

STATE OF ALABAMA,
BALDWIN COUNTY.

This day personally appeared before me
a Notary Public in and for said State and County, Mrs. H. M.
Lawrence of Dyas, Alabama, who is known to me and who states
on oath that the facts stated in the foregoing bill of com-
plaint are true and correct.

Mrs. H. M. Lawrence

Subscribed and sworn to before me this 29th day of
October, 1935.

Charles E. Jones
Notary Public

The State of Alabama, }
Baldwin County.

CIRCUIT COURT AT BAY MINETTE, ALA.

Know all Men by these Presents, That we, Mrs. H. M. Lawrence. As Pincipal.

and R. M. Newton. as Surities

of the County of Baldwin

are held and firmly bound unto H. H. McGill.

in the sum of _____ Dollars, to

be paid to the said H. H. McGill.

heirs, executors, administrators, or assigns, for which payment, well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors, and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated the _____ day of _____, 192_____

The Condition of this Obligation is such:

That whereas, the above bounden, Mrs. H. M. Lawrence.

has, on the day of the date

Restaining Order.

hereof, prayed an Attachment at the suit of _____

against the estate of above named _____

for the sum of One Hundred Forty Dollars, and hath obtained the same, returnable to the Circuit Court of Baldwin County:

Now, if the said H. M. Lawrence.

should prosecute said Attachment to effect, and pay the said Defendant all such damages as may sustain by the wrongful or vexatious suing out said Attachment, then the above obligation to be void; otherwise to remain in full force and effect.

And we and each of us hereby waive all rights of claims of exemption we or either of us have now, or may hereafter have, under the Constitution and Laws of the State of Alabama.

Signed, Sealed, and delivered the date above written.

Mrs. H. M. Lawrence (Seal)

R. M. Newton (Seal)

(Seal)

(Seal)

Approved, this 20 day of October, 1925

Robert S. Deek, Clerk.

STATE OF ALABAMA,
BALDWIN COUNTY.

This day personally appeared before me
a Notary Public in and for said State and County, Mrs. H. M.
Lawrence of Dyas, Alabama, who is known to me and who states
on oath that the facts stated in the foregoing bill of com-
plaint are true and correct.

Mrs. H. M. Lawrence

Subscribed and sworn to before me this 29th day of
October, 1935.

C. H. B. [Signature]
Notary Public

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

No. *178*

Mrs H M Lawrence

VS.

