

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

September 30, 1949

2322

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

BRADLEY VS BRADLEY, No. 2322: Confirming our telephone conversation of this morning, we hand you with this opinion on the title to the lots in Loxley, which you are authorized to purchase with the funds received from the sale of the Bradley home in Daphne, and which trade you can conclude when the approval of your report is signed by the Judge. It may be that the Central Baldwin Bank has sent you, in addition to the note, a cancellation of the mortgage. If so, this can be recorded and made a part of the costs in the cause. Send the check down to the Central Baldwin Bank by registered mail and advise us as to the cancellation which we will see is perfected.

The two deeds can be sent to us for delivery, together with a copy of the Judge's decree, which, with your report, is also enclosed. You will also send a check to Barnes for \$921.85, also by registered mail. The Federal stamps you can put on the Barnes deed.

Send us also a bill for the entire court costs which you will note are to be charged up to Mrs. Grace, as she is to pay this to us at the first of the month and upon confirmation of the sale.

Sincerely,

*Elliott G. Rickarby*

For  
RICKARBY & RICKARBY

EGR:HB  
Enc -4  
2938

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

September 30, 1949

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Madam:

In accordance with the terms of the recent decree rendered by Judge Mashburn in Case No. 2322, Bradley vs Bradley, we have made an examination of the title of Harley O. Barnes to Lots Seven and Fifteen in Block Five of the "Highways", a subdivision of the Town of Loxley, Alabama, as per plat recorded in Map 1, page 91. We have used for the purpose abstract and continuation made by J. A. Ertzinger & Son, under date of September 16, 1949.

According to this abstract, we find a merchantable title vested in Harley O. Barnes, subject, however, to a first mortgage in favor of the Central Baldwin Bank, dated March 18, 1948 for \$366.50, which mortgage will have to be paid to vest a good title in a prospective purchaser. Mr. Barnes, through us, authorizes you to pay this mortgage out of the funds in your hands, and, also, to pay \$10.00 to J. A. Ertzinger & Son for continuation of the abstract and to purchase documentary stamps for \$1.65, to be attached to the deed before delivery. With these matters cared for, you will be safe in paying the difference of \$921.85 to Mr. Barnes and delivering the deed.

All taxes are paid except the State and County for the current year, due October 1st, which Barnes will pay.

We are leaving it to you to see whether the deed of Barnes to Mrs. Bradley and her children, drawn by us, is properly acknowledged.

Respectfully submitted,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:HB  
2938

STATE OF FLORIDA:

COUNTY OF ESCAMBIA:

I, MERVYN WADE BRADLEY, a minor fifteen years of age and one of the six children of Wister Denmark Bradley, hereby nominate J. Jefferson Bennet of Fairhope, Alabama, as my guardian ad litem in the cause filed by my stepmother, Mrs. Annie Mae Bradley, and my older brother, Lavaughn Bradley, asking to sell our present home at Daphne, for reinvestment in another home of equal value in Loxley.

WITNESS my hand at Pensacola, Florida, this the 8<sup>th</sup> of August, 1949.

Mervyn Wade Bradley

STATE OF FLORIDA:

COUNTY OF ESCAMBIA:

I, Homer Waldrop, a Notary Public in and for said State and County, hereby certify that MERVYN WADE BRADLEY, whose name is signed to the foregoing appointment, and who is known to me, acknowledged before me on this day, that, being informed of the contents of the appointment, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this the 8<sup>th</sup> day of August, 1949.

Homer Waldrop  
Notary Public, Escambia County, Florida.

Notary Public, State of Florida At Large  
My Commission Expires May 13, 1950.

(IN THE MATTER OF THE PETITION OF ANNIE MAE BRADLEY)

NO. 2322


STATE OF ALABAMA )  
BALDWIN COUNTY )

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

Comes now Mervyn Wade Bradley, James David Bradley,  
Betty Fay Bradley and Doris Bradley by their Guardian Ad Litem,  
J. Jefferson Bennett, and ~~an~~ answers to the petition filed in  
the above stated cause as follows:

1. The allegations of paragraph No. 1 First of said  
petition are admitted.

2. The allegations of paragraphs Second, Third and  
Fourth are denied and strict proof demanded thereof.

  
J. Jefferson Bennett as Guardian  
Ad Litem

Baldwin County Circuit  
Court, In Equity

No. 2322

In re: Petition of Annie  
May Bradley

Answer of Edm. Ad Litem

FILED

AUG 22 1949

ALICE J. DUCK, Register

Jefferson Bennett, atty.

ANNIE MAE BRADLEY, et al,  
Complainants,

vs

WILLIE MAE BRADLEY, et al,  
Defendants

E Q U I T Y No. 2322

CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA.

This cause coming on upon the report of the Register as to her actions under the decree of this Court of September 30, 1949, and it appearing to the Court that the mandate of said decree has been met:

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the report of the Register be, in all respects, ratified and confirmed and that she make delivery of the two deeds therein described and of the funds in her hands as set out by her, and her act in so doing is hereby confirmed and approved.

IT IS FURTHER ORDERED that the costs in this cause be taxed to Susie Belle Grace, and that in default of payment of same, that execution issue.

Done at Bay Minette, Alabama, this the first day of October, 1949.

TELFAIR J. MASHBURN, JR.

\_\_\_\_\_  
Judge

STATE OF ALABAMA:

COUNTY OF BALDWIN:

I, ALICE J. DUCK, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the matter set out above is a true and correct copy of the decree rendered by the Judge of the Circuit Court of Baldwin County in Case No. 2322 Equity, as same appears upon the records of said Court.

Given under my hand and seal of said Court this the 4th day of October, 1949.

\_\_\_\_\_  
Register, Circuit Court.

LAURA BLAIR MARQUES,

Complainant,

VS.

JAWN W. MARQUES,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. 2182.

