

ESTATE OF

BARBARA JANE KNIGHT,
a minor.

) IN THE CIRCUIT COURT OF
)
)
) BALDWIN COUNTY, ALABAMA
) NO. 3635

PETITION FOR FINAL SETTLEMENT

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

Your petitioner, W. K. Arant, who is over twenty-one years
of age and a resident of Baldwin County, Alabama, respectfully
represents unto the court and your Honor as follows:

1. Petitioner has heretofore been appointed, qualified
and is now acting as guardian of the estate of Barbara Jane Knight
(Cooper), which guardianship is now pending in this court.

2. That by a previous decree heretofore rendered by
this court your petitioner was authorized to expend from the
principal of said minor's estate the monthly sum of \$50.00 for
her maintenance and education.

3. That petitioner has administered the estate of said
minor and has expended the sum of Fifty Dollars (\$50.00) each month
in accordance with said decree and has expended the assets of said
estate for the maintenance and education of the said minor.
Petitioner is now entitled to be relieved and discharged as such
guardian and the sureties on his bond as said guardian should be
relieved of all liability under the said bond. That the said minor
has now arrived at the age of eighteen years and is now married
and that petitioner has made a full and final settlement with said
ward and prays that this be taken as and for his account for a
final settlement of his guardianship of said estate and that he
be discharged from all other and further liability.

4. Also, Barbara Jane Knight Cooper, who states and shows
unto the court that she is now over the age of eighteen years and
is married and that she has received from her said guardian all of
the assets of her said estate that has come into the hands of her
guardian and hereby acknowledges receipt thereof in full, and also

asks that her guardian be discharged from all other and further liability on account of his said guardianship.

W. K. Arant
W. K. Arant

Barbara Jane Knight Cooper
Barbara Jane Knight Cooper

Sworn to and subscribed before me
on this the 26th day of March, 1969.

Ernestine R. Lons
Notary Public, Baldwin County, Alabama

FILED

MAR 26 1969

ALICE J. DUCK CLERK
REGISTER

ESTATE OF
BARBARA JANE KNIGHT,
a minor.

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) NO. 2635

FINAL DECREE

This day came W. K. Arant, as guardian of Barbara Jane Knight (Cooper), and filed his petition for a final settlement of said estate and it appearing to the court that the said Barbara Jane Knight (Cooper) is over the age of eighteen years and is now married and that she has also joined in the said petition asking that the said guardian be discharged and relieved of all other liability by reason of his said guardianship and acknowledged receipt of all of the assets of her said estate and consented that said settlement be made without further notice to her and that said guardian and the sureties on his bond be discharged.

It is, therefore, ORDERED, ADJUDGED AND DECREED by the court as follows:

1. That W. K. Arant, as guardian of the estate of Barbara Jane Knight (Cooper), be and he is hereby discharged as guardian aforesaid and that the sureties on his official bond as such guardian be, and are hereby forever discharged from all further liability on said bond.

2. That the costs of this matter be taxed by the Register and paid by W. K. Arant, as such guardian.

ORDERED, ADJUDGED AND DECREED on this the 26th day of March, 1969.

William J. Madala
Judge

FILED

MAR 26 1969

ALICE J. DUCK CLERK
REGISTER

ESTATE OF
BARBARA JANE KNIGHT,
A minor.

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

DECREE AUTHORIZING GUARDIAN TO USE THE PRINCIPAL
OF ESTATE FOR MAINTENANCE AND EDUCATION OF MINOR

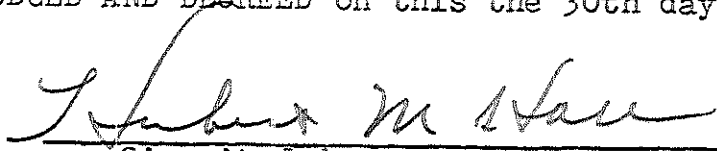
This day being the day regularly appointed to hear the Petition of W. K. Arant, Guardian of said minor, asking that he be allowed to expend \$50.00 each month for the maintenance and education of said minor, and Floyd G. Swearingen, an Attorney at Law, heretofore appointed by this Court to represent said minor on this hearing, having put in issue the facts stated in the application and having acquired proof thereof, the Court now proceeds to hear said petition;

It appears to the Court from the testimony taken orally in open court that the said minor has no income from the principal of the estate for her maintenance and education in an amount suitable to prospects and conditions in life; that the said minor is six years of age and has begun her education at the Baldwin County Grammar School in September, 1957, and that the expense of maintaining and providing for her maintenance and education will aggregate the sum of approximately \$50.00 each month and that an amount sufficient for her maintenance and education cannot be provided for said minor other than by using part of the principal of the said estate and that it would be to the best interest of said minor to grant said petition; it is, therefore,

ORDERED, ADJUDGED AND DECREED that W. K. Arant be, and he is hereby authorized and directed to expend from the principal of said minor's estate the monthly sum of \$50.00 for her maintenance and education.

