

IN THE
CIRCUIT COURT OF BALD-
WIN COUNTY, ALABAMA.
IN EQUITY.
NO. 2375

FINAL DECREE:

This cause coming on to be heard is submitted for a final decree upon the original bill of complaint filed October 21, 1949, writ of injunction issued October 21, 1949, answer and cross bill filed November 22, 1949, answer to cross bill filed December 21, 1949, and stipulation of parties filed May 23, 1955. The Court, after a consideration of the pleadings and stipulation, finds as follows:

1. That the Complainant is the owner of the Northeast Quarter of the Northwest Quarter of Section 35, Township 5 South, Range 3 East.
2. That the Respondents are the owners of the Northwest Quarter of Northwest Quarter of Section 35, Township 5 South, Range 3 East.
3. That the Complainant and the Respondents are co-terminus owners.
4. That the true dividing line between the properties of the Complainant and the Respondents is the east line of the Northwest Quarter of Northwest Quarter, Section 35, Township 5 South, Range 3 East, which is the same line as the west line of the Northeast Quarter of the Northwest Quarter of Section 35, Township 5 South, Range 3 East.
5. That the parties, by and through their stipulation, have entered into an agreement as to the true dividing line between the property of said parties -

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the dividing line between the lands of the Complainant and the Respondents is as follows:

Beginning at a concrete marker, which is located at the Northeast corner of the Northwest Quarter of Northwest Quarter of Section 35, Township 5 South, Range 3 East, which is the same point as the Northwest Corner of the Northeast Quarter of Northwest Quarter, Section 35, Township 5 South, Range 3 East, run thence South 1209 feet to a concrete marker located at the Southeast corner of the Northwest Quarter of Northwest Quarter of Section 35, Township 5 South, Range 3 East, which is the same point as the Southwest corner of the Northeast Quarter of Northwest Quarter of Section 35, Township 5 South, Range 3 East.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the temporary injunction heretofore issued in this cause be, and the same is hereby dissolved, and that the Complainant and the sureties on her bond are relieved from all liability thereunder.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a copy of this decree be recorded in the office of the Judge of Probate of Baldwin County, Alabama, and properly indexed therein, the cost of such recording to be taxed as a part of the Court cost herein.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondents pay the costs herein taxed, for which execution may issue.

Dated at Bay Minette, Alabama, this 2nd day of June, 1955.

Hubert M. Hall
Judge of the 28th Judicial
Circuit of Alabama.

STATE OF ALABAMA, BALDWIN COUNTY

Filed 6-27-55 10:30 A.M.

Recorded *and* book 222 page 341-2*M. Stunt*
Judge of Probate *51*ADELINE PEARSON,
Complainant,
VS.JOSEPH FROLIK, MARIE FROLIK AND ANN KRAL,
Respondents.IN THE
CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

IN EQUITY

NO. 2375

FINAL DECREE:

This cause coming on to be heard is submitted for a final decree upon the original bill of complaint filed October 21, 1949, writ of injunction issued October 21, 1949, answer and cross bill filed November 22, 1949, answer to cross bill filed December 21, 1949, and stipulation of parties filed May 23, 1955. The Court, after a consideration of the pleadings and stipulation, finds as follows:

1. That the Complainant is the owner of the Northeast Quarter of the Northwest Quarter of Section 35, Township 5 South, Range 3 East.
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3. That the Complainant and the Respondents are co-terminus owners.
4. That the true dividing line between the properties of the Complainant and the Respondents is the east line of the Northwest Quarter of Northwest Quarter, Section 35, Township 5 South, Range 3 East, which is the same line as the west line of the Northeast Quarter of Northwest Quarter of Section 35, Township 5 South, Range 3 East.
5. That the parties, by and through their stipulation, have entered into an agreement as to the true dividing line between the property of said parties -

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the dividing line between the lands of the Complainant and the Respondents is as follows:

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IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the temporary injunction heretofore issued in this cause be, and the same is hereby dissolved, and that the Complainant and the sureties on her bond are relieved from all liability thereunder.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a copy of this decree be recorded in the office of the Judge of Probate of Baldwin County, Alabama, and properly indexed therein, the cost of such recording to be taxed as a part of the Court cost herein.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondents pay the costs herein taxed, for which execution may issue.

