

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

WILLIAM FRANK WATSON

Complainant

Vs.

CERTAIN LANDS, ORIN H. QUEAL, ET AL.

Defendant. S

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the _____ day of _____, 19____, in the Foley Onlooker a newspaper published in Foley, 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 Certain Lands, Orin H. Queal, et al.

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 Certain Lands, Orin H. Queal, et al.

This 31st day of August 1951

Alice J. Duck Register.

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

WILLIAM FRANK WATSON

Vs.

CERTAIN LANDS, ORIN H. QUEAL,
ET AL.

Decree Pro Confesso of Publication

Issued 8 - 31 1951

Archie H. Huch
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

WILLIAM FRANK WATSON

vs.

CERTAIN LANDS, ORIN H. QUEAL,
ET AL.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
Affidavit of Non-Residents of Defendants; Motion for Service
by Publication; Order Authorizing Service by Publication; Proof
of Publication; Motion for Decree Pro Confesso after Service by
Publication; Decree Pro Confesso after Service by Publication;
and Testimony of William Frank Watson and Claude Peteet.

and in behalf of Defendant upon _____

W. F. Watson
Atty for Complaint

Wm. H. Henshaw
Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

WILLIAM FRANK WATSON

vs.

CERTAIN LANDS, ORIN H. QUEAL,
ET AL.

NOTE OF TESTIMONY

Filed in Open Court this

day of

SEP

6

194

ALICE J. DUCK,

Register

Register.

Printed By The Baldwin Times

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

WILLIAM FRANK WATSON

Complainant

Vs.

CERTAIN LANDS, ORIN H. QUEAL, ET AL.

Defendant S

Motion is hereby made for a Decree Pro Confesso against Certain Lands, Orin H. Queal,

et al.Defendant S

in the annexed stated cause. on the ground that more than thirty days have elapsed since the perfection 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 30th day of August 1951

746 Code



Solicitor.

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

WILLIAM FRANK WATSON

Complainant _____

Vs.

CERTAIN LANDS, ORIN H. QUEAL,

ET AL.

Defendant _____

Motion for Decree Pro Confesso
on Publication

Filed _____ 19 _____

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Lorna Underwood

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 William Frank Watson and Claude Peteet

as witnesses in behalf of William Frank Watson in a cause pending in our Circuit Court in Baldwin County, of said State, wherein William Frank Watson is

and Certain Lands, Orin H. Queal, et al. are Complainant

on oath, to be by you administered, upon them Respondent S
to take and certify the depositionS of the witnessES and return the same to our Court, with all convenient speed, under your hand.

Witness 31st day of August, 195 1

Archie J. Henshaw
Register.

Commissioner's Fee, \$ 10.00

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

WILLIAM FRANK WATSON

Complainant—

vs.

CERTAIN LANDS, ORIN H.

QUEAL, ET AL.

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Lorna Underwood

WITNESSES:

William Frank Watson

Claude Peteet

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

WILLIAM FRANK WATSON

Complainant

VS.

CERTAIN LANDS, ORIN H. QUEAL, ET AL.

Respondent

I, Lorna Underwoodas Register and Commissioner in chanceryhave called and caused to come before me William Frank Watson and Claude Peteet

witness es named in the Requirement for Oral Examination, on the 4th day of September
1945, at the office of C. G. Chason
 in Foley, Alabama, and having first sworn said Witness es to speak the
 truth, the whole truth, and nothing but the truth, the said William Frank Watson and
Claude Peteet doth depose and say as follows:

TESTIMONY OF WILLIAM FRANK WATSON:

My name is William Frank Watson; I am over the age of twenty-one years and the owner of the property in Baldwin County, Alabama, described as follows:

The East Half ($E\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$); and the East Half ($E\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) of Section thirty-four (34), Township eight (8) South, Range four (4) East;

I purchased this property from Minnie Marie Adams by Warranty Deed dated December 6, 1948, and I recorded it in the office of the Judge of Probate of Baldwin County, Alabama, where it appears in Deed Book 136 NS, Pages 467-8; Minnie Marie Adams purchased this property from Edward W. Zimmerman; no one, other than the three of us, have had any possession of the property or paid any taxes on it for a period of over ten (10) years and I have been in the open, notorious, peaceable and adverse possession of the property since I bought it; both Minnie Marie Adams and Edward W. Zimmerman were in the open, notorious, peaceable and adverse possession of the property during the time that they owned it; the property is known as mine in the area where it is located and there is no dispute between me and any adjoining owners as to the boundary lines; I have had an abstract of title prepared on the property and have made an effort be inquiry in the area of the property to locate those persons named as defendants in my suit to quiet title and believe them all to be non-residents of the State of Alabama.