H H McJunk

PLAINTIFF

DEFENDANT

Bill of Costs

Fees of Register		Dollars	Cts.	Brought Forward	
Filing each bill and other papers	\$ 10		<i>10</i>	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.	
Issuing each subpoena	50		<i>58</i>	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received,	
Issuing each copy thereof	40		<i>40</i>	Each Notice sent by mail to creditors	15
Entering each return thereof	15		<i>15</i>	Filing, Receipting for and docketing each claim, etc.	25
For each order of publication	1 00		<i>1 00</i>	For all entries on subpoena docket, etc.	50
Issuing writ of injunction	1 50		<i>1 50</i>	For all entries on commission docket, etc.	50
For each copy thereof	50		<i>1 00</i>	Making final record, per 100 words	15
Entering each return thereof	15		<i>1 15</i>	Certified copy of decree	1 00
Issuing writ of attachment	1 00		<i>1 15</i>	Report of divorce to State Health office Acts 1915	50
Entering each return thereof	15		<i>1 30</i>		
Docketing each case	1 00		<i>1 00</i>	Total Fees of Register	<i>7 85</i>
Entering each appearance	25		<i>1 55</i>		
Issuing each decree pro confesso on persl ser	1 00		<i>1 55</i>	Fees of Sheriff	
Issuing each decree pro confesso on publication	1 00		<i>1 55</i>	Serving and returning subpoena on deft.	\$ 1 50
Each order appointing guardian	1 00		<i>1 55</i>	Serving and returning subpoena for witness	65
Any other order by Register	50		<i>2 05</i>	Levying attachment	1 50
Issuing commission to take testimony	50		<i>2 05</i>	Entering and returning same	25
Receiving and filing	10		<i>2 15</i>	Selling property attached	
Endorsing each package	10		<i>2 15</i>	Impaneling Jury	75
Entering order submitting cause	50		<i>2 15</i>	Executing writ of possession	2 50
Entering any other order of Court	25		<i>2 15</i>	Collecting execution for costs	1 50
Noting all testimony	50		<i>2 15</i>	Serving and returning sci. fa., each	65
Abstract of cause, etc.	1 00		<i>2 15</i>	Serving and returning notice	65
Entering each decree	75		<i>2 15</i>	Serving and returning writ of injunction	1 50
For every 100 words over 500	15		<i>2 15</i>	Serving and returning writ of exeat.	1 50
Taking account, etc.	3 00		<i>2 15</i>	Taking and approving bonds, each	75
Taking testimony, etc.	15		<i>2 15</i>	Collecting money on execution	
Each report, 500 words or less	2 50		<i>2 15</i>	Making deed	2 50
For every 100 words over 500	15		<i>2 15</i>	Serving and returning application, etc.	1 00
Amount claimed less than \$500, etc	2 00		<i>2 15</i>	Serving attachment, contempt of court.	1 50
Issuing each subpoena	25		<i>2 15</i>		
Witness certificate, each	25		<i>2 15</i>	Total Fees of Sheriff	<i>2 00</i>
Issuing execution, each	75		<i>2 15</i>		
Entering each return	15		<i>2 15</i>	Recapitulation	
Taking and approving bond, each	1 00		<i>2 15</i>	Register's Fees	<i>7 85</i>
Making copy of bill, etc	15		<i>2 15</i>	Sheriff's Fees	<i>3 00</i>
Each notice not otherwise provided for	50		<i>2 15</i>	Commissioner's Fees	
Each certificate or affidavit, with seal	50		<i>2 15</i>	Solicitor's Fees	
Each certificate or affidavit, no seal	25		<i>2 15</i>	Witness Fees	
Hearing and passing on application, etc.	3 00		<i>2 15</i>	Guardian Ad Litem	
Each settlement with receiver, etc.	3 00		<i>2 15</i>	Printer's Fees	
Examining each voucher of receiver, etc	10		<i>2 15</i>	Trial Tax	3 00
Examining each answer, etc.	3 00		<i>2 15</i>	Recording Decree in Probate Court	
Recording resignation, etc.	75		<i>2 15</i>		
Entering each certificate to Supreme Court	50		<i>2 15</i>	TOTAL	<i>13 85</i>
Taking questions and answers, etc.	25		<i>2 15</i>		
For all other service relating to such proceedings	1 00		<i>2 15</i>		
For services in proceeding to relieve minors, etc., same fees as in similar cases.			<i>2 15</i>		
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.			<i>2 15</i>		
Sub Total Carried Forward					

Received payment this _____ day of _____ 193_____

Fee Book - 3 - Page 322

Register.

STATE OF ALABAMA,
BALDWIN COUNTY

MRS. H. M. LAWRENCE
Complainant

vs. IN EQUITY

H. H. MCGILL, Respondent

To the Honorable F. W. Hare, Judge of the 21st Judicial Circuit,
In Equity.

Your oratrix, Mrs. H. M. Lawrence of Dyas, Alabama, who is over the age of twenty one years and is a bona fide resident and citizen of Baldwin County files this, her bill of complaint against H. H. McGill, a citizen of Baldwin County Alabama, over the age of twenty one years, and respectfully shows unto your Honor the following facts, namely;

1. That on the 8th day of June 1934, your oratrix purchased of Mrs. Frances A. St. Clair, a resident of Chicago, Illinois, the merchantable timber in Section Seven, Township One South Range Four East of St. Stephens Meridian, and received a deed therefor. The description in said conveyance reads as follows; "All your merchantable timber in Section Seven, Township One South Range Four East of St. Stevens Meridian. This scattered timber is the same that was once sold J. B. Lawrence by you and Geo. Roy Sieger on October 11, 1919"; and your oratrix respectfully shows unto your Honor that the description of the land containing the timber recited in the foregoing description as having been sold to J. B. Lawrence on October 11, 1919, is as follows, to-wit: "The South Half (S $\frac{1}{2}$) of the Northwest Quarter (NW $\frac{1}{4}$) of Section Seven (7), Township One (1) South Range Four (4) East of St. Stevens Meridian", and your oratrix respectfully shows unto your Honor that the conveyance of said timber to her by Mrs. Frances A. St. Clair on June 8, 1934, was in consideration of the payment by your oratrix to said grantor of a valuable consideration, to-wit, of the sum of Fifty Dollars (\$50.00).


