

NOTICE OF PENDENCY OF BILL OF COMPLAINT

155 MAR 1970

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

L. W. BRANNAN, JR., also known as
Louie W. Brannan,
Complainant,
VS.

LANDS HEREINAFTER DESCRIBED, and
PETER KRAUSS, ANNA KRAUSS, PETER
KRANSZ, BALDWIN LAND HOLDING COMPANY,
INC., a corporation, the officers,
directors and stockholders of Baldwin
Land Holding Company, Inc., a corpora-
tion, and BALDWIN COUNTY COLONIZATION
COMPANY, a corporation, the officers,
directors and stockholders of the
Baldwin County Colonization Company, a
corporation,
Respondents.

Notice is hereby given to Peter Krauss, Anna Krauss,
Peter Kransz, Baldwin Land Holding Company, Inc., a corporation,
the officers, directors and stockholders of the Baldwin Land Hold-
ing Company, Inc., a corporation, and Baldwin County Colonization
Company, a corporation, the officers, directors and stockholders of
the Baldwin County Colonization Company, a Corporation, and the
heirs and devisees of such of the said parties as may be dead, and
any and all persons, firms or corporations claiming any title to,
interest in, lien or encumbrance on the lands hereinafter described,

that on the 6th day of July, 1950, the said Complainant, L. W.

Brannan, Jr., who is also known as Louie W. Brannan, filed in the
Circuit Court of Baldwin County, Alabama, Equity Side, a verified
Bill of Complaint against the following described lands situated in
Baldwin County, Alabama, to-wit:

Southwest Quarter (SW $\frac{1}{4}$) of the Northeast Quarter
(NE $\frac{1}{4}$), Section Thirteen (13), Township Seven
(7) South, of Range Five (5) East, Baldwin
County, Alabama,

and against Peter Krauss, Anna Krauss, Peter Kransz, Baldwin Land
Holding Company, Inc., a corporation, the officers, directors and
stockholders of the Baldwin Land Holding Company, Inc., a corpora-
tion, and the Baldwin County Colonization Company, a Corporation,
the officers, directors and stockholders of the Baldwin County

Colonization, a Corporation, and the heirs and devisees of such of

155 MA 108
BOOK

the said parties as may be dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, the said Bill of Complaint having been filed for the purpose of establishing the title of the said Complainant to all of the said lands for the purpose of quieting his title thereto, and to clear up all doubts and disputes concerning his title to the said property.

The Complainant claims the absolute fee simple title in and to all of the said lands under, by and through the following conveyances, all of which are recorded in the office of the Probate Judge of Baldwin County, Alabama, the County where the lands are situated, to-wit:

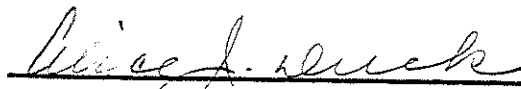
- A. Patent from United States to State of Alabama, dated September 10, 1869, and recorded in Deed Book 5, at page 219.
- B. Deed from State of Alabama, to Robert F. Queal, O. H. Queal and S. K. Scott, dated February 20, 1872, and recorded in Deed Book "J", Page 434.
- C. Tax Deed from the State of Alabama to J. A. Pilgrim, dated April 6, 1938, and recorded in Deed Book 65, Page 104.
- D. Deed from J. A. Pilgrim and Mary E. Pilgrim, his wife, to Louie W. Brannan, dated July 23, 1940, and recorded in Deed Book 76, Page 426.

The Complainant, in and by his said Bill of Complaint, alleges and avers that he owns the said lands in his own right, absolutely and in fee simple; that he is in the actual peaceable possession of all of the said lands; that title to the said lands stands upon the records of Baldwin County, Alabama, the County where the lands are situated, in the name of the Complainant; that no suit is pending to test Complainant's title to, interest in, or right to possession of the said lands, or any part thereof; that no persons, firms or corporations, other than the Complainant, and those through whom he claims title, are known to the Complainant to have had any possession of the said lands, or any part thereof, within ten years next prior to the filing of the said Bill of Complaint, that no persons, firms or corporations, other than the Complainant and those through whom he claims title, are known to

the Complainant to have paid any taxes on the said lands, or any part thereof, or any interest therein, within ten years next prior to the filing of the said Bill of Complaint; and that the Complainant together with those through whom he claims title to the said lands, have held color of title thereto, and have been in the actual, peaceable, continuous and undisputed possession of all of the said property for more than ten years next preceding the filing of this Bill of Complaint.

The said parties named above and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, must appear in this Court and plead, answer or demur to the said Bill of Complaint before the 5th day of September, 1950, or on the said date Decrees Pro Confesso will be taken against them, testimony will be thereafter taken and the said cause submitted for a final decree quieting Complainant's title to the said lands.

IN WITNESS WHEREOF, I have hereunto set my hand, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, and affixed the seal of the said Court on this the 6th day of July, 1950.




Register of the Circuit Court of Baldwin County, Alabama, in Equity.

J. B. BLACKBURN,
Solicitor for Complainant.

STATE OF ALABAMA, BALDWIN COUNTY

Filed 7-7-50.....1 P.M.

Recordedbook.....page.....


Judge of Probate

directors and stockholders of the Baldwin County Colonization Company, a Corporation, and the heirs and devisees of such of the said parties as may be dead, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the lands hereinafter described, that on the 6th day of July, 1950, the said Complainant, L. W. Brannan, Jr., who is also known as Louie W. Brannan, filed in the Circuit Court of Baldwin County, Alabama, Equity Side, a verified Bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

Southwest Quarter (SW 1/4) of the Northeast Quarter (NE 1/4), Section Thirteen (13), Township Seven (7) South, of Range Five (5) East, Baldwin County, Alabama,

and against Peter Krauss, Anna Krauss, Peter Krausz, Baldwin Land Holding Company, Inc., a Corporation, the officers, directors and stockholders of the Baldwin Land Holding Company, Inc., a Corporation, and the Baldwin County Colonization Company, a Corporation, the officers, directors and stockholders of the Baldwin County Colonization Company, a Corporation, and the heirs and devisees of such of the said parties as may be dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any

Pilgrim, his wife, to Louie W. Brannan, dated July 23, 1940, and recorded in Deed Book 76, Page 426.

The Complainant, in and by his said Bill of Complaint, alleges and avers that he owns the said lands in his own right, absolutely and in fee simple; that he is in the actual peaceable possession of all of the said lands; that title to the said lands stands upon the records of Baldwin County, Alabama, the County where the lands are situated, in the name of the Complainant; that no suit is pending to test Complainant's title to, interest in, or right to possession of the said lands, or any part thereof; that no persons, firms or corporations, other than the Complainant, and those through whom he claims title, are known to the Complainant to have had any possession of the said lands, or any part thereof, within ten years next prior to the filing of the said Bill of Complaint; that no persons, firms or corporations, other than the Complainant and those through whom he claims title, are known to the Complainant to have paid any taxes on the said lands, or any part thereof, or any interest therein, within ten years next prior to the filing of the said Bill of Complaint; and that the Complainant together with those through whom he claims title to the said lands, have held color of title thereto, and have been in the actual, peaceable, continuous and undisputed possession of all of the said property for more than ten years next preceding the filing of this Bill of Complaint.

The said parties named above and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, must appear in this Court and plead, answer or demur to the said Bill of Complaint before the 5th day of September, 1950, or on the said date Decrees Pro Confesso will be taken against them, testimony will be thereafter taken and the said cause submitted for a final decree quieting Complainant's title to the said lands.

IN WITNESS WHEREOF, I have hereunto set my hand, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, and affixed the seal of the said Court on this 6th day of July, 1950.

ALICE J. DUCK, Register of the Circuit Court of Baldwin County, Alabama, in Equity.

J. B. BLACKBURN
Solicitor for Complainant.

23-4c.

JIMMY FAULKNER
EDITOR AND PUBLISHER

BALDWIN TIMES , ALABAMA

BEST NEWSPAPER

DAVIT OF PUBLICATION

Faulkner being duly sworn, deposes and says
ER of THE BALDWIN TIMES, a Weekly Newspaper published in Baldwin County, Alabama; that the notice hereto attached of

Brannan Jr. vs. Brannan
in Lands

COST STATEMENT

1012 WORDS @ $4\frac{1}{2}$ cents — — — \$ 45.54

I hereby certify this is correct, due and unpaid (paid).

Jimmy Faulkner
Publisher.

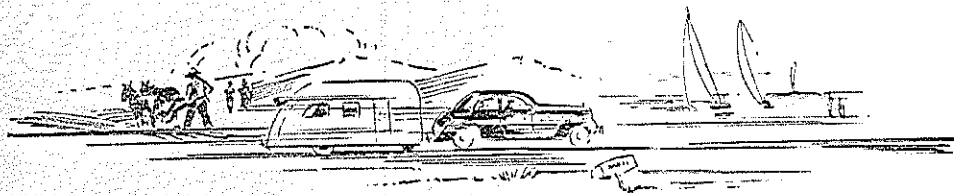
Was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication	<u>June 29</u>	19 <u>50</u>	Vol. <u>61</u>	No. <u>23</u>
Date of 2nd publication	<u>July 6</u>	19 <u>50</u>	Vol. <u>61</u>	No. <u>24</u>
Date of 3rd publication	<u>July 13</u>	19 <u>50</u>	Vol. <u>61</u>	No. <u>25</u>
Date of 4th publication	<u>July 20</u>	19 <u>50</u>	Vol. <u>61</u>	No. <u>26</u>

Subscribed and sworn before the undersigned this 20 day of July, 1950

Dorothy Martin
Notary Public, Baldwin County.

Publisher.



925
Testimony

L. W. BRANNAN, JR.,
also known as LOUIE W.
BRANNAN,

Complainant,

VS.

PETER KRAUSS, et al

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 2503.