W. F. Watson

ORAL EXAMINATION.

I, Lorna Underwood, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and C. G. Chason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 4th day of September, 1951

Lorna Underwood (L. S.)

ORAL EXAMINATION.

I, Lorna Underwood, as Register and Commissioner hereby certify that the foregoing deposition s on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and C. G. Chason

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witnesses es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 4th day of September, 1951

Lorna Underwood (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

WILLIAM FRANK WATSON

vs. Complainant

CERTAIN LANDS, ORIN H. QUEAL,

ET AL.

Respondent.

Oral Deposition

Filed _____, 1951

Register.

FILED
SEP 11 1951
Recorded in

Record

Vol. _____

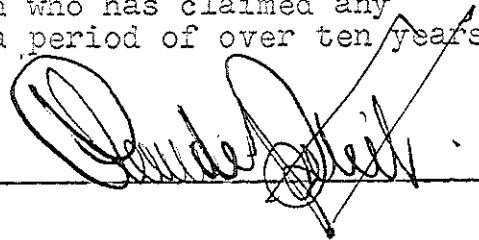
Register.

TESTIMONY OF CLAUDE PETEET:

My name is Claude Peteet; I am over the age of twenty-one years and a resident of Baldwin County, Alabama; I am familiar with the property in Baldwin County, Alabama, described as follows:

The East Half ($E\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 83 feet of the West Half ($W\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$); and the East Half ($E\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) of Section thirty-four (34), Township eight (8) South, Range four (4) East;

this property use to be the property of Edward W. Zimmerman, who owned it over ten years ago; he sold it to Minnie Marie Adams, who sold it about three years ago to W. F. Watson; I know of no one who has had any possession of this property for over ten years except these three persons, nor anyone else who has paid any taxes thereon; each of these persons was in the actual, notorious, peaceable and adverse possession of this property during the time that they owned it and I know of no other person who has claimed any right, title or interest in this land for a period of over ten years.



The East Half ($E\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$); and the East Half ($E\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) of Section thirty-four (34), Township eight (8) South, Range four (4) East,

and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said land or any part thereof, and especially that Orin H. Queal; Sarah K. Scott; Robert T. Queal; A. C. Bay; Southern Plantation Development Company, a corporation, and any and all stockholders or trustees thereof; the Bay La Launch Orchards Company, a corporation, and any and all stockholders or trustees thereof; Signe D. Bay; Ida C. Zimmerman; Lillian J. Zimmerman; Minnie B. Adams; Minnie Marie Molick Adams; Chester Adams, if they be living, and if dead, then their unknown heirs, devisees or grantees, and any other person, firm or corporation claiming any interest in or right or title to said land, have no right, title to, interest in or lien or encumbrance upon said land.

It is further Ordered, Adjudged and Decreed that the Register shall, within thirty (30) days from the rendition of this decree, file a certified transcript thereof for record in the Probate Court of Baldwin County, Alabama, showing title out of the defendants above named in the Direct Indexes to the records and title into William Frank Watson in the Indirect Indexes to the records and that the expense thereof shall be taxed in the cost of this cause.

It is further ordered that William Frank Watson pay the costs herein to be taxed, for which execution may issue.

This 6th day of September, 1951.

