

3483

LLOYD L. REDDITT, JR., a minor suing by his father and guardian, LLOYD L. REDDITT, and LLOYD L. REDDITT,	↓	IN THE CIRCUIT COURT
	↓	OF
	↓	BALDWIN COUNTY,
Complainants	↓	ALABAMA
-VS-	↓	IN EQUITY
FRANK G. REDDITT and EDWARD R. REDDITT,	↓	NO.
Respondents	↓	

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Your Complainants, LLOYD L. REDDITT and LLOYD L. REDDITT, JR., respectfully show unto your Honors:

1. That LLOYD L. REDDITT is over the age of twenty-one (21) years and is a resident of Mobile County, Alabama; that LLOYD L. REDDITT, JR., is a minor over the age of fourteen (14) years and resides with his father and guardian, LLOYD L. REDDITT, in Mobile, County, Alabama, said letters of guardianship over the person and estate of said LLOYD L. REDDITT, JR., marked Exhibit "A" and attached hereto, were granted to the said LLOYD L. REDDITT by the Probate Court of Mobile County, Alabama, on the 13th day of May, 1954, Case No. 5996 N.S.; that the respondent, FRANK G. REDDITT is over the age of twenty-one (21) years and is a resident of Mobile County, Alabama; and that the Respondent EDWARD R. REDDITT, is over the age of twenty-one (21) years and resides in Citronelle, Mobile County, Alabama.

2. That complainants, together with the respondents, jointly own in fee simple the following described real property all of which is situate in the County of Baldwin, State of Alabama, to-wit:

Lot 4 in Shellbanks, a Subdivision of Section 23, Township 9 South, Range 2 East, as per plat thereof recorded in Book 1, page 678 of the Public Records in the office of the Probate Judge of Baldwin County, Alabama.

3. That the interest of said parties hereto in said real estate are as follows:

- Lloyd L. Redditt - 1/4 interest
- Lloyd L. Redditt, Jr. - 1/4 interest
- Frank G. Redditt - 1/4 interest
- Edward R. Redditt - 1/4 interest

4. Complainants further aver that they desire that said property be partitioned between the parties and that said lands can be fairly and equitably partitioned among the parties jointly owning the same. Complainants show unto your Honors that on the 19th day of October, 1953 a survey was made of said property by J. B. Allen, a registered surveyor, Alabama Register No. 1326, same being attached hereto, marked Exhibit "B" and made part of this Bill of Complaint the same as if specifically set out herein with leave of reference thereto made as often as may be necessary, wherein said property was divided unto four equal lots or parcels and your complainants aver and believe that the following is a fair, just and equitable plan for the petition thereof:

That the full and complete title to the real property described in said survey as parcel or Lot No. 1 and more particularly described as follows, viz: The West $\frac{1}{2}$ of the West $\frac{1}{2}$ of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Frank G. Redditt;

That the full and complete title to the real property described in said survey as parcel or Lot No. 2 and more particularly described as follows, viz: The East $\frac{1}{2}$ of the West $\frac{1}{2}$ of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Edward R. Redditt;

That the full and complete title to the real property described in said survey as parcel or Lot No. 3, and more particularly described as follows, viz: The West $\frac{1}{2}$ of the East $\frac{1}{2}$ of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Lloyd L. Redditt;

That the full and complete title to the real property described in said survey as parcel or Lot No. 4, and more particularly described as follows, viz: The East $\frac{1}{2}$ of the East $\frac{1}{2}$ of Lot No. 4, of the Kennedy Survey and plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Lloyd L. Redditt, Jr.

5. Complainants further shows unto your Honors that said property described in Paragraph 2 of this bill of complaint consists of lot of land bounded on the North by Mobile Bay, on the East by Lot No. 3, of the Kennedy survey and plat of Shellbanks,

on the South by a 20' road and on the West by Lot No. 5 of said survey and plat; that each and every part or portion thereof is in all respects equal in value to each other; and that the plan for partition among the joint owners as outlined in said Paragraph 4 of this bill of complaint constitutes a fair, just and equitable partition or division thereof, taking into consideration all aspects of said property.