It is further ORDERED that W. K. Arant pay the costs of this proceeding amounting to the sum of \$_____, and take credit on his account for said payment.

ORDERED, ADJUDGED AND DECREED on this the 30th day of September, 1957.


Circuit Judge.

DECREE AUTHORIZING GUARDIAN TO
USE THE PRINCIPAL OF ESTATE FOR
MAINTENANCE AND EDUCATION OF
MINOR.

ESTATE OF
BARBARA JANE KNIGHT,
A Minor.

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

[Handwritten signature]

ESTATE OF
BARBARA JANE KNIGHT,
A minor.

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

PETITION TO USE PRINCIPAL OF ESTATE FOR
MAINTENANCE AND EDUCATION OF MINOR:

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

Your Petitioner, W. K. Arant, respectfully represents
and shows unto the Court and your Honor as follows:

1. That the administration of this guardianship estate
is pending in this court; that the said minor is a resident of
Baldwin County, Alabama, and resides with, and is in the custody
of Mary D. Knight, the grandmother of said minor.

2. That the said minor has no income from the prin-
cipal of the estate for her maintenance and education in an amount
suitable to her prospects and condition in life; that the said
minor is six years of age and is a student at the public schools
of Baldwin County, Alabama, in Bay Minette, Alabama, and that the
expense of maintaining her and providing for her education
aggregate the sum of approximately \$50.00 per month and that an
amount sufficient for her maintenance and education cannot provid-
ed for said minor other than by using part of the principal of this
said estate. That the assets of said estate is the following sum
of money in cash, to-wit, \$3,592.92.

3. That it is necessary in order to provide funds for
the maintenance and education of the said minor and that it will
be to the best interest of said minor to use the principal of said
estate for her maintenance and education.

WHEREFORE, Petitioner files this application and prays
that a day may be set for the hearing of this application in
accordance with the practice of this Honorable Court, and that the
Court will appoint a suitable and competent person, not of kin or
of counsel to petitioner, as guardian ad litem, to represent the
said minor upon the hearing of this petition, and upon the hearing
hereof, that the court will render a decree authorizing petitioner

to expend from the principal of said minor's estate the monthly sum of \$50.00 for the maintenance and education of said minor.

W. K. Arant
Petitioner.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared W. K. Arant, who first being duly and legally sworn, deposes and says: That he has read over the foregoing petition and that the facts set out therein are true.

W. K. Arant

Sworn to and subscribed before
me on this the 7th day of
September, 1957.

John R. O.
Notary Public, Baldwin County, Ala.

ORDER:

The above petition having been presented to me on this date the same is hereby submitted for hearing at 10:00 o'clock A. M. on the 30 day of Sept, 1957.

Gloyd A. Weary, an Attorney at Law and Solicitor in Chancery, practicing in Baldwin County, Alabama, who is, in all respects, a fit and proper person to be appointed as guardian ad litem, shall be, and he is hereby appointed as guardian ad litem to represent the said minor, Barbara Jane Knight.

ORDERED, ADJUDGED AND DECREED on this the 7th day of September, 1957.

Hubert M. Stace
Judge.

Filed - 9-7-57

ESTATE OF
BARBARA JANE KNIGHT,
a Minor.

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

ANSWER OF GUARDIAN AD LITEM

Now comes Floyd G. Swearingen, the guardian ad litem heretofore appointed in this cause to represent the said minor, and for answer to the petition heretofore filed in said cause says:

1. He denies each and every allegation of the said petition and demands strict proof thereof.

Floyd G. Swearingen
Guardian ad litem.

