice J. Duck  
Register in Chancery  
Bay Minette, Alabama

In Re: Walter A. Beegle -vs-  
Certain Lands, et al,  
etc, # 3219.

Dear Mrs. Duck:

Attached hereto is a demand for oral examination of certain witnesses for the above styled cause as well as another order for the appointment of a guardian ad litem which is prepared for your signature. If Judge Hall has had an opportunity to make the appointment already then please disregard the inclosed order.

I wish to take testimony of the Complainant by interrogatories since he is presently out of the State; however, I cannot proceed until the guardian ad litem is appointed. I will appreciate your cooperation in this matter. Also will appreciate the commission for the taking of oral examination soon as possible.

Yours very truly,

ENGEL & WEISSINGER

  
MYLAN R. ENGEL

MRE/jg.

WALTER A. BEEGLE,

Complainant,

vs.

LANDS as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (And any other person or persons claiming any interest in and to said land.)

Respondents.

IN THE CIRCUIT

COURT OF BALDWIN

COUNTY, ALABAMA.

IN EQUITY, IN REM.

NO. 3219

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT:

DEPOSITION of Walter A. Beegle, taken before me, a Notary Public in and for Meigs County, Ohio, and Commissioner appointed by the Circuit Court, Baldwin County, The State of Alabama, in a cause pending in the Circuit Court of Baldwin County, State of Alabama, wherein Walter A. Beegle is Complainant, and Certain Lands et als are Respondents, to be material evidence for the Complainant on the trial of the aforesaid cause.

ANSWERS TO INTERROGATORIES TO WALTER A. BEEGLE

1. Walter A. Beegle, present address Racine, Ohio, R. D. 1.
2. Yes.
3. Yes.
4. I am a resident there but am temporarily absent.
5. I was.
6. Yes.
7. Yes.
8. March 3, 1937.
9. Purchased it from H. C. Peterson by a quitclaim deed.
10. I did. Yes.

11. Yes.
12. Fenced it in, paid taxes, cut timber off the land, growing soybeans, corn and other crops throughout the years, maintained fences around the property during all this time, pastured the cows after the crops were harvested.
13. No.
14. No.
15. No.
16. Yes.
17. (a) Yes.  
(b) Yes.
18. Yes.
19. No.
20. No.
21. No.
22. Yes.
23. No.

ANSWERS TO CROSS INTERROGATORIES TO WALTER A. BEEGLE:

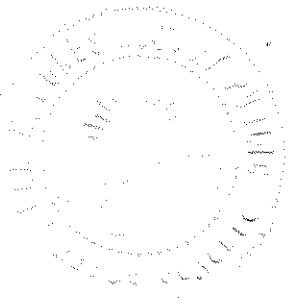
1. It is.
2. It has been maintained, and it was built around 1940, don't know the exact date or exactly when it was built.
3. It has. Yes.
4. 1940.
5. No.
6. Yes, it has been assessed and paid.
7. No.

The State of Ohio, )  
Meigs County, ) SS.

I, Jean K. Jones, a Notary Public in and for the County and State aforesaid, and Commissioner appointed by the Circuit Court, Baldwin County, Alabama, do hereby certify that the above named

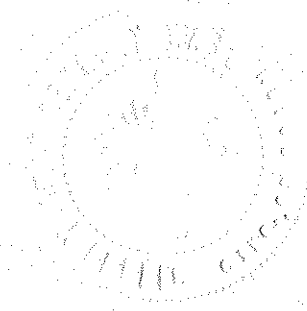
Walter A. Beegle was by me first severally sworn to testify the truth, the whole truth and nothing but the truth, and that the Deposition by him given, as above set forth, was reduced to writing by myself. I do further certify that I am not counsel, attorney or relative of either party or otherwise interested in the event of this suit.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office this 20th day of August, 1954.



Jean K. Jones  
Notary Public in and for Meigs  
County, Ohio, and Commissioner  
appointed by the Circuit Court,  
Baldwin County, Alabama.

1954  
AUG 20  
BALDWIN COUNTY, ALA.  
JEAN K. JONES  
NOTARY PUBLIC



of office this 20th day of August, 1954.

Respectfully submitted,  
SIGNED: ALICE J. BECK, Register  
ALICE J. BECK, Register

under oath and otherwise represented in the event of this writ.  
so further certify that I am not counsel, attorney or relative of  
him given, as above set forth, was reduced to writing by myself. I  
the whole truth and nothing but the truth, and that the Deposition of  
Walter A. Beagle was by me taken severally known to exactly the truth.

