

**CIRCUIT COURT, BALDWIN COUNTY, ALA.,
IN EQUITY.**

J A Allen

No. 167

VS.

Grace E Brown et al

PLAINTIFF
DEFENDANT

Bill of Costs

Fees of Register		Dollars	Cts.	Brought Forward	
Filing each bill and other papers	25	\$ 10	50	For receiving, keeping and paying out or distributing money, etc.; 1st \$1,000 1 per ct.; all over \$1,000, and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000, and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.	1830
Issuing each subpoena	6	50	00	For receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received,	
Issuing each copy thereof	4	40	40	Each Notice sent by mail to creditors	15
Entering each return thereof	3	15	40	Filing, Receipting for and docketing each claim, etc.	25
For each order of publication		1 00	00	For all entries on subpoena docket, etc.	50
Issuing writ of injunction		1 50	00	For all entries on commission docket, etc.	50
For each copy thereof		50	00	Making final record, per 100 words	15
Entering each return thereof		15	00	Certified copy of decree	1 00
Issuing writ of attachment		1 00	00	Report of divorce to State Health Office Acts 1915	30
Entering each return thereof		15	00	Total Fees of Register	2680
Docketing each case		1 00	00		
Entering each appearance		25	00	Fees of Sheriff	
Issuing each decree pro confesso on persl ser	Revised	1 00	00	Serving and returning subpoena on deft.	3 \$ 1 50
Issuing each decree pro confesso on publication	Revised	1 00	00	Serving and returning subpoena for witness	65
Each order appointing guardian		1 00	00	Levying attachment	1 50
Any other order by Register		50	00	Entering and returning same	25
Issuing commission to take testimony		50	00	Selling property attached	
Receiving and filing		10	00	Impaneling Jury	75
Endorsing each package		10	00	Executing writ of possession	2 50
Entering order submitting cause		50	00	Collecting execution for costs	1 50
Entering any other order of Court		25	00	Serving and returning sci. fa., each	65
Noting all testimony		50	00	Serving and returning notice	65
Abstract of cause, etc.		1 00	00	Serving and returning writ of injunction	1 50
Entering each decree		75	00	Serving and returning writ of exeat	1 50
For every 100 words over 500		15	00	Taking and approving bonds, each	75
Taking account, etc.		3 00	00	Collecting money on execution	
Taking testimony, etc.		15	00	Making deed	2 50
Each report, 500 words or less		2 50	00	Serving and returning application, etc.	1 00
For every 100 words over 500		15	00	Serving attachment, contempt of court	1 50
Amount claimed less than \$500, etc		2 00	00	Total Fees of Sheriff	4 50
Issuing each subpoena		25	00		
Witness certificate, each		25	00	Recapitulation	
Issuing execution, each		75	00	Register's Fees	26 80
Entering each return		15	00	Sheriff's Fees	4 50
Taking and approving bond, each		1 00	00	Commissioner's Fees <i>State Health</i>	
Making copy of bill, etc		15	00	Solicitor's Fees	
Each notice not otherwise provided for		50	00	Witness Fees	
Each certificate or affidavit, with seal		50	00	Guardian Ad Litem	
Each certificate or affidavit, no seal		25	00	Printer's Fees	
Hearing and passing on application, etc.		3 00	00	Trial Tax	3 00
Each settlement with receiver, etc.		3 00	00	Recording Decree in Probate Court	
Examining each voucher of receiver, etc		10	00	TOTAL	34 30
Examining each answer, etc.		3 00	00		35 65
Recording resignation, etc.		75	00		
Entering each certificate to Supreme Court		50	00		
Taking questions and answers, etc.		25	00		
For all other service relating to such proceedings		1 00	00		
For services in proceeding to relieve minors, etc., same fees as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 per cent.; all over \$100, and not exceeding 1,000, 1 1-2 per ct.; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct.					
Sub Total Carried Forward			18 30		

Received payment this 29 day of Jul 1934

Rubens L. Smith
Register.

Fee Book 3. Page 348

Circuit Court, Baldwin County, Ala.
In Equity.

No. _____

J. H. ...
vs.
...

Cost Bill

Paid _____ 193 _____

Register.

Moore Printing Co. Bay Minette

10 00
100 00
110 00

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RECORDED
Dues
6-26-36

No. 167

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

J. A. ALLEN

vs.

