

WILLIE ELIZABETH McCONNELL  
BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL  
BOYINGTON, WALTER R. Mc-  
CONNELL and TIM McCONNELL  
RAULPHINE McCONNELL AND  
MARGARET McCONNELL, MINORS,  
SUIING BY AND THROUGH LAURA  
McCONNELL BROUGHTON, AS  
NEXT FRIBND,

Complainants,

VS.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY  
McCONNELL COGGINS AND VEMA  
McCONNELL WILLIAMS,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

DECREE

This cause coming on to be heard on this date is submitted for a decree upon the original Bill of Complaint, amended Bill of Complaint, answers and waivers of IRENE McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS and VEMA McCONNELL WILLIAMS, in which and by which the admitted all of the allegations of the amended Bill of Complaint, agreed that the said cause be heard and that a decree be rendered in accordance with the prayer thereof, the testimony of the complainants' witnesses, which was taken in open court in the manner provided by Equity Rule Number 56, as amended, on this date, upon consideration of all of which, the court is of the opinion that the allegations of fact set out in the amended Bill of Complaint are true, and that the complainants are entitled to the relief prayed for by them therein; upon consideration of all of which, it is therefore, ORDERED, ADJUDGED AND DECREED by the court as follows:

1. The complainants, WILLIE ELIZABETH McCONNELL BANKESTER, LAURA McCONNELL BROUGHTON, LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, and the respondents, IRENE McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS and VEMA McCONNELL WILLIAMS, are joint owners or tenants in common of the following described real property situated in Baldwin County, Alabama, to-wit:

page two.

The northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South, Range 3 East, containing 10 acres, more or less, except the following described property:

EXCEPTION NUMBER 1: Beginning at the southeast corner of the northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South Range 3 East, run thence North 70 yards, West 210 yards, South 70 yards, East 210 yards to the place of beginning, containing 3 acres, more or less.

2. Laura McConnell Broughton, who is the widow of Marshall McConnell, Deceased, has, by proper conveyance, conveyed all of her interest in and to the above described property to her children, namely, Ludeen McConnell Boyington, Walter R. McConnell, Tim McConnell, Raulphine McConnell and Margaret McConnell, and, therefore, has no further interest in the said property.

3. The interest of the various complainants and respondents in and to the above described property is as follows:

WILLIE ELIZABETH McCONNELL BANKESTER	1/6
IRENE McCONNELL LANGHAM	1/6
HERBERT McCONNELL	1/6
RUBY McCONNELL COGGINS	1/6
VEMA McCONNELL WILLIAMS	1/6
LUDEEN McCONNELL BOYINGTON	1/30
WALTER R. McCONNELL	1/30
TIM McCONNELL	1/30
RAULPHINE McCONNELL	1/30
MARGARET McCONNELL	1/30

4. The above described property cannot be equitably divided among the said joint owners or tenants in common without a sale thereof and a division of the proceeds, and it is to the best interest of all of the said parties that the said tract of land be sold for division at private sale to Ray E. Loper Lumber Company, Inc., an Alabama Corporation, for the sum of Six Thousand Dollars (\$6,000) cash, to be paid at the time of the delivery of the deed hereinafter provided for, conveying the said property.

5. Upon payment of the said sum of \$6,000 by Ray E. Loper Lumber Company, Inc., an Alabama Corporation, to Alice J. Duck, as Register of this court, title to all of the above described property is hereby divested out of the said joint owners, namely, Willie Elizabeth McConnell Bankester, Ludeen McConnell Boyington, Walter R. McConnell,

page three.

Tim McConnell, Raulphine McConnell, Margaret McConnell, Irene McConnell Langham, Herbert McConnell, Ruby McConnell Coggins and Vema McConnell Williams, and vested in the said purchaser, Ray E. Loper Lumber Company, Inc., an Alabama Corporation, and Alice J. Duck, as Register of this court, shall be and she is hereby fully and completely authorized, empowered, instructed and directed to make, execute and deliver a Register's deed to the said purchaser conveying the said property.

6. The sum of Two Hundred Dollars (\$200) is hereby fixed and allowed to Telfair J. Mashburn, Jr., Solicitor for the complainants in this cause, as the amount of his fee for services rendered by him in this cause, which fee is made a common charge against the purchase price of the said property and taxed as a part of the costs of this proceeding.

7. The Register of this court shall deduct from the said purchase price all of the costs of this proceeding, including the solicitor's fee provided for above, divide the balance among the said complainants and respondents in the proportion set out above, pay the said funds to them and take their receipts therefor. It appearing to the court that the minors interested in this proceeding have no guardian, the Register of this court is, therefore, authorized, empowered, instructed and directed to pay the portion of the purchase price to which each of the said minors is entitled to the Probate Judge of Baldwin County, Alabama, to be handled and disbursed in the manner provided by Title 61, Sections 90-102 of the 1940 Code of Alabama, as amended.

8. The Register of this court shall file a certified copy of this decree for record in the office of the Judge of Probate of Baldwin County, Alabama, and tax the cost of such recording as a part of the costs of this proceeding.

9. On payment of the purchase price of the said property, on execution and delivery of the deed provided for above, and on distribution of the purchase price of the said property as provided in this decree, the Register of this court shall report her actions in the premises to this court for final confirmation.

page four.

10. Jurisdiction of this cause is reserved for the purpose of making such other and further orders or decrees as may become necessary and proper in the premises.

ORDERED, ADJUDGED AND DECREED on this the 25 day of May, 1954.

Richard M. Price  
JUDGE.

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

Witness my hand and seal this the 31st day of May, 1954.