P R A Y E R

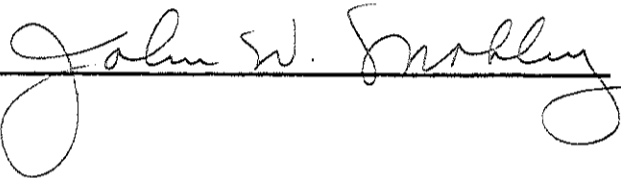
WHEREFORE, the premises considered, your Complainants pray that the said Frank G. Redditt and the said Edward R. Redditt be made parties respondents to this bill of complaint and that they be required to plead, answer or demur to the same, within the time required by law and the rules of this Honorable Court, or failing therein that a decree pro confesso be entered against them, and that upon the hearing hereof this Court will make or render a decree directing that said property be partitioned among the joint owners as prayed for by complainants, or as to this Court may seem just and equitable and will make such other, further and additional orders or decrees so as to vest in the several owners thereof such portion of said property as may be allotted or partitioned to them upon such partition. And that if Complainants are mistaken in the relief specifically prayed for, they pray for such other, further or different relief to which they may be entitled, and the facts of the case justify, and, as in duty bound, will ever pray.


 SOLICITOR FOR COMPLAINANT

STATE OF ALABAMA)

COUNTY OF MOBILE)

Before me, the undersigned Notary Public in and for said County and State personally appeared JOHN W. MOBLEY, who on oath being first duly sworn, deposes and says that he is the solicitor of record for the Complainants in the above styled cause and that the allegations of said bill of complainant are true except as to matters of information and belief and as to such matters he believes it to be true.



Subscribed and sworn to before
me on this 7th day of March,
1955.


NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

Respondents may be served at:

Frank G. Redditt
1563 East Martin Drive
Mobile, Alabama

Edward R. Redditt
Citronelle, Alabama

LLOYD L. REDDITT, JR., a
minor suing by his father and
guardian, LLOYD L. REDDITT, and
LLOYD L. REDDITT,

Complainants

-VS-

FRANK G. REDDITT and
EDWARD R. REDDITT,

Respondents

IN THE CIRCUIT COURT

of

BALDWIN COUNTY

ALABAMA

IN EQUITY

NO.

FINAL DECREE

This cause coming on to be heard on this date is submitted for final decree upon the verified bill of complaint and the decree pro confesso heretofore rendered in this cause against the respondents, all as shown by the note of submission filed in this cause, and the same having been read, considered and understood by the Court, it is the opinion of the Court, and the Court so finds, that the allegations of the bill of complaint are true and that the complainants are entitled to the relief prayed for therein as same pertains to the division and partition of the property described therein.

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that the complainants are entitled to the relief as prayed for in the bill of complaint.

It is further ORDERED, ADJUDGED and DECREED by the Court that the property described in said bill of complaint in this cause can be equitably, fairly and justly divided and partitioned among the parties to this suit without a sale thereof, and that said property can be divided and partitioned in the manner and method prayed for in said bill of complaint, said division of partition thereof in said manner would be for the best interest of all parties interested in said property.

It is further ORDERED, ADJUDGED and DECREED by the Court that all the parties to this suit, both complainants and respondents, are joint owners or tenants in common in the property which is described in the bill of complaint in this cause in the following respective interests or shares: Complainants have each an undivided one-fourth interest and the respondents have each an undivided one-fourth interest.