Dated at Bay Minette, Alabama, this 2nd day of June, 1955.

Hubert M. Hall
Judge of the 28th Judicial
Circuit of Alabama.

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in above stated cause, which said decree is on file and enrolled in my office.

WITNESS MY HAND AND SEAL THIS THE 2nd day of June 1955

Alice J. Duck
Register of Circuit Court, in Equity

ADELINE PEARSON,

Complainant,

vs.

JOSEPH FROLIK, MARIE
FROLIK and ANN KRAL,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 2375

STIPULATION

It is hereby stipulated and agreed by and between the Complainant in the above styled cause, acting by and through J. B. Blackburn as her Solicitor of Record, and the Respondents in the above styled cause, acting by and through John Chason as one of their Solicitors of Record, as follows:

1. That said cause which is now pending in the Circuit Court of Baldwin County, Alabama, In Equity, shall be submitted to the Court for final decree without further evidence and without notice of submission to either party.

2. That the temporary injunction issued by the Court on October 21, 1949, shall be dissolved by said Court without any liability for the issuance of such injunction against the Complainant or her sureties on her injunction bond.

3. That such final decree shall fix the true dividing line between the Northeast Quarter of the Northwest Quarter of Section 35, Township 5 South, Range 3 East, in Baldwin County, Alabama, which said property is owned by the Complainant in said cause and the Northwest Quarter of the Northwest Quarter of said Section, Township and Range which is owned by the Respondents in said cause and that such boundary line shall be fixed in such decree as beginning at a concrete marker which is located at the Northwest corner of said land owned by the Complainant and the Northeast corner of said land owned by the Respondents, and such line shall extend South 1299 feet to a concrete marker located at the Southwest corner of the land owned by the Complainant and the Southeast corner of the above described land which is owned by the Respondents, which said markers

are shown on a survey made by Claude W. Arnold on September 16, 1949, a copy of which survey is attached to and made a part of this stipulation.

4. That a copy of such decree when rendered by this Court shall be recorded in the Office of the Judge of Probate of Baldwin County, Alabama, and properly indexed therein, the cost of recording the same to be taxed as a part of the Court costs in this proceeding.

5. That the Respondents shall be taxed with the costs of this proceeding, for which execution may issue.

That the Complainant and the Respondents, acting by and through their respective solicitors of record, have executed this instrument on this the 22nd day of May, 1955.

ADELINE PEARSON,

By:

