

STATE OF ALABAMA O BALDWIN COUNTY O

TO ANY SHERIFY OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. H. Krames, Henry Popek, John Passmore, Raymond Passmore, William Passmore, Helen Passmore, J. S. Lowrey, George McEwen, Addoe Orr, American Securities Corporation, a corporation, to appear and plead, answer, or demar within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity by Charles Passmore, as Complainant, and against W. H. Krames, Henry Popek, John Passmore, Raymond Passmore, William Passmore, Helen Passmore, J. S. Lowrey, George McEwen, Addoe Orr, and American Securities Corporation, a corporation.

WITNESS my hand this the 23 day of October, 1949.

Augh Register

CHARLES PASSMORE		. Ø	IN THE CIRCUIT COURT OF	
	COMPLAINANT	٥	BALUWIN COUNTY, ALABAMA	
VS.	en e	٨	IN EQUITY	
W. H. KRAMES	ET AL.	Ø		
	RESPONDENTS	0		

TO HOW. TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

Your Complainant, Charles Passmore, presents this his bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

South half of Southeast quarter of Southeast quarter of Northeast quarter of Section 29, Township 6 South, Range h East.

South half of Southwest quarter of Southeast quarter of Northeast quarter of Section 29, Township 6 South, Range 4 East.

South half of South half of Southeast quarter of Northeast quarter of Southeast quarter of Section 29, Township 6 South, Range 4 East,

and also against W. H. Krames, Henry Popek, John Passmore, Raymond Passmore, William Passmore, Helen Passmore, J. S. Lowrey, George McEwen, Adloe Orr, American Securities Corporation, a corporation, the unknown heirs, devisees, personal representatives, grantees and assigns of W. H. Krames, G. H. Passmore, Helen Snoddy, George E. McEwen, Adloe Orr, Henry Popek, American Securities Corporation, a corporation, Alabama Tobacco Company, a corporation, Alabama, Sumatra & Havan Tobacco Company, a corporation, and also against any other person, firm or corporation, claiming any right, title

to, interest in, lien or encumbrance upon the said land or any part thereof, and respectfully represents and shows unto your Honor and this Honorable
Court as follows:

That your Complainant is ever twenty-one years of age, and a bona fide resident of Baldwin County, Alabasa, living at Summerdale.

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That the Respondente J. S. Lowrey and Relen Passmore are ever twentyone years of age, and residents of May Minette, in Baldwin County, Alabama; that William Passmore, is over tempty-one years of age, and a resident of Magnolia Springs, in Baldwin County, Alabama; that Raymond Passmore, is -over twenty-one years of age, and a non resident of the State of Alabama, his address being Pensacola, Florida; that John Fasomore, is over twentyone years of age, of unsound mind, a non resident of the State of Alahana, his address being Chattahoochee, Florida; that the American Securities Corporation, has its principle place of business at Mobile, Mobile County, Alabama; that a diligent search and inquiry has been made to ascertain the names, ages and addresses of the heirs, devisees, grantees, personal representatives and assigns of G. H. Passmore, Helen Snoddy, W. H. Mrames, Henry Popek, George E. Hollwen, Adlice Crr, and they are unknown and cannot be found, but from all information available, they are, if living, non residents of the State of Alabama, and over twenty-one years of age, and that if they be dead, their beirs are all non recidents of the State of Alabama.

3.

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

South half of Southeast quarter of Southeast quarter of Northeast quarter of Section 29, Township 6 South, Range & Bast.

South half of Southmest quarter of Southeast quarter of Northeast quarter of Section 29, Township 6 South, Range h Bast.

South half of South half of Southeast quarter of Northeast quarter of Southeast quarter of Section 29, Township & South, Range h Bast.

iii.

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 to set forth and specify what right, title or

interest they have in and to said land and by what instrument or instruments the same is derived, and or/created.

5.

