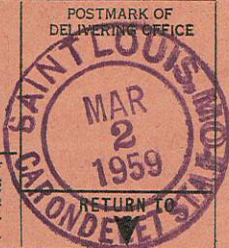


POSTMARK OF
DELIVERING OFFICE



INSTRUCTIONS.—Show name, address and number of article below. Complete "Instructions to Delivering Employee" on other side, when applicable. Moisten gummed ends and securely attach to back of article. Endorse front of article RETURN RECEIPT REQUESTED.

REGISTERED NO.

NAME OF SENDER

CERTIFIED NO.

STREET AND NO. OR P. O. BOX

INSURED NO.

CITY, ZONE, AND STATE

Arice L. Smith
Box 239
Bay Minette, Ala

POD Form 3811, Dec. 1955

35-71548-3

4488
INSTRUCTIONS TO DELIVERING EMPLOYEE

- ☐ DELIVER ONLY TO ADDRESSEE (20¢ additional)
☐ SHOW ADDRESS WHERE DELIVERED IN ITEM 4 BELOW (3¢ additional)

RECEIPT

Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

1. SIGNATURE OR NAME OF ADDRESSEE

X

2. SIGNATURE OF ADDRESSEE'S AGENT (Agent should enter addressee's name in item 1 above)

Deliver to Addressee Only

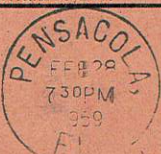
3. DELIVERY DATE

MAR 2 1959

, 19

4.

FILED
MAR 3 1959
CLERK
REGISTER
GPO
c10-71548-3



NEW HOPE FOR HEARTS
SUPPORT
THE HEART

POSTMARK OF
DELIVERING OFFICE

INSTRUCTIONS.—Show name, address and number of article below. Complete "Instructions to Delivering Employee" on other side, when applicable. Moisten gummed ends and securely attach to back of article. Endorse front of article RETURN RECEIPT REQUESTED.

RETURN TO
▼

REGISTERED NO.	NAME OF SENDER <i>Eric A. Luck</i>
CERTIFIED NO.	STREET AND NO. OR P. O. BOX <i>Box 239</i>
INSURED NO.	CITY, ZONE, AND STATE <i>Bay Minette, Ala</i>

POD Form 381 I, Dec. 1955

016-71548-8

4488
INSTRUCTIONS TO DELIVERING EMPLOYEE

- ☐ DELIVER ONLY TO ADDRESSEE (20¢ additional)
☐ SHOW ADDRESS WHERE DELIVERED IN ITEM 4 BELOW (31¢ additional)

RECEIPT

Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

1. SIGNATURE OR NAME OF ADDRESSEE

X

2. SIGNATURE OF ADDRESSEE'S AGENT (Agent should enter addressee's name in item 1 above)

Deliver to Addressee Only

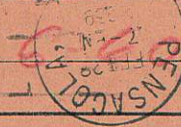
3. DELIVERY DATE

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NEW HOPE FOR HEARTS
SUPPORT
THE HEART FUND



POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE \$300



NEW HOPE FOR
--- SUPPORT
THE HEART F

POSTMARK OF
DELIVERING OFFICE

INSTRUCTIONS.—Show name, address and number of article below. Complete "Instructions to Delivering Employee" on other side, when applicable. Moisten gummed ends and securely attach to back of article. Endorse front of article RETURN RECEIPT REQUESTED.

RETURN TO

REGISTERED NO.

NAME OF SENDER

CERTIFIED NO.

STREET AND NO. OR P. O. BOX

INSURED NO.

CITY, ZONE, AND STATE

Alfred J. Smith

Box 239

Bay Minette, Ala

POD Form 3811, Dec. 1955

c10-71549-3

4488

INSTRUCTIONS TO DELIVERING EMPLOYEE

- ☐ DELIVER ONLY TO ADDRESSEE (20¢ additional)
☐ SHOW ADDRESS WHERE DELIVERED IN ITEM 4 BELOW (31¢ additional)

RECEIPT

Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

1. SIGNATURE OR NAME OF ADDRESSEE

X

Mrs. Voncile Logsdon

2. SIGNATURE OF ADDRESSEE'S AGENT (Agent should enter addressee's name in item 1 above)

Deliver to Addressee Only

3. DELIVERY DATE

7/28/59 19

4.

MAILED
JUL 28 1959
CLERK
REGISTER

616-71548-3 GPO

4488
INSTRUCTIONS TO DELIVERING EMPLOYEE

- ☐ DELIVER ONLY TO ADDRESSEE (20¢ additional)
☐ SHOW ADDRESS WHERE DELIVERED IN ITEM 4 BELOW (31¢ additional)

RECEIPT

Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

1. SIGNATURE OR NAME OF ADDRESSEE

X

Elynn Frost

2. SIGNATURE OF ADDRESSEE'S AGENT (Agent should enter addressee's name in item 1 above)

Deliver to Addressee Only

3. DELIVERY DATE

March 2, 1959

4.

616-71548-3 GPO

POSTMARK OF
DELIVERING OFFICE

BRAZORIA
MAR 2
12 M

RETURN TO

TEX.

INSTRUCTIONS.—Show name, address and number of article below. Complete "Instructions to Delivering Employee" on other side, when applicable. Moisten gummed ends and securely attach to back of article. Endorse front of article RETURN RECEIPT REQUESTED.