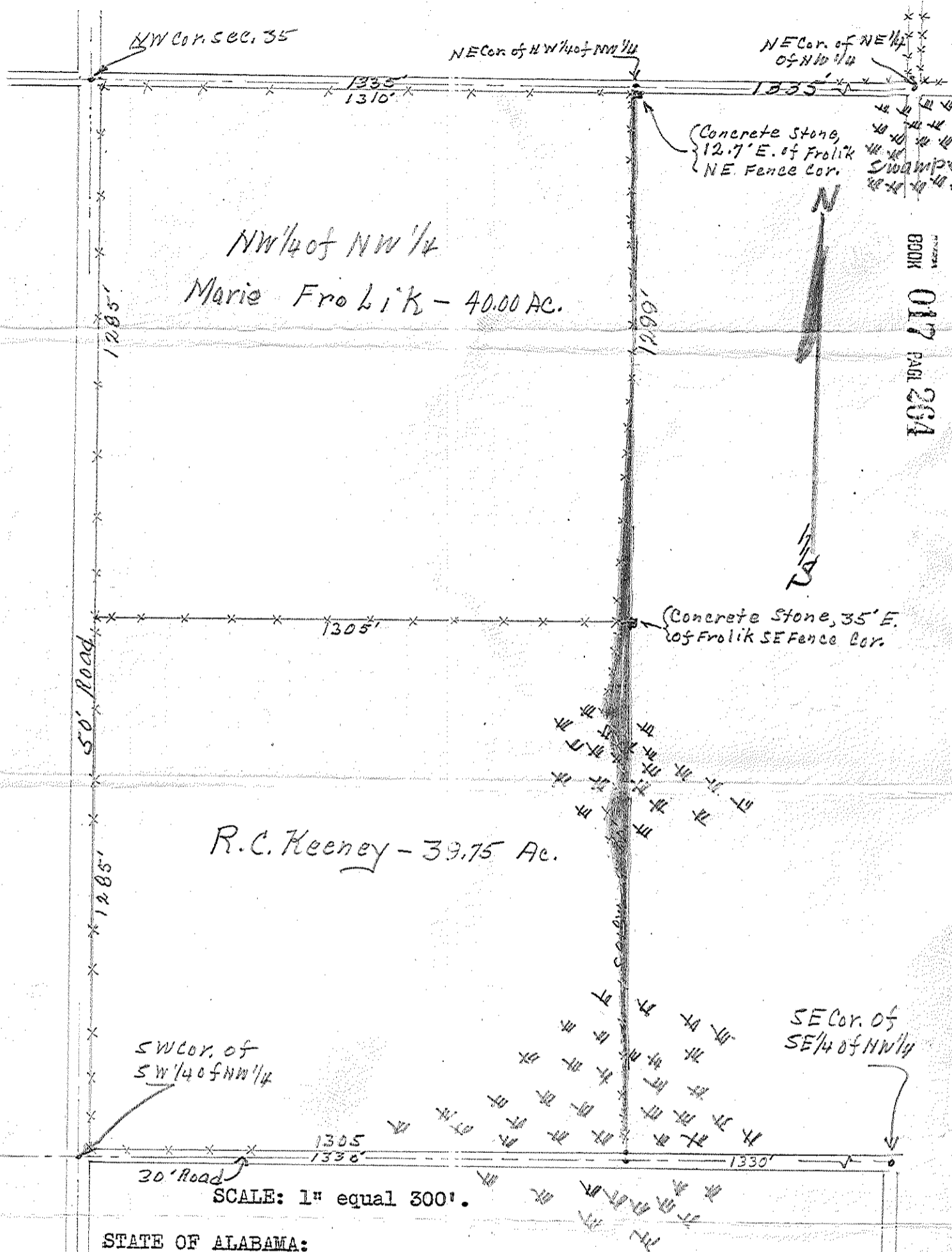
J. B. Blackburn
As Her Solicitor of Record.

JOSEPH FROLIK, MARIE
FROLIK and ANN KRAL,

By:

Sharon Stone
As Their Solicitors of Record.

SURVEY OF W $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec. 35, T. 23E.



BOOK 017 PAGE 264

STATE OF ALABAMA:
BALDWIN COUNTY:

I hereby certify that on August 13th, and on Sept. 15th, 1949, I surveyed the SW $\frac{1}{4}$ of the NW $\frac{1}{4}$, and the NW $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Sec. 35, T5S, R3E, respectively, in Baldwin County, Alabama, and that upon making such surveys found that C. O. Pearson had encroached upon said lands, approximately as shown in red shading upon the attached plat; and that the above plat is a true and correct plat of my said surveys. The location of the section and $\frac{1}{4}$ section corners was assumed to be in the center of the roadway into sections as shown; this survey is subject to minor changes upon proof of the corner locations by application of U.S. Government Survey Field Note references.

Witness my hand, this the 16th day of September, 1949

Claude W. Arnold
Land Surveyor, Ala. Reg. No. 1276.

ADELINE PEARSON,
Complainant,

VS.

JOSEPH FROLIK, MARIE FROLIK,
and ANN KRAL,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY. NO. 2375.

