

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3308

FINAL DECREE

This cause coming on to be heard was submitted for final decree upon the pleadings, decrees pro confesso and proof as noted by the Register, and it appearing to the satisfaction of the court that the Complainants are the owners in fee simple of, are now and were at the time of the filing of the bill of complaint in this cause, in the actual and peaceable possession of the said land, and each and every part and parcel thereof; that service was perfected by personal service upon Henry George Coleman, Francis Crawford, Henry Crawford Jr., Mrs. F.B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp and Mary Klumpp; that service was perfected upon all the Respondents by publication in the Baldwin Times, a newspaper published at Bay Minette in Baldwin County, Alabama, for four consecutive weeks commencing on the 29th day of July, 1954; that service was perfected by publication in the Baldwin Times, a newspaper published at Bay Minette in Baldwin County, Alabama, for four consecutive weeks beginning with its issues of July 29th, 1954, against the unknown heirs, devisees, grantees, personal representatives and assigns of the Respondents and each of them, and any and all other persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land or any part or parcel thereof; that notice of the pendency of said suit was given by the filing of a lis pendens notice in the office of the Probate Judge of Baldwin County, Alabama, and by posting at the court house door in Bay Minette, Alabama; that the Respondents and each of them, having failed to appear and plead, answer or demur to the bill of complaint as required by law, a decree pro confesso was entered against them and each of them; that J. Connor Owens Jr., a practicing attorney at law, in Bay Minette, Baldwin County, Alabama,

was appointed Guardian ad Litem to represent the Respondents whose names were unknown, and duly filed his appearance agreeing to act as Guardian ad Litem, and filed answer denying all the material allegations of the complaint, and appeared and cross examined the witnesses for the Complainant; that the title of the Complainants have been duly and legally established by legal and competent evidences, the court is of the opinion that the Complainants are entitled to the relief prayed for.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED, by the court, that the Respondents, Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, (Mildred K. Stetzel), Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, (Mildred K. Stetzel), Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and also any and all persons, firms or corporation claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, have no right, estate, claim, interest in or encumbrance upon the following described lands or any part or parcel thereof in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records, Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED and decreed, by the court, that the full fee simple title to the said land in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records, Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the Court, that a certified copy of this decree be recorded in the office of the Probate Judge of Baldwin County, Alabama, in the direct index in the names of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schmitzer, (Mildred K. Stetzel,) Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustees and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and in the indirect index in the names of C. H. Woodward and Patricia R. Woodward.

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

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

Dated at Bay Minette, Baldwin County, Alabama, This the 12 day of November, 1954.

Hubert M. Z. Hall
JUDGE

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

FINAL DECREE

FILED

NOV 12 1954

ALICE L. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY GEORGE COLEMAN, FRANCIS CRAWFORD, HENRY CRAWFORD, JR., MRS. F. B. MOORE, L. W. SCHNITZER, (MILDRED K. STETZEL), ANNIE E. MASON, WILLIAM C. MASON, Trustee and individually, J. I. PITMAN, Trustee, and individually, E. J. ROBERTS, TRUSTEE and individually, GODFREY KLUMPP, MARY KLUMPP, LARKIN H. HARRIS, GENEVIVE WINBERG, EMILE HERPIN, the unknown heirs, devisees, executors, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by C. H. Woodward and Patricia R. Woodward, as Complainant, and against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee, and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, executor, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, as Respondents.

Witness my hand this the 28th day of June, 1954.

Reid J. Muck
Register

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainants, C. H. Woodward and Patricia R. Woodward, humbly complain-
ing against the following described lands situated in Baldwin County, Alabama,
to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition
to the Town of Fairhope, Baldwin County, Alabama, as per map thereof
recorded in Map Book No. 1, at page 72, Probate Records, Baldwin
County, Alabama.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY GEORGE COLEMAN, FRANCIS CRAWFORD, HENRY CRAWFORD, JR., MRS. F. B. MOORE, L. W. SCHNITZER, (MILDRED K. STETZEL), ANNIE E. MASON, WILLIAM C. MASON, Trustee and individually, J. I. PITMAN, Trustee, and individually, E. J. ROBERTS, TRUSTEE and individually, GODFREY KLUMPP, MARY KLUMPP, LARKIN H. HARRIS, GENEVIVE WINBERG, EMILE HERPIN, the unknown heirs, devisees, executors, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by C. H. Woodward and Patricia R. Woodward, as Complainant, and against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee, and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, executor, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, as Respondents.

Witness my hand this the 28th day of June, 1954.

Bridget Luck
Register

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainants, C. H. Woodward and Patricia R. Woodward, humbly complain-
ing against the following described lands situated in Baldwin County, Alabama,
to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition
to the Town of Fairhope, Baldwin County, Alabama, as per map thereof
recorded in Map Book No. 1, at page 72, Probate Records, Baldwin
County, Alabama.

And also against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, and also against the unknown heirs, devisees, grantees, successors, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually and any and all other persons, firms, or corporation claiming any title to, right, interest in, lien or encumbrance, upon the said lands or any part or parcel thereof and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainants, F. H. Woodward and Patricia R. Woodward, are bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, if living, or if dead, their heirs, assigns, devisees, grantees, and personal representatives are non-residents of the State of Alabama and over twenty-one years of age; that a diligent search and inquiry has been made, and caused to be made to ascertain the present addresses of the respondents, and whether or not any of them are dead, and if so the names, ages and residences of their heirs and next of kin, and from all information obtainable, the said parties are all non-residents of the State of Alabama, and over twenty-one years of age and their post offices cannot be ascertained; that an examination has been made of the land and tax records at Bay Minette, Alabama, the county seat of Baldwin County

BOOK 015 PAGE 439

inquiries has been made of persons in and around Fairhope, in Baldwin County, Alabama, the vicinity in which the lands are located and no information can be obtained as to the addresses of the individual respondents and whether or not any of them are dead, and if dead the names, ages and resident of their heirs and next of kin.

3.

That your Complainants are the owners in fee simple and in the actual possession of lands described herein in Baldwin County, Alabama, to-wit:

Lots 12, 13 and 14, in Block 7, of the Ingleside Highlands, Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records Baldwin County, Alabama.

4.

That no suit is pending to test the Complainants' title to, interest in, or rights of possession to said land; that the Complainants therefore call upon the Respondents, and each of them, separately and severally to set forth and specify what right, title, interest in, lien or encumbrances the said Respondents and each of them have in and to said lands and by what instrument or instruments the same are derived and/or created.

5.

That your Complainants acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book, 197, NS, pages 216-17; that your Complainants acquired title to said Lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 204-5.

6.

That the title to said lands claimed by your Complainants stand upon the record of the Probate Court of Baldwin County, Alabama, in the name of C. H. Woodward and Patricia E. Woodward.

7.

That no one has at any time within ten years next preceding the filing of this bill, of Complaint paid any taxes upon said land, or had any possession

thereof other than your Complainants, C. H. Woodward, Patricia R. Woodward, Ira Stetzel, Mildred K. Stetzel, Godfred Klumpp, Mary Klumpp, Larkin Harris, and L. W. Schnitzer.

WHEREFORE, the premises considered, your Complainants prays that your Honor will by proper process make the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors, and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other person, firm or corporation claiming any right, title to, interest in or encumbrance upon the said lands in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14 in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama,

or any part thereof, parties respondent to the bill of complaint, and require them, and each of them to appear and plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining and determining that the fee simple title, free from all liens and encumbrances to the lands herein described and to each and every part and parcel thereof, is vested in your Complainants, C. H. Woodward and Patricia R. Woodward, and that neither Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives.

successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, E. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klumpp, Mary Klumpp, Iarkins H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, nor any other persons, firms or corporation has any right, title, interest in, or encumbrances upon the said lands or any part or parcel thereof and that any and all doubts and disputes concerning the said lands may be cleared up.