**FILED**  
AUG 24 1954  
ALICE J. BECK, Register

ENGEL & WEISSINGER  
ATTORNEYS AT LAW  
VAN ANTWERP BUILDING  
MOBILE, ALABAMA

MYLAN R. ENGEL  
ALAN B. WEISSINGER

August 13, 1964

TELEPHONE  
8-3566

Mrs. Alice J. Duck, Register  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Re: Walter A. Beegle  
-vs-  
Certain Lands, et al

Dear Mrs. Duck:

Enclosed herewith is our motion for decree pro confesso on publication as well as the decree for your signature. Also enclosed is the testimony of the two witnesses named in the commission issued to Fred M. Kroner, Jr.

As soon as the answers to the interrogatories sent to the complainant in Ohio are received please let me know and I shall prepare the decree and send you the costs.

With best regards, I remain,

Yours very truly,

ENGEL & WEISSINGER

  
MYLAN R. ENGEL

MRE/jg.



WALTER A. BEEGLE

Complainant

No. 3219 Vs.

Certain Lands, et al.

Defendant

BALDWIN  
CIRCUIT COURT OF MOBILE  
COUNTY, ALABAMA  
IN EQUITY

DEMAND FOR ORAL EXAMINATION

The State of Alabama, }  
Baldwin Mobile County

The Complainant requests the oral examination of the following named witnesses  
on his behalf, viz: George W. Engel, Summerdale, Ala.  
E. S. Tunstall, Tax Assessor, Bay Minette, Ala.

said witnesses reside in the County of Baldwin, State of Alabama

Fred M. Kroner, Jr. who reside at 2575 Skylark Bld., Mobile, Ala.

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

Filed  
Alice J. Duck,  
JAMES A. CRANE, Register.

  
Solicitor for

Complainant

No. 3219

**CIRCUIT COURT OF MOBILE COUNTY,**  
**Bay Minette, Alabama**

WALTER A. BECKLE

Vs.

CERTAIN LANDS, ET AL,

**DEMAND FOR ORAL EXAMINATION**

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Fred M. Kroner, Jr.

2575 Skylark Bld.

Mobile, Alabama

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 George W. Engel, Summerdale, Alabama and  
E. S. Tunstall, Tax Assessor, Bay Minette, Alabama

as witnesses in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Walter A. Beegle

Complainant  
and Certain Lands et als

Respondent

on oath, to be by you administered, upon them  
to take and certify the deposition es of the witness es and return the same to our Court, with all  
convenient speed, under your hand.

Witness 2nd day of August, 1945

Walter A. Beegle  
Register.

Commissioner's Fee, \$ 10.00

Witness' Fees, \$

No. 3219

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

WALTER A. BEMBLE

Complainant—

VS.

CERTAIN LANDS, et al, etc.

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Fred M. Kroner, Jr.

WITNESSES:

George W. Engel

E. S. Tunstall

THE STATE OF ALABAMA, }

CIRCUIT COURT, IN EQUITY

Baldwin County

No. 3219

Term, 19 54

WALTER A. BEEGLE

Complainant

Vs.

Lands as described in this bill, and Gladys Scott, et al, etc  
Defendant s

In this cause it appears to the Register \_\_\_\_\_ that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, in the Baldwin Times, a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the \_\_\_\_\_ day of \_\_\_\_\_, 194\_\_\_\_ and \_\_\_\_\_

And it now further appearing to the Register Alice J. Duck, that the said Gladys Scott, Marshall Scott, and all other heirs and next of kin of George W. Scott, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, and any other person or persons claiming any interest in and to said land,

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register Alice J. Duck that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Gladys Scott, Marshall Scott, and all other heirs and next of kin of George W. Scott, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, and against any other person or persons claiming any interest in and to said land.

This 12<sup>th</sup> day of Aug, 1954.

Alice J. Duck, Register.

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT, IN EQUITY

WALTER A. BEEGLE

Vs.

Certain Lands, et al, etc.

Decree Pro Confesso of Publication

Issued , 19

Register.

Recorded in Record

Vol. Page

Register.