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that:

(1) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 1 and more particularly described as follows, viz: The West $\frac{1}{2}$ of the West $\frac{1}{2}$ of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Frank G. Redditt;"

be and the same is hereby vested in the respondent, Frank G. Redditt, and all right, title and interest in said Lot No. 1, hereinabove specifically described, now or heretofore jointly held or owned by the parties hereto, be and the same hereby is divested out of the respondent Edward R. Redditt, and the complainants Lloyd L. Redditt, and Lloyd L. Redditt, Jr., and vested in the respondent, Frank G. Redditt.

(2) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 2 and more particularly described as follows, viz: The East $\frac{1}{2}$ of the West $\frac{1}{2}$ of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Edward R. Redditt;"

be and the same is hereby vested in the respondent, Edward R. Redditt, and all right, title and interest in said Lot No. 2, hereinabove specifically described now or heretofore jointly held or owned by the parties hereto, be and the same is hereby divested out of the respondent, Frank G. Redditt, and the complainants, Lloyd L. Redditt and Lloyd L. Redditt, Jr., and vested in the respondent, Edward R. Redditt.

(3) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 3, and more particularly described as follows, viz: The West $\frac{1}{2}$ of the East $\frac{1}{2}$ of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Lloyd L. Redditt;"

be and the same is hereby vested in the complainant, Lloyd L. Redditt, and all right, title and interest in said Lot No. 3, hereinabove specifically described, now or heretofore jointly held or owned by the parties hereto, be and the same is hereby divested out of the respondents, Frank G. Redditt and Edward R. Redditt, and the complainant, Lloyd L. Redditt, Jr., and vested in the complainant Lloyd L. Redditt.

(4) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 4, and more particularly described as follows, viz: The East $\frac{1}{2}$ of the East $\frac{1}{2}$ of Lot No. 4, of the Kennedy Survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Lloyd L. Redditt, Jr."

be and the same is hereby vested in the complainant, Lloyd L. Redditt, Jr., and all right, title and interest in said Lot No. 4, hereinabove specifically described, now or heretofore jointly held or owned by the respondents, Frank G. Redditt and Edward R. Redditt, and the complainant, Lloyd L. Redditt, be and the same is hereby divested out of them and vested in the complainant Lloyd L. Redditt, Jr.,

It is further ORDERED, ADJUDGED and DECREED by the Court that the survey made of said property by J. B. Allen, a registered surveyor, Alabama Register No. 1326, dated October 19, 1953, which survey was attached and made a part of the original verified bill of complaint filed in this cause, be attached to this decree and made a part hereof, and that the property hereinabove described as Lot No. 1, Lot No. 2, Lot No. 3, and Lot No. 4 is the same property as shown in said survey as lots 1, 2, 3, and 4, being a resubdivision of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury Tract, in Section 23, T9S, R2E, in Baldwin County, Alabama.

It is further ORDERED, ADJUDGED and decreed by the Court that a certified copy of this decree be recorded in the office of the Judge of Probate of Baldwin County, Alabama, including said survey which is attached hereto and made a part hereof, and that it be indexed in the names of both the complainants and the respondents in both the direct index and the indirect index of the record thereof.