Justin A. Mable
Judge of the Circuit Court of
Baldwin County, Alabama,
in equity

WILLIAM FRANK WATSON,) (

Complainant,) (

-vs-) (

The East Half (E $\frac{1}{2}$) of the) (Southwest Quarter (SW $\frac{1}{4}$) of) (the Southeast Quarter (SE $\frac{1}{4}$)) (and the East 88 feet of the) (West Half (W $\frac{1}{2}$) of the South-) (west Quarter (SW $\frac{1}{4}$) of the) (Southeast Quarter (SE $\frac{1}{4}$); and) (the East Half (E $\frac{1}{2}$) of the) (South Half (S $\frac{1}{2}$) of the South) (Half (S $\frac{1}{2}$) of the Northwest) (Quarter (NW $\frac{1}{4}$) of the South-) (east Quarter (SE $\frac{1}{4}$) and the) (East 88 feet of the West Half) ((W $\frac{1}{2}$) of the South Half (S $\frac{1}{2}$)) (of the Northwest Quarter (NW $\frac{1}{4}$)) (of the Southeast Quarter (SE $\frac{1}{4}$)) (of Section thirty-four (34),) (Township eight (8) South,) (Range four (4) East; ORIN H.) (QUEAL; SARAH K. SCOTT; ROBERT) (T. QUEAL; A. C. BAY; SOUTHERN) (PLANTATION DEVELOPMENT COM-) (PANY, a corporation, and any) (and all stockholders or) (trustees thereof; the BAY LA) (LAUNCH ORCHARDS COMPANY, a) (corporation, and any and all) (stockholders or trustees there-) (of; SIGNE D. BAY; IDA C.) (ZIMMERMAN; LILLIAN J. ZIMMER-) (MAN; MINNIE B. ADAMS; MINNIE) (MARIE MOLICK ADAMS; CHESTER) (ADAMS, and any and all un-) (known heirs, devisees or) (grantees of said named de-) (fendants, and any other person,) (firm or corporation claiming) (any interest in or right or) (title to said lands,) (

Defendants.) (

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Comes your complainant, William Frank Watson, and brings this his Bill of Complaint against the following described tract of land situated in the County of Baldwin, State of Alabama, to-wit:

The East Half (E $\frac{1}{2}$) of the Southwest Quarter (SW $\frac{1}{4}$) of the Southeast Quarter (SE $\frac{1}{4}$) and the East 88 feet of the West Half (W $\frac{1}{2}$) of the Southwest Quarter (SW $\frac{1}{4}$) of the Southeast Quarter (SE $\frac{1}{4}$); and the East Half (E $\frac{1}{2}$) of the South Half (S $\frac{1}{2}$) of the South Half (S $\frac{1}{2}$) of the Northwest Quarter (NW $\frac{1}{4}$) of the Southeast Quarter (SE $\frac{1}{4}$) and the East 88 feet of the West Half (W $\frac{1}{2}$) of the South Half (S $\frac{1}{2}$) of the Northwest Quarter (NW $\frac{1}{4}$) of the Southeast Quarter (SE $\frac{1}{4}$) of Section thirty-four (34), Township eight (8) South, Range four (4) East;

And complainant further brings this Bill of Complaint against any and all persons claiming any title to, interest in or lien or