That your Complainant acquired title to the said land by the following instruments: Deed from the State Land Commissioner of Alabama, dated December 31, 1936, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 62 NS page 74, conveying the South half of Southeast quarter of Southeast quarter of Northeast quarter of Section 29, Township & South, Range & East, Baldwin County, Alabama; Deed from State Land Commissioner of Alabama, dated December 31, 1936, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 62 NS page 72, conveying the South half of Southwest quarter of Southeast quarter of Northeast quarter of Section 29, Township 6 South, Range & Bast, Baldwin County, Alabama; Deed from G. W. Robertson, Judge of Probate, dated May 9, 1944, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 85 pages 37-8, conveying the South half of South half of Southeast quarter of Northeast quarter of Southeast quarter of Section 29, Township 6 South, Range 4 East, Baldwin County, Alabama.

6.

That the title to said lands claimed by your Complainant, stands upon the records of the Probate Court of Baldwin County, Alabama, in the name of the Complainant, Charles Passmore.

7.

That no one has at any time within ten years next preceding the filing of the bill of complaint in this cause, paid any taxes upon said land, other than the Complainant Charles Passmore.

8.

That the only person shown by the records of Baldwin County,
Alabama, to claim said land, or any part thereof, or any interest therein, is your Complainant Charles Passmore.

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That the Complainant in an effort to ascertain the claimants of any interest in said land, or any part thereof, has examined the records of Baldwin County, Alabama, and made inquiry of residences at Summer-dale, Baldwin County, Alabama, in the vicinity of said lands, and also

of residences at Bay Minette, Baldwin County, Alabama, the County Seat.

WHEREFORE, your Complainant prays that your Honor will by proper process make the said W. H. Krames, Henry Popek, John Passmore, Raymond Passmore, William Passmore, Helen Passmore, J. S. Lowrey, George McKwen, Adloe Orr, American Securities Corporation, a corporation, the unknown heirs, devisees, personal representatives, grantees and assigns of W. H. Krames, G. H. Passmore, Helen Smoddy, George H. McKwen, Adloe Orr, Henry Popek, American Securities Corporation, a corporation, Alabama Tobacco Company, a corporation, Alabama, Sumatra & Havana Tobacco Company, a corporation, and any other person, firm, or corporation claiming any right, title to, interest in, or encumbrances upon the said land, in Baldwin County, Alabama, to-wit:

South half of Southeast quarter of Southeast quarter of Mortheast quarter of Section 29, Township 6 South, Range 4 East.

South half of Southwest quarter of Southeast quarter of Mortheast quarter of Section 29, Township 6 South, Range & East.

or any part thereof, parties respondent 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.

Honor will make and enter a decree ascertaining and determining that the fee simple title, free from all liens and encumbrances to the land herein described, and to each and every part and parcel thereof, is vested in your Complainant; and that neither W. H. Krames, Henry Popek, John Passmore, Raymond Passmore, William Passmore, Helen Passmore, J. S. Lowrey, George McRwen, Addoe Orr, American Securities Corporation, a corporation, the unknown heirs, devisees, personal representatives, grantees and assigns of W. H. Krames, G. H. Passmore, Helen Snoddy, George E. McRwen, Addoe Orr, Henry Popek, American Securities Corporation, a corporation, Alabama, Sumatra & Havana Tobacco Company, a corporation, nor any other person, firm or corporation has any right, title to, interest in, or encumbrance upon the said land, or any part or parcel thereof, and that any and all doubts and disputes concerning the said land be cleared up.

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

Solicitor for Complainant.

STATE OF ALABAMA O BALDWIN COUNTY O

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 for the Complainant in the above styled cause, and authorized to make this affidavit; that from all information obtainable the facts contained in the foregoing bill of complaint are true and correct.

Sworn to and subscribed before me on this the 23 day of Zotabe

Notary Public, Baldwin County, Alabama.