DECREE

This day came Laura Blair Marques and filed herein her verified petition praying that Jawn W. Marques be required to appear and show cause, if any he have, why he should not be punished as for a contempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is,

ORDERED, ADJUDGED AND DECREED by the Court that the said Jawn W. Marques appear before the Court instantly, in the court room of the circuit court of Baldwin County, at Bay Minette, Alabama and show cause, if any he have, why he should not be punished as for a contempt.

Let a copy of said petition and of this rule to show cause be served forthwith, personally upon the said Jawn W. Marques by the Sheriff of Baldwin County, Alabama.

Done this 2nd day of September, 1949.

Julius A. Maslowen, Jr.  
Judge

E Q U I T Y, No. 2322

ANNIE MAE BRADLEY, et al  
Complainants

vs

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

WILLIE MAE BRADLEY, et al  
Defendants

This cause coming on to be heard upon the pleadings and proof as presented by depositions, and the same being duly considered, the Court is of the opinion that the Complainants are entitled to the relief prayed in the bill. IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED:

FIRST: That it is to the interest of the minor defendants, Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, that the property in which each owns a one-twelfth interest, in the Town of Daphne, namely, Lot Nineteen in Block Two of the Manci and Trione Sub-division, as per plat recorded in Map Book 1, page 41, of the Probate Records of Baldwin County, be sold to Mrs. Susie Belle Grace for the sum of Thirteen Hundred Dollars, offered by her, and that the Register of this Court be, and she is hereby authorized and empowered in behalf of said minors, to join with complainants, Annie Mae Bradley and Lavaughn Bradley in the execution of a deed of warranty conveying the interests of all owners of said to said Susie Belle Grace when the sum of Thirteen Hundred Dollars shall have been deposited with said Register as the consideration for such sale.

SECOND: It is further ORDERED, ADJUDGED AND DECREED that the Register of this Court, upon presentation to her of a warranty deed for Lots Seven and Fifteen in Block Five of the HIGHWAYS, an addition to the Town of Loxley, as per plat recorded in Map Book 1, page 91 of the Probate Records of this County, properly executed by the owners of said lots, Hartley Barnes and his wife, and on the further presentation of a proper showing of a satisfactory title in Hartley Barnes, free of encumbrances, as evidenced by an opinion to this effect by some reputable lawyer of Baldwin County, said deed conveying a half interest to Annie Mae Bradley and the remaining half interest to



LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

September 19, 1949

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

BRADLEY VS BRADLEY:

As you see by enclosed copy, we are writing the Central Baldwin Bank to send you, for collection, the mortgage given by Harley Barnes on Lots 7 and 15 of Block 5 of the "Highways" in Loxley, which Mrs. Bradley and the children are buying and on which we have examined title and find the only encumbrance to be this mortgage, on which is due \$366.50 and the current taxes. Barnes is also to send you the deed to Mrs. Bradley and the six children when it is signed by him, and his wife, and in the payoff, which will be when the Judge signs the decree, as he will when we give him the green light as to title, this is to be paid out as follows:

Purchase price	\$1300.00
Central Baldwin Bank	\$ 366.50
Ertzinger, for con-	
tinuation of abstract	10.00
Deed stamps	1.65
Balance due Barnes	<u>\$ 921.85</u>

The court costs, Mrs. Grace, who is purchasing the Daphne property, will pay, together with our fee and after the first of the month will put in our hands \$100.00 for the purpose. We are also asking you to put the \$1.65 of Federal documentary stamps on the deed and record it, sending bill to us for record fee. The \$10.00 can be paid to the Ertzinger firm. As matters now stand we are waiting for signatures of the Pensacola heirs to the Daphne property and the completed abstract.

Sincerely,

*Elliott E. Rickarby*

for  
RICKARBY & RICKARBY

EGR:HB  
cc - H. Barnes  
Enc - 1  
2938

Lavaughn Bradley, Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, children of Annie Mae Bradley and the late Wister D. Bradley, to pay to said Barnes the Thirteen Hundred Dollars deposited with her as hereinbefore provided, and which sum in the half share of Annie Mae Bradley in the purchase price, together with the half share belonging jointly to the six children above named, who will thereupon jointly own a half interest in said Loxley property, together with Annie Mae Bradley, owner of the remaining half.

THIRD: It is further ordered that this cause be held for such further orders as may be proper in the premises.

Done at Bay Minette, Alabama, this the 30th day of September, 1949.

TELFAIR J. MASHBURN, JR.

JUDGE

STATE OF ALABAMA:

COUNTY OF BALDWIN:

I, ALICE J. DUCK, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the matter set out above is a true and correct copy of the decree rendered by the Judge of the Circuit Court of Baldwin County in Case No. 2322 Equity, as same appears upon the records of said Court.

Given under my hand and seal of said Court this the 4th day of October, 1949.

---

Register, Circuit Court

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

October 6, 1949.

Central Baldwin Bank,  
Robertsdale,  
Alabama.

Gentlemen:

HARLEY O. BARNES MORTGAGE: This will confirm our telephone message of yesterday, stating that Mrs. Alice J. Duck, Register of the Circuit Court, having received the authority of the Judge of said Court, has made disbursement of the money placed in her hands for the purchase of the Barnes property in Loxley, and by registered mail this morning we have received check #1228 in your favor for \$366.50, signed by the Register, and which we are glad to enclose.

For Mrs. Duck's records, it will be necessary to have a receipt from you for this amount, which is here enclosed, and which we ask that you execute and mail to her. We also ask that you cancel upon the records, not only this mortgage, which is recorded in Mortgage Book 138, page 417, but two prior mortgages, reported uncanceled on the records; one, dated July 21, 1944 in Mortgage Book 100, page 528 and one dated November 7, 1947 in Mortgage Book 134, pages 3-4, advising us when you have done so.

We appreciate your cooperation in this matter and are glad to say that the delay was due, not to any lack of diligence on our part, as the money was promptly paid into Court and the several deeds drawn and sent to the proper parties, but these were slow in being executed and the interests of minors being involved, Judge Mashburn was particularly careful to see that every requirement had been properly met.