TESTIMONY TAKEN IN ABOVE STYLED CAUSE ON FEBRUARY
15, 1951

APPEARED: For Complainant,

Hon. J. B. Blackburn

Mr. L. W. Brannan, Jr., having been first duly and legally
sworn, testified as follows:

ON DIRECT EXAMINATION

By Mr. Blackburn

Q. Are you Mr. L. W. Brannan, Jr?

A. Yes sir.

Q. You are the complainant in this suit?

A. Yes sir.

Q. Mr. Brannan, did you on or about the 6th of July, of last year,
file this suit to quiet title to the property described in the
complaint?

A. I did.

Q. Are you over twenty-one years of age and a resident of Baldwin
County, Alabama?

A. Yes sir.

Q. At the time this suit was filed, did the Baldwin Land Holding
Company have any person in its employ, or doing business for it,
in this State?

A. No sir.

Q. Did the Baldwin County Colonization Company have any person in its
employ, doing business for it in the State of Alabama?

A. Did not.

Q. At he time this suit was filed was Peter Krauss, Anna Krauss,
Peter Kranz, if living, over the age of twenty-one?

A. They were to the best of my knowledge.

Q. Before this suit was filed I will ask you, Mr. Brannan, had you

had an abstract made?

A. I did.

Q. Did you have it examined by an attorney?

A. I did.

Q. Did you make an investigation in the community where this land is located for the purpose of trying to determine who was making claim to it and the residences of the people who at one time owned it?

A. I did.

Q. Is the information that you located clearly set out in the Bill of Complaint?

A. It is to the best of my knowledge.

MR. BLACKBURN: We want to offer in evidence at this time certified copy of Patent from the United States to the State of Alabama, dated September 10, 1869, and recorded in Deed Book 5 at pages 219-22, Baldwin County Records, and ask that it be identified as Complainant's Exhibit "1".

(Instrument admitted in evidence, properly identified and is set out below)

Complainant's Exhibit "1"

"No. 1 T H E U N I T E D S T A T E S O F A M E R I C A
TO ALL TO WHOM THESE PRESENTS SHALL COME_Greeting.

Whereas by the Act of Congress approved September 28, 1850, entitled "An Act to enable the State of Arkansas and other States to reclaim the "Swamp Lands' within their limits",, it is provided that all the "Swamp and Overflowed Lands," made unfit thereby for cultivation within the State of Alabama, which remained unsold at the passage of said act, shall be granted to said State:

AND WHEREAS, in pursuance of instructions from the General Land Office of the United States, the several tracts or parcels of land hereinafter described have been selected as swamp and overflowed lands, inuring to said State under the act aforesaid being situated in the District of Lands subject to sale at Mobile, formerly at Elba, Alabama, to-wit:

Township One South of Range five East.

The East half of the north east quarter, and the east half of the south east quarter of Section six; all of fractional sections eight and twenty; and the east fractional half of section thirty; containing in all eight hundred and thirty four acres and thirty three hundredths of an acre.

Township two South of Range five East.

All of fractional section six; containing ninety-four acres and thirty eight hundredths of an acre.

Township three South of Range five East.

The southeast quarter of the south east quarter of section six; all of section twenty-two; all of fractional section twenty-six the north half of the north east quarter of section twenty-eight; (the south half of the south east quarter of section thirty four) the east fractional half,

the west half of the north west quarter and the south west quarter of section thirty-five; and all of fractional section thirty-six; containing all one thousand seven hundred and seventy eight acres and nineteen hundredths of an acre.

Township five south of Range five East.

The south west quarter and the east half of section one; the west half of the north east quarter, the east half of the north west quarter, the south east quarter, and the east half of the south west quarter of section two; the south west quarter of the north east quarter, the north west quarter, the north half of the south west quarter and the south west quarter of the south west quarter of section three; the south half of the north east quarter, and the south east quarter of section four; the west half of the north east quarter and the west half of section five; the south west quarter of the north east quarter; the north west quarter, the south east quarter and the north west quarter of the south west quarter of section six; the north east quarter and the north half of the south east quarter of section seven; the south west quarter of the north east quarter, the north west quarter, the north west quarter of the south east quarter, the south half of the south east quarter and the north half of the south west quarter of section eight; the east half of section nine; the south half of section ten; the north east quarter the east half of the north west quarter and the south half of section eleven; the south half of section twelve; all of sections thirteen and fourteen; the north east quarter of the north west quarter, the west half of the north west quarter, the south west quarter and the east half of section fifteen; the south half of section seventeen; the south west quarter of the north east quarter, and the south half of section eighteen; all of section nineteen; the north half, the west half of the south east quarter, the north east quarter of the south west quarter, and the south west quarter of the south west quarter of section twenty; the north east quarter, the north half of the north west quarter, the south east quarter of the north west quarter, the south west quarter of the south east quarter; and the north east quarter of the south west quarter of section twenty-one; the north west quarter of section twenty-two; the east half of the south west quarter, the south east quarter, and the north half of section twenty-three; all of section twenty-four; the north west quarter, the south east quarter, the east half of the south west quarter, and the north west quarter of the south west quarter of section twenty-five; the north east quarter, the west half of the South east quarter, the north east quarter of the south west quarter, and the south west quarter of the south west quarter of section twenty-six; the south east quarter of the north west quarter, the south east quarter, the north east quarter of the south west quarter, and the south west quarter of the south west quarter of section twenty-seven; the south east quarter of section twenty-eight; the west half of the north east quarter, the north west quarter, the northeast quarter of the south west quarter and the south west quarter of the south west quarter of section twenty-nine; the north east quarter, the north east quarter of the north west quarter, the north west quarter of the southeast quarter, and the south half of the south east quarter of section thirty; the south west quarter of the north east quarter, the south half of the north west quarter (the north west quarter of the south east quarter) and the south west quarter of section thirty one) the west half of the north east quarter, and the south east quarter of section thirty-three; all of section thirty-four; the north east quarter and the west half of section thirty-five; the east half, the south half of the north west quarter, and the north half of the south west quarter of section thirty six; containing in all thirteen thousand eight hundred and eleven acres and fifteen hundredths of an acre.

Township six South of Range five east.

The south west quarter, and the east half of section one; the south

half of section two; the north west quarter, and the south half of the south east quarter of section three; all of section four; the south west quarter of the north east quarter; the north half of the northwest quarter; and the south half of section six, the west half of the north west quarter, and the south west quarter of section seven; the north west quarter of the southeast quarter and the south west quarter of section eight; the south west quarter of section nine; the north half of the north east quarter, the south west quarter of the north east quarter, and the east half of the south east quarter of section ten; the north west quarter of the north east quarter, the south half of the north east quarter, the north west quarter of the south west quarter, and the south half of the south west quarter of section eleven; the east half and the west half of the north-west quarter of section twelve; the north west quarter of the south east quarter, the south half of the south east quarter the north east quarter of the south west quarter, and the south half of the south west quarter of section thirteen; the west half of the north east quarter, the east half of the north west quarter, the south west quarter of the north west quarter, the west half of the south east quarter and the east half of the south west quarter of section fourteen; the south half of the north east quarter, and the north half of the south east quarter of section fifteen (the south west quarter of the north east quarter, the south east quarter, and the west half of section seventeen) all of sections eighteen, nineteen, and twenty; the west half of the north east quarter, the south east quarter, and the west half of section twenty-one; the south west quarter of section twenty-two; the west half of the north east quarter, the south east quarter of the north east quarter, the north half of the south east quarter, and the north east quarter of the south west quarter of section twenty-three; all of sections twenty four and twenty-five; the south half of the north east quarter, and the south half of section twenty-six; the south east quarter, and the west half of section twenty-seven; all of sections twenty-eight, twenty-nine and thirty; the north east quarter of the north west quarter and the east half of section thirty one; the north east quarter, and the west half of section thirty-two the east half of section thirty-three and all of section thirty-four, thirty-five and thirty-six, containing in all fourteen thousand nine hundred and eighty acres, and ninety-nine hundredths of an acre.

Township Seven South of Range five East.

All of sections one, two and three; the south east quarter of the north west quarter, the south west quarter and the east half of section four; the south east quarter, and the west half of section five; all of section six; the north east quarter of the north east quarter, the west half of the north east quarter, the west half of the south east quarter, and the west half of section seven; the east half of section eight; all of section-nine, ten, eleven and twelve; the north half of the south east quarter, the south west quarter, and the north half of section thirteen; all of sections fourteen and fifteen; the north east quarter, the south half of the north west quarter, and the south west quarter of section seventeen; the west half of the north east quarter, the south east quarter of the north east quarter, the south east quarter, and the west half of section eighteen; all of section nineteen; the west half of the north east quarter, the south east quarter and the west half of section twenty; all of section twenty-one; the south west quarter of the south west quarter, and the north half of section twenty-two; the north half of the south west quarter, the south east quarter, and the north half of section twenty-three; the north west quarter of the south west quarter, the south east quarter, and the north half of section twenty-four; all of section twenty-five; the south half of the north-east quarter, the south half of the north west quarter, and the south half of section twenty-six; all of sections twenty-seven, twenty-eight, twenty-nine, thirty, and thirty-one; the east half of the south east quarter, and the north half of section thirty-two; all of section thirty-three; the south west quarter of the north east quarter, the south east quarter, and the west half of section thirty-four; the north half of the south east quarter, and the west half of section thirty-five; and the north half of section thirty-six; containing in all nineteen thousand, six hundred and fifty-four acres and ninety hundredths of an acre.

Township eight South of Range five East.

The North west quarter of the North east quarter, the east half of the north west quarter, and the north west quarter of the south west quarter of section two; the north west quarter of the south east quarter, the south west quarter, and the north half of section three; all of section four; the west half of the north east quarter of section five; the north east quarter of section eight; the north half of section nine; the south east quarter of the north west quarter, the north west quarter of the south east quarter, and the south west quarter of the south west quarter of section ten; the north west quarter, all of the north west quarter, and the north west quarter of the southwest quarter of section eleven; all of section nineteen; the north west quarter of the north east quarter or the north half of lot numbered one, and the north west quarter of the south east quarter, or the north half of lot numbered six of section twenty-one; all of sections thirty and thirty one; containing in all three thousand, four hundred and eighty-one acres and fifty-nine hundredths of an acre.