Your Complainants prays for such other, further, different or general relief as they may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY Harry J. Wilters Jr.
Solicitor for the Complainants

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County, in said State, personally appeared Harry J. Wilters Jr., who is known to me and who having been by me first duly sworn, deposes and says; that he is solicitor of record for the Complainants in the within cause; that he is authorized to make this affidavit; that from all information obtainable after a diligent search and inquiry the facts contained in the foregoing bill of complaint are true and correct.

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

Harry J. Wilters Jr.
John M. Brantley
Notary Public, Baldwin County, Alabama

FILED

7-28-54

ALICE J. DUCK, Clerk

Received 28 day of July 1954
and on 28 day of July 1954

I served a copy of the within
on Sumner

By service on Henry George Coleman

TAYLOR WILKINS, Sheriff
By John H. Harris D.S.

James Campbell
Henry George Coleman
Mrs. H.B. Moore
L.W. Schmitzer
Anna E. Mason
William L. Mason
J.R. Pittman
E.J. Roberts
Rodney Blumpp
Mary Blumpp

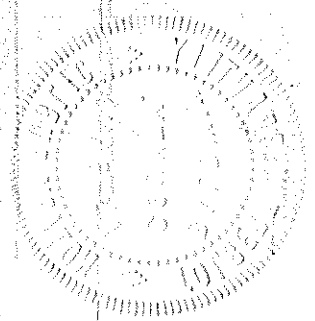
Larkin W. Harris
Not found

no 3386

C. M. WOODWARD AND
PARTOTA R. WOODWARD
COMPLAINANTS
VS
HENRY GEORGE COLEMAN, ET AL,
RESPONDENTS

BILL OF COMPLAINT

FILED
JUL 28 1954
ALICE J. DUCK, Register



C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
NO. 3308

DECREE PRO CONFESSO ON PERSONAL SERVICE

In this cause, it being made to appear to the Court, that a summons, requiring the Respondents, Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp, Mary Klumpp, to appear and plead to or answer the bill of complaint in this cause, within thirty days from the service upon Henry George Coleman, Francis Crawford, Henry Crawford Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp, Mary Klumpp, was served upon them by the Sheriff of Baldwin County, on the 28th day of July, 1954, and upon each of them on the 28th day of July, 1954, and the said Respondents having failed to plead, to, answer or demur to the said bill to the date hereof, it is now, therefore, on motion of the Complainants' solicitor, ordered and decreed that the said bill of complaint in this cause, be, and it hereby is, in all things taken as confessed against the said Respondents.

Done this 10 day of Nov, 1954.

Hubert M. Hall
Circuit Judge.

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3308

DECREE PRO CONFESSO ON PUBLICATION

In this cause it appearing to the court that the order of publication heretofore made in this cause was published four consecutive weeks commencing on the 29th day of July, 1954, in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama; that a copy of said order was posted at the Court House door in Baldwin County, Alabama, on the 29th day of July, 1954, and it now further appearing to the court that the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, Godfred Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Mildred K. Stetzel and Emile Herpin, the unknown heirs, devisees, grantees, personal representatives and assigns of them and each of them, respondents, have to date hereof failed to plead, answer or demur to this bill of complaint.

It is therefore on motion of the Complainant, ordered and decreed, by the court, that the said bill of complaint be and it is hereby, in all things, taken as confessed against the Respondents named in this cause.

Witness my hand this the 10 day of Nov, 1954.

Hubert M. Still
JUDGE

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

no 3308

THIS PRESENTS NOTICE

It having been made to appear in the above styled cause by proper affidavit that Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris; are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Harpin, are non-residents of the State of Alabama, and over twenty-one years of age, or if dead, their heirs, devisees, grantees, personal representatives and assigns are unknown, and cannot be ascertained after a diligent search and inquiry and who are, from all information available, non-residents of the State of Alabama, and over twenty-one years of age; that C. H. Woodward and Patricia R. Woodward are both over twenty-one years of age, residents of Baldwin County, Alabama, and the owners in fee simple of and in the actual possession of the following described lands situated in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama;

That they acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 216-17, that they acquired title to said lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197, pages 204-5.

That no one has at any time within ten years next preceding the filing of the bill of complaint paid any taxes upon said land, or had any possession

thereof other than the Complainants, Ira Stetzel, Mildred K. Stetzel, Godfrey, Klumpp, Mary Klumpp, Larkin Harris and L. W. Schnitzer.

It is therefore ordered and notice is hereby given that the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, Trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klump, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpink Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other persons, firms or corporations claiming any right, title to, interest in or encumbrance upon the said lands, or any part thereof, to appear in the Circuit Court of Baldwin County, Alabama, in Equity, and plead, answer or demur to this bill of complaint on or before the 27 day of August, 1954, or upon their having failed to do so upon the expiration of thirty days from said date, a decree pro confesso shall be taken against them, and that this cause shall be at issue.

It is further ordered that this order and notice be published in the Baldwin Times, Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks.

In Witness Whereof, I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, have hereunto set my hand and seal of office on this the 28th day of July, 1954.

Alice J. Duck
Register

Wilters & Brantley
Solicitors for the Complainants

FILED
7-28-54

ALICE J. DUCK, Clerk

STATE OF ALABAMA, BALDWIN COUNTY

Filed 7-28-54 8A.M.

Recorded 7-28-54 book 4 page 21-2

W. B. Stuart
Judge of Probate

NO 3308

88 MAY 100 MID.

C. H. Woodward and
Patricia R. Woodward

Complainants

vs

Henry George Coleman, et al

Respondents

Lis Pendens Notice

R1⁷⁵
Mr. Duck

FILED

JUL 28 1954

ALICE J. DICK, Register

FILED 072-2710

C. H. WOODWARD AND
PATRICIA WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3308

REQUEST FOR APPOINTMENT OF COMMISSIONER

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

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

C. H. Woodward

Fairhope, Alabama

J. E. Gooden

Fairhope, Alabama.

It is hereby requested that they be given proper and legal notice
and that Evelyn Watts be appointed as Special Commissioner, to take testi-
mony of said witnesses, and that due and legal notice be given as required
by law.

Dated this the 6 day of Nov, 1954.

FILED

11-6-54

ALICE J. DUCK, Clerk

[Signature]
Solicitor for the Complainants

C. H. WOODWARD AND
PATRICIA WOODWARD,

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

REQUEST FOR APPOINTMENT
OF COMMISSIONER

no 6, 1956

Filed 11-6-54

Aud. French
Register

C. H. WOODWARD AND
PATRICIA WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

No. 3308

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

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

IT IS FURTHER ORDERED that the said J. Connor Owens be notified of his appointment, and of the time fixed to take testimony in the cause.

Dated this the 8 day of November, 1954.

W. J. Owens
Register

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

Dated this the 8 day of November, 1954.

J. Connor Owens, Jr.

C. H. WOODWARD AND
PATRICIA WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 3308

Comes now the Respondent, Larkin H. Harris, in the above styled cause and for answer says that he does not now claim or pretend to have any right, title or interest, either legal or equitable, of, in, or to Lots 12, 13, and 14, in Block 7 of Ingleside Highland Addition to the town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book 1, at page 72, Probate records, Baldwin County, Alabama, which is the subject matter of the bill of complaint as above styled, or in part thereof; and this Respondent disclaims both individually and in any respective capacity, any right, title, and interest, of, in, or to the same and every part thereof.