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

STATE OF ALABAMA, BALDWIN COUNTY

Filed 5-31-54

Recorded Due book 209 page 2

M. B. Stuart  
Judge of Probate

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

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. 3222

WILLIE ELIZABETH Mc  
 CONNELL BANKESTER,  
 LAURA MCCONNELL BROUGHTON,  
 LUDEEN MCCONNELL BOYINGTON,  
 WALTER R. MCCONNELL and  
 TIM MCCONNELL, RANLPHINE  
 MCCONNELL AND MARGARET  
 MCCONNELL, MINORS, SUING  
 BY AND THROUGH LAURA Mc-  
 CONNELL BROUGHTON, AS  
 next friend,

Vs.  
 IRENE MCCONNELL LANGHAM,  
 HERBERT MCCONNELL, RUBY  
 MCCONNELL COUGENS AND  
 VEMA MCCONNELL WILLIAMS,

Complainants,  
Respondents.

DEGREE

ORDERED, ADJUDGED AND DECREED ON THIS 25th day of May,  
 1924, that the complainants do hereby certify that the  
 respondents are the persons named in the petition for  
 the purpose of the same.

WITNESSE MY HAND

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

Comes now your Oratrix, WILLIE ELIZABETH McCONNELL BANKESTER, and  
begs leave of this Honorable Court to amend her bill of complaint  
heretofore filed in this cause to include as parties complainant  
your Oratrix, WILLIE ELIZABETH McCONNELL BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, and TIM  
McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, Minors, suing  
by and through LAURA McCONNELL BROUGHTON, as Next Friend; and your  
Complainants present this Amended Bill of Complaint against IRENE  
McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS and VEMA  
McCONNELL WILLIAMS, and, thereupon, your Complainants complain and  
show unto your Honor and this Honorable Court as follows:

1.. Your Complainants, except for TIM McCONNELL, RAULPHINE McCONNELL  
and MARGARET McCONNELL, WHO are minors over the age of fourteen years  
residing with their Mother, LAURA McCONNELL BROUGHTON, at Bay Minette,  
Baldwin County, Alabama, are each over the age of twenty-one years  
and residents of Baldwin County, Alabama, residing at Bay Minette,  
Alabama. The respondents are each over the age of twenty-one years,  
and their places of residence and post office addresses are as follows:

IRENE McCONNELL LANGHAM  
Bay Minette, Alabama

HERBERT McCONNELL  
% McConnelli's Radio Shop  
Market Street  
Pascagoula, Mississippi

RUBY McCONNELL COGGINS  
124 Florence Place  
Mobile, Alabama

VEMA McCONNELL WILLIAMS  
Jackson, Alabama

2. Your Complainants and the respondents are joint owners or  
tenants in common of the following described real property situated  
in Baldwin County, Alabama, viz:

The northeast quarter of the northwest quarter of the  
southeast quarter of Section 16, Township 2 South,  
Range 3 East, containing 10 acres, more or less, ex-  
cept the following described property:

EXCEPTION NUMBER 1: Beginning at the southeast corner  
of the northeast quarter of the northwest quarter of  
the southeast quarter of Section 16, Township 2 South,  
Range 3 East, run thence North 70 yards, West 210 yards,  
South 70 yards, East 210 yards to the place of beginning.

page two.

containing 3 acres, more or less.

3. The interest of your complainants and the respondents in the above described property is as follows:

WILLIE ELIZABETH McCONNELL BANKESTER	1/6
IRENE McCONNELL LANGHAM	1/6
HERBERT McCONNELL	1/6
RUBY McCONNELL COGGINS	1/6
VEMA McCONNELL WILLIAMS	1/6
LAURA McCONNELL BROUGHTON (Dower interest)	1/6*
LUDEEN McCONNELL BOYINGTON	1/30*
WALTER R. McCONNELL	1/30*
TIM McCONNELL	1/30*
RAULPHINE McCONNELL	1/30*
MARGARET McCONNELL	1/30*

\*LAURA McCONNELL BROUGHTON, who is the widow of RUBE McCONNELL, deceased, and the mother of LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, owns a dower interest in the 1/6th share of her deceased husband in said property; and their five children own a 1/30th interest in said property, subject to the dower interest of their mother.

4. Part of the said property is improved and has buildings situated thereon, while the remainder of the said property is unimproved, because of which it cannot be equitably divided among the said joint owners without a sale thereof and a division of the proceeds.

5. Ray E. Loper Lumber Company has made an offer to purchase the above described property for SIX THOUSAND (\$6,000.00) DOLLARS, which is as much as the said land is reasonably worth; and it would be to the best interests of the parties hereto, both complainants and respondents, if the said land were sold at a private sale.

6. It has been necessary for the complainants to employ Telfair J. Mashburn, Jr., an attorney of Bay Minette, Alabama, for the purpose of filing this suit to effect a division of the said property among the said joint owners.

7. It will be to the best interest of all the parties to this cause that an abstract of title be made to the above described property, in order that this abstract can be examined by the prospective purchaser prior to the sale, the cost of which should be taxed as a part of the costs of this proceeding.

PRAYER FOR PROCESS

STATE OF ALABAMA,     0  
                                  0  
COUNTY OF BALDWIN.   0

Before me, the undersigned authority, within and for said County and State, personally appeared Telfair J. Mashburn, Jr., who, being by me first duly and legally sworn, deposes and says: That he is the Solicitor for the Complainants in this cause; that he is informed and believes and that he, on such information and belief, states the fact to be that the allegations contained in the foregoing Amended Bill of Complaint are true.

Telfair J. Mashburn, Jr.

Sworn to and subscribed before  
me on this 28th day of April, 1954.

[Signature]  
Notary Public, Baldwin County, Alabama.





Your Complainants pray that this Honorable Court will take jurisdiction of this Amended Bill of Complaint and that due notice thereof, in the form and manner prescribed by law, be given to the respondents requiring them to appear and plead, answer or demur to this/<sup>Amended</sup> Bill of Complaint within the time allowed by law and the practice of this Honorable Court.

