

HELEN LARUE,

Plaintiff,

VS.

FRANK SOESBE,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

CASE NO. 8666


Comes the Plaintiff and produces the abstract of titles which she will rely on for recovery:

- (1) Will of Lillian Bach, recorded in Will Book 8, Page 588.
- (2) File and Judgment in the case of Lillian Bach vs. Robert E. Hairston, Circuit Court Case No. 583.#5/85
- (3) Deed from Howard Nye Quistorf and wife to Lillian Bach, Deed Book 316, Page 143-4.
- (4) Deed from W. D. Stapleton to Howard Nye Quistorf, et. al., Deed Book 205, Page 322.
- (5) Deed from Birger Peterson to W. D. Stapleton, Deed Book 38 N.S. Pages 263-5.
- (6) Deed from Baldwin County Colonization Co., a corporation, to Birger Peterson, Deed Book 37, Page 441.
- (7) Deed of Baldwin County Colonization Co., a corporation, to Birger Peterson, Deed Book 15, Page 109.
- (8) Deed of Southern States Lumber Co., to Baldwin County Colonization Co., a corporation, Deed Book 15, Pages 108-9.
- (9) Deed of Robert MacLay, Jr., to Southern States Lumber Company, Deed Book 3, Pages 314-18.
- (10) Deed of Georgiana MacLay, Alfred E. MacLay and Robert MacLay, Jr., to Southern States Lumber Co., Deed Book Y, Page 307.
- (11) Deed of Max Nathan and wife and Leopold Wallach to Southern States Lumber Company, Deed Book Y, Page 301.

Page Two, Two Pages:
Larue vs. Soesbe.

- (12) Power of Attorney from Leopold Wallach to William Randolph in Deed Book Y, Page 306-7.
- (13) Deed of Southern States Land and Timber Company, Ltd., to Nathan, Leopold, Wallach and Robert MacLay, Deed Book Y, Page 81.
- (14) Deed of Charles L. Bucki to Southern States Land and Timber Co., Deed Book P, Page 412-16.
- (15) Deed of George W. Robinson and wife to Charles Lloyd Bucki, Deed Book P, Pages 438-9.
- (16) Deed of Charles A. Swift and wife, to George W. Robinson, Deed Book O, Pages 570-1.
- (17) Deed of W. L. Wittich by Y. C. Hall to Charles A. Swift, Deed Book O, Pages 156-9.
- (18) Deed of I. B. Johnson and wife to Wilds L. Wittich, Deed Book L, Pages 527-29.
- (19) Deed from J. E. Mathews and wife to I. B. Johnson, Deed Book K, Page 718.
- (20) Deed of C. L. Mathews, E. G. Mathews and Medora Mathews to Joel E. Mathews, Deed Book K, Page 759-61.
- (21) Deed of George Mathews to Charles Mathews, et. al., Deed Book I, Page 722.
- (22) Patent of the United States of America to George W. Mathews, Deed Book 2, Page 75.
- (23) Map of Peterson's Point, Map Book 1, Page 82.

DONE THIS THE 2nd day of February, 1970. All references Probate Court, Baldwin County, Alabama, except Item 2.


E. G. RICKARBY, Attorney for Plaintiff.

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in an envelope with adequate postage prepaid the same and properly addressed.

This 1 day of Feb, 1970.

E. G. RICKARBY


Attorney for Plaintiff
P. O. Box 471, Fairhope, Ala. 36532

FILED

FEB 4 1970

ALICE J. DUCK
CLERK
REGISTER

Seal of the Court

Our File No. ~~68~~-309

Your File No.

Law Offices

E. G. RICKARBY

35 SOUTH SECTION STREET

FAIRHOPE, ALABAMA 36532

Code 205

Telephone: 928-9836

Mailing Address

P. O. BOX 471

February 2, 1970

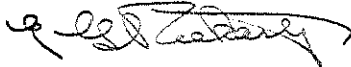
Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: Larue vs. Soesbe
Case No. 8666

Enclosed find Abstract of Title in Larue vs. Soesbe,
Case No. 8666.

Yours very truly,



EGR/jlb

Encl.

cc: Mr. Harry Wilters

2-9-70

Our File No. 68-309

Your File No. _____

Law Offices
E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

CODE 205
Telephone: 928-9836

Mailing Address
P. O. BOX 471

April 16, 1969

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

MD, 8666

Dear Mrs. Duck:

Inre: Helen LaRue versus Frank Soesbe

Enclosed find Summons & Complaint in LaRue versus Soesbe. Please
process and oblige.

Yours very truly,



EGR/jlb
Encl.
4-28-69

FOREST A. CHRISTIAN

ATTORNEY AT LAW

FOLEY, ALABAMA

June 28, 1961

COPY

Mr. W. F. Mandrell

631 Williams Street

Mobile, Alabama

Dear Mr. Mandrell:

Mr. Robert R. Hairston, Jr. of Mtiln, Alabama, has been in to see me and states that the property in the enclosed deed is an extension on the north of the beach property adjoining him which you conveyed to him several years ago.

