

2274

CLAUDE PETEET,

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24 IN
BLOCK 20 IN FOLEY, BEING A
SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH, OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN
THE OFFICE OF THE JUDGE OF
PROBATE, BALDWIN COUNTY, ALA-
BAMA; AND HEINRICH REINCKE,
AND THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES, ALIEN-
EES, AND ASSIGNS OF THE SAID
NAMED INDIVIDUAL AND EACH OF
THEM AND ANY AND ALL PERSONS,
FIRMS, ASSOCIATIONS, CORPORAT-
IONS, CLAIMING ANY TITLE TO,
INTEREST IN, CLAIM, LIEN OR
ENCUMBRANCE ON SAID LANDS OR
ANY PART THEREOF,

DEFENDANTS.

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

This cause coming on to be heard is submitted for
final decree upon behalf of the Complainant, upon the original
Bill of Complaint and upon the service, pleading and proof
as noted by the Register; and the same being considered by
the Court, the Court is of the opinion, does find, ascertain
and decree, that due and proper notice of the pendency of the
said Bill of Complaint against the said lands and the named
Defendant, Heinrich Reincke, and the unknown heirs, devisees,
personal representatives, alienees and assigns of the said
named individual and each of them and any and all persons,
firms, associations, corporations, claiming any title to, int-
erest in, claim, lien or encumbrance on said lands or any part
thereof, has been given in the manner required by law, and
that the Complainant is entitled to the relief as prayed for
in his Bill of Complaint.

IT IS THEREFORE FOUND, ASCERTAINED, ORDERED, ADJUDGED
AND DECREED by the Court that the said Complainant, Claude
Peteet, is over the age of twenty-one years and a resident of
Baldwin County, Alabama; that at the time of the filing of the
said Bill of Complaint and at the time of the submission of
this cause for final decree, the Complainant was and is in the

actual and peaceable possession, claiming to own the same absolutely, and in fee simple of all that certain tract of land situated in the County of Baldwin, State of Alabama, described as follows, to-wit:

Lots 21, 22, 23 and 24 in Block 20 in Foley, being a subdivision of a part of Sections 28 and 29, Township 7 South, Range 4 East, as per plat thereof recorded in the office of the Judge of Probate, Baldwin County, Alabama.

That the Complainant obtained title to the said lands as follows: Lots 21, 22, 23 and 24 in Block 20 in Foley, being a subdivision of a part of Sections 28 and 29, Township 7 South, Range 4 East, from the State of Alabama by tax deed dated September 22, 1941, recorded in Deed Book 76 NS, page 146, under a sale of the said lands for taxes June 13, 1932, on an assessment of the same to Heinrich Reincke, who acquired the said lands by mesne conveyances from the United States; that the title to the said lands and each parcel thereof stand in the name of the Complainant upon the records of Baldwin County, Alabama; that for more than ten years next preceeding the filing of said Bill of Complaint no person other than those through whom he claims title to the said lands or any part thereof have assessed or paid taxes thereon.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Claude Peteet at the time of the filing of the Bill of Complaint in this cause and at this time had and has the fee simple title to the above described lands, and to each and every part and parcel thereto, that neither of the said defendants, Heinrich Reincke, the unknown heirs, devisees, personal representatives, alienees, and assigns of the said named individual and each of them and any and all persons, firms, associations or corporations have any right, title to, interest in, claim or encumbrance upon the whole or any part of the said lands, and that the fee simple title to the said lands and each and every part and parcel thereof be and the same is hereby quieted and established in and declared to be in the said Claude Peteet, as against the defendants Heinrich Reincke, and the unknown

heirs, devisees, personal representatives, alienees and assigns of the said named individual and each of them and any and all persons, firms, associations, corporations claiming any title to, interest in, claim, lien or encumbrance on said lands or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the title hereby quieted and established in and declared to be in the said Claude Peteet, shall inure to the benefit of all persons deriving title to said lands or any part therein, from or through the said Claude Peteet, and the said title so quieted and established in him shall be treated and considered as established in favor of the said Claude Peteet and all persons deriving title through him.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a certified copy of this decree be, by the Register of this Court, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in which County the said land lies, within thirty days from the date of this decree, and that the cost thereof be taxed as a part of the cost in this proceeding.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Claude Peteet be and he is hereby taxed with the cost of this proceeding for which let execution issue.