Township nine South of Range five East.

All of fractional sections one and three; the south fractional half of section four; the south half of section five; all of section six and seven; the north east quarter and the west half of section eight; the south east fractional quarter, and the north half section nine; all of fractional sections ten and eleven, containing in all three thousand two hundred and ninety seven acres and eighteen hundredths of an acre.

Township four south of Range six East.

All of fractional section six; the east half of the south west quarter, and the east half of section seven; all of fractional sections eight, nine, fourteen and fifteen; all of sections seventeen, eighteen, nineteen and twenty; the east half of section twenty-one; all of section twenty-two; all of fractional sections twenty-three, twenty-four and twenty-five, the north east quarter and the south half of the south west quarter of section twenty-six; the north west quarter and the east half of section twenty-seven; all of section twenty-nine and thirty; the east half of the south east quarter, the north west quarter of the south east quarter, and the north half of section thirty-one; the west half of the south east quarter, the south west quarter, and the north half of section thirty-two the south half of section thirty-three; the south west quarter and the east half of section thirty-four; all of sections thirty-five and thirty six; containing in all eleven thousand and sixty three acres, and forty-six hundredths of an acre.

Township five South of Range six East.

The South east quarter of section one; the south east quarter of section two; the North half of the south east quarter, the south west quarter and the north half of section three; all of section four; five, six, seven and eight; the south west quarter and the north half of section nine; the south half of the north east quarter and the west half of section ten; the north east quarter of section eleven; the south half of the north west quarter, and the east half of the south east quarter of section twelve; the south half of the north-east quarter, and the west half of the south east quarter of section thirteen; the south west quarter of section fifteen; the north half of section seventeen; the north west quarter of the south east quarter, the south west quarter, and the north half of section eighteen, all of section nineteen, twenty, and twenty-one; the west half of the south east quarter, and the west half of section twenty-two, the north west quarter of the north west quarter, and the south east quarter of section twenty-three; the south half of the north east quarter, the south east quarter, the west half of the south west quarter, and the south east quarter of the south west quarter of section twenty-four; all of sections twenty-five, twenty-six, twenty-seven, twenty-eight, twenty-nine, thirty, thirty-one, thirty-two, thirty-three, thirty-four and thirty-five and all of fractional section thirty six; containing in all sixteen thousand, eight hundred and nine acres, and seventy hundredths of an acre.

Township six South of Range six East.

All of fractional sections one and two; all of sections three and four; the south half of the north east quarter, the south half of the north west quarter, and the north half of the south west quarter of section five; all of section six, seven, eight, nine and ten; all of fractional section eleven; the south west quarter and the north half of section fifteen; the north half of the south east quarter, the south half of the south west quarter, and the north half of section seventeen; the south half of the south east quarter, the south west quarter, and the north half of section eighteen; all of section nineteen; the north west quarter of the north east quarter the south half of the north east quarter, the south east quarter, and the west half of section twenty; the south half of the north-west quarter, and the south half of section twenty-one; the north half of the north-west quarter, and the south west quarter of the south west quarter of section twenty-two; all of fractional section twenty-six; all of section twenty-seven, the west half of the north east quarter, the west half of the south east quarter, the south east quarter of the south east quarter and the west half of section twenty-eight; all of sections twenty-nine, thirty, thirty-one, thirty-two, thirty-three and thirty-four; and all of fractional section thirty-five; containing in all fourteen thousand, three hundred and forty-seven acres and sixty three hundredths of an acre.

Township seven South of Range six East.

All of fractional sections one and two; all of sections three, four, five, six, seven, and eight; the north half of section nine; all of sections ten and eleven; the east fractional half of section twelve; the north half of the south west quarter, the south east quarter and the north half of section thirteen; the north half of the south east quarter, the south west quarter, and the north half of section fourteen; the south east quarter and the north half of section fifteen; the south west quarter and the north half of section seventeen; all of sections eighteen and nineteen; the south east quarter and the west half of section twenty; the north east quarter of section twenty-two; the north west quarter of lots numbered three and four of section twenty-three; the north east quarter, and the south half of section twenty-four; the west half of the north east quarter of section twenty-nine; and the north half of section thirty; containing in all eleven thousand, one hundred and twenty acres and fifty six hundredths of an acre.

Township four South of Range seven East.

All of fractional sections thirty and thirty-one; containing in all five hundred and thirty six acres and twenty-four hundredths of an acre.

Township five South of Range seven East.

All of fractional sections six and seven; all of section eighteen; the south half of lot "B" of fractional section nineteen; and all of fractional section thirty; containing in all one thousand nine hundred and twenty-five acres and forty one hundredths of an acre.

Township seven South of Range seven East.

All of fractional sections seven, eight, seventeen, and nineteen; containing in all four hundred and eighty-seven acres and seventy five hundredths of an acre, and containing in the aggregate one hundred and fourteen thousand, two hundred and thirty-one acres and forty-six hundredths of an acre, according to official plats of survey of said lands returned to the General Land Office by the Surveyor General and for which the governor of the said State of Alabama, did, on the 21st day of August 1869, request a patent to be issued to the said state, as required in the aforesaid act.

Now therefore know ye that the United States of America, in consideration of the premises and in conformity with the act of congress aforesaid, have given and granted, and by these presents do give and grant, unto the said state of Alabama, in fee simple subject to the disposal of the Legislature thereof, the tracts of land above described.

To have and to hold the same together with all the rights, privileges, immunities, and appurtenances thereto belonging unto the said State of Alabama in fee simple and to its assigns forever.

In Testimony whereof, I, Ulysses S. Grant, President of the United States of America, have caused these letters to be made patent and the seal of the General Land Office to be hereunto affixed.

Given under my hand at the city of Washington, the tenth day of September in the year of our Lord one thousand eight hundred and sixty-nine, and of the independence of the United States the ninety-fourth.

By the President: U. S. Grant,

By J. N. Burrett, Secretary

L.S.

J. N. Granger, Recorder of the General Land Office

M. L. 128314

E. M.

DEPARTMENT OF THE INTERIOR
GENERAL LAND OFFICE.

Washington, D. C. June 9, 1902

K.

R.C.L.

I, Binger Hermann, Commissioner of the General Land Office, do hereby certify that the annexed paper being a copy of Alabama Swamp Land Patent No. 1, Mobile Series, issued September 10, 1869, is a true and literal exemplification of the record of the original patent in this office.

In Testimony whereof I have hereunto subscribed my name and caused the seal of this office to be affixed at the City of Washington, on the day and year above written.

Binger Hermann

Commissioner of the General
Land Office

(Seal)

Filed for record June 16th, 1902 at 10:15 A. M.,

Recorded June 18th, 1902.

Chas. Hall, Judge of Probate

STATE OF ALABAMA)
BALDWIN COUNTY)

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify that the within and foregoing pages contain a full, true and complete copy of the United States Patent to reclaim the Swamp Lands, as the same appears of record in my office in Deed Book No. 5 Page 219-222.

Given under my hand and seal of office, this 9 day of Augst, 1950.
/s/ W. R. Stuart

Judge of Probate

(Seal)"

MR. BLACKBURN: Then, we offer in evidence certified copy of Patent from State of Alabama to Robert F. Queal, Orin H. Queal and Sarah K. Scott, dated February 20, 1872, and recorded in Deed Book J page 434, Baldwin County, Alabama Records and ask that it be identified as Complainant's Exhibit "2".

(Instrument admitted in evidence, properly identified and is set out below)

Complainant's Exhibit "2"

Certificate No. 1059
Recorded Vol. 1 Page 38.

"Map Book No. 1
Page 35

The State of Alabama
To all whom these presents shall come - Greeting:
Whereas Robert F. Queal, Orin H. Queal, and Sarah K. Scott, jointly, has deposited in the Office of the Secretary of State of Alabama

a Certificate of the Receiver of the Swamp and Overflowed Lands of Alabama in and for the district of Mobile, whereby it appears that full payment has been made by the said Robert F. Queal, O. H. Queal and Sarah K. Scott, jointly, according to the provisions of the Act of the General Assembly of Alabama entitled "An Act for the sale of Swamp and Overflowed Lands of the State of Alabama, and for other purposes," approved February 8th, 1861 for the following tract of land, to-wit:

N $\frac{1}{2}$ and SW $\frac{1}{4}$ Section 13, Township 7 South Range 5 East,
Four hundred sixty-nine 20/ (469.20) acres.

according to the official Plat of Survey of Record in the General Land Office of the United States, a certified copy whereof is now on file in the Office of the Secretary of State of Alabama, which land has been purchased by the said R. F. Queal, O. H. Queal and S. K. Scott jointly. Now Know Ye, That the State of Alabama in consideration of the premises, and in conformity with the several Acts of Congress making donations to certain States of the Swamp and Overflowed Lands within their limits, and of the several Acts of the General Assembly of Alabama above mentioned, and any other act or acts in such case made and provided, have granted and conveyed, and by these presents do grant and convey unto the said Robert F. Queal, Orin H. Queal and Sarah K. Scott jointly, and to heirs, the tract above described, To have and to hold the same together with all the rights, privileges, immunities and appurtenances of whatsoever nature thereunto belonging unto the said Robt. F. Queal, O. H. Queal, & S. K. Scott jointly.

In testimony whereof, I Robert B. Lindsay, Governor of the State of Alabama, have caused these letters to be made Patent, and the Seal of the "Swamp and Overflowed Land Office" to be hereunto affixed, Given unser my hand, at the City of Montgomery, the 20th day of Febr'y 1872.

Robert B. Lindsay
Governor of Alabama
By W. V. Chardavoyne
Secretary

Received for Record November 28th, 1872.
Recorded December 28th, 1872.

W. C. Gasque
Judge

STATE OF ALABAMA)
BALDWIN COUNTY) PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify that the within and foregoing ----pages contain a full, true and complete copy of the Deed From Robert B. Lindsay to Robert F. Queal et als as the same appears of record in my office in Deed Book No. J Page 434.
Given under my hand and seal of office, this 9 day of August, 1950.