REGISTERED NO.

6276

NAME OF SENDER

Miss A. S. S. S.

CERTIFIED NO.

STREET AND NO. OR P. O. BOX

Box 239

INSURED NO.

CITY, ZONE, AND STATE

Bay Minette Ala

POD Form 3811, Dec. 1955

610-71649-3

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

DECREE

This cause coming on to be heard and is submitted for final decree upon the pleadings and proof as noted by theregister and the same having been heard and considered by the court, it is Ordered, Adjudged and Decreed that the Complainant is entitled to the relief prayed for in his bill of complaint in this cause.

It appearing further to the court that answers and waivers were signed in this cause by Hattie Page, Florence Rice, Verta Mary Kilpatrick, Alwilda Rabon, Annie Mae Knowles, Buford Frost and Margarete Hayes, and that a decree pro confesso was rendered against the following named persons on personal service: Lillian Langham, Morris Broughton, Melbon Broughton, Minnie Broughton and Mrs. Dan Brunson. That a decree pro confesso was rendered against the following named persons, who was served by Registered Mail: Glenn Frost, Lucille Gross, Joseph H. Frost, and Voncille F. Logsdon. That a decree pro confesso has been rendered against George Broughton, who was served by publication. That each of the parties in this suit are over the age of 21 years and of sound mind and that it further appears to the court that all parties have been properly served and are properly before the court.

IT IS FUTHER ORDERED, ADJUDGED AND DECREED as follows:

1. That the Complainant and Respondents are the joint owners of the following described land located in Baldwin County, Alabama, to-wit:

Northwest quarter of Southeast quarter of Section 34, Township 2 South, Range 2 East, less approximately 2 acres used by public roads.

That their interest in and to this property is as follows: Joe Broughton, the Complainant, $\frac{7}{14}$, less a $\frac{4}{14}$ mineral interest; Minnie Broughton $\frac{1}{14}$ interest; Hattie Page $\frac{1}{14}$ interest; Florence Rice, $\frac{1}{14}$ interest; Lillian Langham $\frac{1}{14}$ interest; Morris Broughton $\frac{1}{14}$ interest; George Washington Broughton $\frac{1}{14}$ interest; Melbon Broughton $\frac{1}{14}$ mineral interest; Verta Mary Kilpatrick $\frac{1}{14}$ mineral interest; Alwilda Rabon $\frac{1}{14}$ mineral interest;

Annie Mae Knowles 1/14 mineral interest; Buford Frost 1/98 interest; Glenn Frost 1/98 interest; Margarete Hayes 1/98 interest; Lucille Gross 1/98 interest; Mrs. Dan Brunson 1/98 interest; Joseph Hershel Frost 1/98 interest; Voncille Frost Logsdon 1/98 interest.

2. That said real property cannot be equitably divided among the owners thereof without a sale of the same for division.

3. That Alice J. Duck, as Commissioner, be and she is hereby authorized and directed to sell on _____ day of _____, 1959, at public outcry, for cash, in front of the South door of the court house of Baldwin County, Alabama, during the legal hours of sale to the highest bidder, the property herein above described, after first giving notice by publication in the Baldwin Times a newspaper of general circulation published in Baldwin County, Alabama, once a week for three consecutive weeks of the time, place and terms of sale and a description of the property.

4. That Alice J. Duck, as Commissioner, shall immediately, upon the making of said sale, in the manner and form prescribed herein report her actions herein to the court, so that the same may be confirmed or rejected, as may seem meet and proper.

5. That upon the coming in of the Commissioner's report, and after the same has laid over for the time prescribed by law, the court will proceed to ascertain a reasonable attorneys fee to be paid Complainant's solicitors for their services in this cause and will also fix and ascertain the value of the mineral interest of those parties who had a mineral interest only in and to the aforesaid property. All other questions reserved.

Done this _____ day of June, 1959.

Circuit Judge

Q. How long has your father been dead?

A. More than 10 years.

Q. Name the children of your father and mother for me, please sir? -- I will ask you if these are all of the children of your father and mother: Dan, Ruth, Nellie, Joe, Hattie, Florence, Vitamae, Alwilda, Annie Mae, Charlie, Lillian, Morris, George, Melborn, Johnnie, Minnie and Rennie Frost - 17 in all?

A. That is right.

Q. Are Dan, Ruth and Nellie all dead?

A. Yes sir.

Q. Did any of them have any children?

A. No sir.

Q. Were any of them ever married?

A. Nellie was married, but she had no children.

Q. Now is Renie Frost living or dead?

A. She's dead.

Q. Are these the children of Renie Frost: Buford B. Frost, Glenn Frost, Margarete Hayes, Lucille Gross, Mrs. Dan Brunson, Joseph H. Frost and Vencil F. Longsdon?