Very truly yours,

*Elliott C. Rickarby*

for  
RICKARBY & RICKARBY

EGR:HB  
Enc - 2  
cc - Mrs. Duck  
2938

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

October 6, 1949.

Mr. Harley O. Barnes,  
Loxley,  
Alabama.

Dear Mr. Barnes:

BRADLEY MINORS: We are happy to inform you that the fund that was placed in the hands of Mrs. Duck, the Register in Chancery, some three weeks ago for the purchase of your home in Loxley, is now ready to be disbursed, and if you will call on Mrs. Duck in Bay Minette, and sign the receipt on her records, she will be glad to hand you the balance of \$921.85 due after payment of the Central Baldwin Bank mortgage of \$366.50; the abstract continuation of \$10.00 and \$1.65 for Revenue stamps. If not convenient for you to go to Bay Minette, you can sign the enclosed receipt in the presence of a witness and mail it to Mrs. Duck, and check for this will be at once mailed you.

Please tell Mrs. Bradley that we have her deed, abstract, cancel of mortgage, insurance policy and other papers, which I hope to turn over to her in person within the next few days.

Very truly yours,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:HB  
Enc - 1  
cc - Mrs. Duck  
2938

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

October 6, 1949.

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

BRADLEY VS BRADLEY, No. 2322: As you see by enclosed copies, we have mailed check to the Central Baldwin Bank for its mortgage and notified Barnes that his money was ready for him.

It has occurred to us that the record of Mrs. Grace's title will be made much clearer if a certified copy of the decree of September 30th, under which you acted, and a confirmation of your act is included, so we send copies of these papers which we ask you to certify and return when they will be bound in with the deed. We also ask that the commission issued to Mrs. Baugh to take testimony, and under which she acted, be placed in the file. She failed to attach this to the deposition. Mrs. Grace has been advised of the completion of this transaction and we hope to have her check for costs and fees at a very early date.

We thank you for your usual prompt and efficient cooperation.

Sincerely,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:HB  
Enc - 4  
2938

ANNIE MAE BRADLEY, et al  
Complainants,

vs

WILLIE MAE BRADLEY, et al,  
Defendants

E Q U I T Y No. 2322

CIRCUIT COURT OF BAIWIN

COUNTY, ALABAMA.

This cause coming on upon the report of the Register as to her actions under the decree of this Court of September , 1949, and it appearing to the Court that the mandate of said decree has been met:

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the report of the Register be, in all respects, ratified and confirmed and that she make delivery of the two deeds therein described and of the funds in her hands as set out by her, and her act in so doing is hereby confirmed and approved.

IT IS FURTHER ORDERED that the costs in this cause be taxed to Susie Belle Grace, and that in default of payment of same that execution issue.

Done at Bay Minette, Alabama, this the first day of October, 1949.

---

Judge

PETITION OF ANNIE MAE BRADLEY,  
Complainant,  
VS.  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY  
NO. 2322

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows :

1. That the following named witnesses reside within one hundred miles from

Bay Minette, in the County of Baldwin

Alabama, the place of trial of said cause, to-wit:

Mrs. Annie Mae Bradley, Daphne, Alabama.

Mrs. Margaret Barnes, Loxley, Alabama.

D. S. Comstock, Loxley, Alabama

Gordon G. Stimpson, Daphne, Alabama.

2. That said complainant requires an oral examination of said witnesses before a commis-

sioner appointed by the Register of this Court.

*Richardly & Richardly*  
Solicitors for Complainant.

NOTE:

Complainant suggests the name of Helen P. Baugh, Fairhope,

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

*Richardly & Richardly*  
Solicitors for Complainant.

**DEMAND FOR ORAL EXAMINATION.**

**PETITION OF ANNIE MAE BRADLEY**  
Complainant,

**Vs.**

**Respondent.**

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

Filed this \_\_\_\_\_ day of \_\_\_\_\_,

194 \_\_\_\_\_

**Register.**

**DEMAND FOR ORAL EXAMINATION.**

Reborement

MO. 5255

IN EQUITY

BUTLER COUNTY, ALABAMA  
IN THE CIRCUIT COURT OF

Complainant

As



LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

September 19, 1949.

Central Baldwin Bank,  
Robertsdale,  
Alabama.

Gentlemen:

HARLEY BARNES MORTGAGE: By agreement with Mr. Barnes and in order to perfect the title to the property that he is selling and on which you have a mortgage, we have arranged that Mrs. Duck, the Register in Chancery, shall pay this out of the funds in her hands and therefore ask you to send Barnes' mortgage and any other papers that you have to her to be held by her in escrow until the trade is completed and the mortgage paid.

It will probably be two or three days before all necessary papers are signed and Mrs. Duck is at liberty to make the payment.

With thanks for your cooperation,

Very truly yours,

*Elliott S. Rickarby*

for  
RICKARBY & RICKARBY

EGR:HB

cc - Mrs. Alice J. Duck  
2938

September 19, 1949

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

BRADLEY VS BRADLEY: As you see by enclosed copy, we are writing the Central Baldwin Bank to send you, for collection, the mortgage given by Harley Barnes on Lots 7 and 15 of Block 5 of the "Highways" in Loxley, which Mrs. Bradley and the children are buying and on which we have examined title and find the only encumbrance to be this mortgage, on which is due \$366.50 and the current taxes. Barnes is also to send you the deed to Mrs. Bradley and the six children when it is signed by him, and his wife, and in the payoff, which will be when the Judge signs the decree, as he will when we give him the green light as to title, this is to be paid out as follows:

Purchase price	\$1300.00
Central Baldwin Bank	\$ 366.50
Ertzinger, for con-	
tinuation of abstract	10.00
Deed stamps	1.65
Balance due Barnes	\$ 921.85

The court costs, Mrs. Grace, who is purchasing the Daphne property, will pay, together with our fee and after the first of the month will put in our hands \$100.00 for the purpose. We are also asking you to put the \$1.65 of Federal documentary stamps on the deed and record it, sending bill to us for record fee. The \$10.00 can be paid to the Ertzinger firm. As matters now stand we are waiting for signatures of the Pensacola heirs to the Daphne property and the completed abstract.