/s/ W. R. Stuart
Judge of Probate

Seal."

MR. BLACKBURN: Next, we offer in evidence certified copy of Tax Deed from the State Land Commissioner of Alabama to J. A. Pilgrim dated April 6, 1938 and recorded in Deed Book 65 N. S. pages 104-5, Baldwin County Records and ask that it be identified as Complainant's Exhibit "3".

(Instrument admitted in evidence, properly identified and is set out below)

Exd.
No. 3597

Original

THE STATE OF ALABAMA

KNOW ALL MEN BY THESE PRESENTS: THAT WHEREAS, on the 8th day of June, A. D. 1931, the Probate Court of Baldwin County rendered a decree for the sale of lands hereinafter described and conveyed, for the payment of State and County taxes then due from Baldwin County Colonization Co. the owner of said lands, and for the payment of the fees, costs, and expenses of and under said decree, and the sale had in execution thereof.

AND WHEREAS, thereafter to-wit, on the 8th day of July, 1931, under and in pursuance of said decree, said lands were regularly offered for sale by the Tax Collector of Baldwin County for said taxes, fees, costs, and expenses, and no person having bid a sufficient sum for said lands to pay the same, said lands were bid in for the State for the sum of said taxes, fees, costs, and expenses.

AND WHEREAS, the time allowed by law for the redemption of said lands has elapsed since said sale, and the same not having been redeemed the title thereto under said sale is still in the State.

AND WHEREAS, said lands having been entered upon the books of the State Land Commissioner, and the State Land Commissioner of the State of Alabama, with the approval of the Governor, has fixed the price of said lands, and ascertained that the sum of Three Hundred Forty Two and no/100 (\$342.00) dollars is sufficient to cover and satisfy all claims of the State and County against said lands for or on account of taxes, interest, fees, and costs, and officers' fees which were due upon or have accrued against said lands, as provided by law.

AND WHEREAS, application has been made to the State Land Commissioner of the State of Alabama, by J. A. Pilgrim, to purchase said lands, and said sum of Three Hundred Forty Two and no/100 (\$342.00) dollars therefor has been paid into the State Treasury.

NOW THEREFORE, the State Land Commissioner of the State of Alabama, by virtue of and in accordance with the authority in him vested by law, with the approval of the Governor of Alabama, and in consideration of the premises above set out, has this day granted, bargained, sold, and conveyed, and by these presents does grant, bargain, sell, and convey unto the said J. A. Pilgrim, without warranty or covenant of any kind on the part of the State, express or implied, all right and title of the State of Alabama, in and to said lands, described as follows:

SE cor of SE $\frac{1}{4}$ of SE $\frac{1}{4}$, Sec. 1, Tp 7 s, R 5e;
E $\frac{1}{2}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$, Sec. 9 Tp 7s, R 5e; SE cor
of SE $\frac{1}{4}$ of SE $\frac{1}{4}$, Sec. 8 Tp 7s, R 5e. SE cor of
NE $\frac{1}{4}$ of NE $\frac{1}{4}$, Sec. 12, Tp 7s, R 5e; SW $\frac{1}{4}$ of NE $\frac{1}{4}$,
Sec. 13, Tp 7 s, R 5e; E $\frac{1}{2}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$, Sec. 18,
Tp 7s, R 5e; SW $\frac{1}{4}$ of SW $\frac{1}{4}$, Sec. 33, Tp 7s, R 5 e;
W $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$, Sec. 34, Tp. 7s, R 5e; S $\frac{1}{2}$ of NE $\frac{1}{4}$
of SE $\frac{1}{4}$; Sec. 34, Tp 7s, R 5e; SW $\frac{1}{4}$ of NE $\frac{1}{4}$, Sec. 36,
Tp 7s, R 5e; SW $\frac{1}{4}$ of NW $\frac{1}{4}$, Sec. 20, Tp 7s, R 6e;
N $\frac{1}{2}$ of SE $\frac{1}{4}$ of NE $\frac{1}{4}$, Sec. 21, Tp 7s, R 6e; SE $\frac{1}{4}$ of SE $\frac{1}{4}$,
Sec. 28, Tp 7s, R 6e; W $\frac{1}{2}$ of SW $\frac{1}{4}$ of NE $\frac{1}{4}$, Sec. 29,
Tp 7s, R 6e; SW $\frac{1}{4}$ of NW $\frac{1}{4}$, Sec. 30, tp. 7s, R 6e; NE $\frac{1}{4}$
of NW $\frac{1}{4}$, E $\frac{1}{2}$ of NE $\frac{1}{4}$ of SW $\frac{1}{4}$, Sec. 2, Tp 8s, R 5e; NW $\frac{1}{4}$
of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SE $\frac{1}{4}$, Sec. 5, Tp 8s, R 5e; SE cor of
SW $\frac{1}{4}$ of SE $\frac{1}{4}$ Sec. 6, Tp 8s, R 5e; Frac NW $\frac{1}{4}$ of SE $\frac{1}{4}$, W
of Mifflin Creek, Sec. 7, Tp 8s, R 5e; NW $\frac{1}{4}$ of NE $\frac{1}{4}$,
Sec. 8, Tp 8s, R 5e; SE $\frac{1}{4}$ of NW $\frac{1}{4}$, Sec. 9, Tp 8s, R 5e;
NE $\frac{1}{4}$ of SW $\frac{1}{4}$, Sec. 11, Tp 8s, R 5e; SW $\frac{1}{4}$ cor of SW $\frac{1}{4}$ of
SW $\frac{1}{4}$, Sec. 14, Tp 8s, R 5e; W $\frac{1}{2}$ of NE $\frac{1}{4}$ of SW $\frac{1}{4}$, Sec.
15, Tp 8s, R 5e.

lying and being situate in said County and State, to have and to hold the same, the said right and title of the State in the lands aforesaid, unto J. A. Pilgrim, and his heirs and assigns, forever.

In Testimony whereof, I have hereunto set my hand and seal this the 8th day of April, 1938.

STATE LAND COMMISSIONER OF ALABAMA
By HENRY S. LONG
State Land Commissioner.

APPROVED
BIBB GRAVES
Governor

THE STATE OF ALABAMA
MONTGOMERY COUNTY

I, Mrs. Clay Willingham, a Notary Public in and for said County, in said State, hereby certify that Henry S. Long, whose name is signed to the foregoing conveyance as State Land Commissioner, and who is known to me, acknowledged before me on this day that, being informed of the contents of this conveyance, he, in his capacity as such State Land Commissioner, executed the same voluntarily on the day the same bears date.

Given under my hand this the 6th day of April, 1938.

MRS. CLAY WILLINGHAM
Notary Public

STATE OF ALABAMA
BALDWIN COUNTY

PROBATE COURT

Filed in office this 17th day of May, 1938 at 2:15 PM and duly recorded in Deed Book 65 N. S. page 104-105 and I certify that \$- -, cts 50 Deed tax, has been paid as required by law.

G. W. Robertson, Judge of Probate

G. W. Robertson, Judge of Probate

STATE OF ALABAMA
BALDWIN COUNTY

PROBATE COURT

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify that the within and foregoing pages contain a full, true and complete copy of the Tax Deed From State Land Commissioner to J. A. Pilgrim as the same appears of record in my office in Deed Book No. 65 Page 104-105.

Given under my hand and seal of office, this 9 day of August, 1950.

/s/ W. R. Stuart

Judge of Probate

Seal."

MR. BLACKBURN: Next, we offer in evidence original deed from J. A. Pilgrim and Mary E. Pilgrim, his wife, to Louie E. Brannan, dated July 23, 1940, and recorded in Deed Book 76 pages 426-27, Baldwin County, Alabama Records and ask that it be identified as Complainant's Exhibit "4".

(Instrument admitted in evidence, properly identified and is as follows:)

Complainant's Exhibit "4"

"QUIT CLAIM DEED

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY)

THIS DEED made this 23rd day of July, 1940, between J. A. Pilgrim and wife Mary E. Pilgrim, parties of the first part, and Louie W. Brannan, party of the second part,

WITNESSETH, That the parties of the first part, in consideration of One and no/100-----DOLLARS to us in hand paid by the party of the second part, the receipt of which is hereby acknowledged, have remised, released and quit-claimed and by these presents do remise, release and forever quit-claim unto the said party of the second part his heirs and assigns forever, all the real property in BALDWIN County, Alabama, described as follows, to-wit: The Southwest Quarter (SW $\frac{1}{4}$) of the Northeast Quarter (NE $\frac{1}{4}$) of Section Thirteen (13), Township Seven South (7S) and Range Five East (5E).

TO HAVE AND TO HOLD the said released premises unto the said Louie W. Brannan, his heirs and assigns forever: So that neither the party of the first part, their heirs or assigns, nor any other person in trust for them or in their name shall or will, can or may, by any ways or means whatsoever, hereafter have or claim any right or title thereto; BUT THAT the said parties of the first part, their heirs and assigns, each and every one of them from all estate, right, title, interest or claim, and demand whatsoever in or to the said premises, or any part thereof, are, is, and shall be by these presents, FOREVER EXCLUDED AND DEBARRED.

IN WITNESS WHEREOF, the parties of the first part have hereunto set their hands and seals the day and year first above written.

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF

/s/ J. A. Pilgrim (SEAL)
/s/ Mary E. Pilgrim (SEAL)

Sate of Alabama BALDWIN County.

I, Naomi M. Pilgrim, a Notary Public, in and for said County and State, hereby certify that J. A. Pilgrim, and wife, Mary E. Pilgrim, whose

names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance they executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 23rd day of July A. D. 1940.

/s/ Naomi M. Pilgrim
Notary Public, Baldwin Co., Ala.

(Seal affixed)
MY COMMISSION EXPIRES
DEC. 2, 1941.

State of Alabama, BALDWIN COUNTY.

I, Naomi M. Pilgrim, a Notary Public in and for said County and State, do hereby certify that on the 23rd day of July, 1940 came before me the within named Mary E. Pilgrim, known to me to be the wife of the within named J. A. Pilgrim, who being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord, and without fear, constraint or threats on the part of her husband.