A. Yes sir.

Q. Are all of these children over the age of 21 years?

A. Yes sir.

Q. And of sound mind?

A. Yes sir.

Q. Is Hattie Page a resident of Bay Minette, Alabama?

A. Yes sir.

Q. Minnie Broughton resides in Bay Minette, Alabama?

A. Yes sir.

Q. Florence Rice and Lillian Langham resides at Point Clear, Alabama?

A. Yes sir.

Q. Morris Broughton resides at Semms, Alabama?

A. Yes sir.

Q. George Washington Broughton is a non resident of the State of Alabama, and you don't know where he resides?

A. That's right.

Q. Buford Frost is a non-resident of the state of Alabama, and resides at 1722 Citron St. Terrytary, Hawaii?

A. Yes sir.

Q. Terry Tary, Hawaii--

A. Yes sir.

Q. Glenn Frost is a non-r sident, living at Drazaria, Texas?

A. Yes sir.

Q. Margaret Hayes is a non-resident of the State of Alabama, residing at Route 3, DeFuniak Springs, Florida?

A. Yes sir.

Q. Lucille Gross is a non-resident of the State of Alabama, residing at 2712 West Hatten St., Pensacola, Florida?

A. Yes sir.

Q. Mrs. Dan Brunson, lives at 1123 Caroline St., Mobile, Alabama?

A. Yes sir.

Joseph Hershel Frost lives at 611 Alabama St., St Louis, Mo?

A. Yes sir.

Q. Vencil Frost lives at 2428 North 12th Avenue, Pensacola, Fla?

A. That's right.

Q. Verta Mary Kilpatrick, Melborne Brewton, Alwilda Rabon and Annie Mae Knowles all live in Bay Minette, Alabama?

A. Yes sir.

Q. And you say they are all over the age of 21 years and of sound mind?

A. Yes sir.

Q. Now during his life time did your father own the following described property, located in Baldwin County, Alabama: Northwest Quarter of Southeast Quarter of Section 34, Township 2 South, Range 2 East?

A. That is right.

Q. Was he in possession of this complete forty acre tract of land?

A. Yes sir.

Q. For how long was he in possession of it?

A. As long as I can remember.

Q. How long can you remember?

A. 50 years.

Q. Has anybody ever been in possession of any of it during the time you have known it except your family?

A. No sir.

Q. What is the nature of this land -- Is it all in cultivation?

A. No sir, about half of it is.

Q. The other half is in timber?

A. Yes sir.

Q. Is there a house on the property?

A. Yes sir.

Q. Have some of your brothers and sisters conveyed their interest in this land to you?

A. Yes sir.

Q. Are these the deeds that were given to you?

A. Yes sir.

MR. BRANTLEY: We introduce in evidence the following deeds:

1. Deed Johnnie Broughton and wife, Edna B.

Broughton to Joe Broughton, dated May 22, 1957, recorded in Deed Book 256 at page 332;

2. Deed Alwilda Broughton Rabon, a widow, to Joe

Broughton, dated June 8, 1957 and recorded in Deed Book 256 at page 330, Probate Office of Baldwin County, Alabama;

3. Deed Anna Mae Broughton Knowles and husband, Frank

J. Knowles, to Joe Broughton, dated May 6, 1957 and recorded in deed book 256 at page 328, Probate Office of Baldwin County, Alabama;

4. Deed Verta Mary Broughton Kilpatrick and husband,

James Kilpatrick, to Joe Broughton, dated June 1, 1957 and recorded in Deed Book 256 at page 331, Probate Office of Baldwin County, Alabama ;

5. Deed, Melbon Edward Broughton and wife, Laura Broughton, to Joe Broughton, dated June 27, 1957 and recorded in Deed Book 257 at page 190, Probate Office of Baldwin County, Alabama.

6. Deed Charlie Broughton and wife, Alberta Davis Broughton, to Joe Broughton, dated June 8, 1957 and recorded in Deed Book 256 at page 329, Probate Office of Baldwin County, Alabama,

Each of said deeds conveying the NW $\frac{1}{4}$ of Southeast Quarter, Section 34, Township 2 South, Range 2 East, Baldwin County, Alabama.

Q. Now in the deeds that we have introduced, did Verta Mary Kilpatrick, Alwilda Rabon, and Annie Mae Knowles and Melbon Broughton reserve their mineral rights in and to these lands?

A. Yes sir.

Q. And the deeds from the other three parties included all mineral rights?

A. That's right.

Q. In your opinion, can this land be divided among the heirs of your father and mother in kind?

A. No sir.

Q. That is, giving each one the same amount in value?

A. No sir.

Q. It would be impossible because of the number of heirs?

A. Yes sir.

Q. What effort have you gone to locate George Washington Broughton? - How long has it been since you have heard from him?

A. 1917, when he left home.

Q. No one in your family has heard from him since that time?

A. No.

Q. Do you own an undivided 7/14th interest in this land, less a 4/14th interest in the minerals?

A. Yes sir.

Q. Do you know the interest of Minnie Broughton, Hattie Page, Florence Rice, Lillian Langham, Morris Broughton, George Washington Broughton?

A. A child's part.

Q. Is that an undivided 1/14th interest?

A. Yes sir.

Q. The other heirs that we have named, Buford, Frost, Glenn Frost, Margarete Hayes, Lucille Gross, Mrs. Dan Brunson, Joseph Hershel Frost and Voncile Frost each own an undivided 1/98th interest in this land?

A. Yes sir.

Q. Was it necessary for you to employ a lawyer to bring this suit?

A. Yes sir.

Q. What firm did you employ?

A. Wilters & Brantley.

C E R T I F I C A T E:

I hereby certify that the foregoing, consisting of pages 1 to 6 both inclusive, correctly sets forth a true and correct transcript of the testimony as taken by me on this day in open Court in the above styled cause.

This 29th day of May, 1959.