GRACE E. BROWN, ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued 10th of Jan. 1936

Richard Dues
Register.

RECORDED
Book
6-268

No. 167 Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

J. A. ALLEN

VS.

GRACE E. BROWN, ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued January 10th 1936

Robert D. ...
Register.

Meore Printing Company, Bay Minette, Ala.

RECORDED
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6-26-7

No. 167

CIRCUIT COURT OF BALDWIN
COUNTY, ALA.

In Equity.

J. A. ALLEN

VS.

GRACE E. BROWN, ET AL.

Decree Pro Confesso After
Notice By Registered Mail.

Filed in office this 10th day of

January

1936

Arthur D. Sweet
Register

Entered in O. B. Page

MOORE PTO CO.

RECORDED
Wick
6-268

No. **167**

CIRCUIT COURT OF BALDWIN
COUNTY, ALA.

In Equity.

J. A. ALLEN

VS.

GRACE E. BROWN, ET AL

**Decree Pro Confesso After
Notice By Registered Mail.**

Filed in office this **10th** day of

January

1936

Richard D. Wick
Register

Entered in O. B. Page

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN et al,

Respondents.

AFFIDAVIT

Filed this 14 day Oct, 19 35

Robert S. Duck

Clerk-Register X

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED
Rec'd
6-2-68

No. 167

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The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

J. A. ALLEN

vs.

GRACE E. BROWN, ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued January 10th 19 36

Robert D. ...
Register.

127 RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN et al,

Respondents.

CERTIFICATE OF REGISTER

Filed this 15th day of Oct 1934
Robert S. DeLoach
Clerk-Register

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

167 RECORDED
6-26-8

Motion, ss

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

MOTION

May 19 1936
Richard H. Foley
Clerk of the Court

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED
INDEXED
6-26-29

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

AFFIDAVIT

J. A. Allen
Plaintiff

LLOYD A. WAGNER
Attorney
Foley, Alabama.

167 RECORDED

6-307

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN ET AL,

Respondents.

RECEIPT OF GUARDIAN AD
ITEM

Filed this 29 day Feb 1936

Robert S. Ducek

CLerk-Register

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED
6-508

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN
GERTRUDE F. GORDON, ESTELLE VIR.
GINIA ALLEN, MABLE BLACK &
FRANK ALLEN,

Respondents.

CERTIFICATE OF REGISTER

Filed July 30 21 1936
Lloyd A. Wagney

LLOYD A. WAGNEY
Attorney
Foley, Alabama.

RECORDED
Duck
6-307

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN,
MABLE BLACK & FRANK ~~ALLEN~~,

Respondents.

ACCEPTANCE OF GUARDIAN AD
LITEM

Robert Duck 36

LLOYD A. MAGNEY
Attorney, Foley, Alabama.

167 RECORDED
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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

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2-187

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

ORDER APPOINTING GUARDIAN AD

LITEM

167
Robert Devel

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE F. GORDON, ESTELLE VIRGINIA ALLEN, MABLE BLACK & FRANK ALLEN,

Respondents.

ANSWER AND CROSS BILL OF FRANK ALLEN

Frank Allen 31a

LLOYD A. MAGNEY
Attorney, Foley, Alabama.

RECORDED
6-308

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN, MABLE
BLACK & FRANK ALLEN,

Respondents.

ANSWER TO CROSS BILL

*File 3p
Robert & David*

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN, MABLE
BLACK & FRANK ALLEN,

Respondents.

DEPOSITIONS

LLOYD A. MAGNEY
Attorney
Poley, Alabama.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN, MABLE
BLACK & FRANK ALLEN,

Respondents.

DEPOSITIONS

Filed this 17th day of Dec 1936
Charles Reed
Clerk of Court

LLOYD A. MAGNEY
Attorney, Foley, Ala.

Deere

J. A. Allen 3

15

33

Mar E Brown 3

Chas. H. Allen 3

Monte 7 43

Estelle Virginia Allen

Mable Beck 21

Frank Allen

2/21/36

State of Alabama, }
Baldwin County.

Probate Court

Filed in office this FEB 22 1936

at 10:45 am and duly recorded
in Deed Book No. 5845 at page 532-3

and I certify that \$... cts. Deed
tax and \$... cts. Adlige tax, has
been paid as required by law.