2. Your oratrix respectfully shows unto your Honor that the deed for said timber, dated June 8, 1934, from Mrs. Frances A. St. Clair to your oratrix, Mrs. H. M. Lawrence, was admitted to record in the office of the Probate Court of Baldwin County Alabama on the 23rd day of July 1934, at 9:50 o'clock A.M. and was recorded in deed book 55 N. S. page 560.

3. Your oratrix respectfully shows unto your Honor that the standing timber on the above described tract of land has been cut, and

is being cut without her consent, authority or tacit agreement or acquiescence and that she is informed and believes that the said cutting is being done by, for, or at the instance and direction of H. H. McGill the respondent in this suit, to the material damage and loss to your oratrix, which at this time she is unable specifically to estimate or compute.

PRAYER FOR PROCESS. To the end that equity may be done in the premises your oratrix prays that the said H. H. McGill be made a party defendant to this complainant's bill of complaint and that process or subpoena may be issued and served upon him according to the practice of this Honorable Court.

PRAYER FOR RELIEF. Your oratrix further prays that upon the presentation of this complainant's bill your Honor's Court will fix a time for the issuance of an injunction pendente lite for the purpose of restraining the defendant, H. H. McGill, from proceeding further at all with the cutting and removal from said premises of said timber, in violation of the complainant's equitable rights and may be heard and passed upon and that your Honor's Court will meanwhile, by a writ of restraint or such other means as this court may think proper, restrain the said H. H. McGill from any further acts in and concerning said timber; and that the said respondent, H. H. McGill, may be required to report and account for such timber as has been cut and removed by him from the said premises; and the said complainant further prays that she may have such other and further relief as she may be equitably entitled to under the premises and as in duty bound she will ever pray.


Solicitor for Complainant

FOOT NOTE. The said H. H. McGill, respondent, is required to answer each and every allegation of the foregoing bill of complaint paragraphed 1, 2 and 3, but not under oath. Oath as to each of his answers being hereby specially waived.


Solicitor for Complainant

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING;

WE COMMAND YOU, That you summon H H McGill/

of Baldwin. County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by Mrs H M Lawrence.

against said H H McGill

The hearing of the application, for Injunction, Pendente Lite.
Will be heard at the court house at BayMinette Ala.
saturday November the 9th 1935. at two oclock.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 30 day

of Oct ~~November~~ 1935

Robert S. Duck Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

MRS. H. M. LAWRENCE,
Complainant
vs.
H. H. MCGILL,
Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY
ALABAMA - IN EQUITY

The original bill of complaint in the above cause being filed by Mrs. H. M. Lawrence praying for an injunction pendente lite against H. H. McGill, to restrain him from cutting, removing or otherwise interfering with the timber on certain lands described in said complaint, having been presented to me, F. W. Hare Judge of the Circuit Court of Baldwin County Alabama, and it appears that the complainant is entitled to an order setting a time and place for the hearing of the application for an injunction pendente lite not more than ten days from the date of said application and to a restraining order pending said hearing.

It is ordered, adjudged and decreed by the Court that said application for an injunction pendente lite in accordance with the prayer of said bill of complaint be, and the same is hereby set for hearing on the 9th day of November at the hour of 2 P.M. at the court house of Baldwin County, and that at said time and place said application shall be heard and passed upon.

It is further ordered, adjudged and decreed by the Court that at least three days notice of such time and place shall be served upon the said defendant H. H. McGill.

It is further ordered, adjudged and decreed by the Court that the said defendant be, and is hereby restrained from proceeding with the cutting or removal of timber from lands described in said bill of complaint until the said application for an injunction pendente lite has been heard and determined.

