

CLAUDE PETERT,

IN THE CLACUIT COURT OF

COMPLAINANT

BALDWIN COUNTY, ALABARA,

DIFFIRMENTS

Testimony having been taken in this cause and the same being ready for final decree, motion is hereby made that the said cause be set down for final decree. This the Aday of July, 1955.

Claude Pitet Complainant V5

Certain loudst annie M. Jones et als Defendants

Mation Confinal Decree

> FILED FEB. 1 1955

AUCE & WUCK, Registed

THE STATE OF ALABAMA, Baldwin County.

CIRCUIT COURT

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	WITNESS	ES.	

CLAUDE PETEET,	IN THE CIRCUIT COURT OF
COMPLAINANT	
vs	
THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUAR-	
TER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST, BALDWIN	
COUNTY, ALABAMA; AND ANNIE M. JONES, PATRICK J. COONEY,	i BALDWIN COUNTY, ALABAMA,
MARY E. SMITH, JEAN GALLAGAH, BAY LaLAUNCH ORCHARDS COMPANY,	
A CORPORATION, AND ITS ALIENCES, SUCCESSORS AND ASSIGNS, THE UN-	
KNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF	
JOHN U. SCHMIDT AND THE UNKNOWN	
HEIRS, DEVISEES, PERSONAL REPRE- SENTATIVES AND ASSIGNS OF URSULA	
SCHMIDT; AND ANY AND ALL PERSONS FIRMS, ASSOCIATIONS OR CORPORAT-	
IONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR EN-	
CUMBRANCE ON THE SAID LAND OR AN PART OR PARCEL THEREOF:	1X
DEFENDANTS	

To Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations, claiming any title to, interest in, claim, lien or encumbrance on the following described land, to-wit: the Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, Baldwin County, Alabama, and to Alamana Mariana Mariana Guardian ad litem for them;

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Beebe & Swearingen

Solicitors for Complainant

IN THE CIRCUIT COURT OF Baldwin County, Alabama IN EQUITY

AUDE PETEET, Complainant

ter of section 28, Township 8 some part or parcel thereof. South, Range 4 East, in Baldwin County, Alabama; and An-Company, A Corporation, and its alienees, successors and assigus, the unknown heirs, devisees, personal representatives and the unknown heirs, dovisses, personal representatives and asigns of Ursula Schmidt; and any and all persons, firms, Associations or Corporations claiming any title to, interest in, claim, lien or encumbrance on the said land or any part or parcel thereof:

Defendants.

Notice is hereby given to Annie L Jones, Patrick J. Cooney, Mary '. Smith, Jean Gallagah, Bay Laaunch Orchards Company, a orporation and its alienees, sucessors and assigns, the unknown eirs, devisees, personal represenatives and assigns of John U. chmidt, the unknown heirs, devies, personal representatives and ssigns of Ursula Schmidt, and ny and all persons, firms, asociations claiming any title to, rterest in, claim, lien or encumrance upon the following de-The Southwest cribed lands: uarter and the South half of the orthwest quarter of Section 28, wnship 8 South, Range 4 East, n Baldwin County, Alabama.

That Claude Peteet has filed his ill of complaint on the 2 day of ovember, 1954, in this court on ne equity side claiming to be in ctual peaceable possession, ownng and claiming to own that cerain land, lying and being situatd in the County of Baldwin, tate of Alabama, described as

ollows:

The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East;

omplaingnt alleges in his bill f complaint that he acquired title o the said lands from D. D. Golen by d943, recorded in the ofof June, le Judge of Probate of tice of thCounty, Alabama, in Baldwin 🕏 ine 🗧

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interest in, claim, lien or encumbrance upon the Southwest quarter and the South half of the Northwest quarter of Section 28, The Southwest quarter and the Township 8 South, Range 4 East, South Half of Northwest quar- in Baldwin County, Alabama, or

Complainant further that he and those through whom nie M. Jones, Patrick J. Co. he claims have, for more than oney. Mary F. Smith, Jean Gal. ten years next preceding the fillagah, Bay LaLaunch Orchards ing of said bill of complaint, been in the actual peaceable adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during and assigns of John U. Schmidt such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereof and that the bill of complaint is filed for the purpose. of establishing his title to and interest in the said lands and clearing up doubts and disputes concerning the same.

And it appering from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, deceased, and the unknown heirs, devisces, personal representatives and assigns of Ursula Schmidt, deceased, are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained;

And it further appearing from said bill of complaint, that the defendant, Bay LaLaunch Or-chards Company, a corporation, place of business and its officers and their names and place of business is unknown to complainant and cannot be ascertained upon diligent search and inquiry;

And an order having been made and entered that notice of the pendency of said suit be given by publication once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama;

It is therefore ordered that the said Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gal-



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E, Baidwin County, Alabama; that the notice hereto attached of

being duly sworn, deposes and says

CLAUDE PETEET.

A Property (Agree)

COMPLAINANT

VS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST, IN BALDWIN COUNTY, ALABAMA; AND ANNIE M. JONES, PATRICK J. COONEY, MARY F. SMITH, JEAN GALLAGAH, BAY LaLAUNCH ORCHARDS COMPANY, A CORPORATION, AND ITS ALIENEES, SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF JOHN U. SCHMIDT AND THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHMIDT; AND ANY AND ALL PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR EN-INTEREST IN, CLAIM, LIEN OR EN-CUMBRANCE ON THE SAID LAND OR ANY PART OR PARCEL THEREOF;

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

DEFENDANTS

litem for, and Mary F. Smith, Jean Gallagar, BAy LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all other persons, firms, associations or corporations, claiming any title to, interest in, claim, lien or encumbrance on the following described land, to-wit: the Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, Baldwin County Alabama. County, Alabama;

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

Witness this the // day of

Beebe & Swearingen

for

CLAUDE PETEET,

COMPLAINANT

VS

THE SOUTHWEST QUARTER AND THE SOUTH WALF OF MORTHWEST QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 MAST, IN BALK-WIN COUNTY, ALABAMA; AND ARBIE M. JONES, PATRION J. COGNIY, MARY F. SMITH, JEAN GALLAGAR, BAY LeLAUNON ORCHARDS COMPARY, A CORPORATION, AND ITS ALIENBAS, SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISERS, PERSONAL REPRESENTATIVES AND ASSIGNS OF JOHN U. SOUNTED AND THE UNKNOWN HEIRS, DEVISERS, PERSONAL REPRESENTATIVES AND ASSIGNS OF USBULA SCHEDT; AND ANY AND ALL PERSONS, FIRBS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, DISK OR EN-CUMBRANCE OF THE SAID LAND OR ANY PART OR PARCEL THEREOF;