ANSWER TO CROSS-BILL

Now comes the Complainant and Cross-Respondent in the above styled cause, and in answer to the Cross-Bill filed by the Respondents and the Cross-Complainants, says:

She denies each and every allegation contained in the Cross-Bill and demands strict proof thereof. She says that the true facts of the case are the facts contained in the original Bill of Complaint.

FILED

Dec. 21 1949

ALICE J. DUCK, Clerk

J. B. Blanton

Solicitor for Complainant and
Cross-Respondents.

ADELINE PEARSON,	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS.	Ø	IN EQUITY
JOSEPH FROLIK, MARIE FROLIK, and ANN KRAL.	Ø	NO. 2375
RESPONDENTS	Ø	

Now comes the Respondents, separately and severally, and for answer to the Complainant's bill of complaint, and each paragraph thereof, and allegations therein, therein say:

1. They admit the allegations contained in paragraph one.
2. They no nothing about the allegation that the Complainant owns the East half of Northwest quarter of Section 35, Township 5 South, Range 3 East, in Baldwin County, Alabama, and therefore demands strict proof; they deny the allegation that the Complainant has had her tract of land included, being fenced for more than forty years and demand strict proof of the same.
3. They deny the allegation contained in paragraph three and demand strict proof of the same.
4. They deny the allegation contained in paragraph four and demand strict proof of the same.
5. The Respondent for further answer to the Complainant's bill of complaint says, that the Respondents or some of them built a fence near the East line of the property belonging to the Respondent; that the said fence on the Respondents line was moved from time to time as the Respondents or those through whom they claim needed additional lands; that they have never recognized the Complainant as being the owner of the land immediately East of their said fence; that their land extends to the East line of the Northwest quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East; that the Complainant has never been in the adverse possession of any part of the said Northwest quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East; that they have never recognized the fence near the East line of the Northwest quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East, as being the dividing line between the property of the Complainant and the Respondents.

6. That the Complainant Adeline Pearson and the Respondent Marie Frolik are coterminous owners; that the Respondent owns the Northeast quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East, and the Respondent Marie Frolik owns the Northwest quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East.

7. That the dividing line between the properties of the Complainant and that of the Respondent Marie Frolik, is the line dividing the said Northeast quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East, and the Northwest quarter of Northwest quarter of Section 35, Township 5 South, Range 3 East.

WHEREFORE the premises considered, the Respondents pray that the said Adeline Pearson be made party cross-respondent to this cause of action, and by appropriate process required to come into court and to plead, answer or demur to the Respondents' cross-bill, within the time and under the penalties of law and the practice of this Honorable Court.

The Respondents further pray that upon a final hearing hereof this Honorable Court will make and enter a decree ascertaining and determining the true dividing line between the property of the Complainant and the Respondent Marie Frolik, as herein set out; that the Respondents be awarded such other, further, different or general relief as they may be in equity and good conscience entitled to receive.

FILED

Nov. 22 1949

ALICE J. DUCK, Clerk

[Signature]

Solicitor for the Respondents.

RECORDED

ADELINE PEARSON

COMPLAINANT

VS.

JOSEPH FROLIK, MARIE
FROLIK, and ANN KRAL.

RESPONDENTS

NO. 2375

FILED

NOV 22 1949

ALICE J. DUCK, Clerk

ADELINE PEARSON,

VS.

Complainant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

JOSEPH FROLIK, also known as
Joseph Frolich; MARIE FROLIK,
also known as Marie Frolich,
and ANN KRAL,

IN EQUITY.

Respondents.

WRIT OF INJUNCTION

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

We command you that without delay you execute this
Writ and due return thereof make to us instanter.