It is further ordered, adjudged and decreed by the Court that the said writ of restraint hereby ordered to be issued shall not be issued until the complainant in this cause has filed with the Register of this Court a bond in the sum of \$150.00 dollars, payable to H. H. McGill, approved by the Register in Chancery of Baldwin County Alabama, and conditioned to pay all damage and costs which any person may sustain by the suing out of such restraining order if the same is dissolved.


JUDGE

STATE OF ALABAMA,
BALDWIN COUNTY

MRS. H. M. LAWRENCE
Complainant

vs.

IN EQUITY

H. H. MCGILL, Respondent

To the Honorable F. W. Hare, Judge of the 21st Judicial Circuit,
In Equity.

Your oratrix, Mrs. H. M. Lawrence of Dyas, Alabama, who is over the age of twenty one years and is a bona fide resident and citizen of Baldwin County, files this, her bill of complaint against H. H. McGill, a citizen of Baldwin County Alabama, over the age of twenty one years, and respectfully shows unto your Honor the following facts, namely;

1. That on the 8th day of June 1934, your oratrix purchased of Mrs. Frances A. St. Clair, a resident of Chicago, Illinois, the merchantable timber in Section Seven, Township One South Range Four East of St. Stephens Meridian, and received a deed therefore. The description in said conveyance reads as follows; "All your merchantable timber in Section Seven, Township One South Range Four East of St. Stevens Meridian. This scattered timber is the same that was once sold J. B. Lawrence by you and Geo. Roy Sieger on October 11, 1919"; and your oratrix respectfully shows unto your Honor that the description of the land containing the timber recited in the foregoing description as having been sold to J. B. Lawrence on October 11, 1919, is as follows, to-wit: "The South Half ($S\frac{1}{2}$) of the Northwest Quarter ($NW\frac{1}{4}$) of Section Seven (7), Township One (1) South Range Four (4) East of St. Stevens Meridian", and your oratrix respectfully shows unto your Honor that the conveyance of said timber to her by Mrs. Frances A. St. Clair on June 8, 1934, was in consideration of the payment by your oratrix to said grantor of a valuable consideration, to-wit, of the sum of Fifty Dollars (\$50.00).

2. Your oratrix respectfully shows unto your Honor that the deed for said timber, dated June 8, 1934, from Mrs. Frances A. St. Clair to your oratrix, Mrs. H. M. Lawrence, was admitted to record in the office of the Probate Court of Baldwin County Alabama on the 23rd day of July 1934, at 9:50 o'clock A.M. and was recorded in deed book 55 N. S. page 560.

3. Your oratrix respectfully shows unto your Honor that the standing timber on the above described tract of land has been cut, and


is being cut without her consent, authority or tacit agreement or acquiescence and that she is informed and believes that the said cutting is being done by, for, or at the instance and direction of H. H. McGill the respondent in this suit, to the material damage and loss to your oratrix, which at this time she is unable specifically to estimate or compute.

PRAYER FOR PROCESS. To the end that equity may be done in the premises your oratrix prays that the said H. H. McGill be made a party defendant to this complainants bill of complaint and that process or subpoena may be issued and served upon him according to the practice of this Honorable Court.

PRAYER FOR RELIEF. Your oratrix further prays that upon the presentation of this complainant's bill your Honor's Court will fix a time for the issuance of an injunction pendente lite for the purpose of restraining the defendant, H. H. McGill, from proceeding further at all with the cutting and removal from said premises of said timber, in violation of the complainants equitable rights and may be heard and passed upon and that your Honor's Court will meanwhile, by a writ of restraint or such other means as this court may think proper, restrain the said H. H. McGill from any further acts in and concerning said timber; and that the said respondent, H. H. McGill, may be required to report and account for such timber as has been cut and removed by him from the said premises; and the said complainant further prays that she may have such other and further relief as she may be equitably entitled to under the premises and as in duty bound she will ever pray.


Solicitor for Complainant

FOOT NOTE. The said H. H. McGill, respondent, is required to answer each and every allegation of the foregoing bill of complaint paragraphed 1, 2 and 3, but not under oath. Oath as to each of his answers being hereby specially waived.


Solicitor for Complainant

See next sheet for journal