ENGEL & WEISSINGER  
ATTORNEYS AT LAW  
VAN ANTWERP BUILDING  
MOBILE, ALABAMA

MYLAN R. ENGEL  
ALAN B. WEISSINGER

August 24, 1954

TELEPHONE  
8-3566

Mrs. Alice J. Duck  
Register of Circuit Court  
Baldwin County  
Bay Minette, Alabama

Re: Walter A. Beegle, -vs-  
Certain Lands, et al,  
etc, No. 3219.

Dear Mrs. Duck:

Enclosed herewith are three copies of the decree in the above entitled cause, along with a note of evidence, and our check to cover costs.

Please return two copies of the decree to me unless you need more than one. If you notice I included in the decree a Guardian ad litem fee of \$25.00 which is the usual fee here in Mobile. Hope thats agreeable with you.

Thank you so much for your call this morning. Appreciate your help in this matter very much.

Sincerely Yours,

ENGEL & WEISSINGER

  
MYLAN R. ENGEL

MRE/jg.  
Encl.

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Jean Jones  
Meigs County Court House  
Pomeroy, Ohio

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 Walter A. Beegle

as witnesses in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

Walter A. Beegle

\_\_\_\_\_, Complainant  
and Certain Lands et als

\_\_\_\_\_, Respondent

on oath, to be by you administered, upon him  
to take and certify the deposition of the witness and return the same to our Court, with all  
convenient speed, under your hand.

Witness 9th day of August, 1954

Commissioner's Fee, \$ 7.50

Witness' Fees, \$ \_\_\_\_\_

Alvin J. Smith  
Register.

INTERROGATORIES

WALTER A. BEEGLE,	I	IN THE CIRCUIT
Complainant,	I	COURT OF BALDWIN
-vs-	I	COUNTY, ALABAMA.
LANDS as described in this	I	IN EQUITY, IN REM.
bill, and GLADYS SCOTT,	I	
MARSHALL SCOTT, and all other	I	NO. <u>3219</u>
heirs and next of kin of	I	
GEORGE W. SCOTT, Deceased;	I	
if they be living, or their	I	
heirs, devisees, next of kin or	I	
assignees, if they be dead,	I	
(and any other person or persons	I	
claiming any interest in and to	I	
said land.)	I	
Respondents,	I	
	I	

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT

Now comes the Complainant and propounds interrogatories to Walter A. Beegle, a witness whose testimony, when taken, will be material evidence for the Complainant on the trial of the above cause.

Interrogatories to Walter A. Beegle:

1. State your name and address.
2. Are you over the age of twenty-one years?
3. You are the complainant in this action?
4. Are you now a resident of the County of Baldwin, State of Alabama?
5. Were you a resident of the County of Baldwin, State of Alabama at the time of the filing of this bill of Complaint?
6. Are you the owner of that certa in real property located in Baldwin County, State of Alabama, described as Farm #8, being the Southeast ( $SE\frac{1}{4}$ ) Quarter of the Northeast ( $NE\frac{1}{4}$ ) Quarter of Section thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less?
7. Is that real property described in #6 above the same property set forth in this bill of complaint?
8. When did you acquire said property?
9. How did you acquire said property?
10. Did you take actual possession of said property immediately after you acquired it?

11. Have you remained in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property since that time?

12. State what, if anything, that you have done to indicate that you have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said land since you acquired it?

13. Has anyone else been in possession of said land or any part thereof since the date that you acquired it?

14. From the date that you acquired said property until the present time has anyone disputed your title to or your possession of said land?

15. Has anyone, other than yourself, claimed any interest in said land since you acquired it?

16. Did you regularly assess said property for taxes since you acquired it?

17.(a) Did you pay the taxes on said property since the date that you acquired it?

(b) If answer to (a) is yes, did you pay the taxes thereon consecutively since you acquired it?

18. Do the taxes which you have paid constitute more than ten years' taxes on said property?

19. Has anyone else paid taxes on said property or on any part thereof during said period?

20. Has anyone, other than yourself, been in possession of said property, either actually or constructively, within ten years immediately preceding the date of the filing of this bill of complaint?

21. Do you know of anyone or any person, other than yourself, who claims said land, or any title to, interest in, lien or incumbrance on said property?

22. At the time of the filing of this bill of complaint did the record title to said property stand in your name?

23. Is there any suit now pending to test your title, interest in, or right to possession of said land?

State of Alabama )

Baldwin County )

Before me, Walter J. Lee, a Notary Public in and for said State and County, personally appeared Mylan R. Engel, who being by me first duly sworn deposes and says: That he is the agent and attorney for the complainant, Walter A. Beegle; that the witness whose testimony is to be taken is absent from the State of Alabama, presently residing in RFD-1 Racine, Ohio; that the Witness, Walter A. Beegle, is a material witness for the Complainant and his evidence to be secured by this deposition will be material evidence for the Complainant on the trial of this cause.