IN THE CIRCUIT COURT OF

BRIDWIN COURTY, ADABADA,

IN BQUITY

DEFENDANTS

litem for, and hery F. Smith, Jean Gallage, Bay Labounch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all other persons, firms, associations or corporations, claiming any title to, interest in, claim, lien or encumbrance on the following described land, to-wit: the Southwest juarter and the South half of the Northwest quarter of Section 28, Jownship & South, Range & Bast, Baldwin County, Alabama; County, Alabama;

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

Witness this the Zeay of Jan

I, Alice J. Duck, Register of the Circuit Court of Ballwin County, Alabama, do hereby certify that the foregoing is a true and correct copy of the motion and application of the complainant for oral examination of the said Claude flef, as witness for complainant and that notice of said motion was given to the defendants by entry on the order book of the register, said entry having been made on the 20 day of January, 1953-

Register J- Renado

CLAUDE PETEET,

COMPLAINANT

TS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST, IN BALDWIN COUNTY, ALABAMA; AND ANNIE M. JONES, PATRICK J. COGNEY, MARY F. SMITH, JEAN GALLAGAH, BAY Lalaungh Orchards Company, A CORPORATION, AND ITS ALIENEES, SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF JOHN U. SCHMIDT AND THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHMIDT; AND ANY AND ALL PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR ENCUMBRANCE ON THE SAID LAND OR ANY PART OR PARCEL THEREOF:

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

70 3394

DEFENDANTS

Notice is hereby given to Annie M. Jones, Patrick J. Cooney,
Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation
and its alienees, successors and assigns, the unknown heirs, devisees,
personal representatives and assigns of John U. Schmidt, the unknown
heirs, devisees, personal representatives and assigns of Ursula Schmidt,
and any and all persons, firms, associations or corporations claiming
any title to, interest in, claim, lien or encumbrance upon the following
described lands: The Southwest quarter and the South half of the Northwest quarter of Section 28, township 8 South, Range 4 East, in Baldwin
County, Alabama.

That Claude Peteet has filed his bill of complaint on the day of ______, 1954, in this court on the equity side claiming to be in actual peaceable possession, owning and claiming to own that certain land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East;

complainant alleges in his bill of complaint that he acquired title to the said lands from D. D. Golden by deed, dated the 25th day of June, 1943, recorded in the office of the Judge of Probate of Baldwin

County, Alabama, in Deed Book 106 at page 488; who acquired title from the State of Alabama by deed dated May 3, 1935 and recorded in the said Probate office in Deed Book 58 at page 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that John U. Schmidt and Ursula Schmidt are dead, that the unknown heirs, devisees, personal representatives and assigns, of John U. Schmidt, deceased, and the unknownheirs, devisees, personal representatives and assigns of Ursula Schmidt, deceased, Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah and Bay Lalaunch Orchards Company, a corporation, claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama, or some part or parcel thereof.

Complainant further alleges that he and those through whom he claims have, for more than ten years next preceding the filing of said bill of complaint, been in the actual peaceable adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereof and that the bill of complaint is filed for the purpose of establishing his title to and interest in the said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, deceased, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, deceased, are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained:

And it further appearing from said bill of complaint, that the defendant, Bay LaLaunch Orchards Company, a corporation, place of business and its officers and their names and place of business is unknown to complainant and cannot be ascertained upon diligent search

and inquiry;

And an order having been made and entered that notice of the pendency of said suit be given by publication once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Bay Winette, Baldwin County, Alabama;

It is therefore ordered that the said Annie M. Jones,
Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards
Company, a corporation, and its alienees, successors and assigns, the
unknown heirs, devisees, personal representatives, and assigns of
John U. Schmidt, the unknown heirs, devisees, personal representatives
and assigns of Ursula Schmidt; and any and all other persons, firms,
associations or corporations claiming any title to, interest in, claim,
lien or encumbrance upon said lands described as follows: the Southwest
quarter and the South half of the Northwest quarter of Section 25, Township 8 South, Range 4 East, in Baldwin County, Alabama, appear and plead,
answer or demur to the said bill of complaint within sixty days after
the first publication of this notice, namely the 4th day of November,
1954, at which time the said cause shall stand at issue.

Witness my hand this the 2 day of November, 1954.

Register, Circuit Court, Baldwin County, Alabama, in equity.

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the foregoing is a true and correct copy of the notice of the pendency of a bill of complaint in the Circuit Court of Baldwin County, Alabama, in Equity, wherein Claude Peteet, is complainant, and Annie II. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay Lalaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, degisees, personal representatives and assigns of Ursula Schmidt, and the following described lands, to-wit: the Southwest cuarter and the South half of the Worthwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama, are defendants as the same was drawn by me and caused to be published in the Baldwin Times, a newspaper published in Baldwin County, Alabama, - ander and in pursuance of an order of this court made in said cause on the 2 day of 1000. 1954.

Witness my hand this the Z day of Navember 1954.

Alice touche

STATE OF ALABAMA, BALDWIN COUNTY

Recorded Lia Pen book H

of Probate

CLAUDE PETEET

COMPLAINANT

VS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST, IN BALD-WIN COUNTY, ALABAMA; AND ANNIEM. JONES, PATRICK J. COONEY, MARY F. SMITH, JEAN GALLAGAH, BAY LaLAUNCH ORCHARDS COMPANY, A CORPORATION, AND ITS ALIENEES, SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF JOHN U. SCHMIDT AND THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHMIDT: AND ANY AND ALL PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR ENCUMBRANCE ON THE SAID LAND OR ANY PART OR PARCEL THEREOF;

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

This cause coming on to be heard is submitted for final decree upon behalf of the complainant, upon the original bill of complaint and upon the service, decree pro confesso, appointment, acceptance and answer of guardian ad litem, pleading and proof as noted by the register; and the same being considered by the Court. the Court is of the opinion, does find, ascertain and decree, that due and proper notice of the pendency of said bill of complaint against the said lands and the said defendants, Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt; and any and all other persons, firms, associations or corporations, claiming any title to, interest in, claim, lien or encumbrance on said lands or any part thereof, has been given in the manner required by law, and that the complainant is entitled to the relief as prayed for in the bill of complaint.

AND DECREED by the Court that the complainant, Claude Peteet, is over the age of twenty-one years and a resident of Baldwin County, Alabama; that at the time of the filing of the said bill of complaint and at the time of the submission of this cause for final decree, the complainant was and is in the actual and peaceable possession, claiming to own the same absolutely, and in fee sime of all that certain tract of land situated in the County of Baldwin, State of Alabama, described as follows, to-wit:

The Southwest quarter and the South half of Northwest quarter of Section 28, Township 8 South, Range 4 East; in Baldwin County, Alabama;

That the complainant acquired title to the said lands from D. D. Golden by deed, dated the 25th day of June, 1943, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 106 at page 488; who acquired title from the State of Alabama by deed dated May 3, 1935, and recorded in the said Probate office in Deed Book 58 at pages 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that the title to the said lands and each parcel thereof stands in the name of the complainant upon the records of Baldwin County, Alabama; that for more than ten years next preceding the filing of said bill of complaint no person other than those through whom he claims title to the said lands or any part thereof have assessed or paid taxes thereon.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Claude Petest at the time of the filing of the bill of complaint in this cause and at this time had and has the fee simple title to the above described lands, and to each and every part and parcel thereto, that neither of the defendants, Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, nor any other person, firm, association or corporation have any title to, interest in, claim, lien or encum-

brance on said lands or any part thereof.