IN WITNESS WHEREOF, I hereunto set my hand and official seal this 23rd day of July, 1940.

/s/ Naomi M. Pilgrim
Notary Public, Baldwin Co., Ala.

(Seal affixed)
MY COMMISSION EXPIRES
DEC. 2, 1941.

(Here follows a blank form of acknowledgment which is not filled in on the above printed form deed)

STATE OF ALABAMA BALDWIN COUNTY
Filed Jan 12, 1942 335 PM
Recorded Deed book 76 page 426-7
and I certify that the following
Privilege Tax has been paid.
Deed Tax - - - - 50
Mortgage Tax - - - -

/s/ G. W. Robertson
Judge of Probate

By - - -
L W Brannan Jr D50
R75
Foley \$1.25 "

Q. Mr. Brannan, I will ask you if you are the grantee in the deed I just introduced here where your name appears Louie W. Brannan?

A. I am.

Q. After you got title to that piece of property from Mr. and Mrs. Pilgrim what did you do with it, what use did you make of it?

A. Put signs on it indicating to whom it belonged, worked the pine timber thereon for turpentine.

Q. How soon after you got the deed?

A. Around same time I got the deed.

Q. How long did your turpentine operations continue?

A. About five years.

Q. During the past few years what possession have you had of it?

A. Have leased this land for grazing purposes to a party in that neighborhood.

Q. Has he fenced it?

A. Yes, he fenced it.

Q. How long ago?

A. About two years ago.

Q. For the period of ten years next preceding the filing of this suit has any person other than you and Mr. Pilgrim through whom you claim title, had possession of this property or any part thereof?

A. They have not.

Q. During the past ten years have you and Mr. Pilgrim, through whom you claim title, regularly assessed and paid taxes on this property?

A. We have.

Q. Has anyone else assessed or paid taxes on any part of this property?

A. Not that I know of.

Q. No one else had possession of it?

A. No sir.

Q. At the time this suit was filed was there any suit pending to test title to or possession of the property?

A. There wasn't.

Q. Have you read the bill of complaint in this case?

A. Yes.

Q. Are all the facts stated in it true?

A. To the best of my knowledge.

Mr. Pardue having been first duly and legally sworn, testified as follows:

ON DIRECT EXAMINATION

By Mr. Blackburn

Q. Is this Mr. Pardue?

A. Yes.

Q. Mr. Pardue are you familiar with the property described as the Southwest Quarter of the Northeast Quarter of Section Thirteen, Township Seven South Range Five East?

A. Yes sir.

Q. Have you been familiar with that land for more than ten years?

A. Yes sir, worked that place.

Q. Did Mr. Brannan at any time commence turpentine operations on it?

A. Yes sir. I worked with Mr. Brannan, worked right along with him.

Q. Work in that community?

A. Yes sir.

Q. Did he start turpentinizing approximately ten years ago?

A. Yes sir, or more.

Q. He worked it approximately five years?

A. Yes.

Q. During the last three years has it been fenced by one of his tenants?

A. Yes sir. I think he is a little mistaken on the length of time. It's been four years ago.

Q. During the past ten years has any person other than Mr. Brannan been in possession, or his tenant, been in possession of that property?

A. Not to my knowledge.

Q. You see it regularly?

A. Yes sir.

- - - - -

I, Ora S. Nelson, Court Reporter in and for the Twenty-eighth Judicial Circuit of Alabama, hereby certify that the above and foregoing is a true and correct transcript of the evidence given and taken by me on a hearing of the above styled cause on February 15, 1951.
This 19th day of February, 1951.

Ora S. Nelson
Court Reporter

The absolute fee simple title to the said lands and to each and every part thereof and all interest therein is in the said complainant, L. W. Brannan, Jr., free and clear of and from the Southwest Quarter of Northeast Quarter of Section 13, Township 7 South, Range 5 East.

1. The complainant, L. W. Brannan, Jr., is the true and lawful owner in fee simple of the following described real property situated in Baldwin County, Alabama, to-wit:

Court as follows:

WHEREUPON, it is, therefore, ORDERED, ADJUDGED AND DECREED by the Court to the relief prayed for by him in his said Bill of Complaint; which, it appears to the Court that the complainant is entitled as amended; and Note of Submission; upon consideration of all of nesses taken in open court, as provided by Equity Rule Number 56, Rule Number 56, as amended; the testimony of complainant's wit-Decree ordering testimony taken in this case, as required by Equity against Respondents, Decree Pro Confesso against Respondents; of Pendency of Bill of Complaint, Motion for Decree Pro Confesso of Pendency of Bill of Complaint, Proof of Publication of Notice mitted for final decree on the original Bill of Complaint, Notice This cause coming on to be heard on this date is sub-

FINAL DECREE

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

L. W. BRANNAN, JR., also known
as Louie W. Brannan,
Complainant,
VS.
PETER KRAUSS, ANNA KRAUSS, PETER
KRANZ, BALDWIN LAND HOLDING COM-
PANY, INC., a corporation, the
officers, directors and stock-
holders of Baldwin Land Holding
Company, Inc., a corporation, and
BALDWIN COUNTY COLONIZATION COM-
PANY, a corporation, the officers,
directors and stockholders of the
Baldwin County Colonization Com-
pany, a corporation,
Respondents.

claim or claims of any and all persons, firms or corporations

claiming any title to, interest in, lien or encumbrance on the

said lands or any part thereof, or any interest therein. The

said complainant shall have and he is hereby given judgment against

the said lands and against any and all persons claiming any title

to, interest in, lien or encumbrance on the said lands, or any

part thereof.

2. The complainant's title to the said lands and to

each and every part thereof, and each and every interest therein,

is hereby quieted against Peter Krauss, Anna Krauss, Peter Kranz,

Baldwin Land Holding Company, Inc., a corporation, the officers,

directors and stockholders of Baldwin Land Holding Company, Inc.,

a corporation, and Baldwin County Colonization Company, a corpora-

tion, the officers, directors and stockholders of the Baldwin

County Colonization Company, a corporation, and against the heirs,

devisees and personal representatives of such of the said parties

as may be dead, and against all persons, firms or corporations

claiming any title to, interest in, lien or encumbrance on the

said lands, or any part thereof, and any and all such claim or

claims are hereby adjudged and decreed to be invalid, groundless

and of no effect.

3. The Register of this court shall file a certified

copy of this decree for record in the office of the Judge of Pro-

bate of Baldwin County, Alabama, and tax the expense of such re-

cording as a part of this proceeding.

4. The Judge of Probate of Baldwin County, Alabama

shall record the said certified copy of this decree in the same

book and manner in which deeds are recorded and shall index the

same in the direct index in the names of Peter Krauss, Anna Krauss,

Peter Kranz, Baldwin Land Holding Company, Inc., and Baldwin

County Colonization Company, and shall index the same in the in-

direct or reverse index of the said records in the name of L. W.

Brannan, Jr.

5. The title hereby decreed to be in the said complainant, L. W. Brannan, Jr., shall inure to the benefits of all persons who derive title to the said lands, or any part thereof, or any interest therein, from or through the said L. W. Brannan, Jr., and such title or interest shall be at all times treated and considered as though it had been established in favor of the persons so procuring or deriving title from the said complainant.

6. The costs of this proceeding are hereby taxed against the said complainant, for which execution may issue.

ORDERED, ADJUDGED AND DECREED on this the 2nd day of December, 1952.

Jeffrey J. Madliberege.
Judge.

L. W. BRANNAN, JR., also known
as Louie W. Brannan,

Complainant,

VS.

PETER KRAUSS, ANNA KRAUSS, PETER
KRANZ, BALDWIN LAND HOLDING COM-
PANY, INC., a Corporation, the
officers, directors and stock-
holders of Baldwin Land Holding
Company, Inc., a Corporation, and
BALDWIN COUNTY COLONIZATION COM-
PANY, a Corporation, the officers,
directors and stockholders of the
Baldwin County Colonization Com-
pany, a Corporation,

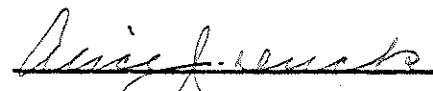
Respondents.


IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

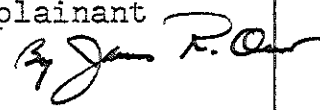
NOTE OF SUBMISSION

This cause coming on to be heard on this date is sub-
mitted for final decree on the original Bill of Complaint, Notice
of Pendency of Bill of Complaint, Proof of Publication of Notice
of Pendency of Bill of Complaint, Motion for Decree Pro Confesso,
against Respondents, Decree Pro Confesso against Respondents,
Decree ordering testimony taken in this case, as required by
Equity Rule Number 56, as amended, and the testimony of Complain-
ant's witnesses taken in open court, as provided by Equity Rule
Number 56, as amended.

Dated this the 2nd day of December, 1952.


Register


Solicitor for Complainant



NOTE OF SUBMISSION

L. W. BRANNAN, JR., also known
as Louie W. Brannan,

Complainant,

VS.

PETER KRAUSS, ET ALS.,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

Filed 12-2-52
Air's French
Register

NOTICE OF PENDENCY OF BILL OF COMPLAINT.

L. W. BRANNAN, JR.,

Complainant,

VS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LANDS HEREINAFTER DESCRIBED, and
 PETER KRAUSS, ANNA KRAUSS, PETER
 KRANSZ, BALDWIN LAND HOLDING
 COMPANY, INC., a Corporation, and
 BALDWIN COUNTY COLONIZATION COM-
 PANY, a Corporation,

IN EQUITY.

Respondents.