Mylan R. Engel  
Attorney for Complainant

Sworn to and subscribed before me this 5<sup>th</sup> day of August, 1954.

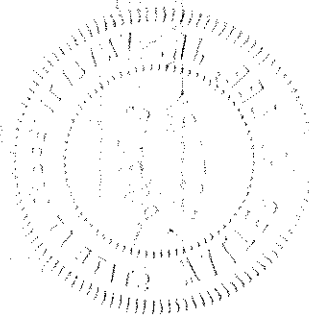
Walter J. Lee  
Notary Public, Alabama State at Large  
My Commission expires 3/1/58

The name of Jean Jones, Meigs County Courthouse, Pomeroy, Ohio, is suggested as a fit and suitable person to take down the answers to the foregoing interrogatories, and it is requested that a commission issue to her for that purpose.

Mylan R. Engel  
Attorney for Complainant



FILED  
AUG 9 1954  
ALICE J. DUCK, Clerk



CROSS INTERROGATORIES

WALTER A. BEEGLE,	Ø	IN THE CIRCUIT COURT
Complainant,	Ø	
-vs-	Ø	OF BALDWIN COUNTY,
LANDS as described in this	Ø	ALABAMA, IN EQUITY,
bill, and GLADYS SCOTT,	Ø	
MARSHALL SCOTT, and all other	Ø	IN REM. NO. <u>3219</u>
heirs and next of kin of	Ø	
GEORGE W. SCOTT, Deceased;	Ø	
if they be living, or their	Ø	
heirs, devisees, next of kin	Ø	
or assignees, if they be dead,	Ø	
(and any other person or persons	Ø	
claiming any interest in and to	Ø	
said land.)	Ø	
Respondents,	Ø	

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT:

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Now comes Edmund R. Cannon, Jr., as guardian ad litem for for all unknown defendants in this proceeding and also as attorney ad litem for any defendants in this proceeding who may be in the armed Forces of the United States of America, and propounds the following cross-interrogatories to Walter A. Beegle:

Cross Interrogatories to Walter A. Beegle:

1. Is all of this property that you are quieting title to now under fence?
2. If cross-interrogatory number 1 is answered in the affirmative, when was this fence built and has this fence been maintained since the same was built?
3. Has any part of this land been cultivated by you since you acquired the same?
4. If cross-interrogatory number 3 is answered in the affirmative, state when same was first cultivated by you.
5. Do you know any of the respondents in this cause?
6. Has this property or any part thereof been assessed for taxes in your name every year since you purchased same?
7. Has anyone else paid any taxes on this property or any part thereof except you, since you purchased same?

*Edmund R. Cannon, Jr.*  
Edmund R. Cannon, Jr., Guardian ad litem  
and Attorney ad litem.

FILED

AUG 9 1954

ALICE J. DUCK, Clerk


COMMISSIONER'S CERTIFICATE

I, Fred M. Kroner, Jr., Commissioner named in the annexed Commission out of the Circuit Court of Baldwin County, Alabama, Equity Division, No. 3219, dated August 2nd, 1954, in case of Walter A. Beegle vs. LANDS as described in this bill, and Gladys Scott, Marshall Scott, and all other heirs and next of kin of George W. Scott, deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (and any other person or persons claiming any interest in and to said land.), caused George W. Engel who is known to me to be the same identical witness named in the attached commission to come before me in the office of Engel & Weissinger, 915 Van Antwerp Building, Mobile, Alabama, on August 5th, 1954; and I caused E. S. Tunstall to appear before me at the office of the Tax Assessor for Baldwin County, Bay Minette, Alabama, on August 12, 1954; that said witnesses were duly sworn by me to testify to the whole truth; that each testified as such testimony is set down; that the testimony was by me reduced to writing; <sup>and</sup> that it was subscribed by the witnesses in my presence, after having been first read over to them.

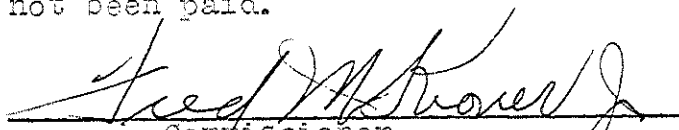
I further certify that I am not of kin or of counsel to <sup>and</sup> any party to the suit, that I am not in any manner interested in the results thereof.