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

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

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

Done at Bay Minette, Alabama, this the lst day of February , 1955.

1 december 1	Hubert M. Hall
I, Alice I. Duck, Register of the Circuit Count of Bridgin County, Alebama, deficiely certify discribe foregoing to a constitutive of the Original decree readers in video and configuration of the constitutive of the constituti	STATE OF ALABAMA, BALDWIN COUNTY
Register of Circuit Court, in Equity,	Recorded book 2/9 page #// /

CLAUDE PETEET,	Y O	IN THE CIRCUIT COURT OF
COMPLAIMANT	, ,	•
· VS	Tr.	BALDWIN COUNTY, ALABAWA,
CERTAIN LANDS & ARNIE M. JONES, ET AL		
		IN EQUITY
DEFENDAN TS	W. W	

Complainant having on the 20 day of January, 1955, filed his methon and request for oral examination of Claude

Let , witness for complainant and due and proper notice thereof having been given as required by law on the Order Book of this Court and to J. Connar Outcoff guardian ad litem for the said unknown defendants, and Madeline S. Pryars of the Town of Bay Minette being a suitable person to act as commissioner to take the deposition of said witness;

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the

said motion for the oral examination of Claude Telet, witness for complainant, be and is hereby granted.

And that Madeline S. Bryars be and she is hereby appointed as commissioner to take the deposition of said witness.

Witness my hand this the 24 day of Lon., 1955.

Alice Joenston

Claude Petect Complainants 25 annie M. Jones et al., & Chitain lands:

Order appointing

Arled 1-24-5'5'
Acric Inench
Reg

Service of South Much

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WE COMMAND YOU that you summon Annie M. Jones, Patrick J. Cooney, Mary F. Smith and Jean Gallagah to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery Jurisdiction within sixty days after the service of the summons and there to answer, plead or demur without oath to a bill of complaint lately exhibited by Claude Peteet against the said Annie M. Jones, Patrick J. Gooney, Mary F. Smith and Jean Gallagah, and further to do and perform what the said Judge shall order and direct in that behalf, and this the defendants shall in no wise omit, under penalty of the law, and we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

Witness, Alice J. Duck, Register of said Circuit Court this the 2 day of Maria 1954.

Register Leuch

CLAUDE PETEET, IN THE CIRCUIT COURT OF COMPLAINANT VS THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWN-QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST,
IN BALDWIN COUNTY, ALABAMA;
AND ANNIE M. JONES, PATRICK
J. COONEY, MARY F. SMITH,
JEAN GALLAGAH, BAY LALAUNCH
ORCHARDS COMPANY, A CORPORATION, AND ITS ALIENBES,
SUCCESSORS AND ASSIGNS, THE BALDWIN COUNTY, ALABAMA, UNKNOWN HEIRS, DEVISEES, PER-SONAL REPRESENTATIVES AND IN EQUITY ASSIGNS OF JOHN U. SCHMIDT AND THE UNKNOWN HEIRS, DEVISEDS, PERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHMIDT; AND ANY AND ALL PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR ENCUMBRANCE ON THE SAID LAND OR ANY PART OR PARCEL THEREOF,

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

DEFENDANTS

Comes your complainant, Claude Peteet, and presents this his bill of complaint against the following described lands in Baldwin County, Alabama, to-wit:

The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East,

and against Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, its alienees, successors or assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance on said land or any portion thereof and respectfully represents and shows unto your honor as follows:

FIRST: That your complainant is over the age of twentyone years and a resident of the County of Baldwin, State of Alabama;
that Annie M. Jones, Patrick J. Cooney and Mary F. Smith are each

over the age of twenty-one years, and whose place of residence and post office addresses are as follows: Annie M. Jones, 1702 Dauphin Street, Mobile, Alabama; Patrick J. Cooney, 181 Louiselle Street, Mobile, Alabama; Mary F. Smith, 1702 Dauphin Street, Mobile, Alabama; that Jean Gallagah is over the age of twenty-one years her last known address was Oak Street, Chicago, Illinois, a better address or her present address, if she does not there reside, cannot be ascertained upon diligent search and inquiry; that Bay LaLaunch Orchards Company, is a corporation organized under the laws of the State of Alabama, with its principal place of business at Foley, Alabama, that the said Bay LaLaunch Orchards Company, a corporation, does not now maintain an office at Foley, and complainant has made diligent search and inquiry at Foley and at the court house of Baldwin County, and at all other known places where such corporation, or the incorporators have been known to do business, or to reside, and upon such inquiry complainant has been unable to ascertain where the said corporation maintains an office and who and where its officers are; that John U. Schmidt and Ursula Schmidt are dead, that complainant has made diligent search to ascertain the names, ages and places of residence of their heirs, devisees, personal representatives and assigns; that he has inquired of numerous persons at Foley and in the vicinity in which such land is located and of persons in Bay Minette, including all of the officers and has searched the Probate and tax records and upon inquiry has been unable to asceptain their names, ages and post office address, but is informed and believes and upon such information and belief alleges that the heirs, devisees, personal representatives and assigns of the said John U. Schmidt and Ursula Schmidt are over the age of twenty-one years and are non-residents of the State of Alabama, their places of residence being unknown to complainant and cannot be

SECOND: That your complainant is the owner of in fee simple and in the actual possession of the said lands in Baldwin County,

ascertained.

Alabama, described as follows, to-wit:

The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama;

and that he and those through whom he claims have been in the continuous peaceable adverse possession of the said lands for more than ten years next preceding the filing of this bill of complaint and that he and those through whom he claims title to the said lands have for more than ten years next preceding the filing of this bill of complaint annually assessed and paid the taxes on the said lands and that during such period of time no other person has assessed the said lands for taxes or paid taxes thereon, and that no other person for such period has had, or attempted to exercise any possession over the said land or claimed any right to possession thereof or any title to, interest in, claim, lien or encumbrance thereon or to any part or parcel of the same.

THIRD: That no suit is pending to test complainant's title to, interest in, lien, claim or encumbrance on, or right of possession of said land.