Done at Bay Minette Ala., this the 13th day of July, 1949.

J. Fair J. Mashburn Jr.
Judge.

CLAUDE PETEET

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24 IN
BLOCK 20 IN FOLEY, BEING
A SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN
THE OFFICE OF THE JUDGE OF
PROBATE, BALDWIN COUNTY, ALA-
BAMA; AND HEINRICH REINCKE, AND
THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES, ALIEN-
EES AND ASSIGNS OF THE SAID NAMED
INDIVIDUAL AND EACH OF THEM AND
ANY AND ALL PERSONS, FIRMS, ASSOC-
IATIONS, CORPORATIONS, CLAIMING
ANY TITLE TO, INTEREST IN, CLAIM,
LIEN OR ENCUMBRANCE ON SAID LANDS
OR ANY PART THEREOF,

DEFENDANTS.

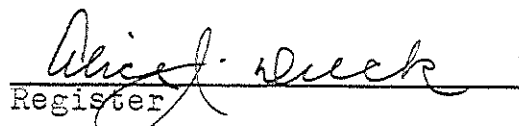
IN CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

This cause is submitted for final decree upon
Bill of Complaint as amended, service by publication, decree
pro confesso, and deposition of Claude Peteet, witness for
complainant.

This the 12 day of July, 1949.


Solicitor for Complainant


Register

Charles T. Hunt
vs
Heinrich Rincke

(15)

Note of Testimony

Filed July 13, 1949
Alice J. Duck
Register

CLAUDE PETEET,

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24 IN
BLOCK 20 IN FOLEY, BEING
A SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN
THE OFFICE OF THE JUDGE OF
PROBATE, BALDWIN COUNTY, ALA-
BAMA; AND HEINRICH REINCKE, AND
THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES, ALIEN-
EES AND ASSIGNS OF THE SAID
NAMED INDIVIDUAL AND EACH OF
THEM AND ANY AND ALL PERSONS,
FIRMS, ASSOCIATIONS, CORPORAT-
IONS, CLAIMING ANY TITLE TO,
INTEREST IN, CLAIM, LIEN OR
ENCUMBRANCE ON SAID LANDS OR
ANY PART THEREOF,

DEFENDANTS.

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

To Heinrich Reincke, and the unknown heirs, devisees,
personal representatives and assigns of Heinrich Reincke, and
any and all persons, firms, associations and corporations claim-
ing any title to, interest in, claim, lien or encumbrance on
the following described lands, to-wit: Lots 21, 22, 23 and 24
in Block 20 in Foley, being a subdivision of a part of Sections
28 and 29, Township 7 South of Range 4 East, as per plat there-
of recorded in the office of the Judge of Probate, Baldwin
County, Alabama;

Notice is hereby given that the Complainant in the
above styled cause has this day made application for the oral
examination of Claude Peteet, witness for the Complainant in the
above styled cause and has suggested Madeline S. Bryars as a
suitable person to act as Commissioner in the taking of the
deposition of said witness.

Witness this 29th day of June, 1949.

Alfred Duck
Clerk, Circuit Court of
Baldwin County, Alabama

W. C. Beck
Attorney for Complainant.

CLAUDE PETEET,

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24 IN
BLOCK 20 IN FOLEY, BEING A
SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN
THE OFFICE OF THE JUDGE OF
PROBATE, BALDWIN COUNTY, ALA-
BAMA; AND HEINRICH REINCKE,
AND THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES, ALIEN-
EES AND ASSIGNS OF THE SAID
NAMED INDIVIDUAL AND EACH OF
THEM AND ANY AND ALL PERSONS,
FIRMS, ASSOCIATIONS, CORPORAT-
IONS, CLAIMING ANY TITLE TO,
INTEREST IN, CLAIM, LIEN OR
ENCUMBRANCE ON SAID LANDS OR
ANY PART THEREOF,

DEFENDANTS.

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

The attorneys for the Complainant in the above styled
cause hereby gives notice to the above named persons, firms,
or corporations that the deposition of Claude Peteet, witness
for the Complainant, will be taken before Madeline S. Bryars,
Commissioner, heretofore named by this Honorable Court, on the
12th day of July, 1949, at the office of W. C. Beebe in the
town of Bay Minette, Alabama, at 10 o'clock A.M.