WILLIAM FRANK WATSON,) (

Complainant,) (

-vs-) (

The East Half ($E\frac{1}{2}$) of the) (

Southwest Quarter ($SW\frac{1}{4}$) of) (

the Southeast Quarter ($SE\frac{1}{4}$)) (

and the East 88 feet of the) (

West Half ($W\frac{1}{2}$) of the South-) (

west Quarter ($SW\frac{1}{4}$) of the) (

Southeast Quarter ($SE\frac{1}{4}$); and) (

the East Half ($E\frac{1}{2}$) of the) (

South Half ($S\frac{1}{2}$) of the South) (

Half ($S\frac{1}{2}$) of the Northwest) (

Quarter ($NW\frac{1}{4}$) of the South-) (

east Quarter ($SE\frac{1}{4}$) and the) (

East 88 feet of the West Half) (

($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$)) (

of the Northwest Quarter ($NW\frac{1}{4}$)) (

of the Southeast Quarter ($SE\frac{1}{4}$)) (

of Section thirty-four (34),) (

Township eight (8) South,) (

Range four (4) East; ORIN H.) (

QUEAL; SARAH K. SCOTT; ROBERT) (

T. QUEAL; A. C. BAY; SOUTHERN) (

PLANTATION DEVELOPMENT COM-) (

PANY, a corporation, and any) (

and all stockholders or) (

trustees thereof; the BAY LA) (

LAUNCH ORCHARDS COMPANY, a) (

corporation, and any and all) (

stockholders or trustees there-) (

of; SIGNE D. BAY; IDA C.) (

ZIMMERMAN; LILLIAN J. ZIMMER-) (

MAN; MINNIE B. ADAMS; MINNIE) (

MARIE MOLICK ADAMS; CHESTER) (

ADAMS, and any and all un-) (

known heirs, devisees or) (

grantees of said named de-) (

fendants, and any other person,) (

firm or corporation claiming) (

any interest in or right or) (

title to said lands,) (

Defendants.) (

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FINAL DECREE

This cause coming on to be heard was submitted on behalf of complainant upon Bill of Complaint, Affidavit of Non-Residents of Defendants, Decree Pro Confesso on Publication and Testimony as stated by the Register and, upon consideration thereof, the Court is of the opinion that the complainant is entitled to the relief prayed for in said Bill of Complaint.

It is therefore, Ordered, Adjudged and Decreed that complainant, William Frank Watson, is the owner in fee simple of the following described lands in Baldwin County, Alabama, to-wit:-

encumbrance upon said lands, or any part thereof, and especially against Orin H. Queal; Sarah K. Scott; Robert T. Queal; A. C. Bay; Southern Plantation Development Company, a corporation, and any and all stockholders or trustees thereof; Signe B. Bay; Ida C. Zimmerman; Lillian J. Zimmerman; Minnie B. Adams; Minnie Marie Melick Adams; Chester Adams, and any and all persons, firms or corporations, claiming any interest in the above described lands, and Complainant respectfully shows unto your Honor as follows:-

FIRST:

That he is in the actual, peaceable, adverse possession of said tract of land heretofore mentioned, claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

SECOND:

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

THIRD:

Complainant further shows that he claims the entire fee simple title in and to said lands, having acquired the same from Minnie Marie Adams by conveyance dated the 6th day of December, 1948, and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 136NS, Pages 467-8.

FOURTH:

Complainant further shows that no one has paid any taxes on this property for over ten (10) years, except your complainant, Minnie Marie Adams and Edward W. Zimmerman.

FIFTH:

Complainant further shows unto your Honor that he is in the actual, open, notorious, peaceable and adverse possession of said land and has been in such possession since the date of purchase; that no other person, firm or corporation has had any possession of said property for over a period of ten (10) years, except those persons through whom complainant claims, namely, Minnie Marie Adams and Edward W. Zimmerman; and that no one is known to your complainant to claim this land or any part thereof or any interest therein,

except the complainant and the defendants to this proceeding, and complainant calls upon the several persons, firms and corporations mentioned as defendants herein, or anyone else having any interest therein, to set forth and specify his, hers or its title to, claim, interest in or encumbrance upon said land and how and by what instrument or otherwise the same is derived or created.

SIXTH:

Complainant avers that he has made a diligent search and inquiry to ascertain the residences and addresses of all persons, firms or corporations heretofore named, and whether or not any of them be dead, and if dead, to ascertain the names and addresses of their heirs, devisees, successors, assigns and grantees; that in this investigation and inquiry have had an abstract of title of said real estate made from the records of Baldwin County, Alabama; that he has made diligent inquiry in the neighborhood of said lands as to the ownership of same, the possession of same, and the whereabouts of any and all persons who are, or may be, interested in or who claim any interest therein, and that in making said inquiry he has inquired of old settlers.

PRAYER FOR PROCESS

TO THE END THEREFORE, that equity may be had in the premises, complainant prays that your Honor will cause the usual writ of process to issue to the defendants named herein, and any and all other persons, firms or corporations claiming any interest in, right of title to said lands, in the usual form and according to the practices of this Honorable Court, requiring them or it, to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court and that your Honor will also cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by the laws of the State of Alabama, authorizing the quieting of title by proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint to the aforesaid defendants by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint and requiring

them to plead, answer or demur to the same within the time as required by law.

PRAYER FOR RELIEF

Complainant further prays that on a hearing of this cause, your Honor will establish complainant's right and title to this land, and will decree the complainant is the owner in fee simple of the lands herein described and that no other persons, firm or corporation has any title to or interest in, or lien or encumbrance upon said land or any part thereof, and especially those persons hereinabove named as defendants, and that in said decree your Honor will cause a certified copy of the same to be filed in the Probate Office of Baldwin County, Alabama, and to be recorded therein, and that in said decree, your Honor will direct in whose name it shall be indexed in the direct and indirect indexes to the records thereof, in said Probate Court of Baldwin County, Alabama, and complainant further prays for such other, further, different and general relief as in equity may seem just and meet, as complainant will ever pray.



