

The State of Alabama,
Baldwin County.

No. CIRCUIT COURT, IN EQUITY.

Gulf Land Co., a Corp.

Complainant

Vs.

Blanche Reed Kaufman et al

Defendants

Motion is hereby made for a Decree Pro Confesso against

Blanche Reed Kaufman Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant, and that said summons was duly served by Registered Mail, according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 14 day of January, 1952

W.C. Beck, Solicitor.

No. Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT, IN EQUITY

Vs.

MOTION FOR DECREE PRO CONFESSO
AFTER NOTICE BY REGISTERED MAIL

Filed 1-14, 1952

W. J. L. L. L.
Register.

Recorded in Record,

Vol. Page

Register.

GULF LAND COMPANY,
a corporation,
COMPLAINANT,

VS

BLANCHE REED KAUFMAN,
NITA HURST STEPHENS and
HELEN HURST STAMPS,
DEFENDANTS.

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

This cause coming on to be heard is submitted for final decree upon the bill of complaint, decree pro confesso against Blanche Reed Kaufman, and agreement between the complainant and defendants, Nita Hurst Stephens and Helen Hurst Stamps for consent decree; and the same being considered by the court, the court is of the opinion that the complainant is entitled to the relief prayed for in its bill of complaint, the complainant having paid into this court the amount agreed as the taxes, interest and costs to which the defendants are entitled;

NOW THEREFORE, it is ordered, adjudged and decreed that the defendants, Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps, have no right, title, claim or interest in or encumbrance upon the following described lands, or any part thereof, situated in Baldwin County, Alabama, to-wit:

Dot 5 as shown on a Plat recorded in Book 11 NS, page 83 in the office of the Judge of Probate of Baldwin County, Alabama; being in Section 5, Township 9 South, Range 3 East.

It is further ordered, adjudged and decreed that the title to the said lands and each and every part and parcel thereof be, and the same is hereby quieted and established in Gulf Land Company, a corporation, as and against the said defendants, Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps;

It is further ordered, adjudged and decreed that the money paid in the court by the complainant is owned, one third by each of the defendants, and the register of this court be, and she is hereby ordered to remit one third thereof, namely \$25.00, to each of the said defendants, Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps;

It is further ordered, adjudged and decreed that the complainant pay the costs in this proceeding, for which let execution issue.

Done this May 21st, 1952.

J. J. Massey, Jr.
Judge

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon Blanche Reed Kaufman, whose address is Minot, North Dakota, Nita Hurst Stephens, whose address is 4 Idlewild Court, Montgomery, Alabama, and Helen Hurst Stamps, whose address is 2187 Clairmont Road, Decatur, Georgia, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction, within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a bill of complaint lately exhibited by Gulf Land Company, against the said Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps and further to do and perform what said Judge shall order and direct in that behalf, and this the defendant shall in no wise omit, under penalty of the law; and we further command that you return this writ with your endorsement thereof, to our said court immediately upon the execution thereof.

WITNESS, Alice J. Duck, Register of said Circuit Court, this the 10th day of October, 1951.

Alice J. Duck
Register.

GULF LAND COMPANY, A
CORPORATION,
COMPLAINANT

VS

BLANCHE REED KAUFMAN,
NITA HURST STEPHENS AND
HELEN HURST STAMPS,
DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Comes GULF LAND COMPANY, a corporation, and humbly
complaining against Blanche Reed Kaufman, Nita Hurst
Stephens and Helen Hurst Stamps, respectfully shows unto
your Honor as follows:

FIRST: That your complainant is a corporation organized and doing business in the State of Alabama, with its principal place of business at Mobile, Alabama at 814 Annex First National Bank Building; that the defendants are each over the age of twenty-one years and whose post-office

addresses are as follows: Blanche Reed Kaufman, Minot, North Dakota; Nita Hurst Stephens, 4 Idlewild Court, Montgomery, Alabama; Helen Hurst Stamps, 2187 Clairmont Road, Decatur, Georgia.

SECOND: That the complainant is the owner of and in the peaceable possession of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

Lot 5 as shown on a Plat recorded in Book 11 NS, page 83 in the office of the Judge of Probate of Baldwin County, Alabama; being in Section 5, Township 9 South, Range 3 East.

THIRD: That the said Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps claim or are reputed to claim some right, title or interest in, or encumbrance upon the above described lands, or some part thereof, and the complainant calls upon them to set forth and specify their right, title, claim, interest in or encumbrance upon the said lands, or any part thereof, and to show how and by what instrument or instruments the same is derived or created.

FOURTH: That there is no suit pending to enforce or test the validity of the complainant's title to the said lands, or to enforce or test the validity of the defendants' right, title, claim, interest in or encumbrance upon the said lands, or any part thereof.