Notice is hereby given to Peter Krauss, Anna Krauss, Peter Kransz, Baldwin Land Holding Company, Inc., a Corporation, the officers, directors and stockholders of the Baldwin Land Holding Company, Inc., a Corporation, Baldwin County Colonization Company, a Corporation, the officers, directors and stockholders of the Baldwin County Colonization Company, a Corporation, and the heirs and devisees of such of the said parties as may be dead, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the lands hereinafter described, that on the 29th day of June, 1950, the said Complainant, L. W. Brannan, Jr., who is also known as Louie W. Brannan, filed in the Circuit Court of Baldwin County, Alabama, Equity Side, a verified Bill of Complaint against the following described lands situated in Baldwin County, Alabama, to-wit:

Southwest Quarter (SW $\frac{1}{4}$) of the Northeast
 Quarter (NE $\frac{1}{4}$), Section Thirteen (13), Town-
 ship Seven (7) South, Range Five (5) East,
 Baldwin County, Alabama,

and against Peter Krauss, Anna Krauss, Peter Kransz, Baldwin Land Holding Company, Inc., a Corporation, the officers, directors and stockholders of the Baldwin Land Holding Company, Inc., a Corporation, Baldwin County Colonization Company, a Corporation, the officers, directors and stockholders of the Baldwin County Colonization Company, a Corporation, and the heirs and devisees of such of the said parties as may be dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encum-

brance on the said lands, or any part thereof, the said Bill of Complaint having been filed for the purpose of establishing the title of the said Complainant to all of the said lands for the purpose of quieting his title thereto, and to clear up all doubts and disputes concerning his title to the said property.

The Complainant claims the absolute fee simple title in and to all of the said lands under, by and through the following conveyances, all of which are recorded in the office of the Probate Judge of Baldwin County, Alabama, the County where the lands are situated, to-wit:

- A. Tax Deed from the State of Alabama to J. A. Pilgrim, dated April 6, 1938, and recorded in Deed Book 65, Page 104.
- B. Deed from J. A. Pilgrim and Mary E. Pilgrim, his wife, to Louie W. Brannan, dated July 23, 1940, and recorded in Deed Book 76, page 426.

The Complainant, in and by his said Bill of Complaint, alleges and avers that he owns the said lands in his own right, absolutely and in fee simple; that he is in the actual peaceable possession of all of the said lands; that title to the said lands stands upon the records of Baldwin County, Alabama, the County where the lands are situated, in the name of the Complainant; that no suit is pending to test Complainant's title to, interest in, or right to possession of the said lands, or any part thereof; that no persons, firms or corporations, other than the Complainant, and those through whom he claims title, are known to the Complainant to have had any possession of the said lands, or any part thereof, within ten years next prior to the filing of the said Bill of Complaint, that no persons, firms or corporations, other than the Complainant, and those through whom he claims title, are known to the Complainant to have paid any taxes on the said lands, or any part thereof, or any interest therein, within ten years next prior to the filing of the said Bill of Complaint; and that the Complainant together with those through whom he claims title to the said lands, have held color of title thereto, and have been in the actual, peaceable, continuous and undisputed possession of all of

the said property for more than ten years next preceding the filing of this Bill of Complaint.

The said parties named above and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, must appear in this Court and plead, answer or demur to the said Bill of Complaint before the 2nd day of January, 1951, or on the said date Decrees Pro Confesso will be taken against them, testimony will be thereafter taken and the said cause submitted for a final decree quieting Complainant's title to the said lands.

IN WITNESS WHEREOF, I have hereunto set my hand, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, and affixed the seal of the said Court on this the 2nd day of November, 1950.

Alfred J. Wuck

Register of the Circuit Court of Baldwin County, Alabama, in Equity.

J. B. BLACKBURN
Solicitor for Complainant.

STATE OF ALABAMA, BALDWIN COUNTY

Filed 11-2-50 2:45 P.M.

Recorded *Lis Pend* book 2 page 323-5

M. Stuart
Judge of Probate *B*

L. W. BRANNAN, JR., also known
as Louie W. Brannan,

Complainant,
VS.

PETER KRAUSS, ANNA KRAUSS, PETER
KRANZ, BALDWIN LAND HOLDING COM-
PANY, INC., a Corporation, the
officers, directors and stock-
holders of Baldwin Land Holding
Company, Inc., a Corporation, and
BALDWIN COUNTY COLONIZATION COM-
PANY, a Corporation, the officers,
directors and stockholders of the
Baldwin County Colonization Com-
pany, a Corporation,

Respondents.

BOOK 188 PAGE 382
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FINAL DECREE

This cause coming on to be heard on this date is sub-
mitted for final decree on the original Bill of Complaint, Notice
of Pendency of Bill of Complaint, Proof of Publication of Notice
of Pendency of Bill of Complaint, Motion for Decree Pro Confesso
against Respondents, Decree Pro Confesso against Respondents;
Decree ordering testimony taken in this case, as required by Equity
Rule Number 56, as amended; the testimony of complainant's wit-
nesses taken in open court, as provided by Equity Rule Number 56,
as amended; and Note of Submission; upon consideration of all of
which, it appears to the Court that the complainant is entitled
to the relief prayed for by him in his said Bill of Complaint;
WHEREUPON, it is, therefore, ORDERED, ADJUDGED AND DECREED BY THE
Court as follows:

1. The complainant, L. W. Brannan, Jr., is the true
and lawful owner in fee simple of the following described real
property situated in Baldwin County, Alabama, to-wit:

Southwest Quarter of Northeast Quarter of Section
13, Township 7 South, Range 5 East.

The absolute fee simple title to the said lands and to each and
every part thereof and all interest therein is in the said com-
plainant, L. W. Brannan, Jr., free and clear of and from the
claim or claims of any and all persons, firms or corporations
claiming any title to, interest in, lien or encumbrance on the
said lands or any part thereof, or any interest therein. The
said complainant shall have and he is hereby given judgment against
the said lands and against any and all persons claiming any title
to, interest in, lien or encumbrance on the said lands, or any
part thereof.

2. The complainant's title to the said lands and to each and every part thereof, and each and every interest therein, is hereby quieted against Peter Krauss, Anna Krauss, Peter Kranz, Baldwin Land Holding Company, Inc., a Corporation, the officers, directors and stockholders of Baldwin Land Holding Company, Inc., a Corporation, and Baldwin County Colonization Company, a Corporation, the officers, directors and stockholders of the Baldwin County Colonization Company, a Corporation, and against the heirs, devisees and personal representatives of such of the said parties as may be dead, and against all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, and any and all such claim or claims are hereby adjudged and decreed to be invalid, groundless and of no effect.

3. The Register of this court shall file a certified copy of this decree for record in the office of the Judge of Probate of Baldwin County, Alabama, and tax the expense of such recording as a part of this proceeding.

4. The Judge of Probate of Baldwin County, Alabama shall record the said certified copy of this decree in the same book and manner in which deeds are recorded and shall index the same in the direct index in the names of Peter Krauss, Anna Krauss, Peter Kranz, Baldwin Land Holding Company, Inc., and Baldwin County Colonization Company, and shall index the same in the indirect or reverse index of the said records in the name of L. W. Brannan, Jr.

5. The title hereby decreed to be in the said complainant, L. W. Brannan, Jr., shall inure to the benefits of all persons who derive title to the said lands, or any part thereof, or any interest therein, from or through the said L. W. Brannan, Jr., and such title or interest shall be at all times treated and considered as though it had been established in favor of the persons so procuring or deriving title from the said complainant.

6. The costs of this proceeding are hereby taxed against the said complainant, for which execution may issue.

ORDERED, ADJUDGED AND DECREED on this the 2nd day of December, 1952.

Telfair J. Mashburn, Jr.

Judge.

STATE OF ALABAMA)
BALDWIN COUNTY)

CERTIFICATE

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the above and foregoing is a full, true, and complete copy of the final decree heretofore rendered in the case of L. W. Brannan Jr., also known as Louie W. Brannan, Complainant vs. Peter Krauss, et.al, Respondents.

Given under my hand and seal this the 2nd day of December, 1952.

Alice J. Duck
Register

STATE OF ALABAMA, BALDWIN COUNTY

Filed 12-3-52 10 am

Recorded deed book 188 page 382-4

M. J. Stewart
Judge of Probate 2

L. W. BRANNAN, JR., also
known as Louie W. Brannan,

Complainant,
VS.

PETER KRAUSS, ET ALS,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

REQUEST FOR ORAL EXAMINATION OF WITNESSES

Now comes the complainant, by his Solicitor, and moves
the Court to take the testimony of the complainant and his witness-
es, Hiram Pardue and _____,
orally, as provided by Equity Rule Number 56, as last amended.

Respectfully submitted,

J. B. Blackman
Solicitor for Complainant.

REQUEST FOR ORAL EXAMINATION
OF WITNESSES.

L. W. BRANNAN, JR., also known
as Louie W. Brannan,

VS. Complainant,

PETER KRAUSS, ET ALS,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

L. W. BRANNAN, JR., also known as Louie W. Brannan,	}	IN THE CIRCUIT COURT OF
Complainant,		BALDWIN COUNTY, ALABAMA
VS.		IN EQUITY. NO. 2503.
PETER KRAUSS, ET ALS.,		
Respondents	}	

REGISTER'S CERTIFICATE AS TO SERVICE.

I, Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the Notice of Pendency of Bill of Complaint in this cause dated November 2, 1950, was published once a week for four successive weeks in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, the said notice appearing in the issues of said paper of November 2nd, 9th, 16th and 23rd, 1950, that on the said date, namely, November 2, 1950, a copy of the said notice was posted at the front door of the courthouse of Baldwin County, at Bay Minette, Alabama, and on the 2nd day of November, 1950, a copy of the said notice was filed for record in the office of the Judge of Probate of Baldwin County, Alabama.

I further certify that to the date of this certificate all of the Respondents named in the Bill of Complaint filed in this cause have failed to appear, and plead, answer or demur thereto.

Dated on this the 31st day of January, 1951.

Alice J. Duck
Register.

TO BE FILED IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

L. W. BRANNAN, JR., also known as Louie W. Brannan,

Complainant,

VS.

PETER KRAUSS, ET ALS.,

Respondents

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY. NO. 2503.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY. NO. 2503.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY. NO. 2503.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY. NO. 2503.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY. NO. 2503.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY. NO. 2503.

REGISTER'S CERTIFICATE AS
TO SERVICE.