#### PRAYER FOR RELIEF

Your Complainants pray for the following separate and several relief:

1. That the above described property be ordered sold at a private sale to the Ray E. Loper Lumber Company for a division among the said joint owners;
2. That this Honorable Court will determine the value of the dower interest of LAURA McCONNELL BROUGHTON in the 1/6th share in said property which her deceased husband owned, and will order an amount equal to said value paid to her;
3. That the Register of this Court be authorized and empowered to have a complete abstract of title, covering the above described property, made for examination by the prospective purchaser, and that the cost of such abstract be taxed as a part of the costs of this proceeding.
4. That this Court will make and enter a proper order or decree fixing the Solicitor's fee to be paid to your Complainants' Solicitor, making it a common charge against the proceeds of the sale of the said property.
5. That such other orders be made and decrees rendered as may be requisite and proper in the premises.

Julius A. MacLure, Jr.  
Solicitor for Complainants.

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

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3222

BOOK 015 PAGE 98

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon IRENE McCONNELL ✓  
LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS, VEMA  
McCONNELL WILLIAMS, LAURA McCONNELL BROUGHTON, LUDEEN  
McCONNELL BOYINGTON, WALTER R. McCONNELL, TIM McCONNELL, ✓  
RAULPHINE McCONNELL, and MARGARET McCONNELL TO appear within  
thirty (30) days from the service of this writ in the Cir-  
cuit Court to be held for said County, Equity Side, then and  
there to answer the Bill of Complaint filed against them by  
WILLIE ELIZABETH McCONNELL BANKESTER.

WITNESS my hand this 22<sup>nd</sup> day of March, 1954.

*Reece J. Smith*  
REGISTER.

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

Your Oratrix, WILLIE ELIZABETH McCONNELL BANKESTER, presents this Bill of Complaint against IRENE McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS, VEMA McCONNELL WILLIAMS, LAURA McCONNELL BROUGHTON, LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, and, thereupon, your Oratrix complains and shows unto your Honor and this Honorable Court as follows:

1. She is over the age of twenty-one years and a resident of the State of Alabama, residing on Elm Street in the Town of Bay Minette, Alabama. The respondents are, except as shown below, each over twenty-one years of age, and their places of residence and post office addresses are as follows:

IRENE McCONNELL LANGHAM  
Bay Minette, Alabama.

HERBERT McCONNELL  
General Delivery  
Pascagoula, Mississippi

RUBY McCONNELL COGGINS  
124 Florence Place  
Mobile, Alabama

VEMA McCONNELL WILLIAMS  
Jackson, Alabama

LAURA McCONNELL BROUGHTON  
Route 1  
Bay Minette, Alabama

LUDEEN McCONNELL BOYINGTON  
Route 1  
Bay Minette, Alabama

WALTER R. McCONNELL  
BAY MINETTE, ALABAMA

TIM McCONNELL  
Bay Minette, Alabama

RAULPHINE McCONNELL  
Bay Minette, Alabama

MARGARET McCONNELL  
Bay Minette, Alabama

The above named Tim McConnell, Raulphine McConnell and Margaret McConnell are minors over the age of fourteen years and reside with their Mother, Mrs. Melvin Broughton, at Bay Minette, Alabama.

2. Your Oratrix and the respondents are joint owners or tenants in common of the following described real property situated in Baldwin County, Alabama, to-wit:

The northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South, Range 3 East, containing 10 acres, more or less, except the following described property:

EXCEPTION NUMBER 1: Beginning at the Southeast corner of the northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South, Range 3 East, run thence North 70 yards; West 210 yards; South 70 yards; East 210 yards to the place of beginning, containing 3 acres, more or less.

3. The interest of your Oratrix and the respondents in the above described property is as follows:

WILLIE ELIZABETH McCONNELL BANKESTER	1/6
IRENE McCONNELL LANGHAM	1/6
HERBERT McCONNELL	1/6
RUBY McCONNELL COGGINS	1/6
VEMA McCONNELL WILLIAMS	1/6
LAURA McCONNELL BROUGHTON	1/36
LUDEEN McCONNELL BOYINGTON	1/36
WALTER R. McCONNELL	1/36
TIM McCONNELL	1/36
RAULPHINE McCONNELL	1/36
MARGARET McCONNELL	1/36

4. Part of the said property is improved and has buildings situated thereon, while the remainder of the said property is unimproved, because of which it cannot be equitably divided among the said joint owners without a sale thereof and a division of the proceeds.

5. It has been necessary for your Oratrix to employ Telfair J. Mashburn, Jr., of Bay Minette, Alabama, for the purpose of filing this suit to effect a division of the said property among the said joint owners.

6. It will be to the best interest of all parties to this cause that an abstract of title be made to the above described property, in order that this abstract can be examined by prospective purchasers prior to a sale, the cost of which should be taxed as a part of the costs of this proceeding.

#### PRAYER FOR PROCESS

Your Oratrix prays that the Court will take jurisdiction of this Bill of Complaint and that due notice thereof, in the form



STATE OF ALABAMA,      0  
                                 0  
COUNTY OF BALDWIN.    0

BOOK 015 PAGE 100

Before me, the undersigned authority, within and for said County and State, personally appeared Telfair J. Mashburn, Jr., who, after being by me first duly and legally sworn, deposes and says: That he is the Solicitor for the Complainant in this cause; that he is informed and believes and that he, on such information and belief, states the fact to be that the allegations contained in the foregoing Bill of Complaint are true.

Telfair J. Mashburn, Jr.

Sworn to and subscribed before me on  
this 22<sup>nd</sup> day of March, 1954.

[Signature]  
Notary Public, Baldwin County, Alabama.