TO JOSEPH FROLIK, also known as Joseph Frolich, MARIE FROLIK, also
known as Marie Frolich, and ANN KRAL:

WHEREAS, Adeline Pearson has filed her Bill of Com-
plaint in the Circuit Court of Baldwin County, Alabama, in Equity,
and has obtained from the Honorable Telfair J. Mashburn, Jr., Judge
of the said Court, an order for the issuance of an injunction to
restrain and enjoin you, as hereinafter mentioned; and,

WHEREAS, the said Adeline Pearson has, in accordance
with the said order, entered into bond with security in the sum of
\$ 250.00, payable to and approved by the Register of the said
Court and conditioned according to law:

NOW, THEREFORE, you, the said Joseph Frolik, also
known as Joseph Frolich, Marie Frolik, also known as Marie Frolich,
and Ann Kral, your agents, servants and employees, are hereby com-
manded and strictly enjoined from trespassing on any part of the
property described in the Bill of Complaint filed in this cause
which lies East of the fence, which bounds the West line of the
property belonging to the Complainant, Adeline Pearson, as described
in the said Bill of Complaint; from cutting timber on the said property;
from interfering with the timber cut-
ting operations of the said Complainant, Adeline Pearson, her agents,
servants and employees; from interfering with the land clearing op-
erations of the said Complainant, Adeline Pearson, her agents, ser-
vants and employees, or from hindering her said operations on the
said property in any way or manner.

IN WITNESS WHEREOF, I have hereunto set my hand and
affixed the seal of the said Circuit Court, in Equity, on this the
21st day of October, 1949.

Wm. J. Smith
Register.

INJUNCTION BOND

STATE OF ALABAMA A
BALDWIN COUNTY A

KNOW ALL MEN BY THESE PRESENTS: That we, Adeline Pearson, as Principal, and the undersigned as sureties, are held and firmly bound unto Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, in Equity, in the sum of \$250.00, for the payment of which to the said Register or her successors we bind ourselves, our executors and administrators, jointly and severally.

Sealed with our seals and dated the 21st day of October, 1949.

WHEREAS, the said Adeline Pearson has filed her Bill of Complaint in the said Circuit Court in Equity and has obtained thereon an order for the issuance of a preliminary injunction from the Honorable Telfair J. Mashburn, Jr., Judge, to restrain and enjoin Joseph Frolik, also known as Joseph Frolich; Marie Frolik, also known as Marie Frolich, and Ann Kral, their agents, servants and employees from trespassing on any part of the property described in the Bill of Complaint filed in this cause which lies East of the fence, which bounds the West line of the property belonging to the Complainant, Adeline Pearson, as described in the said Bill of Complaint; from cutting timber on the said property; from interfering with the timber cutting operations of the said Complainant, Adeline Pearson, her agents, servants and employees; from interfering with the land clearing operations of the said Complainant, Adeline Pearson, her agents, servants and employees, or from hindering her said operations on the said property in any way or manner.

NOW, THEREFORE, the condition of the above obligation is such that if the said Adeline Pearson, her heirs, executors or administrators shall pay or cause to be paid all damages which any person may sustain by the suing out of the said injunction, if the same is dissolved by the Circuit Court of Baldwin County, Alabama, in Equity, on the Bill filed by the said Adeline Pearson, as afore-

said, then the said obligation to be void; otherwise, to remain in full force and effect.

WITNESS our hands and seals on this the day and year first above written.

Adeline Pearson. (SEAL)

Charley Pearson (SEAL)

Earl Childress (SEAL)

Taken and approved on this the
21st day of October, 1949.

Alice J. Neusch.

Register.

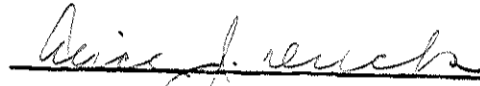
STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JOSEPH FROLIK, also known as Joseph Frolich, MARIE FROLIK, also known as Marie Frolich, and ANN KRAL to appear within thirty days from the service of this writ in the Circuit Court to be held for said County, Equity Side, at the place of holding same, then and there to answer the Bill of Complaint filed by ADELINE PEARSON.

WITNESS my hand this 21st day of October, 1949.



Register.