Filed - 9-30-57

TO THE HONORABLE THE JUDGE OF THE
COURT, BALDWIN COUNTY, ALABAMA
THE PETITIONER, JAMES M. KNIGHT,
DOES HEREBY STATE:

THAT the said BARBARA JANE KNIGHT, a
minor, is the daughter of the said JAMES M. KNIGHT,
and that the said JAMES M. KNIGHT is the
sole owner and possessor of the said
minor, and that the said JAMES M. KNIGHT
is the guardian ad litem of the said
minor.

[Handwritten signature]

ANSWER OF GUARDIAN AD LITEM

ESTATE OF
BARBARA JANE KNIGHT,
A minor.

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

Filed 9-30-57
James M. Knight
Reg

ESTATE OF

BARBARA JANE KNIGHT,
a minor,

I
I
I

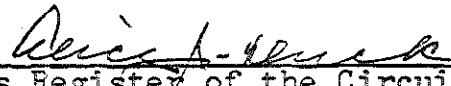
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

NOTICE OF APPOINTMENT OF GUARDIAN AD LITEM

^G
TO FLOYD^GSWEARINGEN, ESQUIRE:

You are hereby notified that by a decree of this Court heretofore rendered in this cause you have been appointed guardian ad litem to represent Barbara Jane Knight in a proceeding to have the Circuit Court of Baldwin County, Alabama, in Equity, approve expenditure of principal of estate.

Dated this 30th day of September, 1957.


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

STATE OF ALABAMA

BALDWIN COUNTY

I, the undersigned Floyd^GSwearingen, do hereby accept appointment as guardian ad litem to represent the said minor, Barbara Jane Knight, in this proceeding.

Dated this 30th day of September, 1957.


Guardian ad litem.

NOTICE OF APPOINTMENT OF
GUARDIAN AD LITEM

ESTATE OF
BARBARA JANE KNIGHT,
A Minor.

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

BARBARA JANE KNIGHT,
A Minor.

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

TESTIMONY TAKEN IN OPEN COURT, BEFORE HON. HUBERT M. HALL, JUDGE
OF SAID COURT. NOVEMBER 8, 1955.

HON. JAMES R. OWENS, REPRESENTING THE PETITIONER

HON. FLOYD SWEARINGEN, GUARDIAN AD LITEM.

MR. KENNETH W. ARANT, GUARDIAN OF BARBARA JANE KNIGHT, BEING FIRST
DULY SWORN. TESTIFIED:

Examination by Mr. Owen.

Q. This is William K. Arant?

A. Yes sir.

Q. Where do you live, Mr. Arant?

A. Bay Minette, Alabama.

Q. Are you the Guardian of Barbara Jane Knight, a minor?

A. Yes sir.

Q. Mr. Arant, do you recall when Barbara Jane Knight's father, William F. Knight, died?

A. Yes, sir.

Q. When was that?

A. May, 1954.

Q. Did he leave a will, or do you know?

A. No he did not.

Q Shortly after his death, I will ask you if you made any investigation of his death and if you made any trips to Mississippi or Louisiana to investigate his death?

A. I went to Grand Island, Louisiana as soon as we got the news of his death and stayed for two days on the Quarter-boat with the crew.

Q. Did you talk with the co-workers who were present when Mr.

Knight fell from the boat?

A. Yes sir, I talked with all of them.

Q. Have you discussed this matter with your Attorneys?

A. Yes sir.

Q. Mr. Blackburn and myself are your Attorneys?

A. Yes sir.

Q. You have discussed this matter with us?

A. Yes sir.

Q. After discussing this matter with us and the gentlemen that were with Mr. Knight on the boat when he drowned, what is your opinion as to this offer to settle any claim which the Minor, Barbara Jane Knight has against Mr. Knight's Employer, Western Geophysical Company? Do you think the \$4,000.00 would be for the best interest of this child?

A. I think it would be.

ON CROSS EXAMINATION OF THIS WITNESS BY MR. SWEARINGEN, HE
TESTIFIED:

Q. Would this minor get the sum total of \$4,000.00, or would there be court costs, etc. here and in New Orleans deducted from that sum?

MR. OWEN: I think I could answer that better. There would be no Court cost deduced from the minor's stand-point either here or New Orleans. There will be some Attorneys' fees deducted.

Q. The Attorneys' fee would be deducted from the \$4,000.00?

MR. OWEN: Yes.

Q. Do you think that the \$4,000.00 lump sum would probably be a better settlement than a continuing some over a period of time?