Larkin H. Harris
Larkin H. Harris

STATE OF ALABAMA
COUNTY OF Baldwin

I, J. E. Goodman, a Notary Public, in and for said County, in said State, hereby certify that Larkin H. Harris, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 6 day of Nov, 1954.

FILED

11-10-54

ALICE J. DUCK, Clerk

J. E. Goodman
Notary Public,

My Commission expires March 3, 1958

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

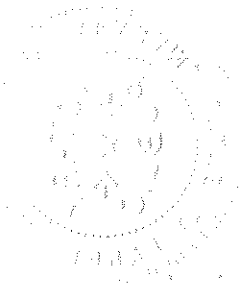
RESPONDENTS

DISCLAIMER OF LARKIN HARRIS

FILED

NOV 10 1954

ALICE J. BACK, Register



STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY GEORGE COLEMAN, FRANCIS CRAWFORD, HENRY CRAWFORDS, JR., MRS. F. B. MOORE, L. W. SCHNITZER (MILDRED K. STETZEL), ANNIE E. MASON, WILLIAM C. MASON, Trustee and individually, J. I. PITMAN, TRUSTEE, and individually, E. J. ROBERTS, TRUSTEE and individually, GODFREY KLUMPP, MARY KLUMPP, LARKIN, H. HARRIS, GENEVIVE WINBERG, EMILE HERPIN, the unknown heirs, devisees, executors, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by C. H. WOODWARD and PATRICIA AS Complainant, and against Henry George Coleman, Francis Crawford, Henry Crawford Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee, and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, executor, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, as Respondents.

Witness my hand this the 28th day of July, 1954.

Chas. J. French
Register

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainants, C. H. Woodward and Patricia R. Woodward, humbly complain-
ing against the following described lands situated in Baldwin County, Alabama,
to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition
to the Town of Fairhope, Baldwin County, Alabama, as per map thereof
recorded in Map Book No. 1, at Page 72, Probate Records, Baldwin
County, Alabama.

And also against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Iarkin H. Harris, Genevive Winberg, Emile Herpin, and also against the unknown heirs, devisees, grantees, successors, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Iarkin, H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually and any and all other persons, firms or corporation claiming any title to, right, interest in, lien or encumbrance, upon the said lands or any part or parcel thereof and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainants, C. H. Woodward and Patricia R. Woodward, are bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Iarkin H. Harris, are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, if living, or if dead, their heirs, assigns, devisees, grantees, and personal representatives are non-residents of the State of Alabama and over twenty-one years of age; that a diligent search and inquiry has been made, and caused to be made to ascertain the present addresses of the respondents, and whether or not any of them are dead, and if so the names, ages and residences of their heirs and next of kin, and from all information obtainable the said parties are all non-residents of the State of Alabama, over twenty-one years of age and their post offices cannot be ascertained; that an examination has been made of the land and tax records at Bay Minette, Alabama, the county seat of Baldwin County

inquiries has been made of persons in and around Fairhope, in Baldwin County, Alabama, the vicinity in which the land are located and no information can be obtained as to the addresses of the individual respondents and whether or not any of them are dead, and if dead the names, ages and resident of their heirs and next of kin.

3.

That your Complainants are the owners in fee simple and in the actual possession of lands described herein in Baldwin County, Alabama, to-wit:

Lots 12, 13 and 14, in Block 7 of the Engleside Highlands, Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records Baldwin County, Alabama.

4.

That no suit is pending to test the Complainants' title to, interest in, or rights of possession to said land; that the Complainants therefore call upon the Respondents, and each of them, separately and severally to set forth and specify what right, title, interest in, lien or encumbrances the said Respondents and each of them have in and to said lands and by what instrument or instruments the same are derived and/or created.

5.

That your Complainants acquired title to said Lot 12, Block 7 in Ingleside Highlands, and addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197, NS, pages 216-17; that your Complainants acquired title to said Lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 204-5.

6.

That the title to said lands claimed by your Complainants stand upon the record of the Probate Court of Baldwin County, Alabama, in the name of C. H. Woodward and Patricia R. Woodward.

7.

That no one has at any time within ten years next preceding the filing of this bill of complaint paid any taxes upon said land, or had any possession

thereof other than your Complainants, C. H. Woodward, Patricia R. Woodward, Ira Stetzel, Mildred K. Stetzel, Godfrey Klumpp, Mary Klumpp, Larkin Harris, and L. W. Schnitzer.

WHEREFORE, the premises considered your Complainants prays that your Honor will by proper process make the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other person, firm or corporation claiming any right, title to, interest in or encumbrance upon the said lands in Baldwin County, Alabama, to-wit:

Lot 12, 13 and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama,

or any part thereof, parties respondent to the bill of complaint, and require them, and each of them to appear and plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further pray that upon a final hearing hereof your Honor will make and enter a decree ascertaining and determining that the fee simple title, free from all liens and encumbrances to the lands herein described and to each and every part and parcel thereof is vested in your Complainants, C. H. Woodward and Patricia R. Woodward, and that neither Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives,

successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, nor any other persons, firms or corporation has any right, title, interest in, or encumbrances upon the said lands or any part or parcel thereof and that any and all doubts and disputes concerning the said lands may be cleared up.

Your Complainants pray for such other, further, different or general relief as they may be in equity and good conscience entitled to receive.

Walters & Brantley

BY Harry J. Walters Jr.
Solicitor for the Complainants

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County, in said State, personally appeared Harry J. Walters Jr., who is known to me and who having been by me first duly sworn, deposes and says; that he is solicitor of record for the Complainants in the within cause; that he is authorized to make this affidavit; that from all information obtainable after a diligent search and inquiry the facts contained in the foregoing bill of complaint are true and correct.

Sworn to and subscribed before me on this the _____ day of _____

1954.

Notary Public, Baldwin County, Alabama

NO 3308

C. H. Woodward and
Patricia R. Woodward.
Complainants

16

Henry George Coleman, et al,
Respondents

Bill of Complaint

FILED

JUL 28 1954

ALICE J. DUCK, Register

1 original
17 copies

C. H. WOODWARD AND
PATRICIA WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3308

NOTE OF TESTIMONY

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

1. Original summons and complaint.
2. Lis Pendens filed for record in the Probate Office.
3. Proof of publication of notice in the Baldwin Times.
4. Decree pro confesso by publication.
5. Decree pro confesso on personal service.
6. Disclaimer of Larkin Harris
7. Request for appointment of commissioner.
8. Commission to take deposition.
9. Notice of time of taking testimony.
10. Appointment of guardian ad litem and acceptance.
11. Oral deposition of C. H. Woodward and J. E. Gooden.

Dated this the 12 day of November, 1954.

Wilters & Brantley

By: W. J. Wilters

Solicitor for the Complainants

Register

C. H. WOODWARD AND
PATRICIA WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

NOTE OF TESTIMONY

*Filed 11-12-54
Airtel re: Rye
Rye*

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ETAL,

RESPONDENTS

Ø
Ø IN THE CIRCUIT COURT OF
Ø BALDWIN COUNTY, ALABAMA,
Ø IN EQUITY
Ø NO. 3308
Ø

MOTION FOR DECREE PRO CONFESSO
ON PUBLICATION

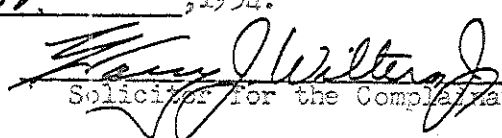
Now comes the Complainants in the above styled cause and shows unto the Court that an order of publication was made on the 28th day of July, 1954, which was duly published in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, in its issues of July 29, 1954, August 5th, August 12, August 19, 1954, and was directed to Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Mildred K. Stetzel and Emile Herpin, the unknown heirs, devisees, personal representatives and assigns of them and each of them, and any other persons, firms or corporations claiming any title to, right, interest in, lien or encumbrances upon the following described land situated in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama,

as respondent, which required the said Respondents to answer or demur to the bill of complaint within thirty days after the 27th day of August, 1954, which said Respondents have to this day failed to do.