FOURTH: That the title to the said lands stands on the records of Baldwin County, Alabama, in the name of your complainant; that he obtained title from D. D. Golden by deed, dated the 25th day of June, 1943, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 106 at page 488; who acquired title from the State of Alabama by deed dated May 3, 1935 and recorded in the said Probate office in Deed Book 58 at page 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that for more than ten years next preceding the filing of this bill of complaint no person other than those through whom he claims title to the said lands or any portion thereof, have assessed or paid taxes thereon and that he and those through whom he claims title as aforesaid, have been in the actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of the same, under color of title claiming to own the same for more than ten years next preceding the filing of this bill of complaint, and that he and those through whom he claims have fenced the said lands, cultivated and harvested crops thereon in person or by tenant; that Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, claim or are reputed to claim some title to, interest in, lien or encumbrance upon the land, or some part or parcel there-of.

WHEREFORE, your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and by appropriate process make the said Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance upon the said lands, to-wit: The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama, or any part or parcel thereof, to be made parties defendant to this bill of complaint and by appropriate process require them and each of them separately and severally 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.

Your complainant further prays that upon a final hearing of this cause, this Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of liens, claims and encumbrances to the said lands and each part and parcel thereof, is vested in your complainant, Claude Peteet, as against Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, its successors, aliences

or assigns, the unknown heirs, devises, personal representatives and assigns of John U. Schmidt, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and as against any and all persons, firms, associations, or corporations, claiming any title to, interest in, claim, lien or encumbrance upon said lands or any part thereof, and that any and all doubts and disputes concerning the same be cleared up, and your complainant prays for such other, further, different or general relief as in equity and good conscience shall seem meet and proper.

BEEBE & SWEARINGEN

Solicitor for complainant

STATE OF ALABAMA BALDWIN COUNTY

Defore me, the undersigned authority in and for said County and State, personally appeared N. C. Beebe, who is known to me, and who, having been by me first duly sworn, deposes and says that he is solicitor for the complainant in the above styled cause, and that the facts stated in the foregoing bill of complaint, from all information obtainable, are true, and from such information obtained he verily believes, and so states, the same to be true.

Sworm to and subscribed before me on this the 2 day of

Menerikes/1954.

Motary Public, State of Alabema at

23 MA

or assigns, the unimper helps, devises, personal representatives and assigns of John D. Schuldt, and the unimper heirs, devisess, personal representatives and assigns of Drawla Schuldt, and as egainst any and all persons, filter, associations, or corporations, claims any tible to, interest in, claim, lien or encustrance upon said lands or any part that the same be cleared up, and will doubte and disputes concerning the same be cleared up, and your complainant prays for each other, further, different or powers relief as in equity and good conscions shall seen meet and proper.

STATE OF ALBANA BALLINE COURT

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OLAUDE PETEET,	i.	IN THE CIRCUIT COURT OF
COMPLAINANT	Ĺ	
VS	N S	BALDMIN COUNTY, ALABAMA
CERTAIN LANDS & ANNIE K. JONES, ET AL		
DEFENDANTS	Y Y	TAN BOUTTY OF

This cause is submitted for final decree upon the bill of complaint, service by publication, personal service, decree pro confesso, appointment of guardian ad litem, acceptance and answer of guardian ad litem and deposition of Claude witness for complainant.

This the policy of Gel, 1935

THE & SHEETINGER

Solicitors for complainant

Aggister J-rench

Claude Petert

Cirtain louds & annie m. Jones et cef.

Note of testimony

FILED FEB 1 1955 AUCE J. BUCK, Register

OTAUDE PREEET,

IN THE CIRCUIT COURT OF

. COGFLAINART

BALDWIN COURTY, ALARMA,

CERTAIN LANDS & AUNTE N. January Relac

DEFERDANTS

Comes the complainart in the above styled cause and requests the oral examination of Claude Peter, as witness for the complainant, who resides in B lawin County, State of Alabama, and suggests Madeline S. Eryars of the Town of Bay Minette, as a suitable person to act as commissioner to take the deposition of the said with ess.

Witness my hand this the 17 day of January

7055.

CLAUDE PETEET

IN THE CIRCUIT COURT OF

COMPLAINANT

WS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST, IN BALDWIN COUNTY, ALABAMA; AND ANNIE M. JONES, PATRICK J. COONEY, MARY F. SMITH, JEAN GALLAGAH, A CORPORATION, AND ITS ALIENEES, SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF JOHN U. SCHMIDT AND THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHMIDT: AND ANY AND ALL FERSONS, FIRMS, ASSOCIATIONS OR CORPORATTIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR ENCUMBRANCE ON THE SAID LAND OR ANY PART OR PARCEL THEREOF;

BALDWIN COUNTY, ALABAMA,

IN EQUITY

DEFENDANTS

This cause coming on to be heard is submitted for final decree upon behalf of the complainant, upon the original bill of complaint and upon the service, decree pro confesso, appointment, acceptance and answer of guardian ad litem, pleading and proof as noted by the register; and the same being considered by the Court, the Court is of the opinion, does find, ascertain and decree, that due and proper notice of the pendency of said bill of complaint against the said lands and the said defendants, Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt; and any and all other persons, firms, associations or corporations, claiming any title to, interest in, claim, lien or encumbrance on said lands or any part thereof, has been given in the manner required by law, and that the complainant is entitled to the relief as prayed for ' in the bill of complaint.

IT IS THEREFORE FOUND, ASCERTAINED, ORDERED, ADJUDGED AND DECREED by the Court that the complainant, Claude Peteet, is over the age of twenty-one years and a resident of Baldwin County, Alabama; that at the time of the filing of the said bill of complaint and at the time of the submission of this cause for final decree, the complainant was and is in the actual and peaceable possession, claiming to bwn the same absolutely, and in fee sime of all that certain tract of land situated in the County of Baldwin, State of Alabama, described as follows, to-wit:

The Southwest quarter and the South half of Northwest quarter of Section 28, Township 8 South, Range 4 East; in Baldwin County, Alabama;

That the complainant acquired title to the said lands from D. D. Golden by deed, dated the 25th day of June, 1943, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 106 at page 488; who acquired title from the State of Alabama by deed dated May 3, 1935, and recorded in the said Probate office in Deed Book 58 at pages 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that the title to the said lands and each parcel thereof stands in the name of the complainant upon the records of Baldwin County, Alabama; that for more than ten years next preceding the filing of said bill of complaint no person other than those through whom he claims title to the said lands or any part thereof have assessed or paid taxes thereon.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Claude Feteet at the time of the filing of the bill of complaint in this cause and at this time had and has the fee simple title to the above described lands, and to each and every part and parcel thereto, that neither of the defendants, Annie M. Jones, Fatrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, nor any other person, firm, association or corporation have any title to, interest in, claim, lien or encum-

brance on said lands or any part thereof.