Louise Dismore
Court Reporter

STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we JOHNIE BROUGHTON and EDNA B. BROUGHTON, his wife, Grantors for and in consideration of the sum of TEN (\$10.00) DOLLARS and other good and valuable consideration to them in hand paid by JOE BROUGHTON, Grantee, the receipt of which is hereby acknowledged, do hereby GRANT, BARGAIN, SELL AND CONVEY unto the said Grantee, my undivided interest in and to the following described property situated in Baldwin County, Alabama to-wit:

The Northwest Quarter of the Southeast quarter less two acres used for public road and situate in Section 34 Township 2 South, Range 2 East.

TO HAVE AND TO HOLD, with the appurtenances thereunto belonging unto the Grantee, his heirs and assigns forever.

IN WITNESS WHEREOF, we have hereunto set our hands and seals on this the 22nd day of May, 1957.

Johnie Broughton (SEAL)
Edna B. Broughton (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, C. L. D. Thompson, a Notary Public, in and for said County, in said State, hereby certify that Johnny Broughton and Edna B. Broughton, his wife whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of said conveyance, they executed the same voluntarily on the day the same bears date.
And I do further certify that on the 22nd day of May, 1957, came before me the within named Edna B. Broughton, known to me to be the wife of the within named Johnny Broughton, and who being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints or threats on the part of her husband.
Given under my hand and seal on this the 22nd day of May, 1957.



C. L. D. Thompson
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA, BALDWIN COUNTY
Filed 9-6-57 2:30 P.M.
Recorded deed book 256 page 332
and I certify that the following Privilege Tax has been paid.

Deed Tax 50
Mortgage Tax _____
By M. O. Stuart
Judge of Probate
By B

STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That, I, WILDA BROUGHTON RABON, widow,
Grantor for and in consideration of the sum of TEN (\$10.00) DOLLARS and
other good and valuable consideration to her in hand paid by JOE BROUGHTON,
Grantee, the receipt of which is hereby acknowledged, do hereby GRANT, BARGAIN,
SELL AND CONVEY unto the said Grantee, my undivided interest in and to the
following described property situated in Baldwin County, Alabama, to-wit:

The Northwest Quarter of the Southeast quarter less two acres
used for public road and situate in Section 34 Township 2 South,
Range 2 East.

Grantor reserves unto herself, her heirs and assigns, the undivided oil,
gas and mineral interest in on and under the said undivided interest in described
property.

TO HAVE AND TO HOLD, with the appurtenances thereunto belonging unto the
Grantee, his heirs and assigns forever.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on this the

8th day of June, 1957.

Alw Ida Broughton Rabon
(SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public, in and for said County, in said
State, hereby certify that Wilda Broughton Raybon, a widow, whose name is
signed to the foregoing conveyance, and who is known to me, acknowledged
before me on this day that being informed of the contents of said conveyance,
she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 8th day of June, 1957.

C. LeNoir Thompson
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA, BALDWIN COUNTY

Filed 9-6-57 2:30 P.M.
Recorded deed book 256 page 330
and I certify that the following Privilege Tax
has been paid.

Deed Tax 50

Mortgage Tax _____

W. D. Strait
Judge of Probate

By g

BOOK
256
PAGE
330

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we Anna Mae Broughton Knowles and Frank Knowles, Grantors for and in consideration of the sum of TEN (\$10.00) DOLLARS and other good and valuable consideration to it in hand paid by Joe Broughton, Grantee, the receipt of which is hereby acknowledged, do hereby GRANT BARGAIN, SELL and CONVEY unto the said Grantee, my undivided interest in and to the following described property situated in Baldwin County, Alabama to-wit:

The Northwest quarter of the Southeast quarter less two acres used for public road and situate in Section 34 Township 2 South, Range 2 East.

Grantor reserves unto herself, her heirs and assigns, the undivided oil, gas and mineral interest in on and under the said undivided interest in described property.

TO HAVE AND TO HOLD, with the appurtenances thereunto belonging unto the Grantee, his heirs and assigns forever.

IN WITNESS WHEREOF, we have hereunto set our hands and seals on this the

6th day of May, 1957.

Anna Mae Broughton Knowles (SEAL)

Frank J. Knowles (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, C. D. Thompson, a Notary Public, in and for said County, in said State, hereby certify that Anna Mae Broughton Knowles and Frank Knowles, her husband whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of said conveyance, they executed the same voluntarily on the day the same bears date.

And I do further certify that on the 6 day of May, 1957, came before me the within named Anna Mae Broughton Knowles, known to me to be the wife of the within named Frank Knowles, and who being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints or threats on the part of her husband.

Given under my hand seal on this the 6th day of May, 1957.

C. D. Thompson
Notary Public, Baldwin County, Alabama

STATE OF ALABAMA, BALDWIN COUNTY

Filed 9-6-57 2:30 P.M.

Recorded deed book 256 page 328
and I certify that the following Privilege Tax has been paid.

Deed Tax 50

Mortgage Tax MR. Stuart

Judge of Probate

By 2

BOOK 256
PAGE 328

STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we,, CHARLIE BROUGHTON and ALBERTA DAVIS BROUGHTON, Grantors for and in consideration of the sum of TEN (\$10.00) DOLLARS and other good and valuable consideration to them in hand paid by JOE BROUGHTON, Grantee, the receipt of which is hereby acknowledged, do hereby GRANT, BARGAIN, SELL and CONVEY unto the said Grantee, my undivided interest in and to the following described property situated in Baldwin County, Alabama

to-wit:

The Northwest quarter of the Southeast quarter less two acres used for public road and situate in Section 34 Township 2 South, Range 2 East.