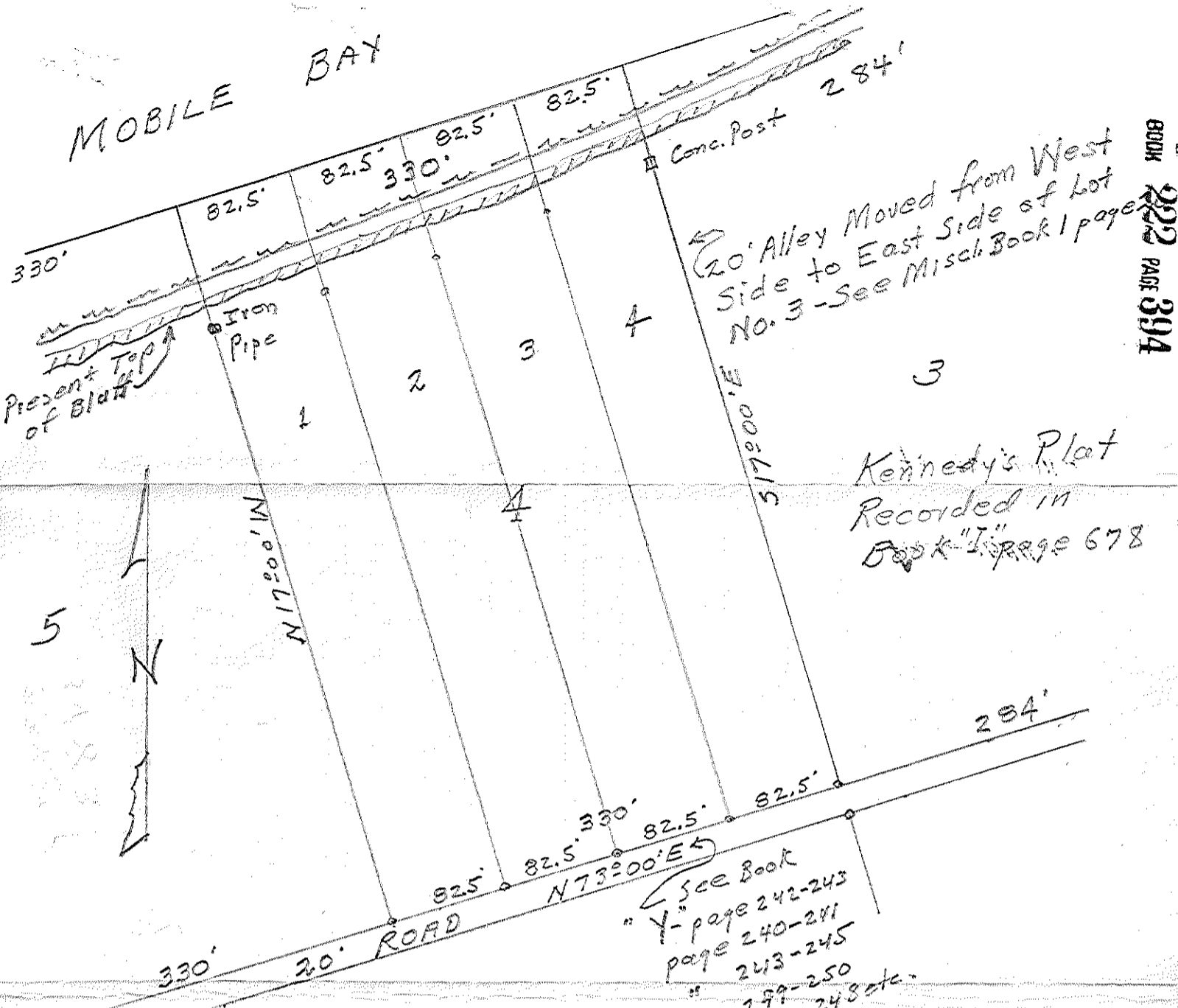
It is further ORDERED, ADJUDGED and DECREED by the Court,
that the complainants pay the cost of this proceeding, for
which let execution issue.

Done this *30* day of May, 1955.

Hubert M. Hall

CIRCUIT JUDGE

MOBILE BAY



BOOK 2022 PAGE 394

Kennedy's Plat Recorded in Book "I" page 678

See Book "Y" page 242-243 page 240-241 page 243-245 page 247-248 etc.

PLAT AND CERTIFICATE OF SURVEY
 Surveyed for F.G.Redditt, Oct.19,1953

Scale of plat 1" : 100'

CORRECT DESCRIPTIONS: Lot No.1 : The West 1/2 of the West 1/2 of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Sec. 23, T 9 S, R 2 E, in Baldwin County, Ala. being a strip of land 82.5 in width.

Lot No. 2: The East 1/2 of the West 1/2 of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury Tract, Section 23, T 9 S, R 2 E, in Baldwin County, Ala., being a strip of land 82.5 feet in width.