Witness this the 6th day of July, 1949.

W C Beebe
Attorney for Complainant.

Madeline S Bryars
Commissioner

1407274
In answer book

Notice
Petrel
vs.
Remick

Notice of the
And Place of
taking depositions

Witness this the 6th day of July, 1943.
Town of Bay Minette, Alabama, at 10 o'clock A.M.
13th day of July, 1943, at the office of M. C. Beebe in the
Commissioner, heretofore named by this Honorable Court, on the
for the Complaint, will be taken before Magellan G. Bryant,
or corporations that the deposition of Claude Robert, witness
same hereby gives notice to the above named persons, alias,

The attorneys for the Complaint in the above styled

DECEASED.

IN EQUITY.

BALDWIN COUNTY, ALABAMA.
IN THE CIRCUIT COURT.

Filed July 6, 1944
Agent - under
Register

Commissioner
Magellan G. Bryant

Attorney for Complaint
M. C. Beebe

-42-

COMPLAINT

CLAUDE REMICK

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO:

Madeline S. Byars

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 *Claude Petitt*

as witnesses in behalf of *Complainant* in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein *Claude Petitt*

and *Henrich Reincke* is *is*, Complainant

Respondent

on oath, to be by you administered, upon *oath*
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness *11th* day of *July*, 194 *9*

Wesley L. Luck
Register.

Commissioner's Fee, \$ *10.00*

Witness' Fees, \$ *7.50*

No. 2274

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Claude Piteel

Complainant

vs.

Heinrich Reuncke

Defendant

COMMISSION TO TAKE DEPOSITION

(1)

COMMISSIONER:

Madelene A. Bryner

WITNESSES:

Claude Piteel

THE STATE OF ALABAMA
Baldwin CountyCircuit Court of Baldwin County, Alabama.
(In Equity)CLAUDE PETEET

COMPLAINANT

VS.

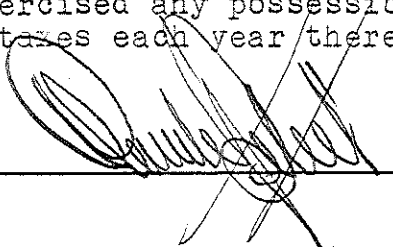
HEINRICH REINCKE

RESPONDENT

I, Madeline S. Bryarsas ~~Register and~~ Commissionerhave called and caused to come before me Claude Peteetwitness named in the Requirement for Oral Examination, on the 12 day of July
1949, at the office of W. C. Beebein Bay Minette, Alabama, and having first sworn said witness to speak the truth,the whole truth, and nothing but the truth, the said Claude Peteet

doth depose and say as follows:

My name is Claude Peteet, I am a resident of Foley, Alabama, and I am over the age of 21 years, I am the owner of and in the actual, peaceable possession, claiming to own Lots 21, 22, 23 and 24 in block 20 in Foley, being a sub-division of a part of Sections 28 and 29, Township 7 South, Range 4 East, as per plat recorded in the office of the Judge of Probate of Baldwin County, Alabama. I am the complainant in that certain case pending in the Circuit Court of Baldwin County, Alabama, in equity, against Heinrich Reincke and said lands, to quit title the same. The said lands were patented by the United States Government to Henry A. Ellison and William L. Kennedy, such patent being recorded in Deed Book 1 NS, page 84. Title to said lands mesne conveyances passed to the said Heinrich Reincke. The said lands were sold for taxes June 13, 1932, under assessment against Heinrich Reincke, and purchased by the State. I bought the lands from the State under tax deed September 22, 1941. My deed is recorded in the Probate office of Baldwin County, Alabama, in Deed Book 76 at page 146. Immediately upon my purchase I went into possession of the land, fenced the same, and have been in continuous possession of the same since the date of purchase. The State went into possession of the same from the date of its purchase and remained in possession until the date it sold the same to me. I and those through whom I claim title have been in possession of such lands for more than ten years next preceeding the filing of the complaint. Neither the said Heinrich Reincke or any other person, for more than ten years, have assessed or paid taxes on the said land or exercised any possession over the same. I have assessed and paid taxes each year thereon.