Sincerely,



for  
RICKARBY & RICKARBY

EGR:HB  
cc - H. Barnes  
Enc - 1  
2938

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

September 13, 1949

Mrs. Alice J. Duck, Register,  
Circuit Court,  
Bay Minette, Alabama.

Dear Mrs. Duck:

BRADLEY vs BRADLEY: With this find the decree ordering sale of the Bradley property in Daphne, in accordance with the prayer of the bill left in your hands this morning for delivery to Judge Mashburn. As soon as the Judge signs this decree, we ask that you execute the deed in behalf of the minors and send it down to Mr. Kirby Wharton of the Bank of Fairhope for delivery when the thirteen hundred dollars has been paid, which amount Mr. Wharton will remit to you. We will then take the deed and have the two necessary signatures of the part owners, and the trade consummated. We will then proceed to get the title to the Loxley property, which the parties hereto propose to buy, put in shape and will send to you for further action.

Sincerely,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY.

EGR.h  
Enc  
2938

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

September 15, 1949.

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

ANNIE MAE BRADLEY vs WILLIE MAE BRADLEY, et al: With this find Cashier's Check of the Bank of Fairhope, No. 27056 in your favor for \$1300.00, to be held by you, as Register, until we can be satisfied as to the property in Loxley, in which this money, proceeds of the minors home in Daphne, is to be invested. Judge Mashburn telephoned us this morning that he is holding up signing the decree until we can assure him that the title to the place proposed to be bought is good and this we expect to do in the next day or two.

In the meantime, you may get a deed signed by H. O. Barnes and wife at Loxley, which you are to take up after deducting from the \$1300.00, \$366.50 due the Central Baldwin Bank of Robertsedale, and any other legitimate charges on the property that our letter of advice tells you.

We are also enclosing with this a letter and self-addressed envelope to be sent to Lavaughn Bradley, one of the adults involved, which we ask that you send, along with the deed you are to sign as Register, without waiting for your signature. We are having him return this to us when we will have Mrs. Bradley sign and will then return it to you for your signature. Right now we are waiting on the adult signatures to this deed and the signatures of Barnes and his wife to that in Loxley.

Sincerely,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:HB  
2938  
Enc - 3

ANNIE MAE BRADLEY, et al,  
Complainants,

E Q U I T Y No. 2322

vs

CIRCUIT COURT OF BALDWIN

WILLIE MAE BRADLEY, et al,  
Defendants

COUNTY, ALABAMA.

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF  
SAID COURT:

In this cause the Register reports to the Court, that, pursuant to the terms of a decree in this cause rendered September , 1949, there has come into her hands:

FIRST: A warranty deed from Annie Mae Bradley and Lavaughn Bradley and Bradley, his wife, to Susie Belle Grace, to convey to said grantee for the sum of \$1300.00 Lot 19 in Block 2 of the Mancitri-Subdivision in the Town of Daphne, Alabama, according to plat recorded in Map Book 1, page 41, and which deed, in accordance with the terms of said decree, she has executed in behalf of Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, minor children of Wister Denmark Bradley, deceased, which deed, properly executed and acknowledged, is now ready for delivery to grantee.

SECOND: Cashier's check of the Bank of Fairhope for \$1300.00 delivered by Susie Belle Grace to be applied to payment for lots last above described upon delivery of deed.

THIRD: Warranty deed of Harley O. Barnes and Willie Mae Barnes, his wife, of Lots 7 and 15 in Block 5 of the "Highways", a subdivision of the Town of Loxley, Alabama, as per plat recorded in Map Book 1, page 91, conveying an undivided one-half interest to said land to Annie Mae Bradley and the remainder in equal shares to Lavaughn Bradley, Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, for a consideration of \$1300.00. Said deed is properly executed and acknowledged.

FOURTH: Abstract of title made by J. A. Ertzinger & Son to Lots 7 and 15 in Block 5 of the "Highways".

FIFTH: Opinion of Rickarby & Rickarby, solicitors for Complainants, reciting safe title vested in Harley O. Barnes, to lots described in his deed, subject to a first mortgage thereon in favor of the Central Baldwin Bank of Robertsedale for an indebtedness of \$366.50, which is to be paid before title is satisfactory.

SIXTH: Note of Harley O. Barnes to Central Baldwin Bank with release of said mortgage and other papers relating to same, to be delivered to purchasers of said property upon payment of said mortgage.

SEVENTH: Letter of Rickarby & Rickarby, dated September 19, 1949, reciting that deed of Barnes and wife was placed in the hands of the Register to be delivered upon payment of the Central Baldwin Bank mortgage, \$366.50; bill of Ertzinger & Son for continuation of abstract, \$10.00; purchase of deed stamps, \$1.65 and balance of \$921.85 to be paid to said Barnes.

Your Register further reports upon approval and confirmation of this report she will make a disbursement of the sum of \$1300.00 now in her hands as above set out and deliver the deeds above described as commanded by said decree.

Respectfully submitted,

Register.

ANNIE MAE BRADLEY, et al,  
Complainants

E Q U I T Y

vs

CIRCUIT COURT OF

WILLIE MAE BRADLEY, et al,  
Defendants

BALDWIN COUNTY, ALABAMA:

DEPOSITIONS OF ANNIE MAE BRADLEY, GORDON G. STIMPSON,  
MARGARET BARNES AND D. S. COMSTOCK, WITNESSES FOR COM-  
PLAINANT.