A. At the present time I believe it would, because they don't need the money at the present time, and it would be drawing interest, and probably for three or four years they won't need it.

Q. According to the testimony that you have been able to

get, that is, relative to Mr. Knight's death, do you think that the \$4,000.00 settlement would be preferable to a suit in New Orleans? Do you think the testimony would be too adverse for a suit for a larger sum to be warranted?

- A. The way I put it, he was ordered to go aboard the Barge and secure the barge, but he was told to stay aboard the barg, but whether he fell from the barge or tried to jump back, they say they didn't know, but in the signed statements they say that he tried to jump back.

C E R T I F I C A T E:

I hereby certify that the foregoing, consisting of pages 1 to 3, both inclusive, correctly sets forth a true and correct transcript of the testimony taken in this cause on this day.

This 8th day of November, 1955.

Roscoe D. Duncanson
Official Court Reporter

TO THE HONORABLE W. R. STUART, JUDGE OF PROBATE, BALDWIN COUNTY, ALABAMA:

Your Petitioner, W. K. Arant, respectfully shows unto the court and your Honor as follows:

1. That your Petitioner is over the age of twenty one years and a resident of Baldwin County, Alabama.

2. That Barbara Jane Knight, a minor, four years of age, is in the care, custody and control of Mary B. Knight and resides with her in Baldwin County, Alabama.

3. That the said minor owns no real property, but she, as the sole heir of William F. Knight, has a cause of action against Western Geophysical Company for causing the wrongful death of her father, William F. Knight, which cause of action is worth approximately Four Thousand Dollars (\$4000) and not probably more.

4. That it is necessary and proper that guardian be appointed over the person and estate of said minor.

WHEREFORE, Petitioner prays this honorable court will take notice of this petition and will issue letters of guardianship to him over the person and estate of the said Barbara Jane Knight, upon him entering into bond with such sureties as this court shall approve.

W. K. Arant

Sworn to and subscribed before me on this the 5th day of October, 1955.

James R. O.
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA, BALDWIN COUNTY
Filed Oct. 5, 1955 M
Recorded Pro x min book 7 page 333
W. R. Stuart
Judge of Probate

GUARDIAN'S BOND

STATE OF ALABAMA)
 *
 BALDWIN COUNTY)

KNOW ALL MEN BY THESE PRESENTS: That we, W. K. Arant,
 as Principal, and W. D. Gause and
W. D. Hastie as Sureties, are held and
 firmly bound unto W. R. Stuart, Judge of the Probate Court of
 Baldwin County, Alabama and his successors in office in the sum of
 Eight Thousand Dollars (\$8000), for the payment of which, well and
 truly to be made, the Principal binds himself, his heirs, executors
 and administrators, and the Sureties bind themselves, their heirs
 and assigns, jointly and severally, firmly by these presents.

Sealed with our seals and dated on this the 5th day
 of October, 1955.

The condition of the above obligation is such that,
 Whereas, W. K. Arant has applied to the Judge of Probate of Baldwin
 County, Alabama for Letters of Guardianship on the person and
 estate of Barbara Jane Knight, a minor.

NOW, THEREFORE, if the said W. K. Arant, as such
 Guardian, shall faithfully perform all of the duties which are or
 which may be required of him by law, then this obligation shall
 be void, otherwise to remain in full force and effect.

W. K. Arant (SEAL)

W. D. Hastie (SEAL)

W. D. Gause (SEAL)

Taken and approved on this the 5th
 day of October, 1955.

W. R. Stuart
 Judge of Probate, Baldwin County, Alabama.

STATE OF ALABAMA, BALDWIN COUNTY
 Filed Oct. 5, 1955 M
 Recorded P. J. Min book 7 page 335
W. R. Stuart
 Judge of Probate #2

LETTERS OF GUARDIANSHIP.

1403-3

Printed and For Sale By Roberts & Son, Birmingham

THE STATE OF ALABAMA

Baldwin

County

PROBATE COURT.

LETTERS OF GUARDIANSHIP OVER THE ESTATE OF

Barbara Jane Knight

, a minor, under the age of fourteen years,

, a minor, the age of fourteen years,

, a minor, the age of fourteen years,

, a minor, the age of fourteen years,

, a minor, the age of fourteen years,

STATE OF ALABAMA, BALDWIN COUNTY

Recorded Pro. & Min. book 7 page 336

W. R. Street
Judge of Probate

are hereby granted to W. K. Arant, who has duly qualified and given bond as required by law, and is authorized to discharge all the functions attached to said guardianship.

