

2705

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ARTHUR M. RYERSON, RONALD McNEIL, SARAH V. LIPSCHULTZ, SIMON HADLEY, the unknown heirs, devisees, grantees, personal representatives and assigns of them, and each of them 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. R. LEHMAN as Complainant, and against Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, and Simon Hadley, as Respondents.

WITNESS my hand this the 20th day of August, 1951.

Quin J. Leuchter
Register

C. R. LEHMAN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. _____

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

Your Complainant, C. R. Lehman, humbly complaining against the Respondents hereinafter set out presents this his bill of complaint against the said Respondents and the following described lands situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
Northeast quarter and South half of Southeast quarter of
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East,

and also against the unknown heirs, devisees, grantees, personal representatives and assigns of the said named respondents and any and all other persons, firms or corporations 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 Complainant, C. R. Lehman, is over twenty-one years of age and a bona fide resident of Summerdale, Baldwin County, Alabama.

2.

That Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, and Simon

Hadley are over twenty-one years of age and if living non residents of the State of Alabama; and 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 either of them is dead and if so the names, ages and residents 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 that their post office addresses cannot be ascertained; that an examination has been made of the land and tax records of Bay Minette, Alabama, the county seat of Baldwin County, Alabama, inquiries has been made of persons in and around Summerdale, the vicinity in which the lands are located and no information can be obtained as to the addresses of the individual respondents.

3.

That your Complainant is the owner in fee simple and in the actual possession of the lands herein described situated in Baldwin County, Alabama, to-wit:

Norhtwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
Northeast quarter and South half of Southeast quarter of
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East.

4.

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

5.

That your Complainant acquired title to said lands by the following conveyances: Northwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East by deed from State Land Commissioner of Alabama dated March 3, 1937, and of record in Deed Book 136 pages 499; deed from State Land Commissioner to South half of Southwest quarter of Northeast quarter of Northeast quarter of Section 33, Township

6 South, Range 4 East, dated February 5, 1941, and of record in Deed Book 118 page 142; deed from State Land Commissioner to South half of Southeast quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, dated March 21, 1945, and of record in Deed Book 115 page 155.

6.

That the title to said lands stand upon the records of the Probate Court of Baldwin County, Alabama, in the name of your Complainant, C. R. Lehman.

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 lands, or had any possession other than your Complainant, C. R. Lehman.

8.

That the only persons shown by the Records of Baldwin County, Alabama to have any claim against said land or any part thereof are Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, and Simon Hadley.

WHEREFORE, the premises considered your Complainant prays that your Honor will by proper process make the said Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, the unknown heirs, devisees, grantees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, and any and all persons, firms or corporations claiming any right, title, interest in, lien or encumbrance upon the said lands herein described in Baldwin County, Alabama, to-wit:

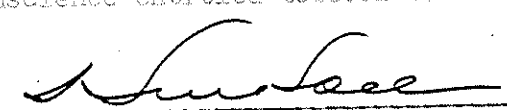
Northwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
Northeast quarter and South half of Southeast quarter of
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East.

or any part or parcel thereof party respondents to this 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.

The Complainant 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 part and parcel thereof is vested in your Complainant, C. R. Lehman and that neither Arthur M. Ryerson, Ronald

McNeil, Sarah V. Lipschultz Simon Hadley or the unknown heirs, devisees, Grantees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley, nor any other person, firm or corporations has any right, title, interest in, or encumbrances upon the said land or any part or parcel thereof and that any and all doubts and disputes concerning the said lands may be cleared up.

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


Solicitor for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority in and for said County, in said State personally appeared H. M. Hall, 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 Complainant 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 20 day of August, 1951.


Notary Public, Baldwin County, Ala.