The said witness having been by me first duly sworn, upon examination by Elliott G. Rickarby of counsel for Complainant, and J. Jefferson Bennett, Esq., Guardian ad Litem, testified as herein-  
after set forth:

ANNIE MAE BRADLEY

I am the Petitioner in this cause and the mother of Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, minors under the age of fourteen, and stepmother of Mervin Wade Bradley, a minor over the age of fourteen. My husband died October 27, 1948, without a will, leaving me as his widow and his six children, the five named above and an older son, Lavaughn Bradley, now of age, as his only heirs. The only assets of my husband's estate are our home in Daphne, described as Lot 19 in Block 2 of the Mancie and Trione Subdivision, as per plat in Map Book 1, page 41, of Baldwin Records. This lot is 50 by 150 feet, with a four room house on it, but the house is not finished inside. We have an offer from Mrs. Susie Belle Grace to buy this place for the price of \$1300.00 cash, and as Daphne, where I am now living, is away from all of my relatives, who live in Loxley, and I have a chance to buy a place right close to my brothers and sisters in the latter town for the price I can get for this, and I am reliably informed that the place I want to buy is worth the money, it will be to the interest of my children and myself to sell this and invest in the Loxley property. My stepson, Lavaughn Bradley, and his minor brother have been consulted about this and think the move a very wise one, and Lavaughn joins in this case with me in asking the sale. It means a great deal to a widow with young children to be near her mother and relatives and I feel that it is to the interest of the children to have a home that will allow them to live near their grandmother and uncles.

Annie Mae Bradley

CROSS-EXAMINATION BY MR. BENNETT

The house is of tile construction. The partitions have not been finished inside. The house is about a year old. I have never had an offer of purchase of this property before. A real estate agent has told me that \$1300.00 is a reasonable price. We have no water supply for the home and have been using that of the neighbors. The house we plan to buy in Loxley will be just as near a school for the children as the one which we now want to sell.

Annie Mae Bradley

MARGARET BARNES

I am the mother of Annie Mae Bradley and grandmother of Willie Mae, James David, Betty Fay and Doris Bradley. I am well acquainted with both the property that Mrs. Bradley and her children own in Daphne and the house and lot that she wants to buy in Loxley. The property in Daphne is described as Lot Nineteen in Block Two of the Mancie and Trione Sub-division, and is about fifty feet front by one hundred fifty feet deep. The house is made of tile but has not been completed inside. It is shaded with small trees, but the lot is rather low and water stands in the front of the house after a rain. Mr. Bradley built it but was unable to finish it as it should be done and since his death his widow with her four little children is unable to complete it. She can sell the place to a lady who owns the lots on each side of her, and who has offered her what I consider a very good price for the place as it now stands. Mrs. Bradley wants to move back to Loxley where she lived before her marriage and where the rest of her family live, and she can buy a four-room home on two lots, fifty by one hundred fifty feet each, in the town of Loxley, at the same price that Mrs. Grace will pay her for the place in Daphne, and it will be very much to her advantage, and that of her little children, to be close to their relatives who live in Loxley. I am not well acquainted with real estate values but base my opinion on what other people have said, including Mr. Stimpson, the Postmaster in Daphne, and Mr. Comstock, a surveyor and real estate man in Loxley.

The two older children of Mr. Bradley, by a former marriage, have lived in the Daphne place and know both properties. They have a part interest in the Daphne home and are very willing for their stepmother to sell it with their interest included, and reinvest the money in Loxley. The older brother is over the age of twenty-one years, and the relations of the two sets of children and Mrs. Bradley with her step-children is very friendly.

NO CROSS EXAMINATION BY J. JEFFERSON BENNETT, GUARDIAN AD LITEM

*Margaret Barnes*

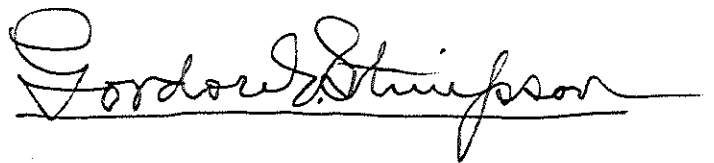


GORDON G. STIMPSON

I am Postmaster of the Town of Daphne and well acquainted with Mrs. Annie Mae Bradley. I knew Mr. Bradley before his death. He died after quite an illness, leaving his wife with four little children and two step-children. They have a small place in Daphne about a city block from the highway. It is of tile, but unfinished. I am very well acquainted with the property and property values in Daphne and in my opinion thirteen hundred dollars is a good price for the place where the Bradleys live. I doubt if they could get that except from Mrs. Grace, who owns the lots on bothsides and who is paying the price she offered in order to keep a stranger from owning property in the middle of her own.

Mrs. Bradley's children are small, and while I do not know the place she is planning to buy in Loxley, I know that her people live there and it would be to her interest to have a home near to them if she can get one at a price she can afford to pay. I wrote about the proposed sale of the Daphne house and reinvestment in one in Loxley to Lavaughn Bradley, the older son by a former marriage, and he wrote me back at once that he was strongly in favor of making the trade and would do anything he could to put the matter through. He and his brother say they are entirely willing to take the same interest in the Loxley place that they have in the one in Daphne.

NO CROSS EXAMINATION BY J. JEFFERSON BENNETT, GUARDIAN AD LITEM

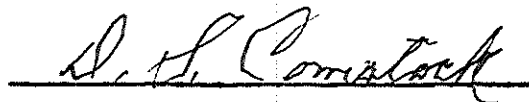


D. S. COMSTOCK

I am a resident of Loxley, Alabama where I have lived for many years and am a surveyor and real estate dealer. From my business I am well acquainted with property values in Loxley, and at the request of Mr. Rickarby looked at the property known as Lots 7 and 15 in Block 5 of the HIGHWAYS, a sub-division of the town of Loxley. I was asked to give my opinion as to whether this property was worth \$1300.00 and after examination do not hesitate to say that the two lots and the house, in its present condition, and in its location, are worth well above that sum, ~~(say \$)~~. I have no interest in this transaction but am simply giving my opinion of values to Mr. Rickarby at his request. I do not hesitate to say that if Mrs. Bradley buys this place for \$1300 she will be getting a good value for her money.