TO HAVE AND TO HOLD, with the appurtenances thereunto belonging unto the Grantee, his heirs and assigns forever.

IN WITNESS WHEREOF, we have hereunto set our hands and seals on this the

8th day of June, 1957.

Charlie Broughton (SEAL)
Alberta Davis Broughton (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public, in and for said County, in said State, hereby certify that Charlie Broughton and Alberta Davis Broughton, his wife whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of said conveyance, they executed the same voluntarily on the day the same bears date.

And I do further certify that on the 8th day of June, 1957, came before me the within named Alberta Davis Broughton, known to me to be the wife of the within named Charlie Broughton, and who being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints or threats on the part of her husband. Given under my hand and seal on this the 8th day of June, 1957.



C. LeNoir Thompson
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA, BALDWIN COUNTY

Filed 9-6-57 2:30 P.M.
Recorded deed book 256 page 329
and I certify that the following Privilege Tax has been paid.

Deed Tax 50

Mortgage Tax _____

MR. D. Stuart
Judge of Probate

By 2

STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, VERTA MARY BROUGHTON KILPATRICK,
and JAMES KILPATRICK, Grantors for and in consideration of the sum of TEN
(10.00) DOLLARS and other good and valuable consideration to them in hand
paid by JOE BROUGHTON, Grantee, the receipt of which is hereby acknowledged, do
hereby GRANT, BARGAIN, SELL and CONVEY unto the said Grantee, my undivided
interest in and to the following described property situated in Baldwin County,
Alabama to-wit:

The Northwest quarter of the Southeast quarter less two acres
used for public road and situate in Section 34 Township 2 South,
Range 2 East.

Grantor reserves unto herself, her heirs and assigns, the undivided oil,
gas and mineral interest in on and under the said undivided interest in described
property.

TO HAVE AND TO HOLD, with the appurtenances thereunto belonging unto the
Grantee, his heirs and assigns forever.

IN WITNESS WHEREOF, we have hereunto set our hands and seals on this the

1st day of June, 1957.

Verta Mary Broughton Kilpatrick (SEAL)
James Kilpatrick (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public, in and
for said County, in said State, hereby certify that Verta Mary Broughton Kilpatrick,
and James Kilpatrick, her husband whose names are signed to the foregoing
conveyance, and who are known to me, acknowledged before me on this day that being
informed of the contents of said conveyance, they executed the same voluntarily
on the day the same bears date.

And I do further certify that on the 1st day of June, 1957, came
before me the within named Verta Mary Broughton Kilpatrick, known to me to be the
wife of the within named James Kilpatrick, and who being examined separate and
apart from her husband, touching her signature to the within conveyance, acknowledged
that she signed the same of her own free will and accord and without fear,
coercion or threats on the part of her husband.

Given under my hand and seal on this the 1st day of June, 1957.



STATE OF ALABAMA, BALDWIN COUNTY
Filed 9-6-57
Recorded deed
and I certify that the following Privilege Tax
has been paid.

C. LeNoir Thompson
Notary Public, Baldwin County, Alabama.
page 251

Deed Tax _____
Mortgage Tax 50

MR. Stuart
Judge of Probate
By 2

JOE BROUGHTON)	
)	IN THE CIRCUIT COURT OF
COMPLAINANT)	BALDWIN COUNTY, ALABAMA,
)	
VS)	IN EQUITY
)	
MORRIS BROUGHTON, ET AL,)	NO. 4488
)	
RESPONDENTS)	

DECREE

This cause coming on for further hearing on the report of the Commissioner notice of which was given the parties and upon testimony, said testimony being taken before Louise Dusenbury, as Commissioner, and the same being considered by the court. It appears to the court as follows:

Pursuant to the decree of this court dated the 1st day of June, 1959, Alice J. Duck, the Commissioner appointed herein, did set a sale of the property hereinafter described for 11:30 A. M. on the 13th day of July, 1959, and did give notice of the time, place and terms of the sale and the description of the property by publication for three successive weeks in the Baldwin Times, a newspaper of general circulation published in Baldwin County, Alabama, said property being located in Baldwin County, Alabama, and being described as follows, to-wit:

Northwest quarter of Southeast quarter of Section 34, Township 2 South, Range 2 East, less approximately 2 acres used for public roads.

At the time and place set out in said notice the said property was offered for sale at public auction to the highest and best bidder for cash. That Joe Broughton, being the highest, best and last bidder, did purchase the aforesaid land for the sum of SIXTY SIX HUNDRED (\$6600.00) DOLLARS. That these bids were fair and reasonable and should be confirmed; that the said Commissioner reported said sale to this Honorable Court on the 13th day of July, 1959; that notice of such was given to the Complainant, the only party in this cause against whom no decree pro confesso was taken; that no objections or exceptions were filed to said report within ten days thereafter, and that no cause was shown why said sale should not be confirmed. It appears to the court from the testimony taken in this cause that said sale should be confirmed and a deed executed by Alice J. Duck, to Joe Broughton conveying to him the property heretofore described in this decree.

It further appearing to the court that this cause was filed by the Firm of Wilters & Brantley, attorneys, and that a reasonable attorneys fee should be allowed them for the services rendered in this cause in the sum of \$700.00.