Solicitor for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, Ora S. Nelson,
a Notary Public in and for said State and County, C. G. Chason, who,
upon oath deposes and says that he is the agent of and the attorney
for the complainant in the above styled cause and is therefore duly
authorized to make this oath; that in the belief of the affiant as
he is informed and believes, all the defendants named in the fore-
going Bill of Complaint are over the age of twenty-one years and
non-residents of the State of Alabama, their places of residence
being unknown to your affiant; that he has made a diligent inquiry
to ascertain the same and has been unable to do so; that all matters
and facts stated in the foregoing Bill of Complaint upon knowledge
are true; that he is informed as to facts stated upon information
and belief and verily believes and so states that the same are true.

[Signature]

Sworn to and subscribed before me,
a Notary Public, on this 16th day
of May, 1951.

Ora S. Nelson
Notary Public, Baldwin County
State of Alabama

FILED
MAY 19 1951
WILLIAM DICKSON

LEGAL NOTICE

William Frank Watson, Complainant,

vs.
The East Half (E½) of the Southwest Quarter (SW¼) of the Southeast Quarter (SE¼) and the East 88 feet of the West Half (W½) of the Southwest Quarter (SW¼) of the Southeast Quarter (SE¼); and the East Half (E½) of the South Half (S½) of the South Half (S½) of the Northwest Quarter (NW¼) of the Southeast Quarter (SE¼) and the East 88 feet of the West Half (W½) of the South Half (S½) of the Northwest Quarter (NW¼) of the Southeast Quarter (SE¼) of Section thirty-four (34), Township eight (8) South, Range four (4) East; Orin H. Queal; Sarah K. Scott; Robert T. Queal; A. C. Bay; Southern Plantation Development Company, a corporation, and any and all stockholders or trustees

thereof; the Bay La Launch Orchards Company, a corporation, and any and all stockholders or trustees thereof; Signe D. Bay; Ida C. Zimmerman; Lillian J. Zimmerman; Minnie B. Adams; Minnie Marie Molick Adams; Chester Adams, and any and all unknown heirs, devisees or grantees of said named defendants, and any other person, firm or corporation claiming any interest in or right or title to said lands, Defendants.

In the Circuit Court of Baldwin County, Alabama,
In Equity.

It having been made to appear in the above styled cause from the affidavit of C. G. Chason, the Solicitor of record for the complainant in said cause, that the defendants in said suit are non-residents of the State of Alabama, their addresses and places of residence being unknown.

Notice is hereby given to the persons, firms and corporations

named hereinabove as defendants and to any and all persons, firms or corporations claiming any interest in, title to, or lien or encumbrance upon the lands herein described, that on the 16th day of May, 1951, William Frank Watson filed in the equity side of the Circuit Court of Baldwin County, Alabama, his Bill of Complaint against the following described lands in Baldwin County, Alabama: viz:

The East Half (E½) of the Southwest Quarter (SW¼) of the Southeast Quarter (SE¼) and the East 88 feet of the West Half (W½) of the Southwest Quarter (SW¼) of the Southeast Quarter (SE¼); and the East Half (E½) of the South Half (S½) of the South Half (S½) of the Northwest Quarter (NW¼) of the Southeast Quarter (SE¼) and the East 88 feet of the West Half (W½) of the South Half (S½) of the Northwest Quarter (NW¼) of the Southeast Quarter (SE¼) of Section thirty-four (34), Township eight (8) South, Range four (4) East;

and against the defendants hereinabove named and any and all other persons, firms or corporations claiming any interest in or lien, or encumbrance upon said lands and you are hereby notified to appear and plead, answer or demur within thirty (30) days from the 18th day of June, 1951, or a decree pro confesso will be rendered against you; that the title to said lands stand in the name of the complainant on the records in the office of the Judge of Probate of Baldwin County, Alabama; that said Bill of Complaint was and is filed for the purpose of establishing the title of said complainant to said land and for the purpose of quieting his title thereto, and clearing up any disputes and doubts concerning the same; that complainant acquired title to said land from Minnie Marie Adams by conveyance dated the 6th day of December, 1948, and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 136NS, Pages 467-8. Complainant further alleges in his Bill of Complaint that he is in quiet and peaceable possession of said lands claiming to own the same absolutely and in fee simple, and that he and those through whom he claims by conveyance of record have been in possession for more than 10 years next preceding the filing of this Bill of Complaint and that no one except Complainant and those through who he claims have paid any taxes on said land for a period of over ten (10) years.