I further certify that each of said witnesses read the testimony and each signed the same in my presence.

Witness my hand this the 13th day of August, 1954.

  
\_\_\_\_\_  
Commissioner,

My Commissioner's fee of \$10.00 has not been paid.

  
\_\_\_\_\_  
Commissioner.

On Direct Examination, E. S. Tunstall, testified as follows:

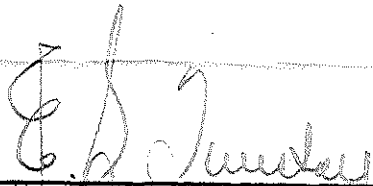
My name is E. S. Tunstall and I am Tax Assessor for Baldwin County, Alabama, and as such have access to all of the real estate assessments affecting property in Baldwin County, Alabama.

I have examined the records in the office of the Baldwin County Tax Assessor with reference to:

Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast (NE $\frac{1}{4}$ ) Quarter  
of Section thirty-four (34), Township Six (6) South,  
Range four (4) East, containing forty acres more or less,

and I find the following:

From the year 1944 through the year 1954, inclusive, this tract of land, according to such records, are assessed in the name of WALTER A. BEEGLE and for such period of time I do not find that any other person or persons were assessing said tract of land for taxation.



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E. S. Tunstall, Tax Assessor.

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Register

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On direct examination by Mylan R. Engel, Solicitor for Complainant, the witness, GEORGE W. ENGEL, after first being duly sworn, testified as follows:

My name is George W. Engel, and I am over the age of 21 years, and a bona fide resident citizen of Baldwin County, Alabama.

The Complainant is my Father-in law. I am very familiar with the property in the Bill of Complaint, filed by the Complainant, and described as Farm #8, being the Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast (NE $\frac{1}{4}$ ) Quarter of Section thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less. I have been familiar with this property ever since the Complainant purchased it on March 3, 1937, from H. C. Peterson. Shortly after the Complainant purchased the property, I recall that he put a fence around the entire tract. A portion of this land has been cultivated for several years now, and all of it has been pastured after the crops were harvested each season. The Complainant has always been held out to be the true owner of this land, and no one has ever disputed his title to this property. I have lived in the community where the land is located and have often passed by this property, and I know of my own knowledge that no one, other than the Complainant, has ever been in possession of said land, either actually or constructively since the day the Complainant purchased it. I further know that no one other than the Complainant claims this land or any title to, interest in, lien or incumbrance on this property. In fact, ever since the Complainant purchased it, which has been some seven-teen odd years ago, I have never heard of anyone making any claim to this land. The Complainant has told me that he has assessed this property for taxes each and every year, since he bought it. He has further told me that he has kept taxes paid up on this property each and every year since he purchased it.

  
George W. Engel

On cross-examination by Edmund R. Cannon, as Guardian ad Litem for unknown Defendants and Attorney ad Litem for any of the Defendants who may be in the Armed Forces of the United States of America, the witness testified as follows:

I have been familiar with the property ever since the Complainant purchased it, and I recall when he put a fence around all of the land, shortly after he purchased it. This fence has been maintained and kept in good repair since it was originally put on the property. A portion of the property is under cultivation and has been cultivated for more than 10 years.

George W. Engel

CROSS INTERROGATORIES

WALTER A. BEEGLE,

Complainant,

-vs-

LANDS as described in this  
bill, and GLADYS SCOTT,  
MARSHALL SCOTT, and all other  
heirs and next of kin of  
GEORGE W. SCOTT, Deceased;  
if they be living, or their  
heirs, devisees, next of kin  
or assignees, if they be dead,  
(and any other person or persons  
claiming any interest in and to  
said land.)

Respondents,

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA, IN EQUITY,

IN REM. NO. 3219

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT:

Now comes Edmund R. Cannon, Jr., as guardian ad litem for  
for all unknown defendants in this proceeding and also as attorney  
ad litem for any defendants in this proceeding who may be in the  
armed Forces of the United States of America, and propounds the  
following cross-interrogatories to Walter A. Beegle:

Cross Interrogatories to Walter A. Beegle:

1. Is all of this property that you are quieting title  
to now under fence?
2. If cross-interrogatory number 1 is answered in the  
affirmative, when was this fence built and has this  
fence been maintained since the same was built?
3. Has any part of this land been cultivated by you  
since you acquired the same?
4. If cross-interrogatory number 3 is answered in the  
affirmative, state when same was first cultivated by  
you.
5. Do you know any of the respondents in this cause?
6. Has this property or any part thereof been assessed  
for taxes in your name every year since you purchased  
same?
7. Has anyone else paid any taxes on this property or  
any part thereof except you, since you purchased same?

