Bay Minette, Ala., Man 5 1918

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IN ACCOUNT WITH

### Jas. M. Voltz

JUDGE OF PROBATE, BALDWIN COUNTY

CA (10)			this Bill With Remittance.		Recording Fee Total	
***************************************	2/16/18	To	Recording Mortgage from Walman werter for Campbell ela	a l	705	
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## THE STATE OF ALABAMA, BALDWIN COUNTY.

# CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

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WE COMMAND 100, That you summon.	<u>P.1/2.11</u>	rnaud		
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dwin County, exercising Chancery jurisdiction,	within thirty	days after th	e service of Su	immons, and there
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wer, plead or demur, wihout oath, to a Bill of C	mplaint lately	y exhibited by.	***************	
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Am	elia W Ca	nnon		
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Fran	r Ladd			
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further to do and perform what said Judge sha				
ll in no wise omit, under penalty, etc. And we	further comm	aand that you	return this writ	with your endorsem
reon, to our said Court immediately upon the	xecution ther	eof.		•
				. The lease
WITNESS, T. W. Richerson, Register of said	Circuit Court	t, this 4th	,day	of repusry
	Circuit Court	t, this 4th	≠day	of Fenuary
WITNESS, T. W. Richerson, Register of said	Circuit Court	t, this 4th	•day	of <u>reducty</u>
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	the second		,day	

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

CIRC	CUIT COURT OF BALDWIN COUNTY
	🦅 IN EQUITY.
ز ٠	No69
	SUMMONS.
-	
	Amelia W Cannon
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	Age Control of the Co
	vs.
	Frank Ladd,
	••••••
	w-
	Chas Hall.
	Solicitor for Complainant,

# THE STATE OF ALABAMA, BALDWIN COUNTY.

Received in office this	s
lay of	191
	Sheriff.
Executed this 21.	/day of
Jely	day of
by leaving a copy of the	
	and S. W.
—————————————————————————————————————	Defendant unbe
	Sheriff /
sy hatteldgmit	L
	Deputy Sheriff.

THE STATE OF ALABAMA,  County. Sold CIRCUIT CO	OURT IN EQUITY.
Amelia W. leannon	Complainant
Frank Ladd	
Motion is hereby made for a Decree Pro Confesso against	Ladd
	Defendant
in the above stated cause, on the ground that more than thirty days have elapsed since ser	vice of summons upon
said Defendant; and that said summons was duly served according to law, and that sa	id Defendantha. <b>5</b>
failed to demur, plead to or answer the Bill of Complaint in this cause to this date.	
76th mark	

This 26th day of March 1918

Chas Half Solicitor.

No. 69 Page	
No. 69 Page	
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MITTER OF	14
THE STATE OF ALABAMA,	
March.	
Bucker County,	
CIRCUIT COURT, IN EQUITY.	
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Unlea W. Cours	
vs.	
Frankliche	
The hade	
MOTION FOR DECREE	
PRO CONFESSO ON PERSONAL SERVICE.	
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Register.	•