FILED  
4-22-54  
ALICE I. DUCK, Register

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

Comes now your Oratrix, WILLIE ELIZABETH McCONNELL BANKESTER, and begs leave of this Honorable Court to amend her bill of complaint heretofore filed in this cause to include as parties complainant your Oratrix, WILLIE ELIZABETH McCONNELL BANKESTER, LAURA McCONNELL BROUGHTON, LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, and TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, Minors, suing by and through LAURA McCONNELL BROUGHTON, as Next Friend; and your Complainants present this Amended Bill of Complaint against IRENE McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS and VEMA McCONNELL WILLIAMS, and, thereupon, your Complainants complain and show unto your Honor and this Honorable Court as follows:

1.. Your Complainants, except for TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, WHO are minors over the age of fourteen years residing with their Mother, LAURA McCONNELL BROUGHTON, at Bay Minette, Baldwin County, Alabama, are each over the age of twenty-one years and residents of Baldwin County, Alabama, residing at Bay Minette, Alabama. The respondents are each over the age of twenty-one years, and their places of residence and post office addresses are as follows:

IRENE McCONNELL LANGHAM  
Bay Minette, Alabama

HERBERT McCONNELL  
% McConnell's Radio Shop  
Market Street  
Pascagoula, Mississippi

RUBY McCONNELL COGGINS  
124 Florence Place  
Mobile, Alabama

VEMA McCONNELL WILLIAMS  
Jackson, Alabama

2. Your Complainants and the respondents are joint owners or tenants in common of the following described real property situated in Baldwin County, Alabama, viz:

The northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South, Range 3 East, containing 10 acres, more or less, except the following described property:

EXCEPTION NUMBER 1: Beginning at the southeast corner of the northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South, Range 3 East, run thence North 70 yards, West 210 yards, South 70 yards, East 210 yards to the place of beginning,



containing 3 acres, more or less.

3. The interest of your complainants and the respondents in the above described property is as follows:

WILLIE ELIZABETH McCONNELL BANKESTER	1/6
IRENE McCONNELL LANGHAM	1/6
HERBERT McCONNELL	1/6
RUBY McCONNELL COGGINS	1/6
VEMA McCONNELL WILLIAMS	1/6
LAURA McCONNELL BROUGHTON (Dower interest)	1/6*
LUDEEN McCONNELL BOYINGTON	1/30*
WALTER R. McCONNELL	1/30*
TIM McCONNELL	1/30*
RAULPHINE McCONNELL	1/30*
MARGARET McCONNELL	1/30*

\*LAURA McCONNELL BROUGHTON, who is the widow of RUBE McCONNELL, deceased, and the mother of LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, owns a dower interest in the 1/6th share of her deceased husband in said property; and their five children own a 1/30th interest in said property, subject to the dower interest of their mother.

4. Part of the said property is improved and has buildings situated thereon, while the remainder of the said property is unimproved, because of which it cannot be equitably divided among the said joint owners without a sale thereof and a division of the proceeds.

5. Ray E. Loper Lumber Company has made an offer to purchase the above described property for SIX THOUSAND (\$6,000.00) DOLLARS, which is as much as the said land is reasonably worth; and it would be to the best interests of the parties hereto, both complainants and respondents, if the said land were sold at a private sale.

6. It has been necessary for the complainants to employ Telfair J. Mashburn, Jr., an attorney of Bay Minette, Alabama, for the purpose of filing this suit to effect a division of the said property among the said joint owners.

7. It will be to the best interest of all the parties to this cause that an abstract of title be made to the above described property, in order that this abstract can be examined by the prospective purchaser prior to the sale, the cost of which should be taxed as a part of the costs of this proceeding.

PRAYER FOR PROCESS



STATE OF ALABAMA,     0  
                              0  
COUNTY OF BALDWIN.    0

Before me, the undersigned authority, within and for said County and State, personally appeared Telfair J. Mashburn, Jr., who, being by me first duly and legally sworn, deposes and says: That he is the Solicitor for the Complainants in this cause; that he is informed and believes and that he, on such information and belief, states the fact to be that the allegations contained in the foregoing Amended Bill of Complaint are true.

Telfair J. Mashburn, Jr.

Sworn to and subscribed before  
me on this 28th day of April, 1954.

[Signature]  
Notary Public, Baldwin County, Alabama.

FILED

4-28-54

ALICE J. DOCK, Register

3222

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

Willie Elizabeth  
McConnell Bankster  
et al.

Complainants

vs.

Dr. M. E. Connell  
Langhans et al.,

Respondents,

Amended Bill of  
Complaint.

FILED

APR 28 1954

ALICE L. DICK, Register

WILLIE ELIZABETH McCONNELL  
BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL  
BOYINGTON, WALTER R. Mc-  
CONNELL and TIM McCONNELL  
RAULPHINE McCONNELL AND  
MARGARET McCONNELL, MINORS,  
SUIING BY AND THROUGH LAURA  
McCONNELL BROUGHTON, AS  
NEXT FRIEND,

Complainants,

VS.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY  
McCONNELL COGGINS AND VEMA  
McCONNELL WILLIAMS,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

DECREE

This cause coming on to be heard on this date is submitted for a decree upon the original Bill of Complaint, amended Bill of Complaint, answers and waivers of IRENE McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS and VEMA McCONNELL WILLIAMS, in which and by which they admitted all of the allegations of the amended Bill of Complaint, agreed that the said cause be heard and that a decree be rendered in accordance with the prayer thereof, the testimony of the complainants' witnesses, which was taken in open court in the manner provided by Equity Rule Number 56, as amended, on this date, upon consideration of all of which, the court is of the opinion that the allegations of fact set out in the amended Bill of Complaint are true, and that the complainants are entitled to the relief prayed for by them therein; upon consideration of all of which, it is therefore, ORDERED, ADJUDGED AND DECREED by the court as follows:

1. The complainants, WILLIE ELIZABETH McCONNELL BANKESTER, LAURA McCONNELL BROUGHTON, LUDEEN McCONNELL BOYINGTON, WALTER R. McCONNELL, TIM McCONNELL, RAULPHINE McCONNELL and MARGARET McCONNELL, and the respondents, IRENE McCONNELL LANGHAM, HERBERT McCONNELL, RUBY McCONNELL COGGINS and VEMA McCONNELL WILLIAMS, are joint owners or tenants in common of the following described real property situated in Baldwin County, Alabama, to-wit:

page two.

The northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South, Range 3 East, containing 10 acres, more or less, except the following described property:

EXCEPTION NUMBER 1: Beginning at the southeast corner of the northeast quarter of the northwest quarter of the southeast quarter of Section 16, Township 2 South Range 3 East, run thence North 70 yards, West 210 yards, South 70 yards, East 210 yards to the place of beginning, containing 3 acres, more or less.

2. Laura McConnell Broughton, who is the widow of Marshall McConnell, Deceased, has, by proper conveyance, conveyed all of her interest in and to the above described property to her children, namely, Ludeen McConnell Boyington, Walter R. McConnell, Tim McConnell, Raulphine McConnell and Margaret McConnell, and, therefore, has no further interest in the said property.

3. The interest of the various complainants and respondents in and to the above described property is as follows:

WILLIE ELIZABETH McCONNELL BANKESTER	1/6
IRENE McCONNELL LANGHAM	1/6
HERBERT McCONNELL	1/6
RUBY McCONNELL COGGINS	1/6
VEMA McCONNELL WILLIAMS	1/6
LUDEEN McCONNELL BOYINGTON	1/30
WALTER R. McCONNELL	1/30
TIM McCONNELL	1/30
RAULPHINE McCONNELL	1/30
MARGARET McCONNELL	1/30

4. The above described property cannot be equitably divided among the said joint owners or tenants in common without a sale thereof and a division of the proceeds, and it is to the best interest of all of the said parties that the said tract of land be sold for division at private sale to Ray E. Loper Lumber Company, Inc., an Alabama Corporation, for the sum of Six Thousand Dollars (\$6,000<sup>00</sup>) cash, to be paid at the time of the delivery of the deed hereinafter provided for, conveying the said property.

5. Upon payment of the said sum of \$6,000<sup>00</sup> by Ray E. Loper Lumber Company, Inc., an Alabama Corporation, to Alice J. Duck, as Register of this court, title to all of the above described property is hereby divested out of the said joint owners, namely, Willie Elizabeth McConnell Bankester, Ludeen McConnell Boyington, Walter R. McConnell,

page three.

Tim McConnell, Raulphine McConnell, Margaret McConnell, Irene McConnell Langham, Herbert McConnell, Ruby McConnell Coggins and Vema McConnell Williams, and vested in the said purchaser, Ray E. Loper Lumber Company, Inc., an Alabama Corporation, and Alice J. Duck, as Register of this court, shall be and she is hereby fully and completely authorized, empowered, instructed and directed to make, execute and deliver a Register's deed to the said purchaser conveying the said property.

6. The sum of Two Hundred Dollars (\$200) is hereby fixed and allowed to Telfair J. Mashburn, Jr., Solicitor for the complainants in this cause, as the amount of his fee for services rendered by him in this cause, which fee is made a common charge against the purchase price of the said property and taxed as a part of the costs of this proceeding.

7. The Register of this court shall deduct from the said purchase price all of the costs of this proceeding, including the solicitor's fee provided for above, divide the balance among the said complainants and respondents in the proportion set out above, pay the said funds to them and take their receipts therefor. It appearing to the court that the minors interested in this proceeding have no guardian, the Register of this court is, therefore, authorized, empowered, instructed and directed to pay the portion of the purchase price to which each of the said minors is entitled to the Probate Judge of Baldwin County, Alabama, to be handled and disbursed in the manner provided by Title 61, Sections 90-102 of the 1940 Code of Alabama, as amended.

8. The Register of this court shall file a certified copy of this decree for record in the office of the Judge of Probate of Baldwin County, Alabama, and tax the cost of such recording as a part of the costs of this proceeding.

9. On payment of the purchase price of the said property, on execution and delivery of the deed provided for above, and on distribution of the purchase price of the said property as provided in this decree, the Register of this court shall report her actions in the premises to this court for final confirmation.

page four.

10. Jurisdiction of this cause is reserved for the purpose of making such other and further orders or decrees as may become necessary and proper in the premises.

ORDERED, ADJUDGED AND DECREED on this the 25 day of May, 1954.

Hubert M. Hall  
JUDGE.



IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. 3222

WILLIE ELIZABETH MC-  
CONNELL BANKESTER,  
LAURA McCONNELL BROUGHTON,  
LUDEEN McCONNELL BOYINGTON,  
WALTER R. McCONNELL and  
TIM McCONNELL, RAUPHINE  
McCONNELL AND MARGARET  
McCONNELL, MINORS, SUING  
BY AND THROUGH LAURA Mc-  
CONNELL BROUGHTON, AS  
next Friend,

Complainants,

VS.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY  
McCONNELL COGGINS AND  
VEMA McCONNELL WILLIAMS,

Respondents.

DECREE.