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

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

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

Done at Bay Minette, Alabama, this the day of

Tubers m Hace

STATE OF ALABAMA

BALDWIN COUNTY

WE COMMAND YOU that you summon Annie of Jones, Patrick J. Cooney, Mary F. Smith and Jean Gallagah to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery Jurisdiction within sixty day: after the service of the summons and there to answer, plead or demr without oath to a bill of complaint lately exhibited by Claude Peteet against the said Annie H. Jones, Patrick J. Cooney, Mary F. Smith and Jean Gallagah, and further to do and perform what the said Judge shall order and direct in that behalf, and this the defendants shall in no wise omit, under penalty of the law, and we further command that you return this writ with your endorsement the reon, to our said Court immediately upon the execution thereof.

Witness, whice J. Duck, Register of said Circuit Court this the 1 day of 1954.

Register herek

by serving a copy of the within on the M. H. HOLCOMBE, She Fit?

By W. H. Derywood. So

MOBILE COUNTY, ALA.

Not found in my County after diligent search and inquiry. Many 31.

W. H. HOLCOMBE, Sheriff

By M. H. D.S.

MOBILE COUNTY, ALA.

FILED

//-2-5-y

ALICE 1. DOCK, Register

CLAUDE PETEET,

IN THE CIRCUIT COURT OF

COMPLAINANT

VS

THE SOUTHWEST QUARTER AND
THE SOUTH HALF OF NORTHWEST
QUARTER OF SECTION 28, TOWNSHIF & SOUTH, RANGE 4 EAST,
IN BALDWIN COUNTY, ALABARA;
AND ANNIE M. JONES, PATRICK
J. COONEY, MARY F. SMITH,
JEAN GALLAGAH, BAY LALAUNCH
ORCHARDS COMPANY, A CORPORATION, AND ITS ALIENEES,
SUCCESSORS AND ASSIGNS, THE
UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND
ASSIGNS OF JOHN U. SCHNIDT AND
THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES AND
ASSIGNS OF URSULA SCHNIDT; AND
ANY AND ALL FERSONS, FIRMS,
ASSOCIATIONS OR CORPORATIONS
CLAIMING MAY TITLE TO, INTEREST
IN, CLAIM, LIEN OR EMOUMBRANCE
ON THE SAID LAND OR ANY PART
OR PARCEL THEREOF,

BALDWIN COUNTY, ALABASA,

IN EQUITY

DEFENDANTS

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CURCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN LUCITY SHTTENG:

Comes your complainant, Claude Peteet, and presents this his bill of complaint against the following described lands in Baldwin County, Alabama, to-wit:

The Southwest quarter and the South half of the Northwest quarter of Section 28, Town-ship 8 South, Range & East,

and against Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay Lalaunch Orchards Company, a corporation, its alienees, successors or assigns, the unknown heirs, devisees, personal representatives and assigns of John J. Schmidt, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance on said land or any portion thereof and respectfully represents and shows unto your honor as follows:

FIRST: That your complainant is over the age of twentyone years and a resident of the County of Baldwin, State of Alabama;
that Annie M. Jones, Patrick J. Cooney and Mary F. Smith are each

over the age of twenty-one years, and whose place of residence and post office addresses are as follows: Annie M. Jones, 1702 Dauphin Street, Mobile, Alabama; Patric: J. Cooney, 181 Louiselle Street, Mobile, Alabama; Mary F. Smith, 1702 Dauphin Street, Mobile, Alabama; that Jean Gallagah is over the age of twenty-one years her last known address was Oak Street, Chicago, Illinois, a better address or her present address, if she loes not there reside, cannot be ascertained upon diligent search and inquiry; that Bay Lalaunch Orchards Company, is a corporation organized under the laws of the State of Alabama, with its principal place of business at Foley, Alabama, that the said Bay LaLaunch Orchards Company, a corporation, does not now maintain an office at Foley, and complainant has made diligent search and inquiry at 'oley and at the court house of Baldwin County, and at all other known places where such corporation, or the incorporators have been known to do business, or to reside, and upon such inquiry complainant has been unable to ascertain where the said corporation maintains an office and who and where its officers are; that John U. Schmidt and Ursula Schmidt are dead, that complainant has made diligent search to ascertain the names, ages and places of residence of their heirs, devisees, personal representatives and assigns; that he has inquired of numerous persons at Foley and in the vicinity in which such land is located and of persons in Bay Minette, including all of the officers and has searched the Probate and tax records and upon inquiry has been unable to ascertain their names, ages and post office address, but is informed and believes and upon such information and belief alleges that the heirs, devisees, personal representatives and assigns of the said John U. Schmidt and Ursula Schmidt are over the age of twenty-one years and are non-residents of the State of Alabama, their places of residence being unknown to complainant and cannot be ascertained.

SECOND: That your complainant is the owner of in fee simple and in the actual possession of the said lands in Baldwin County,

Alabama, described as follows, to-wit:

The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama;

and that he and those through show he claims have been in the continuous peaceable adverse possession of the said lands for more than ten years next preceding the filing of this bill of complaint and that he and those through whom he claims title to the said lands have for more than ten years next preceding the filing of this bill of complaint annually assessed and paid the taxes on the said lands and that during such period of time no other person has assessed the said lands for taxes or paid taxes thereon, and that no other person for such period has had, or attempted to exercise any possession over the said land or claimed any right to possession thereof or any title to, interest in, claim, lien or encumbrance thereon or to any part or parcel of the same.

THIRD: That no suit is pending to test complainant's title to, interest in, lien, claim or encumbrance on, or right of possess-ion of said land.

That the tille to the said lands stands on the FOURTH: records of Baldwin County, Alalama, in the name of your complainant; that he obtained title from D. D. Golden by deed, dated the 25th day. of June, 1943, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Dead Book 106 at page 488; who acquired title from the State of Alabama by deed dated May 3, 1935 and recorded in the said Probate office in Deed Book 58 at page 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that for more than ten years next preceding the filing of this bill of complaint no person other than those through whom he claims title to the said lands or any portion thereof, have assessed or paid taxes thereon and that he and those through whom he claims title as aforesaid, have been in the actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of the same, under color of title claiming to own the same for more than ten years next preceding the filing of this bill of complaint, and that he and those

through whom he claims have fenced the said lands, cultivated and harvested crops thereon in person or by tenant; that Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, claim or are reputed to claim some title to, interest in, lien or encumbrance upon the land, or some part or parcel thereof.

WHEREFORE, your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and by appropriate process make the said Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay Lalaunch Orchards Company, a corporation, its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance upon the said lands, to-wit: The Southwest quarter and the South half of the Nort west quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama, or any part or parcel thereof, to be made parties defendant to this bill of complaint and by appropriate process require them and each of them separately and severally to plead, answer or demur to the same within the time and under the penalties prescr.bed by law and the practice of this Honorable Court.