ORAL EXAMINATION

I, Madeline S. Evans, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition— on Oral Examination was taken down in writing by me in the words of the witness— and read over to him and he signed the same in the presence of myself and W. C. Beebe at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; 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 12th day of July, 1949.

Madeline S. Evans (L. S.)

No. 2274 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Claude Piteet

Complainant

Vs.

Hinnick Reinake

Respondent

(12) ORAL DEPOSITION

Filed July 13, 1949
W. C. Beebe, Register

RECORDED IN

Record

Vol. _____ Page _____

Register

CLAUDE PETEET,

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24 IN
BLOCK 20 IN FOLEY, BEING A
SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN
THE OFFICE OF THE JUDGE OF
PROBATE, BALDWIN COUNTY, ALA-
BAMA; AND HEINRICH REINCKE,
AND THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES, ALIEN-
EES AND ASSIGNS OF THE SAID
NAMED INDIVIDUAL AND EACH OF
THEM AND ANY AND ALL PERSONS,
FIRMS, ASSOCIATIONS, CORPORAT-
IONS, CLAIMING ANY TITLE TO,
INTEREST IN, CLAIM, LIEN OR
ENCUMBRANCE ON SAID LANDS OR
ANY PART THEREOF,

DEFENDANTS.

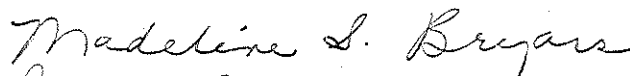
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

The attorneys for the Complainant in the above styled
cause hereby gives notice to the above named persons, firms,
or corporations that the deposition of Claude Peteet, witness
for the Complainant, will be taken before Madeline S. Bryars,
Commissioner, heretofore named by this Honorable Court, on the
12th day of July, 1949, at the office of W. C. Beebe in the
town of Bay Minette, Alabama, at 10 o'clock A.M.

Witness this the 6th day of July, 1949.


Attorney for Complainant.


Commissioner

Notice of Name
and Place of
Taking Deposi-
tion

Patent
No.
Rennick

Filed July 6, 1949
Amey. Rennick
Register

I, Alice J. Duck, Register of the Circuit
Court of Baldwin County, in Equity, do hereby certify
that the foregoing notice of the time and place of
taking deposition of Complainant's witness was filed
and entered on the Order Book of the Register on the
6 day of July, 1949.

Alice J. Duck
Register.

NO 5774

Letter
vs
Reinke

Nature of Time
and Place of
Taking Depo-
sition

(72)

Filed July 6, 1949
Alice J. French
Ressler

CLAUDE PETEET,

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24 IN
BLOCK 20 IN FOLEY, BEING
A SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN
THE OFFICE OF THE JUDGE OF
PROBATE, BALDWIN COUNTY, ALA-
BAMA: AND HEINRICH REINCKE,
AND THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES, ALIEN-
EES AND ASSIGNS OF THE SAID
NAMED INDIVIDUAL AND EACH OF
THEM AND ANY AND ALL PERSONS,
FIRMS, ASSOCIATIONS, CORPORAT-
IONS, CLAIMING ANY TITLE TO,
INTEREST IN, CLAIM, LIEN OR
ENCUMBRANCE ON SAID LANDS OR
ANY PART THEREOF,

DEFENDANTS.

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

Complainant having on 29 day of June, 1949,
filed his motion and request for oral examination of Claude
Peteet, witness for complainant and due and proper notice there-
of having been given as required by law on the Order Book of
this Court and Madelaine Bryars of the Town of
Bay Minette Ala being a suitable person to act as
Commissioner to take the deposition of said witnesses.

It is therefore ordered, adjudged and decreed that
the said motion for the oral examination of Claude Peteet,
witness for complainant, be and is hereby granted.

And that Madelaine Bryars be and she is hereby
appointed as Commissioner to take the deposition of said wit-
ness.

Witness my hand this the 5 day of July, 1949.

Alice J. Duck
Register.

140 100 111
Pittet
v.2.
Reincke

Order appoint
ing Commissioner
to take Depositions

(10)

Filed July 3, 1949
Wm. J. Reuck
Registrar

The BALDWIN Times

ALABAMA'S BEST COUNTY'S-

BEST NEWSPAPER

BAY MINETTE, ALABAMA

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

CLAUDE PETEET, COMPLAINANT,
VS.