WHEREFORE, the Complainants move the court to grant a decree pro confesso against the said Respondents.

Dated this the 8 day of Nov., 1954.


Solicitor for the Complainants

C. H. WOODWARD AND
PATRICIA R. WOODWARD,

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

MOTION FOR DECREE PRO CONFESSO
ON PUBLICATION

Filed Nov. 8, 1954
W. J. French

C. W. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3308

Comes the Complainants in the above styled cause and shows unto the Register that a summons was issued out of this Court on the 28th day of July, 1954, directed to Henry George Coleman, Francis Crawford, Henry Crawford Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Respondents herein, ordering them and each of them to appear and plead, answer or demur, within thirty days from the service thereof to the bill of complaint in this cause; and that a copy of the said summons was duly served upon the said Henry George Coleman, Francis Crawford, Henry Crawford Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp and Mary Klumpp, by the proper officer on the 28th day of July, 1954, and that the said respondents have to the date hereof failed to plead, answer or demur to said bill of complaint:

Wherefore, Complainants move that a decree pro confesso be entered against the said Respondents.

This the 8 day of Nov, 1954.

Wilters & Brantley

By: Harry J. Wilters
Attorney for Complainants.

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

MOTION FOR DECREE PRO CONFESSO
PERSONAL SERVICE

*Filed Nov. 8, 1954
Alice J. Service*

C. H. WOODWARD AND
PATRICIA WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3308

NOTICE OF TIME OF TAKING TESTIMONY

TO: Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer (Mildred K. Stetzel), Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, Trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually:

Notice is hereby given that the Complainants will on the 10 day of November, 1954, before Evelyn Watts, as special commissioner take the testimony of the following witnesses:

C. H. Woodward

Fairhope, Alabama

J. E. Gooden

Fairhope, Alabama

Dated this the 6 day of Nov, 1954.

Walters & Brantley

BY:

Henry J. Walters
Solicitor for the Complainants

Evelyn Watts
Special Commissioner.

C. H. WOODWARD ET AL,
COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,
RESPONDENTS

NOTICE OF TIME OF
TAKING TESTIMONY

Nov 6, 1954

*Filed 11-6-54
Aric J. French
Register*

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Evelyn Watts

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 C. H. Woodward and J. E. Gooden

as witnesses in behalf of Complainants in a cause pending in our Circuit Court in Baldwin County, of said State, wherein C. H. Woodward and Patricia Woodward

and Henry George Coleman, et al,

Respondent on oath, to be by you administered, upon C. H. Woodward and J. E. Gooden to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 16th day of June, 1954

Register.

Commissioner's Fee, \$

Witness' Fees, \$

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

C. H. Woodward, et al,

Complainant

VS.

Henry George Coleman, et al,

Respondent

I, Evelyn Watts

as ~~Register and~~ Commissioner

have called and caused to come before me C. H. Woodward and J. E. Gooden

witnesses named in the Requirement for Oral Examination, on the 10 day of November

1954, at the office of "Halters & Brantley

in Bay Minette

, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said C. H. Woodward and J. E. Gooden

doth depose and say as follows:

My name is C. H. Woodward. I am the Complainant in this case. My wife's name is Patricia R. Woodward. She and I are both over the age of twenty-one years and residents of Baldwin County, Alabama. We have caused a diligent search and inquiry to be made in and around Fairhope, Alabama, as to the whereabouts and present addresses of the following respondents, Genevive Winberg, Mildred K. Stetzel, Emile Herpin, and we have been unable to find any information concerning the matters of our inquiry. In the aforementioned inquiry we attempted to determine whether or not any of them were dead and if so then names, ages and residents of their heirs and next of kin. From all information obtainable, the said parties are all nonresidents of the State of Alabama, and over twenty-one years of age, and their post office addresses cannot be ascertained. The search was also made of the land and tax records at Bay Minette, Alabama, the county seat of Baldwin County, the county in which the land lies.

My wife, Patricia R. Woodward and myself are the owners in fee simple and we are in actual possession of the land described herein in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book 1, page 72 in the Probate Records of Baldwin County, Alabama.

There is no suit pending to test our title to, interest in, or rights of possession to the said land.

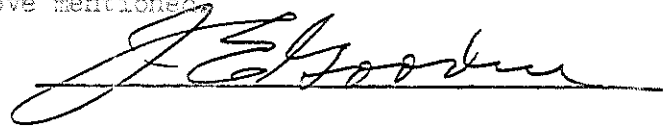
Patricia R. Woodward, my wife and myself, acquired title to said Lots 12, Block 7, in Ingleside Highland, an addition to Fairhope, by warranty deed from Ira Stetzel and Mildred Stetzel, his wife, dated July 2, 1953, and recorded in Deed Book 197 NS, pages 216-17. We acquired title to Lots 13 and 14, Block 7, of the same subdivision by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, on July 2, 1953. This deed is recorded in Deed Book 197 NS, pages 204-5.

The title to this land is in your Complainants and it is recorded in the records of Baldwin County, Alabama, in the names of C. H. Woodward and Patricia R. Woodward. No one has at any time within ten years next preceding the filing of this bill, paid any taxes upon this land or had any possession thereof other than your Complainants, C. H. Woodward and Patricia R. Woodward, Ira Stetzel, Mildred K. Stetzel, Godfrey Klumpp, Mary Klumpp, Larkin Harris and L. W. Schnitzer.

These lots included in this bill are located within the city limits of Fairhope. There are at the present time no buildings upon this property nor was there any at the time we acquired possession of the same. We and those through whom we claim title have paid taxes upon this land for ten years prior to the filing of this suit. Also we and those through whom we acquired title have had possession of this land for ten years next preceding the filing of this suit.

C. H. Woodward

My name is J. E. Gooden. I am a real estate agent in the city of Fairhope Baldwin County, Alabama, and have been in such business there for the past 18 years. I am familiar with Lots 12, 13, and 14, Block 7 of the Ingleside Addition to the town of Fairhope, Baldwin County, Alabama, as recorded in Map Book 1, page 72 of the probate records of Baldwin County, Alabama. I know at the present time that C. H. Woodward and Patricia R. Woodward are the owners of the lots involved in this proceeding and that they are now in possession of the land. I know that within the past ten years that no one has had possession of this land except Godfrey Klumpp, Mary Klumpp, Ira Stetzel, and his wife Mildred K. Stetzel. The reason I am familiar with this ownership of the land is that my company acted as brokers in the conveyance of the land from the Klumpps to Stetzel, and from Stetzels to the Woodward. I know that no one within the past ten years has claimed any ownership or interest in this land except, Mr. and Mrs. Woodward, Ira Stetzel and his wife, Mildred K. Stetzel, Godfrey Klumpp, Mary Klumpp, Larkin Harris and L. W. Schnitzer. From time to time my company were brokers in the transfer of these lots and at different periods we advertized these lots for sale. We also had our real estate signs upon these lots stating the same were for sale. It is common knowledge in the city of Fairhope that the ownership of this land has been in the people that I have above mentioned.



There was present at the time of the taking of this testimony the Honorable J. Connor Owens, attorney at law, and the duly appointed Guardian ad Litem, who was appointed by this Court.

W. R. STUART
PROBATE JUDGE

Bay Minette, Ala.,

Received of

11-23, 1954

[illegible]

FOR RECORD

TOTAL \$

Judge of Probate.