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

Your Oratrix, Adeline Pearson, presents this Bill of Complaint against Joseph Frolik, also known as Joseph Frolich, Marie Frolik, also known as Marie Frolich, and Ann Kral and, thereupon, your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix and the Respondents are each over twenty-one years of age and residents of Baldwin County, Alabama.
2. Your Oratrix owns the East Half of the Northwest Quarter of Section 35, Township 5 South, Range 3 East in Baldwin County, Alabama, which property has been under fence, in possession and under the control of your Oratrix and those through whom she claims title for more than forty years next preceding the filing of this Bill of Complaint. The Respondent, Marie Frolik, owns or owns an interest in the Northwest Quarter of the Northwest Quarter of Section 35, Township 5 South, Range 3 East in Baldwin County, Alabama, which property adjoins part of the above described property which belongs to your Oratrix. The two said tracts of land are separated by a fence which has enclosed the property of your Oratrix, as stated above, for more than forty years.
3. A few days prior to September 16, 1949 the Respondent, Joseph Frolik, also known as Joseph Frolich, a son of the Respondent, Marie Frolik, notified the husband of your Oratrix that he was claiming land inside of the enclosure of your Oratrix and East of the above described fence. On or about September 16, 1949 your Oratrix gave the Respondent, Joseph Frolik, also known as Joseph Frolich, notice by letter, a copy of which is hereto attached, marked "Exhibit A", and by reference made a part hereof as though fully incorporated herein, not to trespass on any property belonging to your Oratrix and inside of the said fence of your Oratrix. The said letter was sent to the said Respondent by registered mail. Subsequent to the mailing of the said written notice to the said Respondent, he notified the husband of your Oratrix not to cut timber inside or East of the above described fence, even though at that time your Oratrix, acting through her agents, servants and employees

was in the process of clearing part of the said lands which are owned by her, in order that they can be put into cultivation. Your Oratrix proceeded with her land clearing operations until on or about Sunday, October 16, 1949, when the Respondent, Joseph Frolik, also known as Joseph Frolich, together with other persons who are unknown to your Oratrix and whom your Oratrix alleges on information and belief to be the agents, servants and employees of the Respondent, Marie Frolik, went inside of the fence of your Oratrix and on the East side thereof on lands which are owned by your Oratrix and which have been under fence, as stated above, for more than forty years, and erected a fence consisting of wooden posts and two or three strands of barb wire. This fence is approximately 12 to 15 feet East of the fence of your Oratrix at the Northwest corner of her property and approximately 30 feet East of the fence of your Oratrix at the Northwest corner of the Southeast Quarter of the said Section 35. There is situated between the fence of your Oratrix and the said fence that was built by the Respondents a number of pine trees which are the property of your Oratrix. The land on which the said trees are located is low and, as hereinabove alleged, your Oratrix is in the process of clearing her said property for the purpose of putting it into cultivation and due to the character of the said land and the fact that it is low or wet land, if her clearing operations cannot be completed while the land is dry, as it is at this time, her clearing operations will be delayed for many months, or possibly a year, before the clearing can be completed. Your Oratrix alleges that the Respondents have threatened to cut and remove the timber between the fence of your Oratrix, which bounds the West side of her property, and the fence erected by the Respondents at the time and in the location as alleged above.

4. Your Oratrix further alleges that if the fence along the West side of her property, as described above, and between the property owned by your Oratrix and that which is owned by the Respondents, or in which they are interested, is not located on the West line of the East Half of the Northwest Quarter of the said Section 35, Township 5 South, Range 3 East in Baldwin County, Alabama,

she and those through whom she claims title to the said property have been in actual possession of all of the said property up to the said fence for more than forty years, during all of which time they have claimed to own the said property up to the said fence. No claim to any property inside or East of the said fence has been made by the Respondents' predecessors in title or by the Respondents up to a few days prior to September 16, 1949 and until the said date the said fence has been recognized by the owners of the said property as being the dividing line between the Northeast Quarter of the Northwest Quarter of the said Section 35, which is owned by your Oratrix, and the Northwest Quarter of the Northwest Quarter of the said Section 35, which is owned by the Respondents, or in which they own an interest.