It further appearing to the court that the costs incurred in this proceeding amount of \$196.41, which includes a Commissioner Fee.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, that Alice J. Duck, as Commissioner, be and she is hereby ordered to execute a deed for the property heretofore described to Joe Broughton.

It appearing to the court from the testimony in this cause that the value of the minerals owned by the tenants in common in this cause is \$10.00 per acre.

It further appearing to the court that since the time of the court's prior decree in this cause the interests owned by the Respondents have changed so that now Minnie Broughton owns an undivided $\frac{4}{14}$ interest, less an undivided $\frac{3}{14}$ oil, gas and mineral interest; that Morris Broughton now owns only an undivided $\frac{1}{14}$ mineral interest; that Lillian Langham now owns an undivided $\frac{1}{14}$ mineral interest; that each of the following now own an undivided $\frac{1}{98}$ mineral interest: Buford Frost, Glenn Frost, Margarete Hayes, Lucille Gross, Mrs. Dan Brunson, Joseph Hershell Forst, Voncille Frost Logsdon. No other interest of the tenants in common have changed.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the proceeds of the sale in the hands of said Commissioner be paid as follows:

Wilters & Brantley, Attorneys at Law	\$700.00 -
Alice J. Duck, as Commissioner and as Register	196.41

This amount being the court cost in this proceeding, and the balance of said proceedings will be distributed as follows:

Joe Broughton	\$2743.23
Minnie Broughton	1548.18
Hattie Page	407.40
Florence Rice	407.39
George Washington Broughton	407.39

Lillian Langham	\$ 27.14
Morris Broughton	27.14
Melborn Broughton	27.14
Verta Mary Kilpatrick	27.14
Alwilda Rabun	27.14
Annie Mae Knowles	27.14
Buford Frost	3.88
Glenn Frost	3.88
Margarete Hayes	3.88
Lucille Gross	3.88
Mrs. Dan Bruson	3.88
Joseph Hershel Frost	3.88
Voncille Frost Logsdon	3.88

Done this 24th day of July, 1959.

Hubert M. Hale
JUDGE

MC

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

DECREE

filed

2-24-59

brief books
any

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

Ø
IN THE CIRCUIT COURT OF
Ø
BALDWIN COUNTY, ALABAMA,
Ø
IN EQUITY
Ø

DECREE

This cause coming on to be heard and is submitted for final decree upon the pleadings and proof as noted by the register and the same having been heard and considered by the court, it is Ordered, Adjudged and Decreed that the Complainant is entitled to the relief prayed for in his bill of complaint in this cause.

It appearing further to the court that answers and waivers were signed in this cause by Hattie Page, Florence Rice, Verta Mary Kilpatrick, Alwilda Rabon, Annie Mae Knowles, Buford Frost and Margarete Hayes, and that a decree pro confesso was rendered against the following named persons on personal service: Lillian Langham, Morris Broughton, Melbon Broughton, Minnie Broughton and Mrs. Dan Brunson. That a decree pro confesso was rendered against the following named persons, who was served by Registered Mail: Glenn Frost, Lucille Gross, Joseph H. Frost, and Voncille F. Logsdon. That a decree pro confesso has been rendered against George Broughton, who was served by publication. That each of the parties in this suit are over the age of 21 years and of sound mind and that it further appears to the court that all parties have been properly served and are properly before the court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED as follows:

1. That the Complainant and Respondents are the joint owners of the following described land located in Baldwin County, Alabama, to-wit:

Northwest quarter of Southeast quarter of Section 34, Township 2 South, Range 2 East, less approximately 2 acres used by public roads.

That their interest in and to this property is as follows: Joe Broughton, the Complainant, $\frac{7}{14}$, less a $\frac{4}{14}$ mineral interest; Minnie Broughton $\frac{1}{14}$ interest; Hattie Page $\frac{1}{14}$ interest; Florence Rice, $\frac{1}{14}$ interest; Lillian Langham $\frac{1}{14}$ interest; Morris Broughton $\frac{1}{14}$ interest; George Washington Broughton $\frac{1}{14}$ interest; Melbon Broughton $\frac{1}{14}$ mineral interest; Verta Mary Kilpatrick $\frac{1}{14}$ mineral interest; Alwilda Rabon $\frac{1}{14}$ mineral interest;

Annie Mae Knowles 1/14 mineral interest; Buford Frost 1/98 interest; Glenn Frost 1/98 interest; Margarete Hayes 1/98 interest; Lucille Gross 1/98 interest; Mrs. Dan Brunson 1/98 interest; Joseph Hershel Frost 1/98 interest; Voncille Frost Logsdon 1/98 interest.

2. That said real property cannot be equitably divided among the owners thereof without a sale of the same for division.

3. That Alice J. Duck, as Commissioner, be and she is hereby authorized and directed to sell on 13 day of July, 1959, at public outcry, for cash, in front of the South door of the court house of Baldwin County, Alabama, during the legal hours of sale to the highest bidder, the property herein above described, after first giving notice by publication in the Baldwin Times a newspaper of general circulation published in Baldwin County, Alabama, once a week for three consecutive weeks of the time, place and terms of sale and a description of the property.

4. That Alice J. Duck, as Commissioner, shall immediately, upon the making of said sale, in the manner and form prescribed herein report her actions herein to the court, so that the same may be confirmed or rejected, as may seem meet and proper.