C. H. WOODWARD AND
PATRICIA R. WOODWARD
COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,
RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
NO. 3308

BOOK 215 PAGE 302

FINAL DECREE

This cause coming on to be heard was submitted for final decree upon the pleadings, decrees pro confesso and proof as noted by the Register, and it appearing to the satisfaction of the court that the Complainants are the owners in fee simple of, are now and were at the time of the filing of the bill of complaint in this cause, in the actual and peaceable possession of the said land, and each and every part and parcel thereof; that service was perfected by personal service upon Henry George Coleman, Francis Crawford, Henry Crawford Jr., Mrs. F.B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp and Mary Klumpp; that service was perfected upon all the Respondents by publication in the Baldwin Times, a newspaper published at Bay Minette in Baldwin County, Alabama, for four consecutive weeks commencing on the 29th day of July, 1954; that service was perfected by publication in the Baldwin Times, a newspaper published at Bay Minette in Baldwin County, Alabama, for four consecutive weeks beginning with its issues of July 29th, 1954, against the unknown heirs, devisees, grantees, personal representatives and assigns of the Respondents and each of them, and any and all other persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land or any part or parcel thereof; that notice of the pendency of said suit was given by the filing of a lis pendens notice in the office of the Probate Judge of Baldwin County, Alabama, and by posting at the court house door in Bay Minette, Alabama; that the Respondents and each of them, having failed to appear and plead, answer or demur to the bill of complaint as required by law, a decree pro confesso was entered against them and each of them; that J. Connor Owens Jr., a practicing attorney at law, in Bay Minette, Baldwin County, Alabama,

was appointed Guardian ad Litem to represent the Respondents whose names were unknown, and duly filed his appearance agreeing to act as Guardian ad Litem, and filed answer denying all the material allegations of the complaint, and appeared and cross examined the witnesses for the Complainant; that the title of the Complainants have been duly and legally established by legal and competent evidences, the court is of the opinion that the Complainants are entitled to the relief prayed for.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED, by the court, that the Respondents, Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, (Mildred K. Stetzel), Annie E. Mason, William C. Mason, J. I. Pitman, E. J. Roberts, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, (Mildred K. Stetzel) Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and also any and all persons, firms or corporation claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, have no right, estate, claim, interest in or encumbrance upon the following described lands or any part or parcel thereof in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records, Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED and decreed, by the court, that the full fee simple title to the said land in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records, Baldwin County, Alabama.

BOOK 215 PAGE 303

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the Court, that a certified copy of this decree be recorded in the office of the Probate Judge of Baldwin County, Alabama, in the direct index in the names of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, (Mildred K. Stetzel,) Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustees and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and in the indirect index in the names of C. H. Woodward and Patricia R. Woodward.

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

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

Dated at Bay Minette, Baldwin County, Alabama, This the _____ day of November, 1954.

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 entitled cause, which said decree was rendered in my office.

WITNESS MY HAND AND SEAL THIS 12 day of Nov, 1954

Alice J. Duck
Register of Circuit Court, in Equity

STATE OF ALABAMA, BALDWIN COUNTY

Filed 11-23-54 10A M

Recorded *Reed* book 215 page 302-4

W R Stewart
Judge of Probate

ES

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY GEORGE COLEMAN, FRANCIS CRAWFORD, HENRY CRAWFORD, JR., MRS. F. B. MOORE, L. W. SCHNITZER, (MILDRED K. STETZEL), ANNIE E. MASON, WILLIAM C. MASON, Trustee and individually, J. I. PITMAN, Trustee, and individually, E. J. ROBERTS, TRUSTEE and individually, GODFREY KLUMPP, MARY KLUMPP, LARKIN H. HARRIS, GENEVIVE WINBERG, EMILE HERPIN, the unknown heirs, devisees, executors, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Robertsd, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by C. H. Woodward and Patricia R. Woodward, as Complainant, and against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee, and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, executor, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, as Respondents.

Witness my hand this the 28th day of July, 1954.

Reinhold A. Smith
Register

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainants, C. H. Woodward and Patricia R. Woodward, humbly complain-
ing against the following described lands situated in Baldwin County, Alabama,
to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition
to the Town of Fairhope, Baldwin County, Alabama, as per map thereof
recorded in Map Book No. 1, at page 72, Probate Records, Baldwin
County, Alabama.

And also against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, and also against the unknown heirs, devisees, grantees, successors, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually and any and all other persons, firms, or corporation claiming any title to, right, interest in, lien or encumbrance, upon the said lands or any part or parcel thereof and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainants, G. H. Woodward and Patricia R. Woodward, are bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, if living, or if dead, their heirs, assigns, devisees, grantees, and personal representatives are non-residents of the State of Alabama and over twenty-one years of age; that a diligent search and inquiry has been made, and caused to be made to ascertain the present addresses of the respondents, and whether or not any of them are dead, and if so the names, ages and residences of their heirs and next of kin, and from all information obtainable, the said parties are all non-residents of the State of Alabama, and over twenty-one years of age and their post offices cannot be ascertained; that an examination has been made of the land and tax records at Bay Minette, Alabama, the county seat of Baldwin County

inquiries has been made of persons in and around Fairhope, in Baldwin County, Alabama, the vicinity in which the lands are located and no information can be obtained as to the addresses of the individual respondents and whether or not any of them are dead, and if dead the names, ages and resident of their heirs and next of kin.

3.

That your Complainants are the owners in fee simple and in the actual possession of lands described herein in Baldwin County, Alabama, to-wit:

Lots 12, 13 and 14, in Block 7, of the Ingleside Highlands, Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records Baldwin County, Alabama.

4.

That no suit is pending to test the Complainants' title to, interest in, or rights of possession to said land; that the Complainants therefore call upon the Respondents, and each of them, separately and severally to set forth and specify what right, title, interest in, lien or encumbrances the said Respondents and each of them have in and to said lands and by what instrument or instruments the same are derived and/or created.

5.

That your Complainants acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book, 197, NS, pages 216-17; that your Complainants acquired title to said Lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 204-5.

6.

That the title to said lands claimed by your Complainants stand upon the record of the Probate Court of Baldwin County, Alabama, in the name of C. H. Woodward and Patricia R. Woodward.

7.

That no one has at any time within ten years next preceding the filing of this bill, of Complaint paid any taxes upon said land, or had any possession

thereof other than your Complainants, C. H. Woodward, Patricia R. Woodward, Ira Stetzel, Mildred K. Stetzel, Godfred Klumpp, Mary Klumpp, Larkin Harris, and L. W. Schnitzer.

WHEREFORE, the premises considered, your Complainants prays that your Honor will by proper process make the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors, and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other person, firm or corporation claiming any right, title to, interest in or encumbrance upon the said lands in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14 in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama,

or any part thereof, parties respondent to the bill of complaint, and require them, and each of them to appear and plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining and determining that the fee simple title, free from all liens and encumbrances to the lands herein described and to each and every part and parcel thereof, is vested in your Complainants, C. H. Woodward and Patricia R. Woodward, and that neither Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives.

successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, nor any other persons, firm or corporation has any right, title, interest in, or encumbrances upon the said lands or any part or parcel thereof and that any and all doubts and disputes concerning the said lands may be cleared up.

Your Complainants prays for such other, further, different or general relief as they may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY:

Solicitor for the Complainants

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County, in said State, personally appeared Harry J. Wilters Jr., who is known to me and who having been by me first duly sworn, deposes and says; that he is solicitor of record for the Complainants in the within cause; that he is authorized to make this affidavit; that from all information obtainable after a diligent search and inquiry the facts contained in the foregoing bill of complaint are true and correct.