Witness my hand this 16th day of May, 1951.

ALICE J. DUCK,
as Register of the Circuit Court of Baldwin County, Alabama.
C. G. CHASON,
Solicitor for Complainant.

5-17-4t

looker, published at
of the above notice,
each week in the
paper, and not in any
secutive weeks, com-
7, 1957, and
7, 1957.

Lawrence
8th day
Public.

FOLEY, ALA., June 8 1937

HOWELL PUBLISHING CO.

HIGH QUALITY JOB PRINTING

Alice J. DuckBay Minette, Ala.

Brought Forward

Legal Notice
forMay 17
24
" 31

June 7

Wm. Frank Watson

\$ 31. 99

WILLIAM FRANK WATSON,) (

Complainant,) (

-vs-) (

The East Half ($E\frac{1}{2}$) of the) (
Southwest Quarter ($SW\frac{1}{4}$) of) (
the Southeast Quarter ($SE\frac{1}{4}$)) (
and the East 88 feet of the) (
West Half ($W\frac{1}{2}$) of the South-) (
west Quarter ($SW\frac{1}{4}$) of the) (
Southeast Quarter ($SE\frac{1}{4}$); and) (
the East Half ($E\frac{1}{2}$) of the) (
South Half ($S\frac{1}{2}$) of the South) (
Half ($S\frac{1}{2}$) of the Northwest) (
Quarter ($NW\frac{1}{4}$) of the South-) (
east Quarter ($SE\frac{1}{4}$) and the) (
East 88 feet of the West Half) (
($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$)) (
of the Northwest Quarter ($NW\frac{1}{4}$)) (
of the Southeast Quarter ($SE\frac{1}{4}$)) (
of Section thirty-four (34),) (
Township eight (8) South,) (
Range four (4) East; ORIN H.) (
QUEAL; SARAH K. SCOTT; ROBERT) (
T. QUEAL; A. C. BAY; SOUTHERN) (
PLANTATION DEVELOPMENT COM-) (
PANY, a corporation, and any) (
and all stockholders or) (
trustees thereof; the BAY LA) (
LAUNCH ORCHARDS COMPANY, a) (
corporation, and any and all) (
stockholders or trustees there-) (
of; SIGNE D. BAY; IDA C.) (
ZIMMERMAN; LILLIAN J. ZIMMER-) (
MAN; MINNIE B. ADAMS; MINNIE) (
MARIE MOLICK ADAMS; CHESTER) (
ADAMS, and any and all un-) (
known heirs, devisees or) (
grantees of said named de-) (
fendants, and any other person,) (
firm or corporation claiming) (
any interest in or right or) (
title to said lands,) (

Defendants.) (

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Comes your complainant, William Frank Watson, and brings
this his Bill of Complaint against the following described tract
of land situated in the County of Baldwin, State of Alabama, to-wit:

The East Half ($E\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of
the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of
the West Half ($W\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of
the Southeast Quarter ($SE\frac{1}{4}$); and the East Half ($E\frac{1}{2}$)
of the South Half ($S\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the
Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$)
and the East 88 feet of the West Half ($W\frac{1}{2}$) of the South
Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the South-
east Quarter ($SE\frac{1}{4}$) of Section thirty-four (34), Town-
ship eight (8) South, Range four (4) East;

And complainant further brings this Bill of Complaint against
any and all persons claiming any title to, interest in or lien or

encumbrance upon said lands, or any part thereof, and especially against Orin H. Queal; Sarah K. Scott; Robert T. Queal; A. C. Bay; Southern Plantation Development Company, a corporation, and any and all stockholders or trustees thereof; Signe D. Bay; Ida C. Zimmerman; Lillian J. Zimmerman; Minnie B. Adams; Minnie Marie Molick Adams; Chester Adams, and any and all persons, firms or corporations, claiming any interest in the above described lands, and Complainant respectfully shows unto your Honor as follows:-

FIRST:

That he is in the actual, peaceable, adverse possession of said tract of land heretofore mentioned, claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

SECOND:

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

THIRD:

Complainant further shows that he claims the entire fee simple title in and to said lands, having acquired the same from Minnie Marie Adams by conveyance dated the 6th day of December, 1948, and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 136NS, Pages 467-8.