THE STATE OF ALABA.	MA,	No.69	S. Serve
Galdun	to or answer the Bill of Complaint in this cause within thirty days after the service of  by the Sheriff of  County, Alabama, on the  Sharay  195, and the said Defendant		
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too a	16	a del	7
In this cause it appears to the Register of this Court that a Summons requiring the Defendant Drawl Land Land Land Land Land Land Land Land	Defendan		
	P. '		
In this cause it appears to the	In this cause it appears to the Clegater of the Summons requiring the Defendant. Defendant to this cause within thirty days after the service of Summons upon the Speriff of Market County, Alabama, on the Lady of Speriff of Market County, Alabama, on the Lady of Speriff of Market County, Alabama, on the County plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of County, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of County and the said Bill of Complaint to this date, it is now, therefore, on motion of County and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as considered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as considered.		
Secret Courty, 18 EQUIT.  Analy Land Defendant.  In this cause it appears to the Clegate of This Court to a Sum anous requiring the Dejendant.  The this cause it appears to the Clegate of This Court to a Sum anous requiring the Dejendant.  The this cause it appears to the Clegate of Complaint in this cause within thirty days after the service of Summons upon.  Summons upon Land We County, Moderna, on the Land day of Markety 1988, and the soid Dejendant. having at a farmy please to or answer the soid this of Complaint in this date, it is now, therefore, an motion of Chart Hall Land for Complaint in this cause be and it hereby is in all things taken as conducted against the soid.  The Market Additional County of Complaint in this cause be and it hereby is in all things taken as conducted against the soid.  The Market Additional County of Complaint in this cause be and it hereby is in all things taken as conducted against the soid.			
And Defendant.  In this cause it appears to the Register of This Court that a Summons requiring the Defendant.  That a Summons requiring the Defendant Dank Land and Summons requiring the Bill of Complaint in this cause within thirty days after the service of aid Summons upon Army. In the Speriff of Month of Courty, Alabama, on the day of Month of Summons, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Character that the said Bill of Complaint to this date, it is now, therefore, on motion of Character that the said Bill of Complaint in this cause be and it hereby is in all things taken as considered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as considered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as considered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as considered.			
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Annual Defendant  To this course it appears to the Asympton of Complaint in this cause within thirty days after the service of the a Summons requiring the Defendant Dank Land County, Alabame, on the Summons upon Asympton by the Swrift of Male County, Alabame, on the County, Plead to or answer the suid Bill of Complaint to this date, it is now, therefore, on motion of the Annual Annual County, Plead to a answer the suid Bill of Complaint to this date, it is now, therefore, on motion of the Annual Annual County, Plead to the said Bill of Complaint in this date, it is now, therefore, on motion of the Annual Annual County, Plead to the said Bill of Complaint in this cause be and it hereby is in all things taken as comain against the said.			
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	And Complainant.  In this course it appears to the Register of This Court Summons requiring the Defendant.  The and demain, plead to or answer the Bill of Complaint in this cause within thirty days after the service of amons upon the service of all upon the service. If the service of the se		
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	Frunk I add Defendant.  We it appears to the Repister of This Court has requiring the Defendant.  We requiring the Defendant Annual to this cause within thirty days after the service of pen him In the Sparify of Model County, Mahama, on the day of Thomas 1988, and the said Defendant having plead to or answer the said Bill of Complaint to this date, it is note, therefore, on motion of the tho said Bill of Complaint in this cause be and it hereby is in all things taken as contested that the said Bill of Complaint in this cause be and it hereby is in all things taken as contested that the said Bill of Complaint in this cause be and it hereby is in all things taken as contested the said.		
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THE STATE OF ALABAMA,			
Ballen County.			
CIRCUIT COURT, IN EQUITY.			
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THE STATE OF ALABAMA. Amelia W. Canson alderi County. IN EQUITY, noteg. CIRCUIT COURT OF This cause is submitted in behalf of Complainant upon the original Bill of Complaint. Durante Throng personal service on the defends

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THE STATE OF ALABAMA,	
IN EQUITY, CIRCUIT COURT OF  COUNTY, COUNTY,	
Janus Lade	
NOTE OF TESTIMONY.	
Filed in Open Court this 2 19 18 19 18 19 18 19 18 Register.	

Bay Minette, Ala., April 1911— 1918

Han J.M. Richerson

IN ACCOUNT WITH

### Jas. M. Voltz

JUDGE OF PROBATE, BALDWIN COUNTY

Please Re	turn this Bill With Remittance.	Mortgage Tax Recording Fee Total
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THE STATE OF ALABAMA,

County.

Amelia W. Cannon

W Richerson Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Solicitors for Complainant.

No. 69	The contract that we will always and contract the contract that the contract the contract that the con		HITT DAIN TO THE TOTAL CONTRACTOR OF THE CONTRAC	TO SECURE SECURITY SE	a de l'illiant de Silliant de Citanon
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Amelia W Camon,

Complainant.

In the Circuit Court of Baldwin County,

#69.--vs.

Alabama.

In Equity.

Frank Ladd.

Respondent.

This cause coming on to be heard was submitted for decree on the pleadings and decree pro confesso, as noted, and upon consideration thereof, the Court is of the opinion that the complainant is entitled to relief.

It is therefore ordered and decreed that the respondent, Frank Ladd, has no estate or interest in, or incumbrances on, the following described lands, or any part thereof, viz:-

The Edmund Gaines Tract, being Section fifty-three, Township two North of Range one East, containing 640 acres, and the Joseph Campbell Tract, being in Section thirty-five, Township two North of Range one East, containing 400 acres, all in Baldwin County, Alabama.

It is further ordered that the Register of this Court, within thirty days from the rendition of this decree file a certified copy of this decree in the office of the Probate Judge of Baldwin County, for record theirein, and that the costs thereof be taxed in the costs of this cause.

Itis further ordered that the complainant pay the costs of this cause for which execution may issue.