Sworn to and subscribed before me on this the ____ day of _____,

1954.

Notary Public, Baldwin County, Alabama

Notary Public, Baldwin County, Alabama

1954.

Sworn to and subscribed before me on this the _____ day of _____,

are true and correct.

seem and indubitably the facts contained in the foregoing bill of complaint to make this affidavit; that from all information obtainable after a diligent of record for the complainants in the within cause; that he is authorized having been by me first duly sworn, deposes and says; that he is solicitor State, personally appeared Harry J. Wilfers Jr., who is known to me and who before me the undersigned authority in and for said County, in said

BALDWIN COUNTY

STATE OF ALABAMA

BY: _____
Solicitor for the complainants

Wilfers & Brantley

FILED

JUL 28 1954

ALICE J. DUCK, Register

703308

C. H. Woodward and
Patricia R. Woodward,
Complainants

vs
Henry George Coleman, et al.,
Respondents

Bill of Complaint

Your complainants desire for such other, further, different

disputes concerning the said lands may be cleared up.

the said land or part or parcel thereof and that any and all doubts and

in or corporations and right, title, interest in, or encumbrances upon

individually, C. H. Woodward, trustee and individually, L. B. Moore, trustee and

trust, William Holcomb, trustee and individually, L. B. Moore, trustee and

Garret Coleman, Allen Wells, Jr. et al., Henry Crawford, trustee and indistinctly

Klimb, Watkins H. Harris, Genevive Winberg, Emilie Herbin, Clement L. Coleman,

individually, E. J. Roberts, trustee and individually, Goddard Klimb, Mary

Mason, William C. Mason, trustee and individually, J. I. Pifman, trustee and

ford, Jr., Mrs. L. B. Moore, L. W. Schmitzer, Mildred K. Stetzel, Annie E.

successors and assigns of Henry George Coleman, Francis Crawford, Henry Craw-

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY GEORGE COLEMAN, FRANCIS CRAWFORD, HENRY CRAWFORD, JR., MRS. F. B. MOORE, L. W. SCHNITZER, (MILDRED K. STETZEL), ANNIE E. MASON, WILLIAM C. MASON, Trustee and individually, J. I. PITMAN, Trustee, and individually, E. J. ROBERTS, TRUSTEE and individually, GODFREY KLUMPP, MARY KLUMPP, LARKIN H. HARRIS, GENEVIVE WINBERG, EMILE HERPIN, the unknown heirs, devisees, executors, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by C. H. Woodward and Patricia R. Woodward, as Complainant, and against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee, and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, executor, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, as Respondents.

Witness my hand this the 28th day of July, 1954.

W. J. H. H. H.
Register

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

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

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

Your Complainants, C. H. Woodward and Patricia R. Woodward, humbly complain-
ing against the following described lands situated in Baldwin County, Alabama,
to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition
to the Town of Fairhope, Baldwin County, Alabama, as per map thereof
recorded in Map Book No. 1, at page 72, Probate Records, Baldwin
County, Alabama.

And also against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, and also against the unknown heirs, devisees, grantees, successors, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually and any and all other persons, firms, or corporation claiming any title to, right, interest in, lien or encumbrance, upon the said lands or any part or parcel thereof and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainants, G. H. Woodward and Patricia R. Woodward, are bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, if living, or if dead, their heirs, assigns, devisees, grantees, and personal representatives are non-residents of the State of Alabama and over twenty-one years of age; that a diligent search and inquiry has been made, and caused to be made to ascertain the present addresses of the respondents, and whether or not any of them are dead, and if so the names, ages and residences of their heirs and next of kin, and from all information obtainable, the said parties are all non-residents of the State of Alabama, and over twenty-one years of age and their post offices cannot be ascertained; that an examination has been made of the land and tax records at Bay Minette, Alabama, the county seat of Baldwin County

inquiries has been made of persons in and around Fairhope, in Baldwin County, Alabama, the vicinity in which the lands are located and no information can be obtained as to the addresses of the individual respondents and whether or not any of them are dead, and if dead the names, ages and resident of their heirs and next of kin.

3.

That your Complainants are the owners in fee simple and in the actual possession of lands described herein in Baldwin County, Alabama, to-wit:

Lots 12, 13 and 14, in Block 7, of the Ingleside Highlands, Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records Baldwin County, Alabama.

4.

That no suit is pending to test the Complainants' title to, interest in, or rights of possession to said land; that the Complainants therefore call upon the Respondents, and each of them, separately and severally to set forth and specify what right, title, interest in, lien or encumbrances the said Respondents and each of them have in and to said lands and by what instrument or instruments the same are derived and/or created.

5.

That your Complainants acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book, 197, NS, pages 216-17; that your Complainants acquired title to said Lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 204-5.

6.

That the title to said lands claimed by your Complainants stand upon the record of the Probate Court of Baldwin County, Alabama, in the name of C. H. Woodward and Patricia R. Woodward.

7.

That no one has at any time within ten years next preceding the filing of this bill, of Complaint paid any taxes upon said land, or had any possession

thereof other than your Complainants, C. H. Woodward, Patricia R. Woodward, Ira Stetzel, Mildred K. Stetzel, Godfred Klumpp, Mary Klumpp, Larkin Harris, and L. W. Schnitzer.

WHEREFORE, the premises considered, your Complainants prays that your Honor will by proper process make the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. E. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors, and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other person, firm or corporation claiming any right, title to, interest in or encumbrance upon the said lands in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14 in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama,

or any part thereof, parties respondent to the bill of complaint, and require them, and each of them to appear and plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining and determining that the fee simple title, free from all liens and encumbrances to the lands herein described and to each and every part and parcel thereof, is vested in your Complainants, C. H. Woodward and Patricia R. Woodward, and that neither Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives.

successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Maspn, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfed Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, nor any other persons, firm or corporation has any right, title, interest in, or encumbrances upon the said lands or any part or parcel thereof and that any and all doubts and disputes concerning the said lands may be cleared up.

40300
C. W. Morrow
J. I. Pitman
E. J. Roberts
Godfed Klumpp
Mary Klumpp
Larkins H. Harris
Genevive Winberg
Emile Herpin
Clement L. Coleman
Sarah Coleman
Allen Wells
Ira Stetzel
Henry Crawford
William McIntosh
F. B. Moore
C. W. Morrow

WALTER T. BRANTLEY
Solicitor

BY: _____
Solicitor for the Complainants

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County, in said State, personally appeared Harry J. Wilters Jr., who is known to me and who having been by me first duly sworn, deposes and says; that he is solicitor of record for the Complainants in the within cause; that he is authorized to make this affidavit; that from all information obtainable after a diligent search and inquiry the facts contained in the foregoing bill of complaint are true and correct.

Sworn to and subscribed before me on this the _____ day of _____, 1954.

Notary Public, Baldwin County, Alabama

1954.