*Edmund R. Cannon, Jr.*  
Edmund R. Cannon, Jr., Guardian ad litem  
and Attorney ad litem.

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to the fact that the Government is not prepared to take any action against the Government of the United States.

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and it deserves a good professional review. It  
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Woy

20. For each of the following, write a sentence or two explaining why you think the person is or is not a good person.

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED  
DATE 08-19-2010 BY 60322 UCBAW

To Hartford And no more! The day ate groggy and  
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INTERROGATORIES

WALTER A. BEEGLE,		IN THE CIRCUIT
Complainant,		COURT OF BALDWIN
-vs-		COUNTY, ALABAMA.
LANDS as described in this		IN EQUITY, IN REM.
bill, and GLADYS SCOTT,		
MARSHALL SCOTT, and all other		NO. <u>3219</u>
heirs and next of kin of		
GEORGE W. SCOTT, Deceased;		
if they be living, or their		
heirs, devisees, next of kin or		
assignees, if they be dead,		
(and any other person or persons		
claiming any interest in and to		
said land.)		
Respondents,		

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT

Now comes the Complainant and propounds interrogatories to Walter A. Beegle, a witness whose testimony, when taken, will be material evidence for the Complainant on the trial of the above cause.

Interrogatories to Walter A. Beegle:

1. State your name and address.
2. Are you over the age of twenty-one years?
3. You are the complainant in this action?
4. Are you now a resident of the County of Baldwin, State of Alabama?
5. Were you a resident of the County of Baldwin, State of Alabama at the time of the filing of this bill of Complaint?
6. Are you the owner of that certa in real property located in Baldwin County, State of Alabama, described as Farm #8, being the Southeast (SE $\frac{1}{4}$ ) Quarter of the Northeast (NE $\frac{1}{4}$ ) Quarter of Section thirty-four (34), Township Six (6) South, Range Four (4) East, containing forty acres more or less?
7. Is that real property described in #6 above the same property set forth in this bill of complaint?
8. When did you acquire said property?
9. How did you acquire said property?
10. Did you take actual possession of said property immediately after you acquired it?

11. Have you remained in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said property since that time?

12. State what, if anything, that you have done to indicate that you have been in actual, peaceable, undisturbed, open, notorious, continuous, adverse possession of said land since you acquired it?

13. Has anyone else been in possession of said land or any part thereof since the date that you acquired it?

14. From the date that you acquired said property until the present time has anyone disputed your title to or your possession of said land?

15. Has anyone, other than yourself, claimed any interest in said land since you acquired it?

16. Did you regularly assess said property for taxes since you acquired it?

17.(a) Did you pay the taxes on said property since the date that you acquired it?

(b) If answer to (a) is yes, did you pay the taxes thereon consecutively since you acquired it?

18. Do the taxes which you have paid constitute more than ten years' taxes on said property?

19. Has anyone else paid taxes on said property or on any part thereof during said period?

20. Has anyone, other than yourself, been in possession of said property, either actually or constructively, within ten years immediately preceding the date of the filing of this bill of complaint?

21. Do you know of anyone or any person, other than yourself, who claims said land, or any title to, interest in, lien or incumbrance on said property?

22. At the time of the filing of this bill of complaint did the record title to said property stand in your name?

23. Is there any suit now pending to test your title, interest in, or right to possession of said land?



Page 3

State of Alabama )

Baldwin County )

Before me, Walter J. Lee, a Notary Public in and for said State and County, personally appeared Mylan R. Engel, who being by me first duly sworn deposes and says: That he is the agent and attorney for the complainant, Walter A. Beegle; that the witness whose testimony is to be taken is absent from the State of Alabama, presently residing in RFD-1 Racine, Ohio; that the Witness, Walter A. Beegle, is a material witness for the Complainant and his evidence to be secured by this deposition will be material evidence for the Complainant on the trial of this cause.

  
Attorney for Complainant

Sworn to and subscribed before me this 5th day of August, 1954.