FIFTH: The complainant further says that it is informed and believes and upon such information and belief alleges that the said defendants claim a right, title, claim or interest in or encumbrance upon the aforesaid lands, or some portion thereof, by virtue of a tax deed issued to

Ralph E. Hurst by the State of Alabama November 22, 1938, recorded in the office of the Judge of Probate of Baldwin County, Alabama in Deed Book 67 NS, page 349-50; that said deed purports to have been executed under a sale of the said lands May 30, 1927, under an assessment against one Mrs. Pearl Bill, and this complainant alleges that at the time of the said sale George C. Meyer, through whom this complainant holds title to the said lands, was the owner of the said lands and in possession of the same; and that the said George C. Meyer held title to the said lands at the time of the said sale through a conveyance from the said Pearl Bill to one Carl T. Martin, by deed dated June 14, 1926, who conveyed the said property to George C. Meyer December 22, 1926, and that the said George C. Meyer subsequently conveyed the said land to this complainant; that at the time of the aforesaid sale the said George C. Meyer, through whom this complainant holds title, was the owner of the said lands and in possession of the same; that the said defendant, Blanche Reed Kaufman is the widow of the said Ralph E. Hurst, that the said defendants, Nita Hurst Stephens and Helen Hurst Stamps are the children of the said Ralph E. Hurst, that the said Ralph E. Hurst is deceased, and that the said named defendants are the heirs and all of the heirs of the said named Ralph E. Hurst, deceased; that your complainant and those through whom it claims were the owners of the said lands and in possession thereof at the time of the sale to the State of Alabama, and at the time of the sale of the same by the State of Alabama to the said Ralph E. Hurst, and it and those through whom it claims have been in continuous possession of the

said lands from the date of the aforesaid deed from Pearl Bill to the said Carl T. Martin, and your complainant is now in possession of the said lands and each and every part and parcel of the same and is the owner thereof.

SIXTH: Complainant further says that it is informed ~~and believes~~ and upon such information and belief alleges that the said tax title of the said Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps is void.

WHEREFORE, your complainant prays this Honorable Court take jurisdiction of the cause made by this bill of complaint and make the said Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps parties defendant hereto and by appropriate process require them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of ~~this cause this Honorable Court will make and enter an~~ order and decree adjudging and decreeing that the said defendants, Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps, have no right, title, claim, interest in or encumbrance upon the said lands, or any part thereof, and that the title to the said lands be quieted and established in this complainant as against the said defendants; and that the said defendants be forever enjoined from asserting or attempting to assert, or from claiming or attempting to claim any right, title or interest in, or encumbrance upon, the said lands, or any part thereof.

~~Complainant further prays that if it shall be mistaken~~ in the relief prayed for, that this Honorable Court will ascertain the amount of taxes and costs for which the said lands were sold, and interest thereon, and the taxes and

interest thereon subsequent to the said sale, and that this complainant be permitted to redeem the said lands from the aforesaid tax sale; and this complainant prays for such other, further or different relief as in equity it shall be entitled to receive in the premises.

W C Beebe
Solicitor for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned Notary Public in and for said State and County, this day personally appeared W. C. Beebe, who is known to me and who being by me duly sworn deposes and says that he is solicitor for Gulf Land Company, a corporation, in that certain suit pending in the Circuit Court of Baldwin County, Alabama wherein the Gulf Land Company is the complainant and Blanche Reed Kaufman, Nita Hurst Stephens and Helen Hurst Stamps are defendants, that each of the said named defendants are over the age of twenty-one years and that Blanche Reed Kaufman and Helen Hurst Stamps are non-residents of the state of Alabama, Blanche Reed Kaufman residing at Minot, North Dakota and Helen Hurst Stamps residing at 2187 Clairmont Road, Decatur, Georgia.

W C Beebe

Sworn to and subscribed before me this the 10th day of October, 1951.

Madeline S. Bryson
Notary Public, Baldwin Co., Ala.

Gulf Land Company, a corporation

vs.

Blanche Reed Kaufman, Nita Hurst

Stephens and Helen Hurst Stamps,

Defendants

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
service on parties, decree pro confesso against Blanche Reed Kaufman,
agreement of defendants Nita Hurst Stephens and Helen Hurst Stamps

and in behalf of Defendant upon agreement for consent decree.

Alice J. Hurst

Wesley B. Baker Register.

No. 2731

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 20th

day of May, 1945

Arice L. Leach

Register.

GULF LAND COMPANY, A
CORPORATION,

COMPLAINANT

VS

BLANCHE REED KAUFMAN,
NITA HURST STEPHENS AND
HELEN HURST STAMPS,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

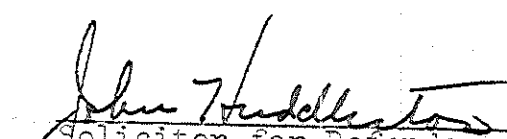
IN EQUITY

The complainant being in actual possession of the property described in the bill of complaint, the defendants interest being through a tax title, the complainant is entitled to redeem upon the payment of the amount of taxes, interest and costs; it is agreed between the parties that the taxes, interest and costs to which the defendants would be entitled is \$75.00.

It is agreed between the parties that upon the payment in the court by the complaint of the sum of \$75.00, that the court enter a decree quieting title in the complainant against the defendants and taxing the complainant with the costs of this proceeding.

The money paid into court shall be distributed, one-third to each of the defendants.

Witness this the 15 day of May, 1952.