Sworn to and subscribed before me on this the _____ day of _____,

are true and correct.

search and inquiry the facts contained in the foregoing bill of complaint to make this affidavit; that from all information obtainable after a diligent of record for the complainants in the within cause; that he is authorized having been by me first duly sworn, deposes and says; that he is solicitor Speke, personally appeared Harry J. Wilbers Jr., who is known to me and who

Before me the undersigned authority in and for said County, in said

BALDWIN COUNTY

STATE OF ALABAMA

BY: _____ Solicitor for the Complainants

Wilbers & Brantley

703308

C. G. Woodward and Patricia R. Woodward Complainant

Henry George Coleman, et al Respondents

Bill of Complaint

FILED JUL 28 1954

ALICE J. DUCK, Register

disputes concerning the said lands may be cleared up. the said land or any part or parcel thereof and that any and all doubts as to or corporation has any right, title, interest in, or encumbrances upon the said land, C. G. Woodward, Trustee and individually, nor any other persons, individually, William McIntosh, Trustee and individually, E. B. Moore, Trustee and individually, Allen Wells, Mrs. Stefzel, Henry Crawford, Trustee and individually, Klumb, Larkins H. Harris, Genevive Winberg, Emilio Herpin, Clement L. Coleman, individually, E. J. Roberts, Trustee and individually, Godfred Klumb, Mary Mason, William C. Mason, Trustee and individually, J. I. Pittman, Trustee and Ford, Jr., Mrs. E. B. Moore, L. W. Schmitzer, Mildred K. Stefzel, Annie E. successors and assigns of Henry George Coleman, Francis Crawford, Henry Craw-

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HENRY GEORGE COLEMAN, FRANCIS CRAWFORD, HENRY CRAWFORD, JR., MRS. F. B. MOORE, L. W. SCHNITZER, (MILDRED K. STETZEL), ANNIE E. MASON, WILLIAM C. MASON, Trustee and individually, J. I. PITMAN, Trustee, and individually, E. J. ROBERTS, TRUSTEE and individually, GODFREY KLUMPP, MARY KLUMPP, LARKIN H. HARRIS, GENEVIVE WINBERG, EMILE HERPIN, the unknown heirs, devisees, executors, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee, and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by C. H. Woodward and Patricia R. Woodward, as Complainant, and against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee, and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkins H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, executor, administrators, successors and assigns of Henry George Coleman, Francis Crawford, Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, as Respondents.

Witness my hand this the 28th day of June, 1954.

Deirdre J. Duck
Register

C. H. WOODWARD AND
PATRICIA R. WOODWARD

COMPLAINANTS

VS

HENRY GEORGE COLEMAN, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainants, C. H. Woodward and Patricia R. Woodward, humbly complain-
ing against the following described lands situated in Baldwin County, Alabama,
to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition
to the Town of Fairhope, Baldwin County, Alabama, as per map thereof
recorded in Map Book No. 1, at page 72, Probate Records, Baldwin
County, Alabama.

And also against Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, and also against the unknown heirs, devisees, grantees, successors, personal representatives and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually and any and all other persons, firms, or corporation claiming any title to, right, interest in, lien or encumbrance, upon the said lands or any part or parcel thereof and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainants, G. H. Woodward and Patricia R. Woodward, are bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, if living, or if dead, their heirs, assigns, devisees, grantees, and personal representatives are non-residents of the State of Alabama and over twenty-one years of age; that a diligent search and inquiry has been made, and caused to be made to ascertain the present addresses of the respondents, and whether or not any of them are dead, and if so the names, ages and residences of their heirs and next of kin, and from all information obtainable, the said parties are all non-residents of the State of Alabama, and over twenty-one years of age and their post offices cannot be ascertained; that an examination has been made of the land and tax records at Bay Minette, Alabama, the county seat of Baldwin County

inquiries has been made of persons in and around Fairhope, in Baldwin County, Alabama, the vicinity in which the lands are located and no information can be obtained as to the addresses of the individual respondents and whether or not any of them are dead, and if dead the names, ages and resident of their heirs and next of kin.

3.

That your Complainants are the owners in fee simple and in the actual possession of lands described herein in Baldwin County, Alabama, to-wit:

Lots 12, 13 and 14, in Block 7, of the Ingleside Highlands, Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1, at page 72, Probate Records Baldwin County, Alabama.

4.

That no suit is pending to test the Complainants' title to, interest in, or rights of possession to said land; that the Complainants therefore call upon the Respondents, and each of them, separately and severally to set forth and specify what right, title, interest in, lien or encumbrances the said Respondents and each of them have in and to said lands and by what instrument or instruments the same are derived and/or created.

5.

That your Complainants acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetsel and Mildred K. Stetsel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book, 197, NS, pages 216-17; that your Complainants acquired title to said Lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetsel and Mildred K. Stetsel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 204-5.

6.

That the title to said lands claimed by your Complainants stand upon the record of the Probate Court of Baldwin County, Alabama, in the name of C. H. Woodward and Patricia R. Woodward.

7.

That no one has at any time within ten years next preceding the filing of this bill, of Complaint paid any taxes upon said land, or had any possession

thereof other than your Complainants, C. H. Woodward, Patricia R. Woodward, Ira Stetsel, Mildred K. Stetsel, Godfred Klumpp, Mary Klumpp, Larkin Harris, and L. W. Schnitzer.

WHEREFORE, the premises considered, your Complainants prays that your Honor will by proper process make the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetsel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors, and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetsel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetsel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other person, firm or corporation claiming any right, title to, interest in or encumbrance upon the said lands in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14 in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama,

or any part thereof, parties respondent to the bill of complaint, and require them, and each of them to appear and plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining and determining that the fee simple title, free from all liens and encumbrances to the lands herein described and to each and every part and parcel thereof, is vested in your Complainants, C. H. Woodward and Patricia R. Woodward, and that neither Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetsel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives.

successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. D. Moore, L. W. Schnitzer, Mildred K. Stetsel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfred Klump, Mary Klump, Larkins H. Harris, Genevive Winberg, Emily Harpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetsel, Henry Crawford, trustee and individually, William McIntosh, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, nor any other persons, firm or corporation has any right, title, interest in, or encumbrances upon the said lands or any part or parcel thereof and that any and all doubts and disputes concerning the said lands may be cleared up.

Your Complainants pray for such other, further, different or general relief as they may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY: _____
Solicitor for the Complainants

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County, in said State, personally appeared Harry J. Wilters Jr., who is known to me and who having been by me first duly sworn, deposes and says; that he is solicitor of record for the Complainants in the within cause; that he is authorized to make this affidavit; that from all information obtainable after a diligent search and inquiry the facts contained in the foregoing bill of complaint are true and correct.

Sworn to and subscribed before me on this the _____ day of _____, 1954.

Notary Public, Baldwin County, Alabama

no 3308

C. H. Woodward and
Patricia R. Woodward

Complainants

vs

Henry George Coleman, et al

Respondents

Bill of Complaint

Larkin H. Harris
At 1/2 Melcham Farm
Fairhope, Ala

FILED
JUL 28 1954

ALICE J. DUCK, Register

Lives with me
water a Fairwood
ala

Returned 24 Aug 54
Not found in my county after diligent search and in-
quiry.

By Geo. Gentry
Deputy Sheriff

WILKIN COUNTY

are true and correct.
search and inquiry the facts contained in the foregoing bill of complaint
to make this affidavit true from all information obtainable after a diligent
of record for the complainants in the within case; that he is authorized
having been by me first duly sworn, deposes and says that he is collector
State, personally appeared Henry G. Coleman Jr., who is known to me and who
before me the undersigned authority in and for said County, in said

1954.

Sworn to and subscribed before me on this 28 day of _____

Notary Public, Wilkinn County, Alabama

RESPONDENTS

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

LIS PENDENS NOTICE

It having been made to appear in the above styled cause by proper affidavit that Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustees and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris; are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, are non-residents of the State of Alabama, and over twenty-one years of age, or if dead, their heirs, devisees, grantees, personal representatives and assigns are unknown, and cannot be ascertained after a diligent search and inquiry and who are, from all information available, non-residents of the State of Alabama, and over twenty-one years of age; that C. H. Woodward and Patricia R. Woodward are both over twenty-one years of age, residents of Baldwin County, Alabama, and the owners in fee simple of and in the actual possession of the following described lands situated in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the Town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama;

That they acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 216-17, that they acquired title to said lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197, pages 204-5.