L. W. BRANNAN, JR., also
known as Louie W. Brannan,
Complainant,

vs.
PETER KRAUSS, ET ALS.,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY. NO. 2503

Filed 1-31-51
W. J. French
Register

Registered

Deposited on this day the 1st day of January, 1951.

certificates being so issued, and filed, under no other process.

All of the respondents named in the bill of Complaint filed in this
Judge of Probate of Baldwin County, Alabama.

I further certify that to the date of this certificate
copy of the said notice was filed for record in the office of the
at Baldwin County, Alabama, and on the 3rd day of November, 1950, a

was deposited at the front door of the courthouse of Baldwin County,

the said date, namely, November 3, 1950, a copy of the said notice
of said order of November 3rd, 1950, and said 3rd, 1950, put on

Baldwin County, Alabama, the said notice appearing in the papers
in the Baldwin Times, a newspaper published at Bay Minette, Ala.

per 3, 1950, was distributed once a week for four successive weeks

notice of removal of bill of Complaint in this cause dated Novem-

Baldwin County, Alabama, in conformity to process hereby given the

I, Alice J. Duck, Register of the Circuit Court of

REGISTER'S CERTIFICATE AS TO SERVICE.

Registered

ENTERED IN THE

IN MONTH. NO. 2503.

AS

Complaint

BALDWIN COUNTY, ALABAMA

FOR THE

IN THE CIRCUIT COURT OF

L. W. BRANNAN, JR., also
known as Louie W. Brannan,

Complainant,

VS.

PETER KRAUSS, ET ALS,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

DECREE ORDERING ORAL EXAMINATION OF WITNESSES

The complainant in this cause having filed his written request that the testimony of the complainant, L. W. Brannan, Jr., and his witnesses, Hiram Pardue and _____ be taken orally in open court, as provided by Equity Rule Number 56, as last amended, it is hereby ORDERED, ADJUDGED AND DECREED that the testimony of the said witnesses be taken orally, as provided in and by the said rule on this date.

ORDERED, ADJUDGED AND DECREED on this the 12th day of February, 1951.

Jelfair J. Mallory Jr.
Judge.

DECREE ORDERING ORAL EXAMINATION
OF WITNESSES.

L. W. BRANNAN, JR., also known
as Louie W. Brannan,

VS. Complainant,

PETER KRAUSS, ET ALS,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

L. W. BRANNAN, JR., also known as	}	IN THE CIRCUIT COURT OF
Louie W. Brannan,		
Complainant,	}	BALDWIN COUNTY, ALABAMA
VS.		
PETER KRAUSS, ET ALS.,	}	IN EQUITY. NO. 2503.
Respondents		

DECREE PRO CONFESSO.

In this cause it being made to appear to the Register that the Notice of Pendency of Bill of Complaint in this cause, dated November 2, 1950, was published once a week for four (4) successive weeks in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, the said notice appearing in the issues of said paper of November 2nd, 9th, 16th and 23rd, 1950, that a copy of the said notice was posted at the front door of the courthouse of Baldwin County, Alabama, in Bay Minette, Alabama on November 2, 1950, and that on the 2nd day of November, 1950 a copy thereof was filed for record in the office of the Judge of Probate of Baldwin County, Alabama, and to date hereof Peter Krauss, Anna Krauss, Peter Kransz, Baldwin Land Holding Company, Inc., a Corporation, the officers, directors and stockholders of the Baldwin Land Holding Company, Inc., a Corporation, Baldwin County Colonization Company, a Corporation, the officers, directors and stockholders of the Baldwin County Colonization Company, a Corporation, and the heirs and devisees of such of the said parties as may be dead, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the following described property situated in Baldwin County, Alabama, to-wit:

Southwest Quarter (SW $\frac{1}{4}$) of the Northeast
Quarter (NE $\frac{1}{4}$) of Section Thirteen (13),
Township Seven (7) South, Range Five (5)
East,

have to date hereof failed to appear and plead, answer or demur to the Bill of Complaint filed against them herein.

ORDERED, ADJUDGED AND DECREED on this the 31st day of
January, 1951.

Chief Clerk
Register.

Figure 1 is a schematic representation of the experimental design. It shows a sequence of events for two groups: 'Control' and 'Experimental'. The Control group receives a 'Control stimulus' (a simple line drawing of a face) and a 'Control response' (a simple line drawing of a face). The Experimental group receives an 'Experimental stimulus' (a complex line drawing of a face) and an 'Experimental response' (a complex line drawing of a face). The sequence is: Control stimulus -> Control response -> Experimental stimulus -> Experimental response.

4

Jan 1st 1791

Jan 2nd 1791

Jan 3rd 1791

Jan 4th 1791

Jan 5th 1791

Jan 6th 1791

Jan 7th 1791

Jan 8th 1791

Jan 9th 1791

Jan 10th 1791

Jan 11th 1791

Jan 12th 1791

Jan 13th 1791

Jan 14th 1791

Jan 15th 1791

Jan 16th 1791

Jan 17th 1791

Jan 18th 1791

Jan 19th 1791

Jan 20th 1791

Jan 21st 1791

Jan 22nd 1791

Jan 23rd 1791

Jan 24th 1791

Jan 25th 1791

Jan 26th 1791

Jan 27th 1791

Jan 28th 1791

Jan 29th 1791

Jan 30th 1791

Jan 31st 1791

Feb 1st 1791

Feb 2nd 1791

Feb 3rd 1791

Feb 4th 1791

Feb 5th 1791

Feb 6th 1791

Feb 7th 1791

Feb 8th 1791

Feb 9th 1791

Feb 10th 1791

Feb 11th 1791

Feb 12th 1791

Feb 13th 1791

Feb 14th 1791

Feb 15th 1791

Feb 16th 1791

Feb 17th 1791

Feb 18th 1791

Feb 19th 1791

Feb 20th 1791

Feb 21st 1791

Feb 22nd 1791

Feb 23rd 1791

Feb 24th 1791

Feb 25th 1791

Feb 26th 1791

Feb 27th 1791

Feb 28th 1791

Feb 29th 1791

Mar 1st 1791

Mar 2nd 1791

Mar 3rd 1791

Mar 4th 1791

Mar 5th 1791

Mar 6th 1791

Mar 7th 1791

Mar 8th 1791

Mar 9th 1791

Mar 10th 1791

Mar 11th 1791

Mar 12th 1791

Mar 13th 1791

Mar 14th 1791

Mar 15th 1791

Mar 16th 1791

Mar 17th 1791

Mar 18th 1791

Mar 19th 1791

Mar 20th 1791

Mar 21st 1791

Mar 22nd 1791

Mar 23rd 1791

Mar 24th 1791

Mar 25th 1791

Mar 26th 1791

Mar 27th 1791

Mar 28th 1791

Mar 29th 1791

Mar 30th 1791

Mar 31st 1791

Apr 1st 1791

Apr 2nd 1791

Apr 3rd 1791

Apr 4th 1791

Apr 5th 1791

Apr 6th 1791

Apr 7th 1791

Apr 8th 1791

Apr 9th 1791

Apr 10th 1791

Apr 11th 1791

Apr 12th 1791

Apr 13th 1791

Apr 14th 1791

Apr 15th 1791

Apr 16th 1791

Apr 17th 1791

Apr 18th 1791

Apr 19th 1791

Apr 20th 1791

Apr 21st 1791

Apr 22nd 1791

Apr 23rd 1791

Apr 24th 1791

Apr 25th 1791

Apr 26th 1791

Apr 27th 1791

Apr 28th 1791

Apr 29th 1791

Apr 30th 1791

May 1st 1791

May 2nd 1791

May 3rd 1791

May 4th 1791

May 5th 1791

May 6th 1791

May 7th 1791

May 8th 1791

May 9th 1791

May 10th 1791

May 11th 1791

May 12th 1791

May 13th 1791

May 14th 1791

May 15th 1791

May 16th 1791

May 17th 1791

May 18th 1791

May 19th 1791

May 20th 1791

May 21st 1791

May 22nd 1791

May 23rd 1791

May 24th 1791

May 25th 1791

May 26th 1791

May 27th 1791

May 28th 1791

May 29th 1791

May 30th 1791

May 31st 1791

Jun 1st 1791

Jun 2nd 1791

Jun 3rd 1791

Jun 4th 1791

Jun 5th 1791

Jun 6th 1791

Jun 7th 1791

Jun 8th 1791

Jun 9th 1791

Jun 10th 1791

Jun 11th 1791

Jun 12th 1791

Jun 13th 1791

Jun 14th 1791

Jun 15th 1791

Jun 16th 1791

Jun 17th 1791

Jun 18th 1791

Jun 19th 1791

Jun 20th 1791

Jun 21st 1791

Jun 22nd 1791

Jun 23rd 1791

Jun 24th 1791

Jun 25th 1791

Jun 26th 1791

Jun 27th 1791

Jun 28th 1791

Jun 29th 1791

Jun 30th 1791

Jul 1st 1791

Jul 2nd 1791

Jul 3rd 1791

Jul 4th 1791

Jul 5th 1791

Jul 6th 1791

Jul 7th 1791

Jul 8th 1791

Jul 9th 1791

Jul 10th 1791

Jul 11th 1791

Jul 12th 1791

Jul 13th 1791

Jul 14th 1791

Jul 15th 1791

Jul 16th 1791

Jul 17th 1791

Jul 18th 1791

Jul 19th 1791

Jul 20th 1791

Jul 21st 1791

Jul 22nd 1791

Jul 23rd 1791

Jul 24th 1791

Jul 25th 1791

Jul 26th 1791

Jul 27th 1791

Jul 28th 1791

Jul 29th 1791

Jul 30th 1791

Jul 31st 1791

Aug 1st 1791

Aug 2nd 1791

Aug 3rd 1791

Aug 4th 1791

Aug 5th 1791

Aug 6th 1791

Aug 7th 1791

Aug 8th 1791

Aug 9th 1791

Aug 10th 1791

Aug 11th 1791

Aug 12th 1791

Aug 13th 1791

Aug 14th 1791

Aug 15th 1791

Aug 16th 1791

Aug 17th 1791

Aug 18th 1791

Aug 19th 1791

Aug 20th 1791

Aug 21st 1791

Aug 22nd 1791

Aug 23rd 1791

Aug 24th 1791

Aug 25th 1791

Aug 26th 1791

Aug 27th 1791

Aug 28th 1791

Aug 29th 1791

Aug 30th 1791

Aug 31st 1791

Sep 1st 1791

Sep 2nd 1791

Sep 3rd 1791

Sep 4th 1791

Sep 5th 1791

Sep 6th 1791

Sep 7th 1791

Sep 8th 1791

Sep 9th 1791

Sep 10th 1791

Sep 11th

[illegible]

DECREE PRO CONFESSED

RECORDED

L. W. BRANNAN, JR., also known
as Louie W. Brannan,

Complainant,

vs.