Solicitor for Defendants


Solicitor for Complaint

RECEIPT FOR REGISTERED ARTICLE No. 334

Fee paid 25

10/11, 1951
(Date)

Class postage paid 1

Return receipt fee 05

Declared value, \$ Papers

Special delivery fee

Surcharge paid, \$

Restricted delivery
(Accepting employee will place initials in proper space)

in person 20

or order

Fee paid

From Alice J. Duck ALA
(Sender)

Bm ala
(Street and number)

Addressed to Blanche Reed Kaufman (Post office and State)

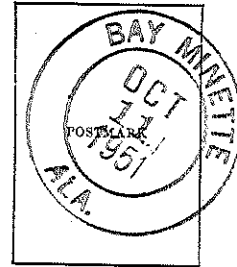
Murphy Trust Station (Addressee)

ALA (Street and number)

GPO c9-16-12666-5

(Post office and State)

Postmaster, per 75



RECEIPT FOR REGISTERED ARTICLE No. 335

Fee paid 25

10/11, 1951
(Date)

Class postage paid 1

Return receipt fee 05

Declared value, \$ Papers

Special delivery fee

Surcharge paid, \$

Restricted delivery
(Accepting employee will place initials in proper space)

in person 20

or order

Fee paid

From Alice J. Duck ALA
(Sender)

Bm ala
(Street and number)

Addressed to Blanche Reed Kaufman (Post office and State)

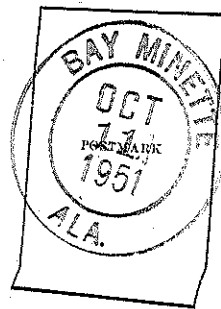
5187 (Addressee)

Charmont Rd. Beaton, Ga (Street and number)

GPO c9-16-12666-5

(Post office and State)

Postmaster, per 75



RECEIPT FOR REGISTERED ARTICLE No.

334

Fee paid 25

(Date)

10/11/57

Class postage paid 1

Return receipt fee 05

Declared value, \$ Papers

Special delivery fee

Surcharge paid, \$

Restricted delivery
(Accepting employee will place initials in proper space)

in person 20

or order

Fee paid

From Alice J. Duck

(Sender)

(Street and number)

Addressed to Blanche Reed

(Post office and State)

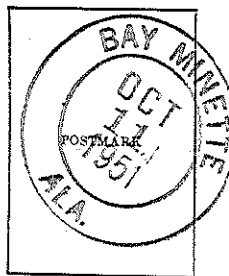
(Address)

(Street and number)

GPO c9-10-12000-5

(Post office and State)

Postmaster, per AK



RECEIPT FOR REGISTERED ARTICLE No.

335

Fee paid 25

(Date)

10/11/57

Class postage paid 1

Return receipt fee 05

Declared value, \$ Papers

Special delivery fee

Surcharge paid, \$

Restricted delivery
(Accepting employee will place initials in proper space)

in person 20

or order

Fee paid

From Alice J. Duck

(Street and number)

Addressed to Blanche Reed

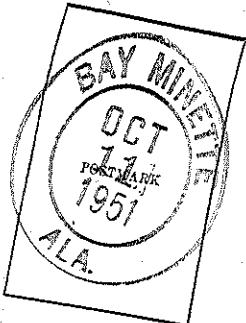
(Post office and State)

(Street and number)

GPO c9-10-12000-5

(Post office and State)

Postmaster, per AK



GULF LAND COMPANY,
a Corporation

COMPLAINANT

VS

BLANCHE REED KAUFMAN,
NITA HURST STEPHENS, and
HELEN HURST STAMPS

DEFENDANTS

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY

IN EQUITY

Case No. 2731

DEMURRER

Now come the respondents, Nita Hurst Stephens and Helen Hurst Stamps, by their solicitor and demur to the bill of complaint filed in the above-styled cause and to each and every paragraph therein and to each and every aspect thereof, separately and severally, and assign the following as grounds therefor:

1. There is no equity in the bill.
2. The complainant has an adequate remedy at law.
3. It affirmatively appears that the complainant is not

entitled to the relief prayed for therein.

4. The bill is multifarious.

CATES & HUDDLESTON

By

John Huddleston
John Huddleston, Solicitor for
Defendants, Nita Hurst Stephens
and Helen Hurst Stamps

Gulf Land Co., a corp.

Vs.

Blanche Reed Kaufman, Nita Hurst Stephens
and Helen Hurst Stamps**CIRCUIT COURT OF
Baldwin County.****IN EQUITY**

In this cause it being made to appear to the Register that on the eleventh
day of October, 1951, a copy of the Bill of Complaint filed in this cause was
sent to Blanche Reed Kaufman

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom
addressed," and return receipt demanded addressed to the Register of this Court; and that on the
22nd day of October, 1951, such receipt was duly
received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer
or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered,
adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things
taken as confessed against the said Blanche Reed Kaufman

Defendant

This the 14 day of January, 1951

Alice J. Henschel Register.

No. _____

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

In Equity.

Vs.

2731

DECREE PRO CONFESSO AFTER
NOTICE BY REGISTERED MAIL

Filed in office this 14th day of

June, 1944

Deputy Clerk Register

Entered in O. B. _____ Page _____