CROSS EXAMINATION BY MR. BENNETT

The property is located just off the main street of Loxley and is improved with a frame house in good repair with a sound roof. The house consists of four rooms. The lot is 50 feet wide and 366 feet long.



I, HELEN P. BAUGH, acting as commissioner by agreement of parties hereby certify that in the case of ANNIE MAE BRADLEY vs WILLIE MAE BRADLEY, ET AL, PENDING ON THE Equity side of the Circuit Court of Baldwin County, I caused ANNIE MAE BRADLEY, GORDON G. STIMPSON, MARGARET BARNES and D. S. COMSTOCK, witnesses for the Complainant, to appear before me at my office, and where, after being duly sworn, upon examination by the Solicitor for the Complainant, and cross-examination by the Guardian ad Litem, they testified as is above written, and their testimony, after being reduced to writing, was read over and signed by them.

I further certify that I am neither of counsel nor of kin to any of the parties to the cause or in anywise interested in the result thereof.

IN WITNESS WHEREOF, I hereto set my hand and seal as commissioner, this the 12th day of September, 1949.

Helen P. Baugh  
Commissioner

COMMISSIONER'S FEE,

\$10.00. Not paid.

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

August 9, 1949

Mrs. Alice J. Duck, Register,  
Circuit Court,  
Bay Minette, Alabama.

Dear Mrs. Duck:

With this find nomination by Mervyn Wade Bradley,  
the non-resident minor over the age of fourteen years,  
of Mr. Bennett as guardian ad litem. This will justify  
your issuing the commission for all five of the minors  
to Jeff.

Sincerely,

*Elliott G. Rickarby*

for  
RICKARBY & RICKARBY.

EGR.h  
Enc-1  
2938

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Mrs. Helen Baugh

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 Mrs. Annie Mae Bradly, Mrs. Margaret Barnes,  
D. S. Comstock and Gordon G. Stimpson

as witnesses in behalf of Mrs Annie Mae Bradly in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Annie Mae Bradly is petitioner

\_\_\_\_\_, Complainant  
and \_\_\_\_\_

\_\_\_\_\_, Respondent

on oath, to be by you administered, upon Mrs. Helen Baugh  
to take and certify the deposition<sup>s</sup> of the witness<sup>es</sup> and return the same to our Court, with all  
convenient speed, under your hand.

Witness 23rd day of August, 1949

Alice J. Leach  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

Petitioner of

Mrs. Annie Mae Bradly

Complainant

vs.

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

Mrs. Helen Baugh

WITNESSES:

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

August 22, 1949

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

PETITION OF ANNIE MAE BRADLEY: Please  
send us a commission for Mrs. Helen Baugh to take  
the testimony of Mrs. Annie Mae Bradley, Mrs. Margaret  
Barnes, D. S. Comstock and Gordon G. Stimpson in this  
case.

Sincerely,



for  
RICKARBY & RICKARBY

EGR:HB  
Enc - 1  
2938

O. A. ELLIS  
PRESIDENT



Robertsdale, Ala.,

Sep. 20, 1949

Mrs. Duck, Register in Chancery,  
Bay Minette, Alabama.

Dear Mrs. Duck:

In accordance with letter I have from Rickarby & Rickarby, Fairhope, Alabama, I am registering Harley Barnes and Wife's papers we have on their real estate in Loxley, Alabama, to you to hold in escrow for a day or so until the matter at that end of the line is completed, when you will remit to cover the note and mortgage herewith inclosed.

List of inclosures: 1. Abstract: 1, Deed, One Mortgage, 1 Note for \$366.50.  
1. Ins. Policy.

Thanking you to give this matter your very earliest attention, I am, Above papers in registered mail this day under separate cover

Yours very truly,

*O. A. Ellis*  
President.

PETITION OF

ANNIE MAE BRADLEY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY. No. 2322

APPOINTMENT OF GUARDIAN AD LITEM

In this cause MERVYN WADE BRADLEY, a minor fifteen years of age and one of the six children of Wister Denmark Bradley, hereby nominates J. Jefferson Bennett as his Guardian Ad Litem in the cause filed by his stepmother, Mrs. Annie Mae Bradley, and his older brother, Lavaughn Bradley, asking to sell their present home at Daphne, for reinvestment in another home of equal value in Loxley.

In this cause, it appearing to the Register, Alice J. Duck, that James DAVID BRADLEY, BETTY FAY BRADLEY and DORIS BRADLEY are minors under the age of fourteen years and who reside with petitioner in the town of Daphne, Alabama, and,

In the said proceeding it being made to appear to the Register, Alice J. Duck, that the said minors are interested in the result of said proceedings to sell lands.

It is therefore ordered, by the Register that J. Jefferson Bennett be and he is hereby appointed Guardian Ad Litem to represent the said MERVYN WADE BRADLEY, JAMES DAVID BRADLEY, BETTY FAY BRADLEY and DORIS BRADLEY, upon hearing of the said application.

Done this 10th day of August, 1949.

---

Register

CONSENT TO ACT

I, J. Jefferson Bennett, hereby consent to act as Guardian Ad Litem for MERVYN WADE BRADLEY, James DAVID BRADLEY, BETTY FAY BRADLEY and DORIS BRADLEY, minors, upon hearing of the above cause.

Witness my hand this       day of       , 1949.

---

Guardian Ad Litem



August 4, 1949

Mrs. Alice J. Duck, Register,  
Bay Minette,  
Alabama.

Dear Mrs. Duck:

PETITION OF MRS ANNIE MAE BRADLEY, et al: With this you will find Petition of Mrs. Annie Mae Bradley for the sale for reinvestment of the home owned jointly by her and her children in Daphne. There are no resident minors under the age of fourteen, but one, aged fifteen, lives in Pensacola and will file the statutory nomination of J. J. Bennett as guardian ad litem, whom, of course, you can then appoint as guardian ad litem for all minors, sending him with the appointment the copy of the petition here enclosed. We will then take testimony and try to have the matter completed within the next two weeks as all parties are anxious to move to Loxley where their kindred live.