Your complainant further prays that upon a final hearing of this cause, this Honorable fourt will make and enter a decree ascertaining and decreeing that the fee simple title, free of liens, claims and encumbrances to the said lands and each part and parcel thereof, is vested in your complainant, Claude Petest, as against Annie M. Jones, Patrick J. Cookey, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, its successors, alienees

or assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and as against any and all persons, firms, associations, or corporations, claiming any title to, interest in, claim, lien or encumbrance upon said lands or any part thereof, and that any and all doubts and disputes concerning the same be cleared up, and your complainant prays for such other, further, different or general relief as in equity and good conscience shall seem meet and proper.

BEDBE & SWEARINGEN

BY Solicitor for complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority in and for said County and State, personally appeared W. C. Beebe, who is known to me, and who, having been by me first duly sworn, deposes and says that he is solicitor for the complainant in the above styled cause, and that the facts stated in the foregoing bill of complaint, from all information obtainable, are true, and from such information obtained he verily believes, and so states, the same to be true.

JACK JULL

Sworn to and subscribed before me on this the 2 day of Market . 1954.

Medic, State of Alabama at large.

FILED

//-2-54

ALICE 1. DECK. Register

CLAUDE PETEET,

COMPLAINAMT

VS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST, IN BALDWIN COUNTY, ALABAMA; AND ANNIE M. JONES, PATRICK J. COCNEY, MARY F. SMITH, JEAN GALLAGAN, BAY LALAUNCH ORCHARDS CONFANY, A CORFORATION, AND ITS ALIENSES, SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISEES, PERSONAL REFRESENTATIVES AND ASSIGNS OF JOHN U. SCHEIDT AND THE UNKNOWN HEIRS, DEVISES, PERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHEIDT; AND ANY AND ALL PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIDN OR ENCOUNBRANCE ON TWO SAID LAND OR ANY PART OR PARCEL THEREOF:

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIK COUNTY, ARABAMA,

IN BUUITY

Notice is hereby given to Annie M. Jones, Fatrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, clair, lien or encumbrance upon the following described lands: The Southwest cuarter and the South half of the Northwest quarter of Section 28, township 8 South, Range 4 Bast, in Baldwin County, Alabama.

That Claude Peteet has filed his bill of complaint on the avenue, 1954, in this court on the equity side claiming to be in actual peaceable possession, owning and claiming to own that certain land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

> The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East;

complainant alleges in his bill of complaint that he acquired title to the said lands from D. D. Golden by deed, dated the 25th day of June, 1943, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 106 at page 488; who acquired title from the State of Alabama by deed date! May 3, 1935 and recorded in the said Probate office in Deed Book 58 at page 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that John U. Schmidt and Ursula Schmid are dead, that the unknown heirs, devisees, personal representatives and assigns, of John U. Schmidt, deceased, and the unknownheirs, devisees, personal representatives and assigns of Ursula Schmidt, deceased, Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah and May Lalaunch Orchards Company, a corporation, claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Southwest quarter and the South half of the Northwest quarter of Jection 28, Township & South, Range 4 East, in Baldwin County, Alabam, or some part or parcel thereof.

Complainant further a leges that he and those through whom he claims have, for more than ten years next preceding the filing of said bill of complaint, been in the actual peaceable adverse possession of the said lands and have an ually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereof and that the bill of complaint is filed for the purpose of establishing his title to and interest in the said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said deferdants, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, deceased, and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, deceased, are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained:

And it further appearing from said bill of complaint, that the defendant, Bay LaLaunch Orcharis Company, a corporation, place of business and its officers and their names and place of business is unknown to complainant and cannot be ascertained upon diligent search

and inquiry;

And an order having been made and entered that notice of the pendency of said suit be given by publication once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama

It is therefore ordered that the said Annie M. Jones,
Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards
Company, a corporation, and its alienees, successors and assigns, the
unknown heirs, devisees, personal representatives, and assigns of
John U. Schmidt, the unknown heirs, devisees, personal representatives
and assigns of Ursula Schmidt; and any and all other persons, firms,
associations or corporations clauming any title to, interest in, claim,
lien or encumbrance upon said lands described as follows: the Southwest
quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Buldwin County, Alabama, appear and plead,
answer or demur to the said bill of complaint within sixty days after
the first publication of this notice, namely the 4th day of November,
1954, at which time the said cause shall stand at issue.

Witness my hand this the 2 day of Marumher, 1954.

Hegister, Lircuit Court, Baldwin County, Wabama, in equity.

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the foregoing is a true and correct copy of the notice of the pendency of a bill of complaint in the Circuit Court of Baldwin County, Alabama, in Equity, wherein Claude Peteet, is complainant, and Annie M. Jones, Patrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, degisees, personal representatives and assigns of Ursula Schmidt, and the following described lands, to-wit: the Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin County, Alabama, are defendants as the same was drawn by me and caused to be published in the Baldwin Times, a newspaper published in Baldwin County, Alabama, under and in pursuance of an order of this court made in said cause on the 2 day of 1954.

Witness my hand this the 2 day of Morente, 1954.

Clerch-weich.
Register

I, Alice J. Duck, Ragister of the Circuit Court of Baldwin County, Alabama, in Equity do hereby certify that the foregoing is a true and correct copy of the notice of the pendency of a bill of complaint in the Circuit Tourt of Baldwin County, Alabama, in Equity, wherein Claude Petee:, is complainant and Annie M. Jones, Patrick J. Cooney, Mary F. Suith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and the following described land, to-wit: the Southwest quarter and the South half of the Northwest quarter of Section 28, Township & South, Range 4 Bast, in Baldwin County, Alatama; and any and all persons, firms, corporations or associations claiming any title to, interest in, claim, lien or encumbrance on the said land are defendants, as the same was drawn by me and caused to be published in the Baldwin Times, a newspaper published in Baldwi'r County, Alabama, under and in pursuance of an order of this court made in said cause on the 2ndiay of Mos., 1954, and I do further certify that the same was published in the Baldwin Times, the newspaper designated therein in its issues of Movember 4, 1954, Movember 11, 1954, Movember 18, 1954 and November 25, 1954.

And I do further certify that the foregoing notice was filed by me for record in the office of the Judge of Probate of Baldwin County, Alabama, recorded by the said Judge of Probate in Lis Fendens 004, page 129 on the 2 day of 1954.

Witness my hand this the M day of Dec, 1954.