2706-

D. R. INELAN

COMPLAINANT

VS

ARTHUR E. HYNDSON, ET AL,

DEFENDANTS

Quit Title

FILED IN COMPLAINT

RECORDED

*Filed 8-20-87
A. J. W. Smith
Clerk.*

H. M. Hall

C. R. LEHMAN

COMPLAINANT

VS

ARTHUR M. RYERSON ET AL

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. _____

It having been made to appear, in the above styled cause by proper affidavit, that Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley 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. R. Lehman is over twenty-one years of age and a resident of Baldwin County, Alabama, and the owner in fee simple of and in the actual possession of the following described lands situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
Northeast quarter and South half of Southeast quarter of
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East;

That your Complainant acquired title to said lands by the following conveyances: Northwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East by deed from State Land Commissioner of Alabama dated March 3, 1937, and of record in Deed Book 136 pages 499; deed from State Land Commissioner to South half of Southwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, dated February 5, 1941, and of record in Deed Book 113 page 442; Deed from State Land Commissioner to South half of Southeast quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, dated March 21, 1945, and of record in Deed Book 115 page 155; that no person is known to have paid any taxes on said land or to have been in possession thereof, within ten years next preceding the filing of the bill of complaint excepting C. R. Lehman.

It is therefore ordered and notice is hereby given that the said Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley the unknown heirs, devisees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, and any other persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon said lands, or any part thereof, to appear in the Circuit Court of Baldwin County, Alabama, in Equity, and plead, answer or demur to the bill of complaint on or before September 22 1951, 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 20th day of August, 1951.

Alice J. Duck
Register

H. M. Hall
Solicitor for Complainant

STATE OF ALABAMA
BALDWIN COUNTY

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the foregoing is a full, true, correct and complete copy of notice given by publication in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, in the cause of C. R. Lehman Complainant vs Arthur M. Ryerson, et al, Respondents, and file for record in the office of the Judge of Probate of Baldwin County, Alabama, the county in which said lands lies, in accordance with the provisions of the laws of the State of Alabama.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office on this the 20th day of August, 1951.

Alice J. Duck
Register

STATE OF ALABAMA, BALDWIN COUNTY
Filed 8-24-51.....9:30 A.M.
Recorded Ex. Ind. book 2 page 253-4
M. S. Stuart
Judge of Probate g.

24

8-20-51

NO 2705

C. R. LEBLAN

COMPLAINANT

VS

ARTHUR L. MYERSON, ET AL,

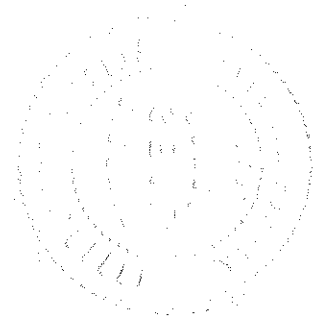
RESPONDENTS

2-353-X

LES PENDENS NOTICE

B 1.50

Mrs. Duck



C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2705

NOTE OF TESTIMONY

This cause is submitted on behalf of the Complainants 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. Request for appointment of Commissioner.
6. Commission to take depositions.
7. Notice of time of taking testimony.
8. Oral depositions of C. R. Lehmann and Eugene W. Lehmann, with exhibits attached.

Dated this the 11 day of February, 1952.

S. L. Lee
Solicitor for the Complainants

W. J. Black
Register

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

NOTE OF TESTIMONY

Filed 2-11-52
Archie Huch
Kirby

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2705

FINAL DECREE

This cause coming on to be heard was submitted for final decree upon the pleadings, decree pro confesso and proof as noted by the Register, and it appearing to the satisfaction of the court that the Complainant is the owner in fee simple of, is now and was 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 the Respondents Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley, if living, are non-residents of the State of Alabama, and over twenty-one years of age, and that if dead their heirs, devisees, Grantees personal representatives and assigns are non-residents of the State of Alabama and over twenty-one years of age; that service was perfected upon the Respondents herein by publication in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, for four consecutive weeks commencing on the 23rd day of August, 1951; that service was also perfected by publication in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, for four consecutive weeks commencing on the 23rd day of August, 1951, against the unknown heirs, devisees, grantees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley, 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 the title of the Complainants has been duly and legally established by legal and competent evidences, the court is of the opinion that the Complainant is entitled to the relief prayed for.

m

C. R. LEHMANN

COMPLAINANTS

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

FINAL DECREE

FILED

FEB 13 1952

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the foregoing and attached is a full, true correct and complete copy of the final decree in the matter of C. R. Lehmann, Complainant vs Arthur M. Ryerson, et al, Respondents, the original of which is on file in my office.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office on this the _____ day of February, 1952.