Dated this 5th day of October, A.D. 19 55.

Code 1940—Tit. 21, Sec.1.

W. R. Street
Judge of Probate.

Bay Minette, Ala., Oct. 5 1955

Est: Barbara Jane Knight, Minor
W. K. Knight, Gen.

In Account With

W. R. STUART

Judge of Probate, Baldwin County

s. R. Owen, atty.

Please return bill with remittance

Recording	from	to	Privilege Tax	Rec. Fee	Total
		Probate Costs - Issuing Ltrs. of Guardianship, etc.			\$ 575

ESTATE OF
BARBARA JANE KNIGHT,
A Minor,

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

DECREE REMOVING GUARDIANSHIP TO EQUITY COURT

This cause coming on to be heard on this date is submitted on the verified Petition of W. K. Arant, as guardian of Barbara Jane Knight, a minor, to remove the guardianship of the said minor, which is now pending in the Probate Court of Baldwin County, Alabama, to the Circuit Court of Baldwin County, Alabama, whereupon, it is, therefore, ORDERED, ADJUDGED AND DECREED by the Court as follows:

1. The said guardianship shall be and it is hereby removed from the Probate Court of Baldwin County, Alabama, to the Circuit Court of Baldwin County, Alabama, sitting in Equity.

2. The Register of this Court shall forthwith deliver a copy of this decree to the Judge of Probate of Baldwin County, Alabama, who shall deliver all papers on file in the said estate to the Register of the Circuit Court of Baldwin County, Alabama, in Equity.

ORDERED, ADJUDGED AND DECREED on this the 18th day of October, 1955.

Hubert M. Hall
Judge.

No. 3635

DECREE REMOVING GUARDIANSHIP
TO EQUITY COURT

ESTATE OF

BARBARA JANE KNIGHT,
A Minor,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED

OCT 24 1955

ALICE J. DUCK, Register

ESTATE OF
BARBARA JANE KNIGHT,
a Minor,

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

DECREE

This cause coming on to be heard on this date on the petition of W. K. Arant, as guardian of Barbara Jane Knight, praying that this court make and enter an order authorizing him, as said guardian, to settle any and all claims which the said minor has or might have against Western Geophysical Company of America for the wrongful death of her father for the sum of Four Thousand Dollars (\$4000.00); and it appearing to the court that it is to the best interest of the said minor that she accept the sum of Four Thousand Dollars (\$4000.00) from the said Western Geophysical Company of America in full and final settlement for any claim or claims which she might have against the said company for the wrongful death of her father, it is, therefore,

ORDERED, ADJUDGED AND DECREED that the said guardian, W. K. Arant, be, and he hereby is, authorized to settle any and all claims which the said Barbara Jane Knight has or may have against Western Geophysical Company of America for the sum of Four Thousand Dollars (\$4000.00).

ORDERED, ADJUDGED AND DECREED on this the 9th day of November, 1955.

Hubert M. Hall

DECREE
RECORDED

ESTATE OF

BARBARA JANE KNIGHT,
a Minor,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED

NOV 9 1955

ALICE J. BUCK, Register

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, SITTING IN EQUITY:

1. Petitioner has been appointed, qualified and is now acting as guardian of the estate of Barbara Jane Knight, a Minor, which guardianship is now pending in the Probate Court of Baldwin County, Alabama.

2. Because of the broader powers of the Equity Court of Baldwin County, Alabama, the said estate can be better administered and handled in the Circuit Court of Baldwin County, Alabama, in Equity, than in the Probate Court of Baldwin County, Alabama.

Wherefore, Petitioner prays that the Court will make and enter a proper order or decree removing the said guardianship from the Probate Court of Baldwin County, Alabama, to the Circuit Court of Baldwin County, Alabama. Petitioner further prays that such other orders be made and decree rendered as may be requisite and proper in the premises.


W. H. Grant
Petitioner

STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, the undersigned authority, within and for the State and County, personally appeared W. K. Arant, who, after being by me first duly and legally sworn, deposes and says: That he has read over the foregoing petition and that the facts stated therein are true.

W. H. Brand

Sworn to and subscribed before me
on this the 17th day of October, 1955.