Register A-sluck

Claude Petert Complainant

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CLAUDE PETERT, IN THE CIRCUIT COURT OF

COMPLAINANT I

VS I BALDWIN COUNTY, ALABARA,

CERTAIN LANDS, AND I

ANNIE M. JONES, ET AL

DEFENDANTS

IN THE CIRCUIT COURT OF

In this cause, it appears to the Register, that service was had on the respondents, Annie M. Jones and Fatrick J. Cooney by the sheriff of Mobile Courty, on the 5th day of Movember, 1954;

And it further appears that the order of publication of notice to the non-resident respondents, Mary F. Smith, Jean Gallagah, Bay Lalaunch Orchards Company, a corporation, and its illeness successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, heretofore made in this causa, was published for four consecutive weeks, commencing on the 4th day of November, 1954, in the Baldwin Times, a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the court house door in Baldwin County, on the 27th day of September, 1954, and notice of the pendency of the suit was filed and recorded in the office of the Judge of Probate of Baldwin County on the 29th day of September, 1954;

And it now further appearing to the register, that the said Annie M. Jones, Patrick J. Cooney, Pary F. Smith, Jean Gallagah,
Bay LaLaunch Orchards Company, a corporation, its alienees,
successors and assigns, the unknown heirs, devisees, personal
representatives and assigns of John U. Schmidt and the unknown
heirs, devisees, personal representatives and assigns of Ursula
Schmidt, the respondents, having to the date hereof, failed to

plead, demur to or answer the bill of complaint filed in this cause, it is now, therefore, on motion of Beebe & Ewearingen, solicitors for complainant, (rdered, and decreed by the register that the bill of complaint in this cause be, and it hereby is, in all things taken as confessed against the said Annie M. Jones, Patrick J. Cooney, Mary P. Smith, Jean Gallagah, Bay Lalaunch Orchards Company, a corporation, its alienses, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, and the unknown heirs, devisees, personal representatives, and assigns of Ursula Schmidt,

This 15 day of January, 1955.

alice I bock, Register

Claude Petert Complaint

Certain landst annie m. Janes et al Defendants

Decree pro

CLAUDE PETEET,

IN THE CIRCUIT COURT OF

COMPLAINANT

BALDWIN COUNTY, ALABAMA,

Motion is hereby made for a decree pro confesso against Annie M. Jones and Patrick J. Dooney, defendakts in the above styled cause, on the ground that more than six days have elapsed since service of summons upon said defendants; and that said summons was duly served according to law; and against Many F. - Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisess, personal representatives and assigns of Ursula Schmidt, defendants in the above stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this court; and it having been shown by die proof to the court that said defendants are non-residents of the State of Alabama, and that said defendants have failed to demur, plead to or answer the bill of complaint in this cause to this date.

This the 15 day of fanuary, 1955.

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1-15-55

ALIGE L. MACK, Residen

Claude Petect Complainant

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Certain lands † Annie M. Janes et al-Defendants

Bration for Decree pro loghes

JAN 15 1955

ALIGE J. BUCK, Registed

CONFLAINANT

VS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF MORTHWEST QUARTER OF SECTION 28, TOWNSHIP SCUTH, RANGE 4, HAST, IN BALDWIN COUNTY, ALABAMA; AND ANNIE M. JONES, PATRICK J. CCONEY, MARY F. SMITH, JEAN GALLAGAM, BAY LALAUNCH CRCHARDS COMPANI, A CORPORATION, AND ITS ALIENDES, SUCCESSORS AND ASSIGNS, THE JNHKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF URBULA SCHEIDT; AND ANY AND ALL PERIORS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, DIEM OR INCUMBRANCE OF THU SAID LAND OF ANY PART OR FARGEL THEREOF:

BAIDAIN COURTY, ALABADA,

IN EQUITY

DEFENDANTS

It appearing that in the above styled cause what ould liones, Patrick J. Cooney, Mary F. Shith, Jean Gallagah, Bay Lalaunch Orchards Company, a corporation, and its alieness, successors and assigns, the unknown holls, devisees, personal representatives, and assigns of John U. Schwilt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest, in, claim, lien or encumbrance upon the following described lands: The Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, in Baldwin Couity, Alabama, are parties defendant, and that due and proper notice of the pendency of the said action has been given in the sanner and for the time required by law and that decree pro confesso has been taken against them and it is necessary and proper that guardian ad litem be appointed to represent Hary F. Smith, Jean Gallegah, Bay Lawaunch Orchards Company, a corporation, and its alienees, successors and assigns,

the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, componations or associations claiming any title to, interest in, claim, liem or encumbrance on the following described Lend: the Couthwest quarter and the South half of the Northwest quarter of Section 28, Townslip & South, Range 4 East, in Baldwin County, Alabama;

Now therefore, it is Ordered, Adjudged and Decreed that mov ower enquire, who is learned in the law and a practicing lawyer at this lar, be and he is hereby appointed as guardian ad litem for and to represent Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation and its alienees, successors and assigns, the unknown heirs, devisees. personal representatives and assigns of John V. Schmidt, the unknown heirs, devisees, partonal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance upon the following described lands: The Southwest quarter and the South half of the Northwest quarter of Section 28, Township & South, Range Last, in Baldwin County, Alabama, in the said cause.

Done this the II day of Iau

1-15-65

ALIGE 1. DOCK - ROCKSON

Hubert M Hall

Claude Petect
Complainant

Certain lands of annie m. Jones et al Defendants

Irder appointing Juardian ad litem

FILED -JAN 15 1955

ALICE J. DUCK, Register

CLAUDE FETEET.

IN THE CIRCUIT COURT OF

COMPLAINANT

VS

THE SOUTHWEST QUARTER AND
THE SOUTH HALF OF MORTHWEST
QUARTER OF SECTION 28, TOWNSHIP 8 SOUTH, RANGE 4 EAST,
IN BALDWIN COUNTY, ALABAMA;
AND ANNIE M. JONES, PATRICK
J. COONEY, MARY F. SMITH,
JEAN GALLAGAH, BAY LALAUNCH
CRCHARDS COMPANY, A CORPORATION, AND ITS ADJENCES,
SUCCESSORS AND ASSIGNS, THE
UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES AND
ASSIGNS OF JOHN U. SCHAIDT AND
THE UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES AND
ASSIGNS OF URSULA SCHAIDT; AND
ANY AND ALL PERSONS, FIRMS,
ASSOCIATIONS OR CORPORATIONS
CLAIMING ANY TITLE TO, INTEREST
IN, CLAIM, LIEM OR ENCUMBRANCE
ON SAID LAND OR ANY PART OR
PARCEL THEREOF, PARCEL THEREOF,

BALDWIN COUNTY, ALABAMA,

IN EQUITY

DEFENDANTS

Whereas, Claude Feteet has filed his bill of complaint on the 2 day of Ibululu, 1954, in this Court on the Equity side, claiming to be in actual peaceable possession, owning and claiming to own those certain lands, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

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The Southwest quarter and the South half of the Northwest quarter of Section 28, Town-ship 8 South, Range 4 East;

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County, in his, Claude Peteet's name; that he acquired title to the said lands from D. D. Golden by deed dated the 25th day of June, 1943, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 106 at page 468; who acquired title from the State of Alabama by deed dated -ay 3, 1935 and recorded in the said Probate office in Deed Book 58 at page 247-8; that the State of Alabama acquired title to the said lands by sale for taxes June 13, 1932; that Annie M. Jones, Fatrick J. Cooney, Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, the unknown heirs, devisees, parsonal representatives and assigns of

John U. Schmidt and the unknown heirs, devisees, personal representatives of Ursula Schmidt claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the aforesaid lands, or some portion thereof.