5. That upon the coming in of the Commissioner's report, and after the same has laid over for the time prescribed by law, the court will proceed to ascertain a reasonable attorneys fee to be paid Complainant's solicitors for their services in this cause and will also fix and ascertain the value of the mineral interest of those parties who had a mineral interest only in and to the aforesaid property. All other questions reserved.

Done this 1st day of June, 1959.

Robert M. Stone
Circuit Judge

m
JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

DECREE

THE BALDWIN TIMES

JIMMY FAULKNER
PUBLISHER

BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

E. R. Morrisette, Jr., being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Joe Broughton vs. Morris Broughton

COST STATEMENT

143 WORDS @ 5 cents \$ 7¹⁵
I hereby certify this is correct, due and unpaid (paid).

E. R. Morrisette Jr.
Editor.

was published in said newspaper for 3 consecutive weeks in the following issues:

Date of 1st publication June 4, 1959 Vol. 71 No. 21

Date of 2nd publication June 11, 1959 Vol. 71 No. 22

Date of 3rd publication June 18, 1959 Vol. 71 No. 23

Date of 4th publication _____, 195____ Vol. _____ No. _____

Subscribed and sworn before the undersigned this 25 day of June, 1959.

Dorothy Martin
Notary Public, Baldwin County.

E. R. Morrisette Jr.
Editor.

LEGAL NOTICE

JOE BROUGHTON, Complainant

vs.
MORRIS BROUGHTON, et al Respondents

Pursuant to terms and provisions of a decree rendered in this cause on the 1st day of June, 1959, the undersigned as Commissioner, will sell at public outcry, to the highest bidder for cash, at the front door of the Courthouse in Bay Minette, Baldwin County, Alabama, at 11:30 o'clock A.M. on the 13th day of July, 1959, the following described property situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Southeast quarter of Section 34, Township 2 South, Range 2 East, less approximately 2 acres used by public roads.

This said sale will be made for the purpose of making a division among the joint owners of said property.

Dated this 1st day of June, 1959.

ALICE J. DUCK,
As Commissioner
Winters & Brantley
Solicitors for Complainant.

21-3tc

of Alabama; that his residence cannot be ascertained after reasonable inquiry. It is therefore ordered that George Washington Broughton plead, answer or demur to the allegations of the Bill of Complaint filed against him in this cause on or before the 27th day of February, 1959, or upon the expiration of thirty days from said date the same will be taken as confessed against him. It is further ordered that notice of this order be published once a week for four consecutive weeks in the Baldwin Times, a newspaper published in the County of Baldwin, State of Alabama.

ALICE J. DUCK,
Register
Winters & Brantley
Solicitors for the Complainant.

3-4tc

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Comes now the Respondent, Verta Mary Kilpatrick,
one of the Respondents in the above styled cause and accepts service of
the Bill of Complaint heretofore filed in said cause; waives notice of
the filing of interrogatories in said cause, the right to cross the same;
waives notice of the taking of testimony in said cause; and consents that
the same may be taken and the cause submitted for final decree. For
answer to the Bill of Complaint heretofore filed in this cause the
Respondent says:

1.

That she admits the allegations of the complaint insofar as it
relates to the names of the parties in this cause, their ages, their
residences, but denies all other allegations contained therein.

Verta M Kilpatrick

WITNESSES:

Charles B. Rice

Wm Wallace

Filed Feb. 26, 1959
Alice J. Luck, Register

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

JOE BROUGHTON
COMPLAINANT
VS
MORRIS BROUGHTON, ET AL,
RESPONDENTS

Verla May R. Broughton
Comes now the Respondent,

one of the Respondents in the above styled cause and accepts service of
the Bill of Complaint heretofore filed in said cause; waives notice of
the filing of interrogatories in said cause, the right to cross the same;
waives notice of the taking of testimony in said cause; and consents that
the same may be taken and the cause submitted for final decree.
answer to the Bill of Complaint heretofore filed in this cause.

Respondent says:

1.

That she admits the allegations of the complaint insofar as it
relates to the names of the parties in this cause, their ages, their
residences, but denies all other allegations contained therein.

Verla May R. Broughton

WITNESSES:

Charles B. Brier

Wm. Wallace

Verla May R. Broughton
Attest: Feb. 26, 1959
Alice J. Duck, Registrar

ALICE J. DUCK, CLERK
REGISTRAR

FILED
FEB 26 1959

THE STATE OF ALABAMA, }
Baldwin County }

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

Joe Broughton

Complainant

Vs.

Morris Broughton, et al

Defendant

Motion is hereby made for a Decree Pro Confesso against George W. Broughton

Defendant

in the annexed 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 due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 14 day of April, 19 59.

746 Code

James M Brantley

Solicitor.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

Complainant _____

Vs. _____

Defendant _____

Motion for Decree Pro Confesso
On Publication

Filed **FILED**, 19 _____

APR 14 1959

Register.

ALICE J. DUCK, CLERK
REGISTER

Recorded in _____ Record

Vol. _____ Page _____

Register.

The Baldwin Times, Bay Minette, Ala.

8847

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Comes now the Respondent, Hattie Page,
one of the Respondents in the above styled cause and accepts service of
the Bill of Complaint heretofore filed in said cause; waives notice of
the filing of interrogatories in said cause, the right to cross the same;
waives notice of the taking of testimony in said cause; and consents that
the same may be taken and the cause submitted for final decree. For
answer to the Bill of Complaint heretofore filed in this cause the
Respondent says:

1.