THE STATE OF	>	CIRCUI'	r court, bal	DWIN COUNTY
Baldwin C	ounty)			_TERM, 194
TO ANY SHERIFF OF	THE STATE OF AL	ABAMA:		
You are hereby comman	ded to summon	Laddie.	Sodo	ma
	West			

to appear and plead, answe				Complaint filed in
the Circuit Court of Baldw	addre	Say Minetto		, Defendant
)ŷ				
Bessi	Lenk		ma	Plaintiff
Witness my hand this	7th day	of Open	<u> </u>	194_9_
)	# 1	Mic	lenc	<u>/2</u> , Clerk

No. Page	
THE STATE of ALABAMA, BALDWIN COUNTY	Defendant lives at
CIRCUIT COURT	RECEIVED IN OFFICE
	, 194
Plaintiffs vs.	this194
	by leaving a copy with
Defendants	
SUMMONS and COMPLAINT	
Filed, 194	
Clerk	
Plaintiff's Attorney	Sherifi
Defendant's Attorney Moore Printing Co., Bay Minette, Ala.	Deputy Sherifi

STATE OF ALABAMA)

BALDWIN COUNTY.)

BESSIE DENK SODOMA)

COMPLAINANT)

IN THE CIRCUIT COURT OF BALDWIN COUNTY,

VS

TWENTY*EIGHTH CIRCUIT OF ALABAMA. IN EQUITY.

LADDIE SODOMA

RESPONDENT.

TO THE HONORABLE JUDGE OF SAID COURT, SITTING IN EQUITY:

Comes your Complainant Bessie Denk Sodoma, respectfully represents and shows unto your Honor the following facts:

- 1. Complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State for more than one year next preceding the filing of this bill of complaint; that Laddie Sodoma is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That complainant and respondent were lawfully married on or about the 8th day of June 1940, at Bay Minette, Alabama and lived together as husband and wife until to-wit: the 13th day of March 1949, at which time they separated and have not lived together since that time.
- 3. That as a result of said marriage, complainant and respondent have three children, who now reside with their mother and their names and ages are as follows: Mary Ann Sodoma, age 8 years, Uulia Agnas Sodoma, age 5 years, and Bobbie Sodoma, age 3 years.
- 4. Your complainant avers and charges that the respondent did on or about the last of January, 1949, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

5. Complainant avers that she has no separate estate and that her income is insufficient to support herself and minor children, and that she has no funds with which to pay her attorney's fee. Complainant avers that respondent is an able bodied man and earning or capable of earning a good salary to-wit \$150.00 per month or more and that although respondent earms and makes an adequate sum of money to support his wife and minor children, he does not do so, but dissipates his earnings and does not provide sufficient food and clothing for his wife and minor children. Complainant further avers that respondent is buying realestate and that he is paying for said real estate from part of his earnings and that respondent has had the title to said property put in his mothers name and otherwise not providing for his wife and children as he should.

THE PREMISES CONSIDERED, your complainant makes the said Laddie Sodoma a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpeona to be issued, and directed to the Laddie Sodoma, commanding him to answer, plead or demur to this bill of complaint, within the time and manner required by law, or suffer a decree pro confesso be taken against him, and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent and complainant further prays that your Honor will award to this complainant the care, custody and control of the said minor children heretofore named in this bill of complaint, and that your Honor will enter a decree, through a reference if necessary, requiring respondent to pay temporary alimoney and solicitors fee to complainant, and on a final decree requiring respondent to pay permanent alimoney and solicitors fee to complainant, for the support of herself and the minor children, and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray.

Solicitor for Complainant.

Solicitor for Complainant.

RECORDED

BESSIE DENK SODOMA

FOR DIVORCE.

RESPONDENT LIVES AT: On Old Silver Hill Road near Roysters residence, and works at Johnson Feed Mill in Robertsdale, Ala.

COMPLAINANT

Received in Sheriff's Office this 9 day of Office, 1949 TAYLOR WILKINS, Sheriff