LOTS 21, 22, 23 AND 24 IN BLOCK 20 IN
FOLEY, BEING A SUBDIVISION OF A
PART OF SECTIONS 28 AND 29, TOWNSHIP
7 SOUTH OF RANGE 4 EAST, AS
PER PLAT THEREOF RECORDED IN THE
OFFICE OF THE JUDGE OF PROBATE,
BALDWIN COUNTY, ALABAMA: WEST
HALF OF THE NORTHEAST QUARTER OF
THE NORTHEAST QUARTER OF SECTION
16, TOWNSHIP 8 SOUTH, RANGE 4 EAST;
ALL IN BALDWIN COUNTY, ALABAMA:
AND HEINRICH REINCKE AND WILLIAM
TUTTLE, AND THE UNKNOWN HEIRS,
DEVISEES, PERSONAL REPRESENTATIVES,
ALIENEES AND ASSIGNS OF THE SAID
NAMED INDIVIDUALS AND EACH OF
THEM AND ANY AND ALL PERSONS,
FIRMS, ASSOCIATIONS, CORPORATIONS,
CLAIMING ANY TITLE TO, INTEREST IN,
CLAIM, LIEN OR ENCUMBRANCE ON
SAID LANDS OR ANY PART THEREOF,
DEFENDANTS.

Notice is hereby given to Heinrich
Reinke and William H. Tuttle, if living,
and if dead, to their unknown heirs, de-
visees, personal representatives, alienees
and assigns and to any and all persons,
firms and corporations claiming any title
or interest in, claim, lien or encumbrance
upon the following described lands: Lots
21, 22, 23 and 24 in Block 20 in Foley,
being a subdivision of a part of Sections
28 and 29, Township 7 South, Range 4
East and the West half of the Northeast
quarter of the Northeast quarter of Section
16, Township 8 South, Range 4 East, Bald-
win County, Alabama.

That Claude Peteet has filed his Bill of
complaint on the 22 day of April, 1949,
in this court on the equity side claiming
to be in actual peaceable possession,
owning and claiming to own those parcels
of lots of land, lying and being situated
in the County of Baldwin, State of Ala-
bama, described as follows:

Lots 21, 22, 23 and 24 in Block 20 in
Foley, being a subdivision of a part of
Sections 28 and 29, Township 7 South,
Range 4 East as per plat aforesaid;
West half of the Northeast quarter of the
Northeast quarter of Section 16, Town-
ship 8 South, Range 4 East, all in Bald-
win County, Alabama;

Complainant alleges in his Bill of Com-
plaint that the title to the said lands
stands on the records of the Probate
Court of Baldwin County in his name;
that he acquired title to the said lands
described as follows: Lots 21, 22, 23 and
24 in Block 20 in Foley, being a subdivi-
sion of a part of Sections 28 and 29,
Township 7 South, Range 4 East, from
Alabama by tax deed dated
22, 1941, recorded in Deed
S., page 146, under a sale
lands for taxes June 13, 1932,
assent of the same to Hein-
rich Reincke, who acquired the said lands
conveyances from the United
States; the Complainant obtained title
to said lands described as follows:
the Northeast quarter of the
quarter of Section 16, Township
8 South, Range 4 East, from G. C. Prew-
ett, his wife, January

deed recorded in the office of
of Probate of Baldwin County, respa-

in Deed Book 87 N. S., page 1,
no acquired the same March 1,
deed recorded in said office in
Book 87 N. S., pages 217-18, under said
closure of mortgage from J. H. Las-
tetter dated June 10, 1942, recorded in town-
office in Mortgage Book 92, pages 313-14,
the said G. W. Hanna, the said G. W. Hanna
Prewett by claim,

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 pub-
lished at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Claude Peteet

vs.