Register

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED, by the court, that the Respondents, Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, and Simon Hadley, the unknown heirs, devisees, grantees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, and Simon Hadley, and also any and all persons, firms or corporations 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:

Northwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
Northeast quarter and South half of Southeast quarter of
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East;

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:

Northwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
~~Northeast quarter and South half of Southeast quarter of~~
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East,

is vested absolutely in the Complainant, C. R. Lehmann.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that a certified copy of this decree be record in the office of the Probate Judge of Baldwin County, Alabama, in the direct index in the names of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley, and in the indirect index in the name of C. R. Lehmann.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court that the Register shall within thirty days from the reddition 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 Complainant pay the costs of this cause for which execution may issue.

Dated at Bay Minette, Baldwin County, Alabama, this the 12th day of February, 1952.

Jeffrey J. Maslebury, Jr.
JUDGE

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

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

NO. 2705

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 for four consecutive weeks commencing on the 23rd day of August, 1951, in the Baldwin Times, a newspaper published in Bay Minette, in Baldwin County, Alabama; that a copy of said order was posted at the Court House door in Baldwin County, Alabama, on the 23rd day of August, 1951, and it now further appearing to the court that the said Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, the unknown heirs, devisees, grantees, personal representatives, and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, respondents have to date hereof failed to plead, answer or demur to this bill of complaint in this cause.

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 28 day of January, 1952.

Wesley W. Wicks
Register

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

DECREE PRO CONFESSO
ON PUBLICATION

Filed 1-22-52

*Alfred. Leuck
Ryerson*

RECORDED

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
NO. 2705

MOTION FOR DECREE PRO CONFESSO ON PUBLICATION

Comes the Complainant in the above styled cause and shows unto the Court that an order of publication was made on the 20th day of August, 1951, which was duly published in the Baldwin Times, a newspaper published in Bay Minette, Alabama, in its issues of August 23, August 30, September 6, and September 13, 1951, and was directed to Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, the unknown heirs, devisees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, and any other persons, firms or corporations claiming any title to, right, interest in, lien or encumbrances upon the following described lands situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Northeast quarter of Northeast quarter;
South half of Southwest quarter of Northeast quarter of
Northeast quarter and South half of Southeast quarter of
Northeast quarter of Northeast quarter of Section 33, Town-
ship 6 South, Range 4 East;

As Respondents, which required the said Respondents to answer or demur to the bill of complaint within thirty days after the 22nd day of September, 1951, 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 Respondent.

Dated this the 15 day of January, 1952.

S. S. S. S.
Solicitor for the Complainant

C. R. LEHMANN

COMPLAINANTS

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION

Filed 1-25-52

*Archie. Luck
Ryerson*

RECORDED

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

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

NOTICE OF TIME OF TAKING TESTIMONY

TO: Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon
Hadley:

Notice is hereby given that the Complainant will on the 8 day of
February, 1952, before Evelyn Watts, as Special Commissioner
take the testimony of the following witnesses:

C. R. Lehmann

Summerville, Alabama

Eugene W. Lehmann

Summerville, Alabama.

Dated this the 7 day of January, 1952.

[Signature]
Solicitor for the Complainant

Evelyn Watts
Special Commissioner

C. R. LEIMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

NOTICE OF TIME OF
TAKING TESTIMONY

Filed 1-29-52

*Arthur M. Ryerson
Respondent*

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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. R. Lehmann

Summerville, Alabama

Eugene W. Lehmann

Summerville, Alabama.

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

Dated this the 27 day of January, 1952.