Lot No. 3 : The West 1/2 of the East 1/2 of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury tract, Section 23, T9 S, R 2 E, in Baldwin County, Ala., being a strip of land 82.5 feet in width.

Lot No. 4 : The East 1/2 of the East 1/2 of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury tract, Section 23, T 9 S, R 2 E, in Baldwin County, Ala., being a strip of land 82.5 feet in width.

SURVEYOR'S CERTIFICATE: I, J.B.Allen, a registered Surveyor, hereby certify that I have surveyed and staked the above described and platted lots numbered 1,2,3 & 4, being a resubdivision of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury tract, in Section 23, T 9 S, R 2 E, in Baldwin County, Alabama. The area around said Lot No. 4 has been surveyed and several iron corner stakes were used in the present survey. I further certify that the surveyeand this plat and descriptions are correct.

Dated this the 19th day of October, 1953

J.B.Allen
 Surveyor, Ala. Reg. No. 1326

FILED

Mar. 8, 1955
 MISS L. JACK, Reg.

EXHIBIT "B"

LLOYD L. REDDITT, JR., a
minor suing by his father and
guardian, LLOYD L. REDDITT, and
LLOYD L. REDDITT,

Complainants

-VS-

FRANK G. REDDITT and
EDWARD R. REDDITT,

Respondents

I IN THE CIRCUIT COURT

of

I BALDWIN COUNTY

ALABAMA

I IN EQUITY

I NO.

FINAL DECREE

This cause coming on to be heard on this date is submitted for final decree upon the verified bill of complaint and the decree pro confesso heretofore rendered in this cause against the respondents, all as shown by the note of submission filed in this cause, and the same having been read, considered and understood by the Court, it is the opinion of the Court, and the Court so finds, that the allegations of the bill of complaint are true and that the complainants are entitled to the relief prayed for therein as same pertains to the division and partition of the property described therein.

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that the complainants are entitled to the relief as prayed for in the bill of complaint.

It is further ORDERED, ADJUDGED and DECREED by the Court that the property described in said bill of complaint in this cause can be equitably, fairly and justly divided and partitioned among the parties to this suit without a sale thereof, and that said property can be divided and partitioned in the manner and method prayed for in said bill of complaint, said division of partition thereof in said manner would be for the best interest of all parties interested in said property.

It is further ORDERED, ADJUDGED and DECREED by the Court that all the parties to this suit, both complainants and respondents, are joint owners or tenants in common in the property which is described in the bill of complaint in this cause in the following respective interests or shares: Complainants have each an undivided one-fourth interest and the respondents have each an undivided one-fourth interest.

BOOK 229 PAGE 390

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that:

(1) That the full and complete title to the real property described in the bill of complaint as follows, viz

"That the full and complete title to the real property described in said survey as parcel or Lot No. 1 and more particularly described as follows, viz: The West 1/2 of the West 1/2 of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Frank G. Redditt;"

be and the same is hereby vested in the respondent, Frank G. Redditt, and all right, title and interest in said Lot No. 1, hereinabove specifically described, now or heretofore jointly held or owned by the parties hereto, be and the same hereby is divested out of the respondent Edward R. Redditt, and the complainants Lloyd L. Redditt, and Lloyd L. Redditt, Jr., and vested in the respondent, Frank G. Redditt.

(2) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 2 and more particularly described as follows, viz: The East 1/2 of the West 1/2 of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Edward R. Redditt;"

be and the same is hereby vested in the respondent, Edward R. Redditt, and all right, title and interest in said Lot No. 2, hereinabove specifically described now or heretofore jointly held or owned by the parties hereto, be and the same is hereby divested out of the respondent, Frank G. Redditt, and the complainants, Lloyd L. Redditt and Lloyd L. Redditt, Jr., and vested in the respondent, Edward R. Redditt.