PETER KRAUSS, ET ALS.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY. NO. 2503


Filed 1-31-57
Miss. Clerk
Register

L. W. BRANNAN, JR., also known as Louie W. Brannan,	}	IN THE CIRCUIT COURT OF
Complainant		BALDWIN COUNTY, ALABAMA
VS.		IN EQUITY. NO. 2503.
PETER KRAUSS, ET ALS.,	}	
Respondents		

MOTION FOR DECREE PRO CONFESSO.

Motion is hereby made for a Decree Pro Confesso against the lands involved in this proceeding, namely, Southwest Quarter of the Northeast Quarter of Section 13, Township 7 South, Range 5 East, Baldwin County, Alabama, and against Peter Krauss, Anna Krauss, Peter Kransz, Baldwin Land Holding Company, Inc., a Corporation, the officers, directors and stockholders of the Baldwin Land Holding Company, Inc., a Corporation, Baldwin County Colonization Company, a Corporation, the officers, directors and stockholders of the Baldwin County Colonization Company, a Corporation, and against the heirs and devisees of such of the said parties as may be dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said land, or any part thereof, on the ground that the Order of Publication in this cause dated November 2, 1950, was published once a week for four (4) successive weeks in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, the said notice appearing in the issues of said paper dated November 2, 1950, November 9, 1950, November 16, 1950, and November 23, 1950, and the said parties have to date failed to appear and plead, answer or demur to the Bill of Complaint filed against them in this cause.

Wherefore, Complainant moves the Court to make and enter a Decree Pro Confesso against each and all of the said parties. Complainant further prays for such other, further and general relief as he may be equitably entitled to in the premises.


Solicitor for Complainant.

RECORDED

MOTION FOR DECREE PRO CONFESSO

L. W. BRANNAN, JR., also
known as Louie W. Brannan,
Complainant,
vs.
PETER KRAUSS, ET ALS.,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY, NO. 2503

Filed 1-31-51
Bridgman
Register

affidavit

MOTION FOR DECREE PRO CONFESSO

Motion is hereby made and confessed

that the undersigned, L. W. Brannan, Jr., also known as Louie W. Brannan, Complainant, do hereby confess and admit that the

defendants, Peter Krauss, et als., have wrongfully and unlawfully taken possession of the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

the property of the complainant, to-wit: the property of the complainant, to-wit: the property of the complainant, to-wit:

affidavit for confession

L. W. BRANNAN, JR., also known as
Louie W. Brannan,
Complainant,
VS.

PETER KRAUSS, ANNA KRAUSS, PETER
KRANSZ, BALDWIN LAND HOLDING COMPANY
INC., a Corporation, the officers,
directors and stockholders of Baldwin
Land Holding Company, Inc., a Corpora-
tion, and BALDWIN COUNTY COLONIZATION
COMPANY, a Corporation, the officers,
directors and stockholders of the
Baldwin County Colonization Company, a
Corporation,

Respondents .

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 2503 .

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

Your Orator, L. W. Brannan, Jr., who is also known as
Louie W. Brannan, presents this Bill of Complaint against the fol-
lowing described real property situated in Baldwin County, Alabama,
to-wit:

Southwest Quarter (SW $\frac{1}{4}$) of Northeast Quarter
(NE $\frac{1}{4}$) of Section Thirteen (13), Township 7
South, Range 5 East, Baldwin County, Alabama,

and against Peter Krauss, Anna Krauss, Peter Kransz, Baldwin Land
Holding Company, Inc., a Corporation, the officers, directors and
stockholders of the Baldwin Land Holding Company, Inc., a Corpora-
tion, and Baldwin County Colonization Company, a Corporation, the
officers, directors and stockholders of the Baldwin County Coloniza-
tion Company, a Corporation, and against the heirs and devisees of
such of the said parties as may be dead, and against any and all
persons, firms or corporations claiming any title to, interest in,
lien or encumbrance on the said lands, or any part thereof, and
thereupon your Orator complains and shows unto the Court and your
Honor as follows:

1. Your Orator is over twenty-one years of age and is
a resident of Baldwin County, Alabama.

2. The Respondents, Baldwin Land Holding Company, Inc.,
a Corporation, and Baldwin County Colonization Company, a Corpora-
tion, have no persons in their respective employ or doing business
for either of them in this state. The individuals named above are,
if living, over the age of twenty-one years, but their places of
residence and post office addresses are unknown and cannot be ascer-
tained after diligent effort and inquiry to ascertain the facts
with regard thereto.

3. Your Orator owns the said lands in Baldwin County, Alabama, namely, Southwest Quarter of Northeast Quarter, Section 13, Township 7 South, Range 5 East, Baldwin County, Alabama, in his own right, absolutely and in fee simple, and is in the actual peaceable possession of all of the said property. Your Orator, together with those through whom he claims title to the said lands, has held color of title thereto, and has been in the actual, peaceable, continuous and undisputed possession of all of the said property for more than ten years next preceding the filing of this Bill of Complaint; no suit is pending to test your Orator's title to, interest in, or right to possession of the said lands, or any part thereof. Wherefore, your Orator files this his verified Bill of Complaint in the Circuit Court of Baldwin County, Alabama, in Equity, the County where the said lands lie, against the said lands and against any and all persons, claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, to establish his title to the said lands, and to clear up all doubts and disputes concerning the same.

4. Your Orator has and claims to have the absolute fee simple title to all of the said described property. The title so held and claimed by your Orator in and through all of the said lands was obtained from the persons and through the instruments as will hereinafter appear. Your Orator further shows that the title to all of the said lands stands upon the records of the Probate Court of Baldwin County, Alabama, the County where the said lands are situated, in the name of your Orator, that no persons, firms or corporations other than your Orator and those through whom he claims title to the said lands, have at any time within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands or any part thereof, or any interest therein, nor has any other person, firm or corporation other than your Orator, and those through whom he claims title to the said lands, had any possession of the said lands, or any part thereof, for more than ten years next preceding the filing of this Bill of Complaint.

5. Your Orator claims the absolute fee simple title to all of the said lands under, by and through the following instruments of writing, all of which are recorded in the Probate Records of Baldwin County, Alabama, the County where the said Lands are situated, to-wit:

- A. Patent from United States to State of Alabama, dated September 10, 1869, and recorded in Deed Book 5, at page 219.
- B. Deed from State of Alabama, to Robert F. Queal, O. H. Queal and S. K. Queal, dated February 20, 1872, and recorded in Deed Book "J", Page 434.
- C. Tax Deed from the State of Alabama to J. A. Pilgrim, dated April 6, 1938, and recorded in Deed Book 65, Page 104.
- D. Deed from J. A. Pilgrim and Mary E. Pilgrim, his wife, to Louie W. Brannan, dated July 23, 1940, and recorded in Deed Book 76, Page 426.

Your Orator avers that he has made and caused to be made a diligent search to ascertain the names, ages and addresses of all of the parties named herein, who are now deceased, and also ascertain if anyone is making any claim to the said property, or any part thereof. These said inquiries have continued for more than three years next preceding the filing of this Bill of Complaint. Your Orator has examined and has employed an attorney to examine the records in the office of the Probate Judge, the Tax Collector and the Tax Assessor of Baldwin County, Alabama, and to ascertain to whom the records show to have any claim to or encumbrance on the said property; that he has made and caused a thorough inquiry to be made in the community where the said lands are situated for the purpose of ascertaining any claimants to it, or any other information having any bearing on the title to the said property; that these efforts by your Orator, his agents and attorney have continued faithfully and diligently for the long period of time, and all of the information so secured as to the said heirs, prior ownership and possession of the said property is set out in this Bill of Complaint.


PRAYER FOR PROCESS

Your Orator prays that the lands hereinabove described, the Respondents named herein and the unknown heirs, devisees, per-

sonal representatives and next of kin of the Respondents named herein who are dead, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the said lands, or any part thereof, be made parties Respondent to this Bill of Complaint, and be brought into Court by the usual and proper process.

PRAYER FOR RELIEF.

Your Orator prays that each and all of the Respondents named herein, the unknown heirs, devisees, legal representatives and next of kin of such of the Respondents herein named who are dead, and any and all persons, firms or corporations who claim to own the said lands, or any part thereof, or any interest therein, or any lien or encumbrance thereon, be required to set forth and specify such claim, title, right, interest, lien or encumbrance and how and by what instrument the same is derived and created; and that upon the final hearing of this cause it be Ordered, Adjudged and Decreed that your Orator, at the time of the filing of this Bill of Complaint, had the legal title to all of the above described lands and that none of the Respondents herein specifically named, or any other person, firm or corporation has any right, title or interest therein, or any part thereof, or any lien or encumbrance thereon, and that all doubts and disputes concerning the said property may be cleared up and that your Orator's title to the said lands be fully and completely quieted. Your Orator further prays for such other, further and general relief as he may be entitled to, the premises considered.


Solicitor for Complainant.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn,

who, after being by me first duly and legally sworn, deposes and says: That he is the Solicitor for the Complainant named in the above entitled cause; that he prepared the foregoing Bill of Complaint, and that the facts stated therein are true.

J. B. Blaschman

Sworn to and subscribed before me on
this the 5th day of July, 1950.

James R. Owen

Notary Public, Baldwin County, Alabama.