[Signature]
Judge of Probate

Julius Myers - 1936

Richard Owen

RS Beck
City

Rec 135
RE

87

RECORDED
INDEXED
6-22-35

THE STATE OF ALABAMA,
BALDWIN COUNTY

Serve on Vertunde E. Gordon
30 West 1st
Circuit Court of Baldwin County
Baldwin EQUITY

No. 167

SUMMONS

J. A. Allen,

VS.

Grace E. Brown,

Charles N. Allen,

Vertunde E. Gordon,

Estelle Virginia Allen,

Mahmud Bask,

Frank Allen,

Lloyd A. Wazney,

Solicitor for Complainant

Received in office this 16

day of Oct 1935

W. H. Wilkins
SHERIFF

Executed this 17 day of

October 1935

by leaving a copy of the within Summons with

Vertunde E. Gordon

R. L.

Defendant

R. L. McLeander
Sheriff

By A. Farmer
Deputy Sheriff

RECORDED
6-22-1

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. 167

SUMMONS

J. A. Allen,

vs.

Grace E. Brown,

Charles E. Allen,

Gertrude F. Gordon,

Estelle Virginia Allen,

Mable Black,

Frank Allen,

Lloyd A. Magney,

Solicitor for Complainant

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this 16

day of Oct, 1935

Robert H. Brown
SHERIFF

Executed this 24th day of Oct 1935

by leaving a copy of the within Summons with

Grace E. Brown and

Estelle Virginia Allen
Defendant

Frank Allen
Sheriff

By _____
Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

A. ALLEN,
Complainant,

-VS-

GRACE E. BROWN et al,
Respondents.

C O/B
BILL OF COMPLAINT

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

[Handwritten signature]
35

The respondents, Grace E. Brown, Charles H. Allen, Gordon, Loretta Virginia Allen, White Black and White Allen, are each hereby required to answer the allegations of the (2) of the foregoing Bill of Complaint from paragraph numbered (1) to paragraph numbered four (4) inclusive, but not more than the oath to answer

167

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,
Complainant,

-VS-

GRACE E. BROWN et al,
Respondents.

C O P Y

BILL OF COMPLAINT

John D. Post
John D. Post
257

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

J. A. ALLEN,
Complainant,

-vs-

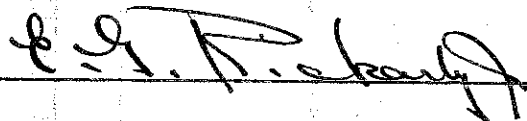
GRACE E. BROWN et al,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

RECEIPT

Received of J. A. Allen by Lloyd A. Magney, full payment
for services as Guardian Ad Litem for Frank Allen, the above
named respondent.

Dated this 28th day of February, 1936.



J. A. ALLEN,
Complainant,

-vs-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

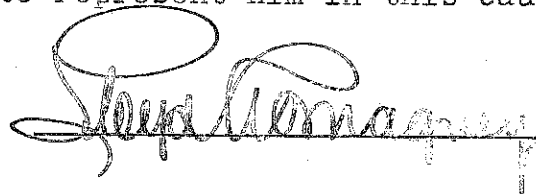
AFFIDAVIT

STATE OF ALABAMA)
BALDWIN COUNTY)

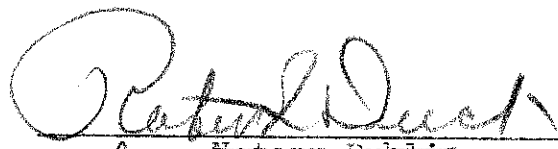
Lloyd A. Magney, being first duly sworn, on his oath deposes and says; that he is the solicitor of record for the complainant in the above entitled cause.

That Frank Allen, one of the above named respondents is a minor over the age of fourteen years and that service upon said minor was completed more than thirty days ago by mailing by registered mail a copy of the Bill of Complaint and a summons addressed to the said Frank Allen, to Mable Black, who is the mother of said Frank Allen, and his natural guardian and who has no interest in this case adverse to that of the said respondent, Frank Allen; that return receipt showing the service of said summons and complaint upon the said Mable Black, mother of the minor respondent, Frank Allen, in Pensacola, Florida, has been received by the Register and filed in this cause.

That although more than thirty days have elapsed since the completion of the service upon said respondent, Frank Allen, he has not named a guardian ad litem to represent him in this cause.