There was an oversight and the property described in the enclosed deed was not included in the original deed. However, Mr. Hairston has been paying taxes on it for fourteen years.

Kindly execute the enclosed deed and return to me as soon as possible so that this matter can be corrected and cleared once and for all.

With best wishes, I am

Cordially yours,

ORIGINAL SIGNED

FOREST A. CHRISTIAN

FOREST A. CHRISTIAN

December 27, 1968

E. G. Rickarby, Esq.
P. O. Box 471
Fairhope, Alabama 36532

Re: Bach property

Dear Rick:

Enclosed is xerox copies of five deeds for your information. It is contention of my client, Frank Soesbe, III, that you client does not own the property indispute.

Should you have any further questions or information, please let us know.

Cordially yours,

FOREST A. CHRISTIAN

CC: Mr. Frank Soesbe, III

HELEN LARUE,

Plaintiff,

vs.

FRANK SOESBE,

Defendant.

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

X

AT LAW

X

CASE NO. 8666

X

Now comes the Defendant, Frank Soesbe, and files this demand, in writing, to the Plaintiff, Helen Larue, for an abstract in writing of the title or titles on which she will rely on for recovery of the land sued for in the above styled cause.

Witness my hand this 8th day of May, 1969.

WILTERS & BRANTLEY

BY:

Gay J. Wilters, Jr.
Attorneys for the Defendant.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8th day of May, 1969, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By:

Gay J. Wilters, Jr.

FILED

MAY 8 1969

ALICE J. DUCK CLERK
REGISTER

HELEN LARUE,

Plaintiff,

vs.

FRANK SOESBE,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8666

Comes now the Defendant in the above styled cause, and withdraws his plea of guilty, and in stead files this his plea of disclaimer:

1.

That the Defendant is not in possession of the property sued for in the Bill of Complaint, and that he was not in possession or claimed the property at the time this suit was filed.

WILTERS & BRANTLEY

BY:

[Signature]
Attorney for Defendant

Filed 2-3-70

Walter Brantley
clerk

HELEN LARUE,

Plaintiff,

vs.

FRANK SOESBE,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8666

Comes now the Defendant in the above styled cause and
for answer to the Plaintiff's Bill of Complaint, says:

1.

That he is not guilty of the matters alleged therein.

WILTERS & BRANTLEY

BY:

Henry J. Wilters, Jr.
Attorneys for the Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 8th day of May
1969, served a copy of the foregoing pleading on-counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

BY:

FILED

MAY 8 1969

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA,
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY,
NO. _____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon FRANK SOESBE to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against FRANK SOESBE, defendant, by HELEN LARUE, Plaintiff.

WITNESS my hand this 18 day of April, 1969.

Alice J. Duck
ALICE J. DUCK, Clerk

HELEN LARUE,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
VS.	X	BALDWIN COUNTY, ALABAMA,
FRANK SOESBE,	X	AT LAW.
Defendant.	X	<u>771.86 66</u>

C O M P L A I N T

Count I.

The Plaintiff sues to recover possession of the following tract of land, lying and being in Baldwin County, Alabama, to-wit:

Beginning at a point on the West side of Lullwater Drive as shown on the map of Peterson's Point, recorded in Map Book 1, Page 82, Baldwin County Records, which point is due West from the Northwest Corner of Lot 45 in Block Numbered One, as shown by said plat; thence due West to a point, on the low water mark on Wolf or Wolf's Bay and Following the meanderings thereof to a point where the half section line running east and west through the section intersects the waters edge, then due East along the one-half section line to the West edge of Lullwater Drive as per plat stated above; thence in a southerly direction along the west edge of Lullwater Drive to the Point of Beginning.

of which she has legal title and upon which, before the commencement of this suit, the Defendaant entered and unlawfully withheld, together with TWO HUNDRED AND NO/100 (\$200.00) DOLLARS for the detention thereof.

E. G. Rickarby
E. G. RICKARBY, Attorney for
Plaintiff

Mr. Frank Soesbe lives at Pirate's Cove,
Elberta, Alabama.

77b.8666

Helen La Rue

VS

Frank Sorsbe

Sheriff claims 84 miles at

Ten Cents per mile Total \$ 8.40

TAYLOR WILKINS, Sheriff

BY W. A. Garner
DEPUTY SHERIFF

Received 18 day of April 1969

and on 25 day of April 1969

I served a copy of the within S & C

on Frank Sorsbe

By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Garner L. S.

Woolf Bay **FILED**

APR 18 1969

ALICE J. DUCK CLERK
REGISTER

E. G. Ruckaby