March 30th, 1918.

A.H.Gamble

Filed April 1st 1918. T.W.Richerson, Register.

Judge of the Circuit Court.

The State of Alabama,:

Circuit Court in Equity.

Baldwin County. :

I.T.W.Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the 50th, day of March, 1918min the cause of Amelia W Cannon, Complainant, -vs -- Frank Ladd,

Respondent, as appears of record in said Court. and seal of said Court itness my hand/this 3rd, day of April 1918.

-----Register.

Amelia W.Cannon,

#69 - Vs.

Complainant, : IN the Circuit Court of Baldwin County, Alabama.

In Equity.

Frank Ladd, Respondent.

This cause coming on to be heard was submitted for decree on the pleadings and decree pro confesso, as noted, and upon consideration thereof, the Court is of the opinion that the complainant is entitled to relief.

It is therefore ordered and decreed that the respondent; Frank Ladd, has no estate or interest in, or incumbrances on, the following described lands, or any part thereof, viz:-

The Edmund Gaines Tract, being Section fifty-three, Township two North of Range one East, containing 640 acres, and the Joseph Campbell Tract, being in Section thirty-five, Township two North of Range one East, containing 400 acres, all in Baldwin County, Alabama.

It is further ordered that the Register of this Court, within thirty days from the rendition of this decree, file a certified copy of this decree in the office of the Probate Judge of Baldwin County, for record therein, and that the costs thereof be taxed in the costs of this cause.

It is further ordered that the complainant pay the costs of this cause for which execution may issue.

March 30th 1918.

Indexes of the Circuit Court.

FINAL DECREE.

Amelia W.Cannon

Vs. # 69

· Frank Ladd

In Circuit Court of Baldwin County.

IN Equity.

Filed april 12/48 IN, Rusewan Register

Recorded on planter.

IN CHANGERY BAIDWIN COUNTY, ALABAMA. , RT.

AMELIA W. CANNON, Complainant,

FRANK LADD,

Respondent.

BILL TO QUIET TITLE.

Filed 2/4/9/8 IM, Reieumon Register

Chas Halling

#### FOURTH.

Complainant calls upon said respondent above named to set forth and specify his title, claim, interest, lien or encumbrance in, to or upon said real estate, and how and by what instrument the same is derived and created.

#### PRAYER FOR PROCESS.

Complainant prays that, by the state's writ of subpoena, or by process of publication, as may be appropriate, Frank Ladd be made a respondent to this bill of complaint and be commanded to demur to, plead to or answer this bill of complaint within the time allowed by law.

#### PRAYER FOR RELIEF.

Complainant prays that upon the hearing of this cause your Honors will order and decree that the respondent above named has not any right, title, interest or estate in or to or lien or encumbrance upon, said real estate above described, or any part thereof; and complainant prays for such further or other or different relief as complainant may be entitled to, and to your Honors may seem meet.

Onal State
Solicitors for Complainant.

Foot Note:

Respondent is required to answer all the allegations of each paragraph of the foregoing bill of complaint from first to fourth, both inclusive, but not under oath, answer under oath being hereby expressly waived.

Solicitors for Complainant.

69

AMELIA W. CANNON.

₩.

Complainant,

FRANK LADD.

Respondent

In The Circuit Court

BALDWIN COUNTY

and the second s

TO THE HONORABLE JUDGES OF THE CHANGES COURT OF BALDWIN COUNTY, ALABAMA:

The bill of complaint of Amelia W. Cannon, complainant, against

Frank Ladd, respondent, respectfully shows unto your Honors:

#### FIRST.

a. The complainant is upwards of twenty-one years of age and resides at Mount Vernon, Alabama.

b. The respondent, Frank Ladd, is upwards of twenty-one years of age and resides in the city of Mobile, Alabama.

#### SECOND.

The complainant owns and is in the peaceable possession of the following real property in Baldwin County, Alabama, claiming to own the same in her own right, viz:

Those two certain tracts of land described as follows: The Edmund Gaines Tract, being section 53, township 2 north, range 1 east, containing 640 acres, and the Joseph Campbell Tract, being section 35, township 2 north, range 1 east, containing 400 acres.

#### THIRD.

That complainant's title to said real property is denied or disputed and that the defendant hereto claims, or is reputed to claim, some right, title or interest in or to, or lien or encumbrance upon, said real property, and that no suit is pending to inforce or test the validity of such title, estate, claim, lien or encumbrance.