FILED  
MAY 27 1954  
ALICE A. JACK, Register

REGISTER'S DEED

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

KNOW ALL MEN BY THESE PRESENTS: That in a proceeding now pending in the Circuit Court of Baldwin County, Alabama, in Equity, wherein Willie Elizabeth McConnell Bankester, Laura McConnell Broughton, Ludeen McConnell Boyington, Walter R. McConnell, and Tim McConnell, Ralphine McConnell and Margaret McConnell, minors, suing by and through Laura McConnell Broughton, as next friend, are complainants, and Irene McConnell Langham, Herbert McConnell, Ruby McConnell Coggins and Vema McConnell Williams are respondents, being a proceeding for the sale of certain land for a division among the joint owners thereof, the said court did on the 25th day of May, 1954, render a decree, a certified copy of which was filed for record in the office of the Judge of Probate of Baldwin County, Alabama, on May 31, 1954, authorizing the undersigned, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, to sell the tract of land hereinafter described at private sale to Ray E. Loper Lumber Company, Inc., an Alabama Corporation, for the sum of Six Thousand Dollars (\$6,000) cash, to be paid at the time of the delivery of the deed conveying the said property; and,

WHEREAS, the said sum of Six Thousand Dollars (\$6,000), which is the full purchase price for the tract of land hereinafter described, has been paid to me as Register as aforesaid:

NOW, THEREFORE, in consideration of the premises and the payment to me by Ray E. Loper Lumber Company, Inc., an Alabama Corporation, of the sum of Six Thousand Dollars (\$6,000), receipt whereof is hereby acknowledged, and by virtue of the authority vested in me by the proceedings hereinbefore recited, I, Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, have this day GRANTED, BARGAINED AND SOLD and by these presents do hereby GRANT, BARGAIN, SELL AND CONVEY unto Ray E. Loper Lumber Company, Inc., an Alabama Corporation, as fully and completely as I am authorized by law to convey the same, all interest of whatsoever kind the said Willie Elizabeth McConnell Bankester, Ludeen McConnell Boyington, Walter R. McConnell, and Tim McConnell, Ralphine McConnell, Margaret McConnell, Irene McConnell Langham, Herbert McConnell, Ruby McConnell Coggins and Vema McConnell Williams had or now have in and to the following described real property situated in Baldwin County, Alabama, to-wit:

The Northeast Quarter of the Northwest Quarter of the Southeast Quarter of Section 16, Township 2 South, Range 3 East, containing 10 acres, more or less, EXCEPT the following described property:

EXCEPTION NUMBER 1: Beginning at the Southeast corner of the Northeast Quarter of the Northwest Quarter of the Southeast Quarter of Section 16, Township 2 South, Range 3 East, run thence North 70 yards, West 210 yards, South 70 yards, East 210 yards to the place of beginning, containing 3 acres, more or less.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

TO HAVE AND TO HOLD unto the said Ray E. Loper Lumber Company, Inc., an Alabama Corporation, its successors and assigns, forever, as fully and completely as I am authorized to convey the same.

IN WITNESS WHEREOF, I, Alice J. Duck, as Register as aforesaid, have hereunto set my hand and affixed my seal on this the 1st day of June, 1954.

Alice J. Duck

(SEAL)

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

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

I, James R. Owen, a Notary Public, within and for said County in said State, hereby certify that Alice J. Duck, whose name as Register of the Circuit Court of Baldwin County, Alabama, in Equity, is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, she, in her capacity as such Register, executed the same voluntarily on the day the same bears date.

Given under my hand and official seal on this the 1st day of June, 1954.

James R. Owen

Notary Public, Baldwin County, Alabama.

June 1, 1954

Received of Alice J. Duck

dollars

Bankester

distributive share in the case of Willie Elizabeth ~~McConnell~~ Langham

vs. Irene McConnell Langham et als, Equity No. 3222

Lillian M. Bayington

June 1, 1954

Received of Alice J. Duck, nine hundred, forty-six  $\frac{22}{100}$  dollars (946.22)  
distributive share in the case of Willie Elizabeth ~~McConnell Langham~~ Bankester  
vs. Irene McConnell Langham et als, Equity No. 3222

Irene H. McConnell

Please sign and mail back for the file.

June 1, 1954

Received of Alice J. Duck

dollars

distributive share in the case of Willie Elizabeth Bankster vs  
Irene McConell Langham et als, Equity No. 3222.

Willie Elizabeth Bankster

June 1, 1954

Received of Alice J. Duck \$946.22 dollars

distributive share in the case of Willie Elizabeth Bankester vs  
Irene McConell Langham et als, Equity No. 3222.

Irene M. Langham  
DOL

June 3, 1954

Register

Received of Alice J. Duck, Clerk of the Circuit Court, Nine hundred  
forty-six and 22/1000 distributive share in the case of WILLIE ELIZA-  
BETH BANKESTER VS IRENE McCONNELL LANGHAM et als, case no. 3222.

Verna M.C. Williams

Please sign and mail back for our file.  
E.



June 16, 1954

Received of Alice J. Duck, Register, One hundred eighty-nine 25/100 dollars  
distributive share in case no. 3222 Willie Elizabeth Bankester vs Irene McConell  
Langham et als.

Walter R McConell

June 3, 1954

Register

Received of Alice J. Duck, Clerk of the Circuit Court, Nine hundred  
forty-six and 22/100 distributive share in the case of WILLIE ELIZA-  
BETH BAKERSTER VS IRENE McCONNELL LANGHAM et als, case no. 3222.

Ruby M. Coggin

note:  
Please sign and mail back for  
our file.

# W. R. STUART

No. 2179

PROBATE JUDGE

Bay Minette, Ala., 6-1, 1954

Received of *Mr. R. R. Smith*

No.		Deed Tax		Mortgage Tax		Recording Fees		Total	
		\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
	<i>W. R. Stuart, Clerk</i>	<i>48</i>				<i>3 00</i>		<i>3 00</i>	
	<i>James M. R. Smith, Jr.</i>								

FOR RECORD

TOTAL \$ *3.00*

Gill—Mobile.