Sincerely,

*Elliott G. Rickarby*

for  
RICKARBY & RICKARBY

EGR:HB  
Enc - 2  
2938

E Q U I T Y, No. 2322

ANNIE MAE BRADLEY, et al  
Complainants

vs

CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

WILLIE MAE BRADLEY, et al  
Defendants

This cause coming on to be heard upon the pleadings and proof as presented by depositions, and the same being duly considered, the Court is of the opinion that the Complainants are entitled to the relief prayed in the bill. IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED:

FIRST: That it is to the interest of the minor defendants, Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, that the property in which each owns a one-twelfth interest, in the Town of Daphne, namely, Lot Nineteen in Block Two of the Manci and Trione Sub-division, as per plat recorded in Map Book 1, page 41, of the Probate Records of Baldwin County, be sold to Mrs. Susie Belle Grace for the sum of Thirteen Hundred Dollars, offered by her, and that the Register of this Court be, and she is hereby authorized and empowered in behalf of said minors, to join with complainants, Annie Mae Bradley and Lavaughn Bradley in the execution of a deed of warranty conveying the interests of all owners of said to said Susie Belle Grace when the sum of Thirteen Hundred Dollars shall have been deposited with said Register as the consideration for such sale.

SECOND: It is further ORDERED, ADJUDGED AND DECREED that the Register of this Court, upon presentation to her of a warranty deed for Lots Seven and Fifteen in Block Five of the HIGHWAYS, an addition to the Town of Loxley, as per plat recorded in Map Book 1, page 91 of the Probate Records of this County, properly executed by the owners of said lots, Hartley Barnes and his wife, and on the further presentation of a proper showing of a satisfactory title in Hartley Barnes, free of encumbrances, as evidenced by an opinion to this effect by some reputable lawyer of Baldwin County, said deed conveying a half interest to Annie Mae Bradley and the remaining half interest to

Lavaughn Bradley, Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, children of Annie Mae Bradley and the late Wister D. Bradley, to pay to said Barnes the Thirteen Hundred Dollars deposited with her as hereinbefore provided, and which sum in the half share of Annie Mae Bradley in the purchase price, together with the half share belonging jointly to the six children above named, who will thereupon jointly own a half interest in said Loxley property, together with Annie Mae Bradley, owner of the remaining half.

THIRD: It is further ordered that this cause be held for such further orders as may be proper in the premises.

Done at Bay Minette, Alabama, this the 30<sup>th</sup> day of September, 1949.

*J. J. Maslbury, Jr.*  
JUDGE

*See  
page 2  
of 2*

RECORDED  
INDEXED  
OCT 10 1949

FILED IN VOLUME 1 OF 1

27

FILED IN VOLUME 1 OF 1

ANNIE MAE BRADLEY, et al

VS

WILLIE MAE BRADLEY, et al.

DECREE  
ORDERING SALE AND  
REINVESTMENT

Filed 7-30-49  
Rece. French  
Register

Incubation of seeds  
2000

666

32-10

ANNIE MAE BRADLEY, et al,  
Complainants,

E Q U I T Y No. 2322

vs

CIRCUIT COURT OF BALDWIN

WILLIE MAE BRADLEY, et al,  
Defendants

COUNTY, ALABAMA.

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF  
SAID COURT:

In this cause the Register reports to the Court, that, pursuant to the terms of a decree in this cause rendered September 30<sup>th</sup> 1949, there has come into her hands:

FIRST: A warranty deed from Annie Mae Bradley and Lavaughn Bradley and *Inez* Bradley, his wife, to Susie Belle Grace, to convey to said grantee for the sum of \$1300.00 Lot 19 in Block 2 of the Mancitriane Subdivision in the Town of Daphne, Alabama, according to plat recorded in Map Book 1, page 41, and which deed, in accordance with the terms of said decree, she has executed in behalf of Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, minor children of Wister Denmark Bradley, deceased, which deed, properly executed and acknowledged, is now ready for delivery to grantee.

SECOND: Cashier's check of the Bank of Fairhope for \$1300.00 delivered by Susie Belle Grace to be applied to payment for lots last above described upon delivery of deed.

THIRD: Warranty deed of Harley O. Barnes and Willie Mae Barnes, his wife, of Lots 7 and 15 in Block 5 of the "Highways", a subdivision of the Town of Loxley, Alabama, as per plat recorded in Map Book 1, page 91, conveying an undivided one-half interest to said land to Annie Mae Bradley and the remainder in equal shares to Lavaughn Bradley, Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, for a consideration of \$1300.00. Said deed is properly executed and acknowledged.

FOURTH: Abstract of title made by J. A. Ertzinger & Son to Lots 7 and 15 in Block 5 of the "Highways".

FIFTH: Opinion of Rickarby & Rickarby, solicitors for Complainants, reciting safe title vested in Harley O. Barnes, to lots described in his deed, subject to a first mortgage thereon in favor of the Central Baldwin Bank of Robertsdale for an indebtedness of \$366.50, which is to be paid before title is satisfactory.

SIXTH: Note of Harley O. Barnes to Central Baldwin Bank with release of said mortgage and other papers relating to same, to be delivered to purchasers of said property upon payment of said mortgage.

SEVENTH: Letter of Rickarby & Rickarby, dated September 19, 1949, reciting that deed of Barnes and wife was placed in the hands of the Register to be delivered upon payment of the Central Baldwin Bank mortgage, \$366.50; bill of Ertzinger & Son for continuation of abstract, \$10.00; purchase of deed stamps, \$1.65 and balance of \$921.85 to be paid to said Barnes.

Your Register further reports upon approval and confirmation of this report she will make a disbursement of the sum of \$1300.00 now in her hands as above set out and deliver the deeds above described as commanded by said decree.