Subscribed in my presence and sworn to before me this 10th
day of January, 1936.



Notary Public
[Handwritten signature]

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

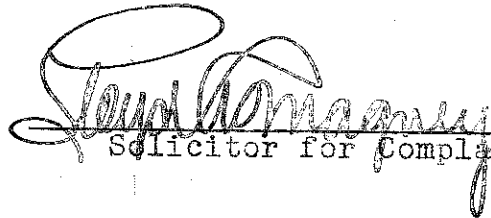
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

MOTION

Comes now the complainant, by his solicitor of record, and moves the Court for an order appointing a guardian ad litem for the respondent, Frank Allen, for the reason that said respondent is a minor and has not named any guardian in this cause although service upon him has been completed for more than thirty days, all as more particularly appears by the affidavit of Lloyd A. Magney filed herewith.

Dated this 13th day of January, 1936.


Solicitor for Complainant.

mother and natural guardian of Frank Allen, her receipt so de-
manded on the 18th day of October, 1935.

IN WITNESS WHEREOF: I have hereunto set my hand this

18th day of October, 1935.

Robert S. Duck

Register

The State of Alabama,
Baldwin County.

No. 167 CIRCUIT COURT IN EQUITY.

J. A. ALLEN

Complainant

vs.

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE F. GORDON, Defendant

ESTELLE VIRGINIA ALLEN, MABLE BLACK & FRANK ALLEN, Register

In this cause it appears to the that a summons requiring the Defendant ESTELLE VIRGINIA ALLEN

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon ESTELLE VIRGINIA ALLEN

was served upon her by the Sheriff of Baldwin County, Alabama, on the 24th day of October 19 35

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Lloyd A. Magney, Solicitor for Complainant,

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 ESTELLE VIRGINIA ALLEN

Defendant aforesaid.

This 10th day of January 19 36

Ruth D. Duck

Register.

J. A. ALLEN,
Complainant,

-vs-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

AFFIDAVIT

Lloyd A. Magney, being first duly sworn, on his oath deposes and says:-

That he is attorney of record for the above named complainant and that the respondent, Charles H. Allen, is a non-resident of the State of Alabama, residing at 248 Cedar Street in Biloxi, Mississippi, and that the said Charles H. Allen, is over the age of twenty-one years.

That the respondent, Mable Black, is also over the age of twenty-one years and a non-resident of the State of Alabama, residing in Pensacola, Florida, where her address is c/o National Cemetery.

That the respondent, Frank Allen, is a minor of ^{over} the age of fourteen (14) years but under the age of eighteen (18) years and that said Frank Allen is also a non-resident of the State of Alabama, residing in Pensacola, Florida with his mother, the respondent, Mable Black, and where his address is also c/o National Cemetery. That the said Mable Black, the mother and natural guardian of the said respondent, Frank Allen, has no interest in this cause adverse to that of the said Frank Allen.

Lloyd A. Magney

Subscribed in my presence and sworn to before me this 14th day of October.

Peter S. Dees
Notary Public

J. A. ALLEN,
Complainant

vs.

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE F.
GORDON, ESTELLE VIRGINIA AILEN, MABLE BLACK &
FRANK ALLEN,
Respondents

CIRCUIT COURT OF
Baldwin County.

IN EQUITY.

In this cause it being made to appear to the Register that on the 16th day of October 19235, a copy of the Bill of Complaint filed in this cause was sent to CHARLES H. ALLEN, 248 Cedar Street, Biloxi, Miss.

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," and return receipt demanded addressed to the Register of this Court; and that on the 18th day of October 19235, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said

CHARLES H. ALLEN Defendant

This the 10th day of January 19236

Robert Duck Register.

J. A. ALLEN,

Complainant,

vs.

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE H. GORDON, ESTELLE VIRGINIA ALLEN, MABLE BLACK & FRANK ALLEN,

Respondents.

CIRCUIT COURT OF Baldwin County.

IN EQUITY.

In this cause it being made to appear to the Register that on the 16th day of October 1935, a copy of the Bill of Complaint filed in this cause was sent to MABLE BLACK, c/o of National Cemetary, Pensacola, Fla.,

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," and return receipt demanded addressed to the Register of this Court; and that on the 18th day of October 1935, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said

MABLE BLACK

Defendant

This the 10th day of January 1936

Robert Deuch

Register.