*W. R. Stuart*  
Judge of Probate.

3222

TELFAIR J. MASHBURN  
ATTORNEY AT LAW  
DAHLBERG BUILDING - TELEPHONE 4661  
BAY MINETTE, ALABAMA

22 March 1954

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

Re: Willie Elizabeth Bankester  
vs. Irene McConnell Langham et al.

Dear Mr. Duck:

Inclosed herewith you will please find a Bill of Complaint and Summons in the above style cause. Please proceed to get service on Irene McConnell Langham, Tim McConnell, Raulphine McConnell and Margret McConnell, the last three of whom are minors and live with their Mother, Mrs. Laura McConnell Broughton on Route 1, in Bay Minette.

Yours very truly,

*Telfair J. Mashburn, Jr.*  
Telfair J. Mashburn, Jr.

TJM/jd

Incl:

WILLIE ELIZABETH McCONNELL  
 BANKESTER, LAURA McCONNELL  
 BROUGHTON, LUDEEN McCONNELL  
 BOYINGTON, WALTER R. Mc-  
 CONNELL, and TIM McCONNELL,  
 RAULPHINE McCONNELL and  
 MARGARET McCONNELL, MINORS,  
 suing by and through LAURA  
 McCONNELL BROUGHTON, as Next  
 Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
 HERBERT McCONNELL, RUBY Mc-  
 CONNELL COGGINS and VEMA  
 McCONNELL WILLIAMS,

Respondents.

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

ANSWER AND WAIVER.

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. She admits the allegations contained in paragraph 1 of said bill of complaint.

2. She admits the allegations contained in paragraph 2 of said bill of complaint.

3. She admits the allegations contained in paragraph 3 of said bill of complaint.

4. She admits the allegations contained in paragraph 4 of said bill of complaint.

5. She admits the allegations contained in paragraph 5 of said bill of complaint.

6. She admits the allegations contained in paragraph 6 of said bill of complaint.

7. She admits the allegations contained in paragraph 7 of said bill of complaint.

*Ruby McConnell Coggins*  
 Respondent.

510-54  
 M.B.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

\*\*\*\*\*

WILLIE ELIZABETH McCONNELL  
BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL  
BOYINGTON, WALTER R. Mc-  
CONNELL, AND TIM McCONNELL,  
RAULPHINE McCONNELL AND  
MARGARET McCONNELL, MINORS,  
suing by and through LAURA  
McCONNELL BROUGHTON, as Next  
Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY Mc-  
CONNELL COGGINS and VEMA  
McCONNELL WILLIAMS,

Respondents.

\*\*\*\*\*

ANSWER AND WAIVER.

FILED

MAY 25 1954

ALABAMA DEED & REGISTER

STATE OF ALABAMA, 0  
COUNTY OF MOBILE. 0

I, Mabel Goodwin, a Notary Public in and for said County and State, hereby certify that RUBY McCONNELL COGGINS, whose name is signed to the foregoing Answer and Waiver and who is known to me, acknowledged before me on this date that, being informed of the contents of said Answer and Waiver, she signed the same voluntarily.

Witness my hand and official seal this 10 day of May, 1954.

Mabel Goodwin  
Notary Public, Mobile County, Alabama.

WILLIE ELIZABETH McCONNELL  
 BANKESTER, LAURA McCONNELL  
 BROUGHTON, LUDEEN McCONNELL  
 BOYINGTON, WALTER R. Mc-  
 CONNELL, and TIM McCONNELL,  
 RAULPHINE McCONNELL and  
 MARGARET McCONNELL, MINORS,  
 suing by and through LAURA  
 McCONNELL BROUGHTON, as Next  
 Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
 HERBERT McCONNELL, RUBY Mc-  
 CONNELL COGGINS and VEMA  
 McCONNELL WILLIAMS,

Respondents.

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

# ANSWER AND WAIVER

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. She admits the allegations contained in paragraph 1 of said bill of complaint.

2. She admits the allegations contained in paragraph 2 of said bill of complaint.

3. She admits the allegations contained in paragraph 3 of said bill of complaint.

4. She admits the allegations contained in paragraph 4 of said bill of complaint.

5. She admits the allegations contained in paragraph 5 of said bill of complaint.

6. She admits the allegations contained in paragraph 6 of said bill of complaint.

7. She admits the allegations contained in paragraph 7 of said bill of complaint.

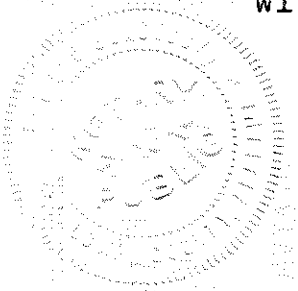
*Irene McConnell Langham*  
 Respondent.



STATE OF ALABAMA, 0  
COUNTY OF BALDWIN. 0

I, Mary Lou Blackburn, a Notary Public in and for said County and State, hereby certify that IRENE McCONNELL LANGHAM, whose name is signed to the foregoing Answer and Waiver and who is known to me, acknowledged before me on this date that, being informed of the contents of said Answer and Waiver, she signed the same voluntarily.

Witness my hand and official seal this 5 day of May, 1954



Mary Lou Blackburn  
Notary Public, Baldwin County, Alabama.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

\*\*\*\*\*

WILLIE ELIZABETH McCONNELL  
BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL  
BOYINGTON, WALTER R. Mc-  
CONNELL, and TIM McCONNELL,  
RAULPHINE McCONNELL AND  
MARGARET McCONNELL, MINORS,  
suing by and through LAURA  
McCONNELL BROUGHTON, As Next  
Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY Mc-  
CONNELL COGGINS and VEMA  
McCONNELL WILLIAMS,

Respondents.

\*\*\*\*\*

ANSWER AND WAIVER.