(3) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 3, and more particularly described as follows, viz: The West 1/2 of the East 1/2 of Lot No. 4, of the Kennedy survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Lloyd L. Redditt;"

be and the same is hereby vested in the complainant, Lloyd L. Redditt, and all right, title and interest in said Lot No. 3, hereinabove specifically described, now or heretofore jointly held or owned by the parties hereto, be and the same is hereby divested out of the respondents, Frank C. Redditt and Edward R. Redditt, and the complainant, Lloyd L. Redditt, Jr., and vested in the complainant Lloyd L. Redditt.

(4) That the full and complete title to the real property described in the bill of complaint as follows, viz:

"That the full and complete title to the real property described in said survey as parcel or Lot No. 4, and more particularly described as follows, viz: The East $\frac{1}{2}$ of the East $\frac{1}{2}$ of Lot No. 4, of the Kennedy Survey and Plat of Shellbanks, in the Drury Tract, Section 23, T9S, R2E, in Baldwin County, Alabama, being a strip of land 82.5 feet in width, shall pass and be vested by this Court in Lloyd L. Redditt, Jr."

be and the same is hereby vested in the complainant, Lloyd L. Redditt, Jr., and all right, title and interest in said Lot No. 4, hereinabove specifically described, now or heretofore jointly held or owned by the respondents, Frank C. Redditt and Edward R. Redditt, and the complainant, Lloyd L. Redditt, be and the same is hereby divested out of them and vested in the complainant Lloyd L. Redditt, Jr.,

It is further ORDERED, ADJUDGED and DECREED by the Court that the survey made of said property by J. B. Allen, a registered surveyor, Alabama Register No. 1326, dated October 19, 1953, which survey was attached and made a part of the original verified bill of complaint filed in this cause, be attached to this decree and made a part hereof, and that the property hereinabove described as Lot No. 1, Lot No. 2, Lot No. 3, and Lot No. 4 is the same property as shown in said survey as lots 1, 2, 3, and 4, being a resubdivision of Lot No. 4, of the Kennedy survey and plat of Shellbanks, in the Drury Tract, in Section 23, T9S, R2E, in Baldwin County, Alabama.

It is further ORDERED, ADJUDGED and decreed by the Court that a certified copy of this decree be recorded in the office of the Judge of Probate of Baldwin County, Alabama, including said survey which is attached hereto and made a part hereof, and that it be indexed in the names of both the complainants and the respondents in both the direct index and the indirect index of the record thereof.

It is further ORDERED, ADJUDGED and DECREED by the Court, that the complainants pay the cost of this proceeding, for which let execution issue.

Done this 30th day of May, 1955.

Hubert M. Hall
CIRCUIT JUDGE

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in above stated cause, which said decree is on file and enrolled in my office.

WITNESS MY HAND AND SEAL THIS THE 30 day of May, 1955

Alice J. Duck
Register of Circuit Court, in Equity



STATE OF ALABAMA, BALDWIN COUNTY

Filed 6-24-55 8A.M

Recorded *duck* book 222 page 390-4

W. P. Stewart
Judge of Probate 4

THE STATE OF ALABAMA }
Mobile County

COURT OF PROBATE

Letters of Guardianship over the Person and Estate of _____

Lloyd Lyons Redditt, Jr.,

a Minor over

the age of Fourteen Years _____

are hereby granted to Lloyd Lyons Redditt, Sr.,

who has duly qualified and given bond as such Guardian, and is authorized to administer such estate.

Witness my hand, and dated this 13th day of May, 1954

Walter J. ...
Judge of Probate.

EXHIBIT "A"

BOOK 003 PAGE 151

BALDWIN

CIRCUIT COURT OF MOBILE COUNTY

Bay Minette Mobile, Alabama

LLOYD L. REDDITT, JR., a minor
 suing by his father and guardian,
 LLOYD L. REDDITT, AND LLOYD L.
 REDDITT,

Complainants,

No. 3383 vs.