FOURTH:

Complainant further shows that no one has paid any taxes on this property for over ten (10) years, except your complainant, Minnie Marie Adams and Edward W. Zimmerman.

FIFTH:

Complainant further shows unto your Honor that he is in the actual, open, notorious, peaceable and adverse possession of said land and has been in such possession since the date of purchase; that no other person, firm or corporation has had any possession of said property for over a period of ten (10) years, except those persons through whom complainant claims, namely, Minnie Marie Adams and Edward W. Zimmerman; and that no one is known to your complainant to claim this land or any part thereof or any interest therein,

except the complainant and the defendants to this proceeding, and complainant calls upon the several persons, firms and corporations mentioned as defendants herein, or anyone else having any interest therein, to set forth and specify his, hers or its title to, claim, interest in or encumbrance upon said land and how and by what instrument or otherwise the same is derived or created.

SIXTH:

Complainant avers that he has made a diligent search and inquiry to ascertain the residences and addresses of all persons, firms or corporations heretofore named, and whether or not any of them be dead, and if dead, to ascertain the names and addresses of their heirs, devisees, successors, assigns and grantees; that in this investigation and inquiry have had an abstract of title of said real estate made from the records of Baldwin County, Alabama; that he has made diligent inquiry in the neighborhood of said lands as to the ownership of same, the possession of same, and the whereabouts of any and all persons who are, or may be, interested in or who claim any interest therein, and that in making said inquiry he has inquired of old settlers.

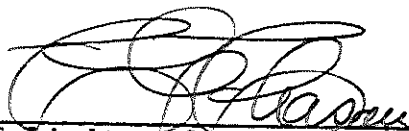
PRAYER FOR PROCESS

TO THE END THEREFORE, that equity may be had in the premises, complainant prays that your Honor will cause the usual writ of process to issue to the defendants named herein, and any and all other persons, firms or corporations claiming any interest in, right of title to said lands, in the usual form and according to the practices of this Honorable Court, requiring them or it, to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court and that your Honor will also cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by the laws of the State of Alabama, authorizing the quieting of title by proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint to the aforesaid defendants by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint and requiring

them to plead, answer or demur to the same within the time as required by law.

PRAYER FOR RELIEF

Complainant further prays that on a hearing of this cause, your Honor will establish complainant's right and title to this land, and will decree the complainant is the owner in fee simple of the lands herein described and that no other persons, firm or corporation has any title to or interest in, or lien or encumbrance upon said land or any part thereof, and especially those persons hereinabove named as defendants, and that in said decree your Honor will cause a certified copy of the same to be filed in the Probate Office of Baldwin County, Alabama, and to be recorded therein, and that in said decree, your Honor will direct in whose name it shall be indexed in the direct and indirect indexes to the records thereof, in said Probate Court of Baldwin County, Alabama, and complainant further prays for such other, further, different and general relief as in equity may seem just and meet, as complainant will ever pray.


Solicitor for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, Ara S. Nelson,
a Notary Public in and for said State and County, C. G. Chason, who,
upon oath deposes and says that he is the agent of and the attorney
for the complainant in the above styled cause and is therefore duly
authorized to make this oath; that in the belief of the affiant as
he is informed and believes, all the defendants named in the fore-
going Bill of Complaint are over the age of twenty-one years and
non-residents of the State of Alabama, their places of residence
being unknown to your affiant; that he has made a diligent inquiry
to ascertain the same and has been unable to do so; that all matters
and facts stated in the foregoing Bill of Complaint upon knowledge
are true; that he is informed as to facts stated upon information
and belief and verily believes and so states that the same are true.



Sworn to and subscribed before me,
a Notary Public, on this 16th day
of May, 1951.