Complainant further alleges that he and those through whom he claims have for more than ten years next preceding the filing of said bill of complaint been in the actual peaceable adverse possession of the said ands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any portion thereof or assessed or paid taxes on taid lands or any portion thereof and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from the said bill of complaint, the same being duly verified, that the names, ages and places of residence and post office address s of the defendants, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt, deceased and the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, deceased, are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the hames, ages and places of residence and post office addresses cannot be ascertained; and it further appearing that the defendant, Bay LaLaunch Orchards Company, a corporation, place of business and its officers and their names and place of business is unknown to complainant and cannot be ascertained upon diligent search and inquiry;

It is therefore ordered, adjuged and decreed that notice of the penceucy of said suit he given by publication once a week for four week consecutively in the Baldwin Times, a newspaper published in Bay Minette, in Baldwin County, Alabama.

WITNESS my hand and seal this the 2 day of Dodentes,

1954

Elegister. Janete

Claude Fitert Camplainant

Cennus M. Grow etal Fortain lands

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NOV 2 1954

ause I. Gick, Register

CLAUDE PETEST,

IN THE CIRCUIT COURT OF

COMPLAIMANT

VS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF MORTHWEST JUAN-TER OF SECTION 28, TOWNSHIP 8 TER OF SECTION 28, TOWNSHIF 8
SOUTH, INNELL TO THE SELL
WIN COUNTY, ALABALA; AND ARMIE
M. JONES, PATRICK J. COONDY,
MARY F. SHITH, JEAN GALLAGAH,
BAY LaLAUNCH CRCHARDS COMPANY,
A CORPORATION, AND ITS ALIENEES,
SUCCESSORS AND ASSIGNS, THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF
JOHN U. SCHMIDT AND THE UNKNOWN HEIRS, DEVISEES, RERSONAL REPRESENTATIVES AND ASSIGNS OF URSULA SCHMIDT; AND ANY AND ALL PIESC NS,
FIRMS, SESCOLATIONS OR COMPORETIONS CLAIMING ANY TITLE TO,
INTEREST IN, CLAIM, LIEM OR EXCUMBRANCE ON THE SAID LAND OR UNY
PART OR FARCEL THEREOF;

BALDWIN COUNTY, ALABAMA,

AH DOUITY

DUFEMDARTS

1. Connor Owen, attorney:

Under and by virtue of an order of the Honorable Hubert M. Hall, Judge of the Circuit Jourt of Baldwin County, sitting in equity, rendered in the above styled cause on the 150 day of _____, 19**33,** yiu are hereby appointed as guardian ad livem for and to represent Wary F. Smith, Jean Gallagah, Bay Labaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unthown heirs, devisees, personal representatives and assigns of John W. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, corporations or associations claiming any title to, interest in, claim, lien or encumbrance on the following described lands, to-lit: the Southwest quarter and the South half of the Morthwest quarter of Section 28, Township 8 South, Rangel Bast, Baldwin County, Alabama, defendants in the above styled cause.

1-15-55 ver i noce register

Witness this the 15 day of January, 1953.

I hereby accept the foregoing appointment as guardian ad litem for Mary F. Smith, Jean Gallagah, Bay LaLaunch Orchards Company, a corporation, and its alienees, successors and assigns, the unknown heirs, devisees, personal representatives and assigns of John U. Schmidt and the Thundam Asire, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance on the Schlowing described land to-wit: the Southwest quarter and the South half of the Northwest quarter of Section 28, Township 8 South, Range 4 East, Baldwin County, Alabama, defendants in the above styled cause, and do hereby file this denial of the allegations made in the bill of complaint in the said cause and demand strict proof of the same.

This the 17 th day of flere eng, 1956.

daardian ad litem.

FILED 1-15-55 LIGHT 1. MICK. Register Claude Peteit Complainant

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Certain landsto annie M. Janes et al Defendants

ance 3 quarking

JAN 15 1955 ALICE J. DUCK, Register COMPLAINANT

VS

THE SOUTHWEST QUARTER AND THE SOUTH HALF OF NORTHWEST QUARTER OF SECTION 28, TOWNSHIP 3 SOUTH, RANGE A BAST, BALDVIN COUNTY, ALABADA; AND ANNIE M. JONES, FATRICK J. COONEY, MARY F. SMITH, JEAN GALLAGAN, BAY LALAUNCH ORCHARDS CORPANT, A CORPORATION, AND ITS ALIENDES, SUCCESSORS AND ASSIGNS, THE MARK HALRS, DEVISES, PERSONAL RESPECTATIVES AND ASSIGNS OF JOHN U. SCHRIDT AND THE UNKNOWN HEIRS, DEVISES, PERSONAL RESPECTATIVES AND ASSIGNS OF JOHN U. SCHRIDT AND THE UNKNOWN HEIRS, DEVISES, PERSONAL RESPECTATIVES AND ASSIGNS OF URBULA SCHRIDT; AND ANY AND ALL PERSONS FIRMS, ASSOCIATIONS OR CORPORATIONS CRACKED ANY TITLE TO, INTEREST IN, CLAIM, LIEH OR INCOMMERANCE ON THE SAID LAND OF ANY PART OR PARCEL THEREOF:

BALDWIN COUNTY, ALABAMA,

IN SQUITY

DEFSMDAMTS

To Kary F. Smith, Jean Gallegah, Bay LaLaunch Crchards
Company, a corporation, and its alienees, successors and assigns,
the unknown heirs, devisees, personal representatives and assigns
of John U. Schmidt, the unknown heirs, devisees, personal representatives and assigns of Ursula Schmidt, and any and all persons,
firms, associations or corporations, claiming any title to,
interest in, claim, lien or encumbrance on the following described
land, to-wit: the Southwest quarter and the South half of the Horthwest quarter of Section 23, lownship & South, Range 4 Bast, Baldwin
County, Alabama, and to O. Lonnor Once, Onguardian ad litem for them;

Notice is hereby given that the testimony of Claude Tetet ___, vitness for the complainant in the above styled cause will be taken orally before Madeline S. Bryars, commissioner, heretofore duly appointed, at the office of Beebe A Swearingen, solicitors for exaplainant, at 10:00 biclock wit. on the 28 day of January, 1955.

madeline St Commissioner

Beebe & Swearingen

I, Alice J. Duck, Register of the Circuit Court of Beldwin County, Alabama, in equity, do hereby certify that the foregoing notice of the time and place of taking deposition of complainant's witness was filed and entered on the order book of the Register on the 24 day of January, 1955.

Register fresch

Claude Petert Complainant

Citain lands & annie M. James Hal

Notice of times place of taking textimony

Will 1-24.55

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