

Bay Minette, Ala.,

Mar 5

1917

How D. W. Richardson

IN ACCOUNT WITH

Jas. M. Voltz

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return this Bill With Remittance.

Mortgage Tax Recording Fee Total

| <i>2/16/18</i> | <i>To</i> | <i>Deed</i> Recording Mortgage from <i>Alb. Cannon vs. Jas. Campbell et al.</i> | | | | | | <i>75</i> |
|----------------|-----------|--|--|--|--|--|--|-----------|

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Frank Ladd

of Mobile County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Amelia W Cannon

against said

Frank Ladd

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 4th day of February

1918.

T. W. Richerson
Register.

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

Serve on Frank Ladd

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. 69

SUMMONS.

Amelia W Cannon

vs.

Frank Ladd,

Chas Hall.

Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 191

Sheriff.

Executed this 21 day of

July 1916

by leaving a copy of the within Summons with

Frank Ladd

Defendant.

W H Humber

Sheriff

By W H Humber

Deputy Sheriff.

THE STATE OF ALABAMA,

Calderin County. }

No. *69* CIRCUIT COURT IN EQUITY.

Amelia W. Cannon Complainant.....

vs.

Frank Ladd Defendant.....

Motion is hereby made for a Decree Pro Confesso against *Frank Ladd*.....

Defendant.....

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

This *26th* day of *March* 19*18*.....

Chas. Hall
Solicitor.

Book

No. 69

Page

THE STATE OF ALABAMA,

Prichard County,

CIRCUIT COURT, IN EQUITY.

Antia W. Cannon

vs.

Frank Ladd

MOTION FOR DECREE
PRO CONFESSO ON
PERSONAL SERVICE.

Filed M. Ch. No. 1908

J. W. Riceman
Register.

Recorded in Record

Vol. Page

Register.

THE STATE OF ALABAMA,
Baldwin County.

No. 69
CIRCUIT COURT, IN EQUITY.

Amelia W. Cannon Complainant

Frank Ladd Defendant

In this cause it appears to the Register of this Court that a Summons requiring the Defendant Frank Ladd

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon him

was served upon him by the Sheriff of Mobile County, Alabama, on the 21st day of February 1918, and the said Defendant having

failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of

Chas. H. C. Jolister for Complainant, ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Frank Ladd

Defendant aforesaid.

This 26th day of March 1918

J. W. [Signature]
Register.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Annellie W. Cannon

vs.

Frank Ladd

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued *March 26th 1918*

T. W. Ricum
Register.

Recorded in.....Record,

Vol.....Page.....

Register.

Amelia W. Lawson

THE STATE OF ALABAMA,
Baldwin County.

vs.

IN EQUITY, *note*
CIRCUIT COURT OF

Frank Ladd

Baldwin COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, *Summons*
showing personal service on the defendant
and Decree Pro Confesso on personal
service

J. M. McIlwain, Register

Free

No. *69*

THE STATE OF ALABAMA,

County.

IN EQUITY,
CIRCUIT COURT OF

Baldwin COUNTY.

Amelia W. Cannon

vs.

Frank Ladd

NOTE OF TESTIMONY.

Filed in Open Court this *28th*

day of *March* 19*18*

J. W. Beaman
Register.

Bay Minette, Ala., April 19th 1918

Wm J. W. Richardson

IN ACCOUNT WITH

Jas. M. Voltz

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return this Bill With Remittance.

Mortgage Tax Recording Fee Total

| 4/2/18 | Do | Recording Mortgage from ^{Recd} Frank Ladd to Amelia W. Cannon | | | | | | 605 |
|--------|----|--|--|--|--|--|--|-----|

CIRCUIT COURT, IN EQUITY.

THE STATE OF ALABAMA,

Baldwin County }

No. 69, Spring Term, 1918

Amelia W. Leannon Complainant

vs.

Frank Ladd Defendant

To T. W. Richardson, 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, the Complainant, by Chas Hall

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.

Chas Hall Solicitors for Complainant.

602

No. 69 Page

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

Amelia W. Garrison

vs.

Frank Ladd

REQUEST FOR DECREE IN
DIVORCE AND ALIENATION.

Filed *Nov 28th* 191*8*

J. W. Rimmer
Register.

Recorded in.....Record

Vol.....Page.....

6
Register.

COPY

Amelia W Cannon, :
 Complainant. : In the Circuit Court of Baldwin County,
 #69.--vs. : Alabama.
 Frank Ladd, : In Equity.
 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.

A.E. 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 30th, day of March, 1918 in the cause of Amelia W Cannon, Complainant, -vs- Frank Ladd, Respondent, as appears of record in said Court.

And seal of said Court
 Witness my hand/this 3rd, day of April 1918.

-----Register.

| | | |
|-------------------|---|--------------------------|
| Amelia W. Cannon, | : | |
| | : | |
| Complainant, | : | IN the Circuit Court of |
| | : | |
| #69 - Vs. | : | 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.

A. C. Gable
 Judge of the Circuit Court.

FINAL DECREE.

Amelia W. Cannon

Vs. # 69

Frank Ladd

In Circuit Court of
Baldwin County.

IN Equity.

Filed April 1st 1908
T. W. Rice
Register

Recorded on Minutes

Exhibit 100 69
IN CHANCERY ~~IN~~ BALDWIN COUNTY,
ALABAMA. *1st*

AMELIA W. CANNON,
Complainant,

v.

FRANK LADD,
Respondent.

BILL TO QUIET TITLE.

Filed 2/4/18
T. W. Ricumson
Register

Chas. Hall
Solicitor for
Complainant,

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.

Chas Hall

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.

Chas Hall

Solicitors for Complainant.

AMELIA W. CANNON,
Complainant,
v.
FRANK LADD,
Respondent

*
*
*
*
*
*
*
*
*

In The Circuit Court
~~IN CHANCERY~~ of BALDWIN COUNTY,
In Equity

TO THE HONORABLE JUDGES OF THE ^{*Circuit*} ~~CHANCERY~~ 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, claim-
ing to own the same in her own right, viz:

Those two certain tracts of land described as follows: The
Edmund Gaines Tract, being section 55, township 2 north, range
1 east, containing 640 acres, and the Joseph Campbell Tract, be-
ing 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 pend-
ing to inforce or test the validity of such title, estate, claim,
lien or encumbrance.