  
Notary Public, Alabama State at Large  
My Commission expires 3/15/58

The name of Jean Jones, Meigs County Courthouse, Pomeroy, Ohio, is suggested as a fit and suitable person to take down the answers to the foregoing interrogatories, and it is requested that a commission issue to her for that purpose.

  
Attorney for Complainant

~~Approved for Complaint~~  
*[Signature]*

ed that a commission issue to her for that purpose.  
The answers to the foregoing interrogatories, and if it is requested  
Ohio, is suggested as a fit and suitable person to take down  
the name of Jess Jones, wife County Commissioner, formerly,

~~My Commission expires~~  
~~Robert L. Dillio, Vice-Chief Clerk of the~~  
*[Signature]*

Sworn to and subscribed before me this 24 day of August, 1954.

~~Approved for Complaint~~  
*[Signature]*

first of this cause.

Position will be satisfied evidence for the Complaint on the  
for the Complaint and its evidence to be secured by this day

**FILED**

AUG 9 1954

ALICE J. DUCK, Register

Ohio; that the witness, Walter W. Deagle, is a married witness

the State of Indiana, presently residing in Shelby County,

that the witness whose testimony is to be taken is absent from

the agent and attorney for the Complaint, Walter W. Deagle;

who being by me first duly sworn, deposes and says: That he is

said State and County, personally appeared Walter W. Deagle;

Before me, Walter J. Lee, a Notary Public in and for

Bartholomew County )

State of Indiana )

March 23, 1954

Engel & Weissinger  
Attorneys at Law  
Van Antwerp Building  
Mobile, Alabama

RE: Walter A. Beegee  
vs.  
Certain Lands et als

Gentlemen:

The Bill of Complaint and two copies in the above styled cause received, filed and given No. 3219. Please instruct me as to service, Lis Pen- etc.

If service is to be had by registered mail, please send two more copies of Bill of Complaint.

Sincerely yours,

Register in Equity

COPY

Mrs. Duck

[illegible]

**FOR RECORD**

**TOTAL \$**

49263 ROBERTS & SON, BIRMINGHAM

*W. B. Stewart*  
Judge of Probate.



24  
2/28/21  
WALTER A. DEEGLE,

Complainant,

-vs-

LANDS as described in this bill, and GLADYS SCOTT, MARSHALL SCOTT, and all other heirs and next of kin of GEORGE W. SCOTT, Deceased; if they be living, or their heirs, devisees, next of kin or assignees, if they be dead, (and any other person or persons claiming any interest in and to said land.)

Respondents,

IN THE CIRCUIT COURT

OF BALDWIN COUNTY,

ALABAMA, IN EQUITY,

IN REM. NO. 3219

Comes Edmund R. Cannon, Jr., attorney, and accepts the appointment by this Court of him as guardian ad litem for all unknown defendants in this proceeding and also as attorney ad litem for any defendants in this proceeding who may be in the Armed Forces of the United States of America.

Edmund R. Cannon, Jr.

Comes Edmund R. Cannon, Jr., attorney, as guardian ad litem for all unknown defendants in this cause, and attorney ad litem for any defendants in this cause who may be in the Armed Forces of the United States of America, and for answer to the bill of complaint filed in this cause says: He denies each and every allegation of the bill of complaint and demands strict proof thereof.

Edmund R. Cannon, Jr.

thereof.

allegation of the pili of conspiracy and demand strict proof  
conspiracy filed in this cause says; he denies each and every  
of the United States of America; and for answer to the pili of  
for any defendants in this cause who say he in the Armed Forces  
for all unknown defendants in this cause; and attorney of item  
James Edmund W. Cannon, Jr., attorney, at Washington of item

Armed Forces of the United States of America.

item for any defendants in this proceeding who say he in the  
unknown defendants in this proceeding and also an attorney at  
appointment of this Court of his as guardian of item for all  
James Edmund W. Cannon, Jr., attorney, and accepts the

defendants;

being found.)  
claiming and interest in and to  
(and any other person or persons  
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person, persons; next of kin  
it may be found; or their  
persons; persons; persons;  
persons and next of kin of  
persons; persons; persons;  
pili; and persons; persons;  
persons as described in this

conspiracy;

James A. Cannon;

OF BIRMINGHAM COUNTY,  
IN THE CIRCUIT COURT

IN THE NO. 2318

WILLIAM, IN EQUITY

FILED  
JUL 2 1954  
CLERK OF COURT, BIRMINGHAM