S. L. Luster
Solicitor for the Complainants

C. R. LEHMANN

COMPLAINANT

VS

ARTHUR M. RYERSON, ET AL,

RESPONDENTS

REQUEST FOR APPOINTMENT
OF COMMISSIONER

*Filed 1-29-52
District Clerk
Register*

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

C. R. Lehmann

Complainant

VS.

Arthur M. Ryerson, et al

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

C. R. Lehmann

Eugene W. Lehmann

Filed 1-24-52

Reimer

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. R. Lehmann and Eugene W. Lehmann

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein C. R. Lehmann

and Arthur M. Ryerson, et al, Complainant

Respondent
on oath, to be by you administered, upon C.R. Lehmann and Eugene W. Lehmann
to take and certify the deposition^s of the witness^{es} and return the same to our Court, with all convenient speed, under your hand.

Witness 24 day of January, 1945

David L. Smith
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

C. R. Lehmann

Complainant

VS.

Arthur M. Ryerson, et al

Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me C. R. Lehmann and Eugene W. Lehmann

witnesses named in the Requirement for Oral Examination, on the 9 day of Feb. 1945, at the office of Hubert M. Hall 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. R. Lehmann and Eugene W. Lehmann doth depose and say as follows:

My name is C. R. Lehmann. I am over twenty-one years of age, and a bona fide resident of Summerdale, Baldwin County, Alabama.

Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley are over twenty-one years of age, if living and non-residents of the State of Alabama; that if dead their heirs, assigns, devisees, grantees and personal representatives are over twenty-one years of age and non-residents of the State of Alabama. A diligent search and inquiry has been made and caused to be made, the addresses of the Respondents and whether or not they are dead, and if dead the names, ages, and residences of their grantees, however, from all information obtainable they are all over twenty-one years of age, non-residents of the State of Alabama, and their addresses cannot be ascertained. I have also had an abstract made of the records of Baldwin County, Alabama, to find out if possible all information relative to the said respondents but there is no information available.

I am the owner in fee simple and in the actual possession of the lands described in this bill of complaint being the Northwest quarter of the Northeast quarter of the Northeast quarter, South half of the Southwest quarter of the Northeast quarter of the Northeast quarter, South half of Southeast quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East.

There is no suit pending to test my title to, interest in or rights of possession to said lands.

I acquired title to said lands by conveyances of record in the office of the Probate judge of Baldwin County, Alabama, as follows: Northwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, by deed from State Land Commissioner of Alabama dated March 3, 1937, and of record in Deed Book 136 page 499; the South half of Southwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, from the State Land Commissioner which deed dated February 5, 1941, and of record in Book 118 page 442; The South half of Southeast quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, from the State Land Commissioner by deed dated March 21, 1945, and of record in Book 115 page 155.

The title to said land stands upon the records of Baldwin County, Alabama, in my name. No one has at any time paid any taxes upon said lands, within ten years next preceding the filing of this bill of complaint or had any possession of said land other than myself. The only person shown by the records of Baldwin County, Alabama, to have any claim against said land or any part thereof are Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley. all of the land is under fence, in cultivation or in pasture. I have been in the actual possession of the land since acquiring title to the same. During the time that I have been in possession of the lands no person has attempted to exercise any rights of possession, or has claimed any title to the said lands. The parties named as respondents are not known in Summerdale near where the lands are located and I can find no information as to their whereabouts.

C. R. Lehmann

ORAL EXAMINATION.

I, Evelyn Watts, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition ~~on~~ Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself and Hubert M. Hail

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ES or had proom made before me of the identity of said witness ES; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 8 day of February, 1945

Evelyn Watts (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

C. R. Lehmann

vs. Complainant

Arthur M. Ryerson, et al

Respondent.

Oral Deposition

Filed 2-11, 1945

Charles L. Black Register.
Recorded in _____

Vol. _____ Page _____

Register.