The State of Alabama,
Baldwin County.

No. 167. CIRCUIT COURT IN EQUITY.

J. A. ALIEN

Complainant

vs.

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE F. GORDON, ESTELLE VIRGINIA ALLEN, MABLE BLACK & FRANK ALLEN, Defendant s.

In this cause it appears to the Register

that a summons requiring the Defendant GERTRUDE F. GORDON

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon GERTRUDE F. GORDON was served upon her by the Sheriff of Mobile County, Alabama, on the 17th day of October 19 35

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Lloyd A. Magney, Solicitor for Complainant,

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 GERTRUDE F. GORDON

Defendant aforesaid.

This 10th day of January 19 36

[Handwritten Signature]

Register.

The State of Alabama,
Baldwin County.

No. 167. CIRCUIT COURT IN EQUITY.

J. A. ALLEN

Complainant

vs.

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE F. GORDON, Defendant s

ESTELLE VIRGINIA ALLEN, MABLE BLACK & FRANK ALLEN

Register

In this cause it appears to the

that a summons requiring the Defendant GRACE E. BROWN

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon GRACE E. BROWN was served upon her by the Sheriff of Baldwin County, Alabama, on the 24th day of October 19 35

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of the Solicitor, Lloyd A. Magney, for the Complainant,

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 GRACE E. BROWN

Defendant aforesaid.

This 10th day of January 19 36

Lester D. Duck

Register.

Circuit Court, Baldwin County, Ala.
In Equity.

No. _____

J. H. ...
vs.
...

Cost Bill

Paid _____ 193

Register.

Moore Printing Co. Bay Minette

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RECORDED
Dues
6-26-36

No. 167

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The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

J. A. ALLEN

vs.

GRACE E. BROWN, ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued 10th of Jan. 1936

Richard Dues
Register.

RECORDED
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No. 167 Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

J. A. ALLEN

VS.

GRACE E. BROWN, ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued January 10th 1936

Robert D. ...
Register.

Meore Printing Company, Bay Minette, Ala.

RECORDED
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No. 167

CIRCUIT COURT OF BALDWIN
COUNTY, ALA.

In Equity.

J. A. ALLEN

VS.

GRACE E. BROWN, ET AL.

Decree Pro Confesso After
Notice By Registered Mail.

Filed in office this 10th day of

January

1936

Arthur D. Sweet
Register

Entered in O. B. Page

MOORE PTO CO.

RECORDED
Wick
6-268

No. **167**

CIRCUIT COURT OF BALDWIN
COUNTY, ALA.

In Equity.

J. A. ALLEN

VS.

GRACE E. BROWN, ET AL

**Decree Pro Confesso After
Notice By Registered Mail.**

Filed in office this **10th** day of

January

1936

Register

Entered in O. B. Page

MOORE PIGEON

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN et al,

Respondents.

AFFIDAVIT

Filed this 14 day Oct, 1935

Robert S. Duck

Clerk-Register X

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED
Rec'd
6-2-68

No. 167

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

J. A. ALLEN

vs.

GRACE E. BROWN, ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued January 10th 19 36

Robert D. ...
Register.

127 RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN et al,

Respondents.

CERTIFICATE OF REGISTER

Filed this 15th day of Oct 1934
Robert S. DeLoach
Clerk-Register

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

167 RECORDED
6-26-8

Motion, ss

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

MOTION

May 19 1936
Richard H. Foley
Clerk of the Court

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED
INDEXED
6-26-29

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

AFFIDAVIT

J. A. Allen
John H. Foley

LLOYD A. WAGNER
Attorney
Foley, Alabama.

167 RECORDED

6-307

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN ET AL,

Respondents.

RECEIPT OF GUARDIAN AD
ITEM

Filed this 29 day Feb 1936

Robert S. Ducek

CLerk-Register

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED
6-508

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN
GERTRUDE F. GORDON, ESTELLE VIR.
GINIA ALLEN, MABLE BLACK &
FRANK ALLEN,

Respondents.

CERTIFICATE OF REGISTER

Filed July 30 21 1936
Lloyd A. Wagney

LLOYD A. WAGNEY
Attorney
Foley, Alabama.

RECORDED
Duck
6-307

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN,
MABLE BLACK & FRANK ~~ALLEN~~,

Respondents.