That no one has at any time within ten years next preceding the filing of the bill of complaint paid any taxes upon said land, or had any possession

thereof other than the Complainants, Ira Stetzel, Mildred K. Stetzel, Godfrey, Klumpp, Mary Klumpp, Larkin Harris and L. W. Schnitzer.

It is therefore ordered and notice is hereby given that the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, Trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klump, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other persons, firms or corporations claiming any

~~right, title to, interest in or encumbrance upon the said lands, or any part thereof,~~ to appear in the Circuit Court of Baldwin County, Alabama, in Equity, and plead, answer or demur to this bill of complaint on or before the 22

day of August, 1954, or upon their having failed to do so upon the expiration of thirty days from said date, a decree pro confesso shall be taken against them, and that this cause shall be at issue.

It is further ordered that this order and notice be published in the Baldwin Times, Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks.

In Witness Whereof, I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, have hereunto set my hand and seal of office on this the _____ day of _____, 1954.

Register

Wilters & Brantley
Solicitors for the Complainants

y, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris, Genevive Winberg, Emile Herpin, Clement L. Coleman, Sarah Coleman, Allen Wells, Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other persons, firms, or corporations claiming any right, title to, interest in or encumbrance upon the said lands, or any part thereof, to appear in the Circuit Court of Baldwin County, Alabama, in Equity, and plead, answer or demur to this bill of complaint on or before the 27 day of August, 1954, or upon their having failed to do so upon the expiration of thirty days from said date, a decree pro-confesso shall be taken against them, and that this cause shall be at issue.

It is further ordered that this order and notice be published in the Baldwin Times, Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks.

In Witness Whereof, I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, have hereunto set my hand and seal of office on this the 28th day of July, 1954.

ALICE J. DUCK,
Register.

Wilters & Brantley
Solicitors for the Complainants.
28-4tc.

BALDWIN TIMES
COUNTY
Best Newspaper
ALABAMA

JIMMY FAULKNER
PUBLISHER

LIS PENDENS NOTICE
C. H. WOODWARD AND
PATRICIA R. WOODWARD
Complainants

Vs.

HENRY GEORGE COLEMAN,
ET AL, Respondents
In The Circuit Court Of Baldwin
County, Alabama, In Equity,
No. 3308

It having been made to appear in the above styled cause by proper affidavit that Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris; are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, are non-residents of the State of Alabama, and over twenty-one years of age, or if dead, their heirs, devisees, grantees, personal representatives and assigns are unknown, and cannot be ascertained after a diligent search and inquiry and who are, from all information available, non-residents of the State of Alabama, and over twenty-one years of age; that C. H. Woodward and Patricia R. Woodward are both over twenty-one years of age, residents of Baldwin County, Alabama, and the owners in fee simple of and in the actual possession of the following described lands situated in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama;

That they acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 216-17, that they acquired title to said lots 13 and 14, Block

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA.
BALDWIN COUNTY.

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

C. H. Woodward v. Henry Coleman

COST STATEMENT

767 WORDS @ 6 1/2 cents — — — \$ 44.98
I hereby certify this it correct, due and unpaid (paid).

E. R. Monizette
Editor Publisher.

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

Date of 1st publication July 29, 1954 Vol. 65 No. 28
Date of 2nd publication Aug 5, 1954 Vol. 65 No. 29
Date of 3rd publication Aug 12, 1954 Vol. 65 No. 30
Date of 4th publication Aug 19, 1954 Vol. 65 No. 31

Subscribed and sworn before the undersigned this 19 day of Aug, 1954

Dorothy Manti
Notary Public, Baldwin County.

E. R. Monizette
Editor Publisher.

JIMMY FAULKNER
PUBLISHER

LIS PENDENS NOTICE
C. H. WOODWARD AND
PATRICIA R. WOODWARD
Complainants
Vs.
HENRY GEORGE COLEMAN,
ET AL, Respondents
In The Circuit Court Of Baldwin
County, Alabama, In Equity,
No. 3308

It having been made to appear in the above styled cause by proper affidavit that Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, E. J. Roberts, trustee and individually, Godfrey Klumpp, Mary Klumpp, Larkin H. Harris; are all over twenty-one years of age and bona fide residents of Baldwin County, Alabama; that Genevive Winberg, Mildred K. Stetzel and Emile Herpin, are non-residents of the State of Alabama, and over twenty-one years of age, or if dead, their heirs, devisees, grantees, personal representatives and assigns are unknown, and cannot be ascertained after a diligent search and inquiry and who are, from all information available, non-residents of the State of Alabama, and over twenty-one years of age; that C. H. Woodward and Patricia R. Woodward are both over twenty-one years of age, residents of Baldwin County, Alabama, and the owners in fee simple of and in the actual possession of the following described lands situated in Baldwin County, Alabama, to-wit:

Lots 12, 13, and 14, in Block 7 of the Ingleside Highlands Addition to the town of Fairhope, Baldwin County, Alabama, as per map thereof recorded in Map Book No. 1 at page 72, Probate Records, Baldwin County, Alabama;

That they acquired title to said Lot 12, Block 7 in Ingleside Highlands, an addition to Fairhope, by a warranty deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197 NS, pages 216-17, that they acquired title to said lots 13 and 14, Block 7 in Ingleside Highlands, an addition to Fairhope by a quit claim deed from Ira Stetzel and Mildred K. Stetzel, his wife, dated July 2, 1953, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 197, pages 204-5.

That no one has at any time within ten years next preceding the filing of the bill of complaint paid any taxes upon said land, or had any possession thereof other than the Complainants, Ira Stetzel, Mildred K. Stetzel, Godfrey Klumpp, Mary Klumpp, Larkin Harris and L. W. Schnitzer.

It is therefore ordered and notice is hereby given that the said Henry George Coleman, Francis Crawford, Henry Crawford, Jr., Mrs. F. B. Moore, L. W. Schnitzer, Mildred K. Stetzel, Annie E. Mason, William C. Mason, trustee and individually, J. I. Pitman, trustee and individually, F. J. Roberts, Trustee and individual-

Ira Stetzel, Henry Crawford, trustee and individually, F. B. Moore, trustee and individually, C. W. Morrow, trustee and individually, and any other persons, firms, or corporations claiming any right, title to, interest in or encumbrance upon the said lands, or any part thereof, to appear in the Circuit Court of Baldwin County, Alabama, in Equity, and plead, answer or demur to this bill of complaint on or before the 27 day of August, 1954, or upon their having failed to do so upon the expiration of thirty days from said date, a decree pro-confesso shall be taken against them, and that this cause shall be at issue.

It is further ordered that this order and notice be published in the Baldwin Times, Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks.

In Witness Whereof, I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, have hereunto set my hand and seal of office on this the 28th day of July, 1954.

ALICE J. DUCK,
Register.

Wilters & Brantley
Solicitors for the Complainants.
28-4tc.

BALDWIN TIMES
COUNTY
Best Newspaper
ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA.
BALDWIN COUNTY.

E. R. Monisette, 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

C. H. Woodward v. Henry Coleman

COST STATEMENT

767 WORDS @ 6 1/2 cents — — — \$ 44.98 1/2

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

E. R. Monisette, Jr.
Editor Publisher.

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

Date of 1st publication July 29, 1954 Vol. 65 No. 28

Date of 2nd publication Aug 5, 1954 Vol. 65 No. 29

Date of 3rd publication Aug 12, 1954 Vol. 65 No. 30

Date of 4th publication Aug 19, 1954 Vol. 65 No. 31

Subscribed and sworn before the undersigned this 19 day of Aug, 1954

Dorothy Manti
Notary Public, Baldwin County.

E. R. Monisette, Jr.
Editor Publisher.