My name is E. W. Lehmann. I live at Summerdale, in Baldwin County, Alabama. I am personally acquainted with the lands described in this bill of complaint and have known them all of my life. I know of my own personal knowledge that the Complainant in this cause immediately upon acquiring title to the said lands went into the actual possession thereof and has remained in such possession until the present time, and that no person has exercised or attempted to exercise any title to or rights of possession over the said land. Part of the land is in cultivation and the balance is under fence and is being used as pasture and pasture is improved pasture lands.

Eugene W. Lehmann

the BALDWIN Times

ALABAMA'S BEST COUNTY'S- BEST NEWSPAPER
BAY MINETTE, ALABAMA

LEGAL NOTICE

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY
NO. 2705

C. R. LEHMAN, Complainant
VS
ARTHUR M. RYERSON ET AL, Respondents

It having been made to appear, in the above styled cause by proper affidavit, that Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz and Simon Hadley 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. R. Lehman is over twenty-one years of age and a resident of Baldwin County, Alabama, and the owner in fee simple of and in the actual possession of the following described lands situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Northeast quarter of Northeast quarter; South half of Southwest quarter of Northeast quarter of Northeast quarter and South half of Southeast quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East.

That your Complainant acquired title to said lands by the following conveyances: Northwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East by deed from State Land Commissioner of Alabama dated March 3, 1937, and of record in Deed Book 136 pages 499; deed from State Land Commissioner to South half of Southwest quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, dated February 5, 1941, and of record in Deed Book 118 page 442; Deed from State Land Commissioner to South half of Southeast quarter of Northeast quarter of Northeast quarter of Section 33, Township 6 South, Range 4 East, dated March 21, 1945, and of record in Deed Book 115 page 155; that no person is known to have paid any taxes on said land or to have been in possession thereof, within ten years next preceding the filing of the bill of complaint excepting C. R. Lehman.

It is therefore ordered and notice is hereby given that the said Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley, the unknown heirs, devisees, personal representatives and assigns of Arthur M. Ryerson, Ronald McNeil, Sarah V. Lipschultz, Simon Hadley and any other persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon said lands, or any part thereof, to appear in the Circuit Court of Baldwin County, Alabama, in Equity, and plead, answer or demur to the bill of complaint on or before September 22, 1951, 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 20 day of August, 1951.

ALICE J. DUCK
Register

H. M. HALL
Solicitor for Complainant

31-4tc

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA
BALDWIN COUNTY.

Jimmy Faulkner, 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. R. Lehman vs.
Arthur M. Ryerson

COST STATEMENT

555 WORDS @ 4 1/2 cents --- \$ 24 97
I hereby certify this is correct, due and unpaid (paid).

Jimmy Faulkner
Publisher.

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

Date of 1st publication Aug. 23, 1951 Vol. 62 No. 31

Date of 2nd publication Aug. 30, 1951 Vol. 62 No. 32

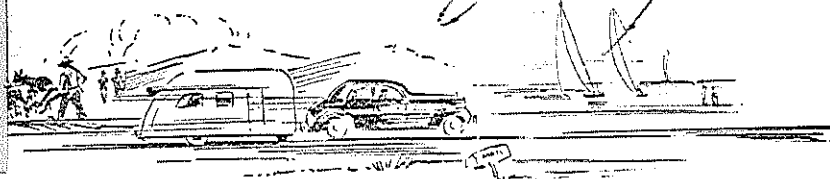
Date of 3rd publication Sept. 6, 1951 Vol. 62 No. 33

Date of 4th publication Sept. 13, 1951 Vol. 62 No. 34

Subscribed and sworn before the undersigned this 13 day of Sept, 1951.

Saratay Minter
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



PROBATE JUDGE

Bay Minette, Ala., 2/19, 195

Received of

Mrs. Duck

[illegible]

FOR RECORD

TOTAL \$ 12.00

41939 MARSHALL & BRUCE-NASHVILLE

Judge of Probate.

PROBATE JUDGE

Bay Minette, Ala., 87 24, 1957

Received of.

[illegible]

FOR RECORD

TOTAL \$

85782 MARSHALL & BRIDGE, NASHVILLE

Judge of Probate.