FILED

MAY 25 1954

ALICE J. DRICK, Register

WILLIE ELIZABETH McCONNELL  
 BANKESTER, LAURA McCONNELL  
 BROUGHTON, LUDEEN McCONNELL  
 BOYINGTON, WALTER R. Mc-  
 CONNELL, and TIM McCONNELL,  
 RAULPHINE McCONNELL and  
 MARGARET McCONNELL, MINORS,  
 suing by and through LAURA  
 McCONNELL BROUGHTON, as Next  
 Friend,

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

NO. \_\_\_\_\_

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
 HERBERT McCONNELL, RUBY Mc-  
 CONNELL COGGINS and VEMA  
 McCONNELL WILLIAMS.

Respondents.

ANSWER AND WAIVER.

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

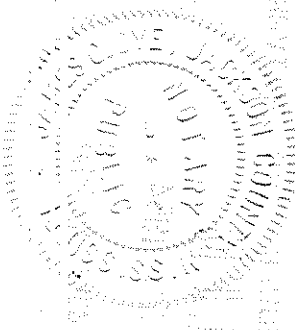
1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.
3. He admits the allegations contained in paragraph 3 of said bill of complaint.
4. He admits the allegations contained in paragraph 4 of said bill of complaint.
5. He admits the allegations contained in paragraph 5 of said bill of complaint.
6. He admits the allegations contained in paragraph 6 of said bill of complaint.
7. He admits the allegations contained in paragraph 7 of said bill of complaint.

*James H. McConnell*  
 Respondent.

STATE OF MISSISSIPPI,  
COUNTY OF Jackson

I, James L. Lyle, a Notary Public in and for said County and State, hereby certify that HERBERT McCONNELL, whose name is signed to the foregoing Answer and Waiver and who is known to me, acknowledged before me on this date that, being informed of the contents of said Answer and Waiver, he signed the same voluntarily.

Witness my hand and official seal this 10 day of May, 1954.



James L. Lyle  
Notary Public, Jackson County, Mississippi.

My Comm. Expires 12/10/55

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

\*\*\*\*\*

WILLIE ELIZABETH McCONNELL  
BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL  
BOYINGTON, WALTER R. Mc-  
CONNELL, and TIM McCONNELL,  
RAULPHINE McCONNELL and  
MARGARET McCONNELL, MINORS,  
suing by and through LAURA  
McCONNELL BROUGHTON, as Next  
Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY Mc-  
CONNELL COGGINS and VEMA  
McCONNELL WILLIAMS,

Respondents.

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ANSWER AND WAIVER.

FILED

MAY 25 1954

ALICE J. BUCK, Register

WILLIE ELIZABETH McCONNELL  
 BANKESTER, LAURA McCONNELL  
 BROUGHTON, LUDEEN McCONNELL  
 BOYINGTON, WALTER R. Mc-  
 CONNELL, and TIM McCONNELL,  
 RAULPHINE McCONNELL and  
 MARGARET McCONNELL, MINORS,  
 suing by and through LAURA  
 McCONNELL BROUGHTON, as Next  
 Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
 HERBERT McCONNELL, RUBY Mc-  
 CONNELL COGGINS and VEMA  
 McCONNELL WILLIAMS,

Respondents,

ANSWER AND WAIVER.

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondents says:

1. She admits the allegations contained in paragraph 1 of said bill of complaint.

2. She admits the allegations contained in paragraph 2 of said bill of complaint.

3. She admits the allegations contained in paragraph 3 of said bill of complaint.

4. She admits the allegations contained in paragraph 4 of said bill of Complaint.

5. She admits the allegations contained in paragraph 5 of said bill of complaint.

6. She admits the allegations contained in paragraph 6 of said Bill of complaint.

7. She admits the allegations contained in paragraph 7 of said bill of complaint.

Vema Mc Connell, Williams  
 Respondent.

STATE OF ALABAMA, 0  
COUNTY OF CLARK. 0

I, L. B. NEIGHBORS, a Notary Public in and for said County and State, hereby certify that VEMA McCONNELL WILLIAMS, whose name is signed to the foregoing Answer and Waiver and who is known to me, acknowledged before me on this date that, being informed of the contents of said Answer and Waiver, she signed the same voluntarily.

Witness my hand and official seal this 6<sup>th</sup> day of MAY, 1954

FILED

5-25-54  
ALICE L. DICK, Register

L. B. Neighbors  
Notary Public, Clark County, Alabama.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. \_\_\_\_\_

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WILLIE ELIZABETH McCONNELL  
BANKESTER, LAURA McCONNELL  
BROUGHTON, LUDEEN McCONNELL  
BOYINGTON, WALTER R. Mc-  
CONNELL, and TIM McCONNELL,  
RAULPHINE McCONNELL AND  
MARGARET McCONNELL, MINORS,  
suing by and through LAURA  
McCONNELL BROUGHTON, as Next  
Friend,

Complainants,

Vs.

IRENE McCONNELL LANGHAM,  
HERBERT McCONNELL, RUBY Mc-  
CONNELL COGGINS and VEMA  
McCONNELL WILLIAMS,

Respondents.

\*\*\*\*\*

ANSWER AND WAIVER.

FILED

MAY 25 1954

ALICE J. DUCK, Register



M. R. HOWELL

JUSTICE OF THE PEACE

P. O. BOX 254

Foley, Alabama

5-28-54

Mr Kenneth Cooper  
Bay Minette, Ala

Dear Mr Cooper:

I am mailing your  
warrants on the three young boys  
that stole things out of Maxine  
Henderson's purse. I have notified  
the witnesses to be there at the  
Court House at nine o'clock  
Monday, a.m. May 31st.  
I hope you can get the Judge to try  
this case first so the girl can get  
on her way home in North Carolina

Respect yours.

M. R. Howell