ACCEPTANCE OF GUARDIAN AD
LITEM

Robert Duck 36

LLOYD A. MAGNEY
Attorney, Foley, Alabama.

167 RECORDED
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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

min.
2-187

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN,
GERTRUDE F. GORDON, ESTELLE VIR-
GINIA ALLEN, MABLE BLACK & FRANK
ALLEN,

Respondents.

ORDER APPOINTING GUARDIAN AD

LITEM

167
Robert Devel

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H. ALLEN, GERTRUDE F. GORDON, ESTELLE VIRGINIA ALLEN, MABLE BLACK & FRANK ALLEN,

Respondents.

ANSWER AND CROSS BILL OF FRANK ALLEN

Frank Allen 31a

LLOYD A. MAGNEY
Attorney, Foley, Alabama.

RECORDED
6-308

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN, MABLE
BLACK & FRANK ALLEN,

Respondents.

ANSWER TO CROSS BILL

*File 3p
Robert & David*

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN, MABLE
BLACK & FRANK ALLEN,

Respondents.

DEPOSITIONS

LLOYD A. MAGNEY
Attorney
Poley, Alabama.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-vs-

GRACE E. BROWN, CHARLES H.
ALLEN, GERTRUDE F. GORDON,
ESTELLE VIRGINIA ALLEN, MABLE
BLACK & FRANK ALLEN,

Respondents.

DEPOSITIONS

Filed this 17th day of Dec 1936
Charles Reed
Clerk of Court

LLOYD A. MAGNEY
Attorney, Foley, Ala.

Deere

J. A. Allen 3
15 33

Mar E Brown 3

Chas. H. Allen 3

Monte 7 43

Estelle Virginia Allen

Mable Beck 21

Frank Allen

2/21/36

State of Alabama, } Probate Court
Baldwin County.

FILED FEB 22 1936

Filed in office this 22 day of February 1936
at Prichard and duly recorded
in Deed Book No. 5845 at page 532-3

and I certify that \$..... cts. Deed
tax and \$..... cts. Adlige tax, has
been paid as required by law.

W. J. [Signature]
Judge of Probate

John M. [Signature] 5-1936

Richard [Signature]

RS [Signature] / Rec 1 35

[Signature]

87

RECORDED
INDEXED
6-22-35

THE STATE OF ALABAMA,
BALDWIN COUNTY

Serve on Vertunde E. Gordon
30 West 1st
Circuit Court of Baldwin County
Baldwin EQUITY

No. 167

SUMMONS

J. A. Allen,

VS.

Grace E. Brown,

Charles N. Allen,

Vertunde F. Gordon,

Estelle Virginia Allen,

Mahmud Bisk,

Frank Allen,

Lloyd A. Wazney,
Solicitor for Complainant

Received in office this 16

day of Oct 1935

W. H. Wilkins
SHERIFF

Executed this 17 day of

October 1935

by leaving a copy of the within Summons with
Vertunde F. Gordon

R. F.
Defendant

R. F. McLeander
Sheriff

By A. Farmer
Deputy Sheriff

RECORDED
6-22-1

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. 167

SUMMONS

J. A. Allen,

vs.

Grace E. Brown,

Charles E. Allen,

Gertrude F. Gordon,

Estelle Virginia Allen,

Mable Black,

Frank Allen,

Lloyd A. Magney,

Solicitor for Complainant

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this 16

day of Oct, 1935

[Signature]

SHERIFF

Executed this 24th day of

Oct 1935

by leaving a copy of the within Summons with

Grace E. Brown and

Estelle Virginia Allen

Defendant

[Signature]

Sheriff

By _____ Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

A. ALLEN,
Complainant,

-VS-

GRACE E. BROWN et al,
Respondents.

C O/B
BILL OF COMPLAINT

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

[Handwritten signature]
35

The respondents, Grace E. Brown, Charles H. Allen, Gordon, Loretta Virginia Allen, White Black and White Allen, are each hereby required to answer the allegations of the (2) of the foregoing Bill of Complaint from paragraph numbered (1) to paragraph numbered four (4) inclusive, but not more than the oath to answer

167

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

J. A. ALLEN,

Complainant,

-VS-

GRACE E. BROWN et al,

Respondents.

C O P Y

BILL OF COMPLAINT

John D. Post
John D. Post
257

LLOYD A. MAGNEY
Attorney
Foley, Alabama.