IN EQUITY

FRANK G. REDDITT AND EDWARD R.
 REDDITT,

Defendant
 Respondents

DECREE PRO CONFESSO

In this cause, it appearing that the Defendant
 Respondents

FRANK G. REDDITT and EDWARD R. REDDITT

have been personally and regularly served with process of Subpoena more than thirty days, and that they have failed to appear and plead, answer or demur, to the allegations of the Bill of Complaint on file, upon motion of Complainant's Solicitors, it is ordered, adjudged and decreed, that the same be taken as confessed against them.

Dated, May 13, 1955

Hubert M. Zoller
 JUDGE.

CIRCUIT COURT

BALDWIN

MOBILE COUNTY

Mobile, Alabama

Bar Minette, Alabama

IN EQUITY

No. _____

VS.

DECREE PRO CONFESSO

DATED, 5-13, 1955

Ent. Min. No. _____ Page _____

LAW OFFICES
HOLBERG, TULLY AND ALDRIDGE
SUITE 631-636 • FIRST NATIONAL BANK BLDG.
P. O. BOX 47
MOBILE 1, ALABAMA

RALPH G. HOLBERG, JR.
ALBERT J. TULLY
HENRI M. ALDRIDGE
JOHN W. MOBLEY

May
27th
1955

Hon. Alice J. Duck, Registrar
Chancery Court
Court House
Bay Minette, Alabama

Dear Madam:

Enclosed herein you will find a non-military affidavit, the order of submission and note of evidence and the final decree to be filed in the matter of Lloyd L. Redditt, Jr., a minor suing by his father and guardian, Lloyd L. Redditt, and Lloyd L. Redditt, vs. Frank G. Redditt and Edward R. Redditt. I would greatly appreciate your filing these documents for me and when you have determined the amount of the cost in this cause, please forward same to me so that I might forward my remittance to you for payment of same.

I am also enclosing herein an extra copy of the final decree and when the Judge has signed same, I would appreciate your forwarding to me a copy of said decree.

Thanking you in this matter, I remain

Very truly yours,


JOHN W. MOBLEY

J
W
M
/
j
h

enc

LAW OFFICES
HOLBERG, TULLY AND ALDRIDGE
SUITE 631-636 - FIRST NATIONAL BANK BLDG.
P. O. BOX 47
MOBILE 1, ALABAMA

RALPH G. HOLBERG, JR.
ALBERT J. TULLY
HENRI M. ALDRIDGE
JOHN W. MOBLEY

May
3rd
1955

Hon. Alice J. Duck, Clerk-Register
Court House
Bay Minette, Alabama

Dear Madam:

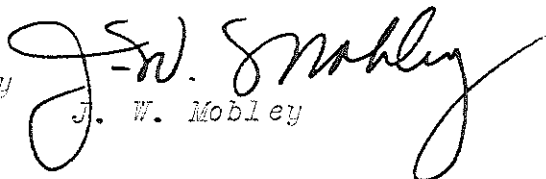
Since the time for filing pleadings in the case of
Lloyd L. Redditt et al vs. Frank G. Redditt et al,
case number 3383, has expired, we now wish to take
a decree Pro Confesso in re same. Therefore, en-
closed herewith please find the appropriate form
for the taking of said decree.

Thanking you in this matter, we remain

Very truly yours,

HOLBERG, TULLY & ALDRIDGE

By


J. W. Mobley

J
W
M
/
m
l
c

Encl.

SUMMONS

Form 1531-3

McQuiddy Printing Co., Nashville, Tenn.

The State of Alabama, Circuit County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

164 Jackson

You are hereby commanded to summon LEX Frank G. Redditt and Edward R. Redditt

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State by Lloyd L. Redditt Jr., a minor suing by his father and Guardian, Lloyd L. Redditt

against Frank G. Redditt and Edward R. Redditt

Herein fail not. Due return make of this writ as the law directs.