Notary Public, Baldwin County, Alabama.

Filed - 10-24-55
779 - 201-72

PETITION TO REMOVE GUARDIANSHIP
FROM PROBATE COURT TO EQUITY
COURT

ESTATE OF

BARBARA JANE KNIGHT,
a minor,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED

OCT 24 1955

ALICE J. DUCK, Register

ESTATE OF

BARBARA JANE KNIGHT,
a minor,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NOTICE OF APPOINTMENT OF GUARDIAN AD LITEM

TO Floyd Swearingen, ESQUIRE:

You are hereby notified that by a decree of this Court heretofore rendered in this cause you have been appointed Guardian ad litem to represent Barbara Jane Knight in a proceeding to have the Circuit Court of Baldwin County, Alabama, in Equity, approve a settlement by her said guardian.

Dated this 26 day of October, 1955.

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

* * * * *

STATE OF ALABAMA)

BALDWIN COUNTY)

I, the undersigned Floyd Swearingen, do hereby accept appointment as guardian ad litem to represent the said minor, Barbara Jane Knight, in this proceeding.

Dated this 27th day of October, 1955.

Floyd Swearingen
Guardian ad litem

NOTICE OF APPOINTMENT OF
GUARDIAN AD LITEM

ESTATE OF

BARBARA JANE KNIGHT,
a minor,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

OCT 17 1955

JOHN J. PUGH, JR.

ESTATE OF
BARBARA JANE KNIGHT,
a Minor,

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

ANSWER OF GUARDIAN AD LITEM

Now comes Floyd G. Swearingen, the guardian ad litem heretofore appointed in this cause to represent the said minor, and for answer to the petition heretofore filed in said cause says:

1. He denies each and every allegation of the said petition and demands strict proof thereof.

Floyd G. Swearingen
Guardian Ad litem.

ANSWER OF GUARDIAN AD LITEM

ESTATE OF

BARBARA JANE KNIGHT,
a minor,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ESTATE OF

BARBARA JANE KNIGHT,
a minor,

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

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

Your Petitioner, W. K. Arant, who is over twenty-one years of age and a resident of Baldwin County, Alabama, respectfully represents unto the Court and your Honor as follows:

1. Petitioner has been appointed, qualified and is now acting as guardian of the estate of Barbara Jane Knight, a minor, which guardianship is now pending in this Court.

2. William F. Knight, the father of the said minor, died intestate in the state of Louisiana on to-wit, May 25, 1954. At the time of the death of the said William F. Knight, he was employed by Western Geophysical Company of America and the said company has offered to pay to the said Barbara Jane Knight the sum of Four Thousand Dollars for negligently causing the death of her father.

3. Petitioner avers that he has made an investigation of the death of the said William F. Knight, has made several trips to Mississippi to discuss the matter with co-workers of the said William F. Knight who were present at the time of his death and has discussed the matter with his attorney. Petitioner further avers that after his said investigation and after discussion with his attorney, he feels that it is to the best interest of the said minor that she accept the offer for settlement of Four Thousand Dollars (\$4000.00) for the death of her father.

The premises considered Petitioner prays that the Court will set a day for hearing the Petition, appoint a guardian ad litem to represent the said minor and that on a final hearing hereof that this court will make and enter an order authorizing him, as guardian of Barbara Jane Knight, to settle any and all claims which she has or might have against Western Geophysical Company of America for the wrongful death of her father for the sum of Four Thousand Dollars (\$4000.00). Petitioner further prays that such

other orders be made and decrees rendered as may be requisite and proper in the premises.

W. H. Grant
Petitioner

Sworn to and subscribed before me on
this the 25 day of October, 1955.

Mary Lou Blackburn
Notary Public, Baldwin County, Alabama.

ORDER

The above Petition having been presented to me on this
date the same is hereby submitted for hearing at 10:00 A. M. on the
8th day of November, 1955.

Floyd Swearingin an Attorney at Law and
Solicitor in Chancery, practicing in Baldwin County, Alabama, who
is in all respects a fit and proper person to be appointed as
guardian ad litem, shall be and he is hereby appointed as guardian
ad litem to represent the said minor, Barbara Jane Knight.

ORDERED, ADJUDGED AND DECREED on this the 26 day of
October, 1955.

Hubert M. Hall
Judge.

Filed 10-26-55