Certain Lands

COST STATEMENT

1258 WORDS @ 4 1/2 cents --- \$ 56.61

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 Apr. 28, 1949 Vol. 60 No. 14

Date of 2nd publication May 5, 1949 Vol. 60 No. 15

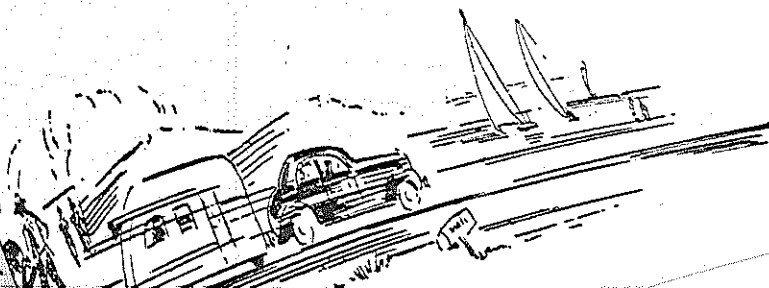
Date of 3rd publication May 12, 1949 Vol. 60 No. 16

Date of 4th publication May 19, 1949 Vol. 60 No. 17

Subscribed and sworn before the undersigned this 20 day of May, 1949.

Marie B. Bryars
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



CLAUDE PETEET,

COMPLAINANT,

-VS-

LOTS 21, 22, 23 AND 24
IN BLOCK 20 IN FOLEY, BEING
A SUBDIVISION OF A PART OF
SECTIONS 28 AND 29, TOWNSHIP 7
SOUTH OF RANGE 4 EAST, AS PER
PLAT THEREOF RECORDED IN THE
OFFICE OF THE JUDGE OF PRO-
BATE, BALDWIN COUNTY, ALABAMA:
WEST HALF OF THE NORTHEAST
QUARTER OF THE NORTHEAST QUAR-
TER OF SECTION 16, TOWNSHIP 8
SOUTH, RANGE 4 EAST: ALL IN
BALDWIN COUNTY, ALABAMA: AND
HEINRICH REINCKE AND WILLIAM
H. TUTTLE, AND THE UNKNOWN HEIRS,
DEVISEES, PERSONAL REPRESENTATIVES
ALIENEES AND ASSIGNS OF THE SAID
NAMED INDIVIDUALS AND EACH OF
THEM AND ANY AND ALL PERSONS, FIRMS,
ASSOCIATIONS, CORPORATIONS, CLAIM-
ING ANY TITLE TO, INTEREST IN,
CLAIM, LIEN OR ENCUMBRANCE ON
SAID LANDS OR ANY PART THEREOF,

DEFENDANTS.

TO THE HONORABLE TELFAIR J. WASHBURN, JR., JUDGE OF THE TWENTY-
EIGHTH JUDICIAL CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN
EQUITY SITTING:

Comes your Complainant, in the above styled cause and
amends his bill of complaint heretofore filed by striking there-
from as parties Defendant, the West half of the Northeast quarter
of the Northeast quarter of Section 16, Township 8 South, Range 4
East in Baldwin County, Alabama and William H. Tuttle, and by strik-
ing therefrom where ever the same appears in the said bill of com-
plaint any and all allegations made relating to the said land and
the said named defendant and all allegations as to the title to the
said lands.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.


Solicitor for Complainant

W 2276

Claude Piteef

N 2

Hennrich Henrich

Amendment
to Complaint

(B.A.)

Filed June 1, 1949
Hennrich Henrich
Register

separately and severally and against any and all persons, firms, associations, corporations, claiming any title to, interest in, claim, lien, encumbrance on 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 is over the age of twenty-one years and a resident of the County of Baldwin, State of Alabama, that Complainant has made diligent search to ascertain the ages, places of residence of the said Heinrich Reincke and William H. Tuttle; that he has inquired of numerous persons in the vicinity in which such land is situated and of persons at Bay Minette, including all of the officers, and has searched the Probate and tax records and from such search and inquiry has ascertained and alleges that Heinrich Reincke and William H. Tuttle, if living, are over the age of twenty-one years and are non-residents of the State of Alabama, and if dead, their heirs, devisees, personal representatives, assignees, and assigns are over the age of twenty-one years and are non-residents of the State of Alabama, their places of residence being unknown to Complainant;

2.

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

Lots 21, 22, 23 and 24 in Block 20 in Foley, being a subdivision of a part of Sections 28 and 29, Township 7 South, Range 4 East; as per plat aforesaid; West half of the Northeast quarter of the Northeast quarter of Section 16, Township 8 South, Range 4 East, all in Baldwin County, Alabama;

and that he and those through whom he claims have been in the peaceable continuous adverse possession of the said lands for more than ten years next preceeding the filing of this Complaint and that