Your Oratrix alleges that the Respondent, Joseph Frolik, also known as Joseph Frolich, has interfered with the parties cutting timber on the above described property of your Oratrix and has advised the husband of your Oratrix that he will use the said property in the future as he sees fit and will cut and remove the timber therefrom.

The Respondent, Ann Kral, also notified the parties whowere cutting wood and timber off the said property not to cut any wood or timber off the land which is located between where the two above described fences are now located.

In addition to the written notice that was given to the Respondent, Joseph Frolik, also known as Joseph Frolich, as alleged in this Bill of Complaint, "No Trespass" signs were posted along the West side of the property belonging to your Oratrix prior to the time and at the time that the various trespasses complained of herein were committed. These signs have all, or practically all, been torn down within the past week or ten days.

PRAYER FOR PROCESS


Your Oratrix prays that the usual process of this Honorable Court will forthwith issue to the Respondents, requiring them to appear and plead, answer or demur to this Bill of Complaint within

the time and under the penalties prescribed by law.

PRAYER FOR RELIEF

Your Oratrix prays for the following separate and several relief:

1. That this Court will, on presentation of this Bill of Complaint, by fiat endorsed thereon, issue or order the issuance of a temporary injunction or restraining order, restraining and enjoining the Respondents, Joseph Frolik, also known as Joseph Frolich, Marie Frolik, also known as Marie Frolich, and Ann Kral, their agents, servants and employees, from trespassing on any part of the property described in this Bill of Complaint filed in this cause which lies East of the fence, which bounds the West line of the property belonging to your Oratrix; from cutting timber on the said property; from interfering with the timber cutting operations of your Oratrix, Adeline Pearson, her agents, servants and employees; from interfering with the land clearing operations of your Oratrix, Adeline Pearson, her agents, servants and employees, or from hindering her said operations on the said property in any way or manner.
2. That on a final hearing of this cause the injunction prayed for in Paragraph Numbered 1 of this Prayer for Relief be made permanent and that this Court will, by a proper decree, adjudge that the said Respondents have no title to or interest in any property East of the fence that has separated the lands owned by your Oratrix and that which the Respondents own or in which they are interested.
3. Your Oratrix further prays for such other, further and general relief as she may be equitably entitled to, the premises considered.


Solicitor for Oratrix.

STATE OF ALABAMA }
 }
BALDWIN COUNTY }

Before me, the undersigned authority, within and for said County in said State, personally appeared Adeline Pearson, who, after being by me first duly and legally sworn, deposes and says: That she is the Complainant named in the foregoing Bill of Complaint; that she has read over the said Bill of Complaint and that the facts stated therein are true.

Adeline Pearson

Sworn to and subscribed before me on
this the 21st day of October, 1949.

Mary Lou Blackburn

Notary Public, Baldwin County, Alabama.

EXHIBIT A

Silverhill, Alabama
September 16, 1949

Mr. Joseph Frolich
Loxley, Alabama

Gentlemen:

I own the East Half of the Northwest Quarter of Section 35, Township 5 South, Range 3 East in Baldwin County, Alabama and have owned this tract of land for more than forty years. The fence along the West side of the property has been at its present location for more than forty years and during all of this period of time I have claimed the land up to the fence.

You have advised me that you are now claiming lands inside or East of my fence, which is the first claim that has been made to any property East or inside of my fence for more than forty years.

You, of course, know that I am in possession of all property inside of my fence and you are hereby notified not to trespass on the property. If you trespass on any property inside of my fence, I will immediately prosecute you for trespass after warning and take such other action as I consider proper.

Very truly yours,

(Signed) ADELINE PEARSON.

STATE OF ALABAMA

BALDWIN COUNTY

TO ALICE J. DUCK, REGISTER OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA:

Upon Complainant, Adeline Pearson, entering into bond with requisite sureties in the sum of \$250⁰⁰~~xx~~, payable to and approved by you, conditioned according to law, let a preliminary injunction issue according to the Prayer of the foregoing Bill of Complaint.

Done on this the 21st day of October, 1949.

J. Fair J. Mashburn
Judge.