Respectfully submitted,

*Marie J. Smith*  
Register.

RECEIVED  
JAN 10 1950  
REGISTER  
OF  
DEEDS  
AND  
MORTGAGES  
OF  
THE  
STATE  
OF  
MISSISSIPPI

REPORT  
OF  
REGISTER

Figure 1. The structure of the proposed model.

ANNIE MAE BRADLEY, et al.  
Complainants,

vs

WILLIE MAE BRADLEY, et al,  
Defendants

E Q U I T Y No. 2322

CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA.

This cause coming on upon the report of the Register as to her actions under the decree of this Court of September , 1949, and it appearing to the Court that the mandate of said decree has been met:

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the report of the Register be, in all respects, ratified and confirmed and that she make delivery of the two deeds therein described and of the funds in her hands as set out by her, and her act in so doing is hereby confirmed and approved.

IT IS FURTHER ORDERED that the costs in this cause be taxed to Susie Belle Grace, and that in default of payment of same that execution issue.

Done at Bay Minette, Alabama, this the first day of October, 1949.

Jeffrey J. Maslbury, Jr.  
Judge



TO THE HONORABLE TELFAIR J. MASHBURN,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

SITTING IN EQUITY:

Come ANNIE MAE BRADLEY and LAVAUGHN BRADLEY and by this their petition presented against MERVIN BRADLEY and WILLIE MAE BRADLEY, JAMES DAVID BRADLEY, BETTY FAY BRADLEY AND DORIS BRADLEY respectfully show:

FIRST: That Petitioner Annie Mae Bradley is the widow of Wister Denmark Bradley, stepmother of Mervin Bradley, a minor over the age of fourteen years, and mother of Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, minors under the age of fourteen years and who reside with petitioner in the Town of Daphne, Alabama in what is now the home of all parties other than Lavaughn Bradley.

SECOND: That Annie Mae Bradley and Wister D. Bradley purchased jointly a lot and dwelling house in the Town of Daphne, more particularly described as Lot Nineteen, in Block Two of the Manci and Trione Sub-division, as per plat recorded in Map Book Number One, Page forty-one of the Probate Records of Baldwin County. That on or about the 27th day of October 1948 Wister D. Bradley died intestate, leaving as his only heirs his widow, Annie Mae Bradley, a petitioner, two children by a former wife, petitioner Lavaughn Bradley and Mervin Bradley, and four minor defendants last above named.

THIRD: That petitioners have recently received a bona fide offer of Thirteen Hundred Dollars from a Mrs. Susie Belle Grace of Daphne, for the purchase of the dwelling owned by the widow and the children aforesaid, which offer petitioners are informed and believe is a fair and reasonable price for the small dwelling jointly owned by them.

FOURTH: That since the death of her husband, Annie Mae Bradley, the widow, finds that it would be to the best interest of both herself and the minor children above named, to return to the

Town of Loxley where her parents resided during the lifetime of her father, now deceased, and where her two brothers now live, and where they have the opportunity to purchase, at the price of thirteen hundred dollars, which price they are informed, and believe, is a very reasonable figure, a four-room home on two lots, fifty feet front each by one hundred fifty feet deep, in the Town of Loxley, and which can be secured at the price now offered for the home in Daphne. This property which they wish to purchase is more particularly described as Lots Seven and Fifteen in Block Five of THE HIGHWAYS, an addition to the Town of Loxley, as per plat recorded in Map Book One, Page ninety-one of the Probate Records of Baldwin County.

THE PREMISES CONSIDERED, Petitioners pray that Mervin Bradley, Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, the minors aforesaid, be made parties defendant to this petition; that a guardian ad litem be named to represent their respective interests and that upon the hearing of this cause, a decree be rendered directing the Register of this Court, in behalf of said minor defendants, to join with Petitioners in a conveyance to Mrs. Susie Belle Grace of the property owned by the parties hereto as above described upon payment of the sum of thirteen hundred dollars aforesaid and to apply the minors' share of the proceeds of said sale together with the net amount realized by Petitioners to the purchase of the property now owned by Hartley Barnes of Loxley, upon proper showing of a satisfactory title in said Barnes, free of encumbrance, to the property owned by him and described in Paragraph Four of this Petition, the title of the property so purchased to be vested one-half in Petitioner Annie Mae Bradley, and one-half in the six children aforesaid, the same as now exists in their present home.

Petitioners submit herewith a certificate of approval of the proposed sale and reinvestment executed by Mrs. Margaret Barnes, the grandmother and nearest of kin to the minors named in this petition, not interested in the cause thereby presented.

Petitioners further pray that the action of the Register in accordance with the prayer of this petition be ratified and confirmed and that they be allowed such other, further or different relief as is to the best interests of the minor children aforesaid.

*Reinhardt & Reinhardt*  
Solicitors for Petitioners.

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Before me, the undersigned Notary, personally appeared Mrs. Margaret Barnes, who, being sworn, says that she is a resident of the County of Baldwin and the grandmother of Willie Mae Bradley, James David Bradley, Betty Fay Bradley and Doris Bradley, minor children named in the foregoing petition, and that in her judgment the sale of the property in the Town of Daphne, with which she is familiar, one-half interest of which is owned by said minors, and a reinvestment of the proceeds in a home in the Town of Loxley, with the value of which she is also familiar, would be to the best interests of said children in that they and their mother would thereby be enabled to live close to other members of Petitioners' family, which in the present home they are not able to do.

*Mrs. Margaret Barnes*

Subscribed and sworn to before me on this the 3 day of Aug 1949.

*J. M. Lenthewood*  
Notary Public, Baldwin County, Alabama

The matters alleged as fact in the foregoing petition are true to the best of my knowledge and belief.

*Annie Mae Bradley*

Subscribed and sworn to this 3rd day of August, 1949.

*J. M. Lenthewood*  
Notary Public, Baldwin County,  
Alabama.