Witness this 8th day of March, 1955

Archie J. [Signature], Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

1179
3483

392

No. ~~3483~~ Page.....

The State of Alabama

..... COUNTY.

IN CIRCUIT COURT, IN EQUITY

LLOYD L. REDDITT, Jr., a minor

suing by his father and Guardian
LLOYD L. REDDITT

VS.

16x fact.

FRANK G. REDDITT and EDWARD R. REDDITT

SUMMONS

Returned by the Sheriff and filed in office, this

the..... day of....., 19.....

....., Register.

FILED
MAR 3 1955
ALICE J. BUCK, Clerk

Received in office, this the..... day of

MAR, 1955

Myler Wilkins Sheriff.

I have executed the within by leaving a copy thereof with

Edw. R. Redditt
on Mar. 16 - 1955

G. R. Jackson

On Apr. 1, 1955
I left a copy
of the within
with Frank G.
Redditt

R. L. Rooney

defendant named herein, on this the.....

day of....., 19.....

Ray D. Bridges, Sheriff.

By....., Deputy.

LLOYD L. REDDITT, JR., a		IN THE CIRCUIT COURT
minor suing by his father and		
guardian, LLOYD L. REDDITT, and		OF
LLOYD L. REDDITT,		
		BALDWIN COUNTY
Complainants		
		ALABAMA
-VS-		
		IN EQUITY
FRANK G. REDDITT and		
EDWARD R. REDDITT,		NO.
Respondents		

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA)
 COUNTY OF MOBILE)

Now comes, JOHN W. MOBLEY, Solicitor of record for complainants, who being first duly sworn, deposes and says that he personally knows the respondents, FRANK G. REDDITT and EDWARD R. REDDITT, and that he knows of his own personal knowledge that the said FRANK G. REDDITT and the said EDWARD R. REDDITT were not at the time of filing of this bill of complaint, and are not now, in the military or naval service of the United States.

That the said respondent, FRANK G. REDDITT, resides at 1563 E. Martin Drive, Mobile, Alabama, and that the said respondent, EDWARD R. REDDITT, resides at Citronelle, Alabama.

John W. Mobley

Sworn to and subscribed before me, this the 29th day of May 1955.

FILED

May 30, 1955

ALICE J. BOCK, Register

John W. Mobley
 NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

LLOYD L. REDDITT, JR., a
minor suing by his father and
guardian, LLOYD L. REDDITT, and
LLOYD L. REDDITT
Complainants

IN THE CIRCUIT COURT
OF

BALDWIN COUNTY

No. VS. }

ALABAMA

FRANK G. REDDITT and
EDWARD R. REDDITT,
Respondents

IN EQUITY

ORDER OF SUBMISSION

This cause coming on to be heard, is submitted for decree on the pleadings and on the proof as noted.

Dated, May, 1955.

NOTE OF EVIDENCE

At the hearing of this cause the following note of evidence was taken to wit:

FOR COMPLAINANT

1. Original verified bill of complaint.
2. Decree pro confesso on personal service against respondents, Frank G. Redditt and Edward R. Redditt.

John W. Snobley
Solicitor—for Complainant

FOR RESPONDENT

Respondents, being also called, offer nothing.

FILED, 5-30-55
Eric J. Luck Register }

Solicitor—For Respondent

3483

OFFICE OF THE
CLERK OF THE
COURT

REGISTERED TO REMAIN

FILED
MAY 30 1955

ALICE J. DUCK, Register

EXHIBIT TO EVIDENCE

copy of exhibit now available to the witness in accordance with the provisions of the rules of evidence

EXHIBIT TO EVIDENCE

This copy is being returned to the witness in accordance with the provisions of the rules of evidence

ORDER OF SUBMISSION
NOTE OF EVIDENCE

FILED

MAY 30 1955

Ent. Min. No. ALICE J. DUCK, Register Page

No. _____

Vs.