Ara S. Nelson
Notary Public, Baldwin County
State of Alabama

WILLIAM FRANK WATSON,) (

Complainant,) (

-vs-) (

The East Half ($E\frac{1}{2}$) of the) (
 Southwest Quarter ($SW\frac{1}{4}$) of) (
 the Southeast Quarter ($SE\frac{1}{4}$)) (
 and the East 88 feet of the) (
 West Half ($W\frac{1}{2}$) of the South-) (
 west Quarter ($SW\frac{1}{4}$) of the) (
 Southeast Quarter ($SE\frac{1}{4}$); and) (
 the East Half ($E\frac{1}{2}$) of the) (
 South Half ($S\frac{1}{2}$) of the South) (
 Half ($S\frac{1}{2}$) of the Northwest) (
 Quarter ($NW\frac{1}{4}$) of the South-) (
 east Quarter ($SE\frac{1}{4}$) and the) (
 East 88 feet of the West Half) (
 ($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$)) (
 of the Northwest Quarter ($NW\frac{1}{4}$)) (
 of the Southeast Quarter ($SE\frac{1}{4}$)) (
 of Section thirty-four (34),) (
 Township eight (8) South,) (
 Range four (4) East; ORIN H.) (
 QUEAL; SARAH K. SCOTT; ROBERT) (
 T. QUEAL; A. C. BAY; SOUTHERN) (
 PLANTATION DEVELOPMENT COM-) (
 PANY, a corporation, and any) (
 and all stockholders or) (
 trustees thereof; the BAY LA) (
 LAUNCH ORCHARDS COMPANY, a) (
 corporation, and any and all) (
 stockholders or trustees there-) (
 of; SIGNE D. BAY; IDA C.) (
 ZIMMERMAN; LILLIAN J. ZIMMER-) (
 MAN; MINNIE B. ADAMS; MINNIE) (
 MARIE MOLICK ADAMS; CHESTER) (
 ADAMS, and any and all un-) (
 known heirs, devisees or) (
 grantees of said named de-) (
 fendants, and any other person,) (
 firm or corporation claiming) (
 any interest in or right or) (
 title to said lands,) (

Defendants.) (

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

W 2647.

It having been made to appear in the above styled cause from the affidavit of C. G. Chason, the Solicitor of record for the complainant in said cause, that the defendants in said suit are non-residents of the State of Alabama, their addresses and places of residence being unknown.

Notice is hereby given to the persons, firms and corporations named hereinabove as defendants and to any and all persons, firms or corporations claiming any interest in, title to, or lien or encumbrance upon the lands herein described, that on the 16th day of May, 1951, William Frank Watson filed in the equity side of the Circuit Court of Baldwin County, Alabama, his Bill of Complaint against the following described lands in Baldwin County, Alabama, viz:-

The East Half ($E\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the Southwest Quarter ($SW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$); and the East Half ($E\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) and the East 88 feet of the West Half ($W\frac{1}{2}$) of the South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of the Southeast Quarter ($SE\frac{1}{4}$) of Section thirty-four (34), Township eight (8) South, Range four (4) East;

and against the defendants hereinabove named and any and all other persons, firms or corporations claiming any interest in or lien or encumbrance upon said lands and you are hereby notified to appear and plead, answer or demur within thirty (30) days from the 18th day of June, 1951, or a decree pro confesso will be rendered against you; that the title to said lands stand in the name of the complainant on the records in the office of the Judge of Probate of Baldwin County, Alabama; that said Bill of Complaint was and is filed for the purpose of establishing the title of said complainant to said land and for the purpose of quieting his title thereto, and clearing up any disputes and doubts concerning the same; that complainant acquired title to said land from Minnie Marie Adams by conveyance dated the 6th day of December, 1948, and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 136NS, Pages 467-8. Complainant further alleges in his Bill of Complaint that he is in quiet and peaceable possession of said lands claiming to own the same absolutely and in fee simple, and that he and those through whom he claims by conveyance of record have been in possession for more than ten (10) years next preceding the filing of this Bill of Complaint and that no one except Complainant and those through whom he claims have paid any taxes on said land for a period of over ten (10) years.

WITNESS my hand this 16th day of May, 1951.

C. G. CHASON
Solicitor for Complainant

ALICE J. DUCK
as Register of the Circuit Court
of Baldwin County, Alabama

STATE OF ALABAMA, BALDWIN COUNTY

Filed 5-22-51 11 A.M.

Recorded *Li* book *2* page *349-50*

MR. Stewart
Judge of Probate