That she admits the allegations of the complaint insofar as it
relates to the names of the parties in this cause, their ages, their
residences, but denies all other allegations contained therein.

Mrs. Hattie Page

WITNESSES

Charles B. Grice

Wm Wallace

Filed Feb. 26, 1959

Alice J. Duck, register

Wainer

FILED

FEB 26 1950

ALICE J. DUCK, CLERK
REGISTER

Waller

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Comes now the Respondent, Margaret Hayes,
one of the Respondents in the above styled cause and accepts service of
the Bill of Complaint heretofore filed in said cause; waives notice of
the filing of interrogatories in said cause, the right to cross the same;
waives notice of the taking of testimony in said cause; and consents that
the same may be taken and the cause submitted for final decree. For
answer to the Bill of Complaint heretofore filed in this cause the
Respondent says:

1.

That she admits the allegations of the complaint insofar as it
relates to the names of the parties in this cause, their ages, their
residences, but denies all other allegations contained therein.

WITNESSES

James F. Hayes
James Hayes

Marguerite Hayes

Filed Feb. 26, 1959
Alice J. Duck, Register

James J. Hester
~~James J. Hester~~

James J. Hester
James J. Hester

Madame Justice

ALLEGED

residence, and since all other allegations concerning these in-
 relates to the name of the parties in this case, their names, their

That ~~the~~ allegations of the complaint insofar as it

respondent says:

waives
 answer to the Bill of Complaint insofar as it is alleged in this
 the case may be taken and the same submitted for their consideration
 raises notice of the taking of testimony in said case, the taking of cross
 the taking of interrogatories in said case, the taking of cross
 the Bill of Complaint insofar as it is alleged in said case, notice of
 one of the respondents in the above styled case and whereby service of
 comes from the respondent, *Madame Justice*

FILED
 FEB 26 1959
 ALICE J. DUCK, CLERK
 REGISTER
Marguerite

RESPONDENTS

REBIS IN REBIS, LT. A.1.

AS

COMPLAINT

FOR REBIS IN REBIS

IN FULLY

WITHIN COURT, VIA JURY

IN THE CIRCUIT COURT OF

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

Comes now the Respondent,

Florence Rice

one of the Respondents in the above styled cause and accepts service of the Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, the right to cross the same; waives notice of the taking of testimony in said cause; and consents that the same may be taken and the cause submitted for final decree. For answer to the Bill of Complaint heretofore filed in this cause the Respondent says:

1.

That she admits the allegations of the complaint insofar as it relates to the names of the parties in this cause, their ages, their residences, but denies all other allegations contained therein.

Florence Rice

WITNESSES

Florence G. L. Lanes

Jackie H. Long

Filed Feb. 26, 1959

Alice J. Duck, Register

EST

not upon ground of illegality

part of subject

Alvin Karpis

RECEIVED

20th January 1935

It is requested that the Commission of the Court be informed as to the result of the hearing of the application for a writ of habeas corpus in the case of the respondent, Alvin Karpis, who is now in custody of the Federal Bureau of Investigation.

Wainwright

FILED
FEB 26 1935
U.S. DEPT. OF JUSTICE
RECEIVED

The respondent, Alvin Karpis, who is now in custody of the Federal Bureau of Investigation, has applied for a writ of habeas corpus in the case of the respondent, Alvin Karpis, who is now in custody of the Federal Bureau of Investigation.

RECEIVED

ALVIN KARPIS

25

COMPLAINT

IN RE KARPIS

IN RE KARPIS

IN RE KARPIS

IN RE KARPIS

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JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Comes now the Respondent, Buford B. Frost,
one of the Respondents in the above styled cause and accepts service of
the Bill of Complaint heretofore filed in said cause; waives notice of
the filing of interrogatories in said cause, the right to cross the same;
waives notice of the taking of testimony in said cause; and consents that
the same may be taken and the cause submitted for final decree. For
answer to the Bill of Complaint heretofore filed in this cause the
Respondent says:

1.

That he admits the allegations of the complaint insofar as it
relates to the names of the parties in this cause, their ages, their
residences, but denies all other allegations contained therein.

WITNESSES

Charles H. Hargis
James W. Hargis

Buford B. Frost
Filed Feb. 26, 1959
Alice J. Duck, Register

ALIBORN

James W. Aliborn

*Rec'd by clerk register
Feb 26 1959*

Robert B. Duck

residence, but denies all other allegations contained therein.

relates to the names of the parties in this cause, their ages, their

that *he* admits the allegations of the complaint insofar as it

is.

Respondent says:

answer to the Bill of Complaint heretofore filed in this cause.

the same may be taken and the cause admitted for final decision.

waives notice of the taking of testimony in said cause; and certifies

the filing of interrogatories in said cause; the right to cross the same

the Bill of Complaint heretofore filed in said cause; waives notice of

one of the respondents in the above styled cause and accepts service of

comes now the Respondent: *Robert B. Duck*

RESPONDENTS

ROBERT B. DUCK, ET AL.

VS

COMPLAINANT

JOE BROUGHTON

IN EQUITY

BALTIMORE COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

FILED

FEB 26 1959

ALICE J. DUCK, CLERK REGISTER

Buyer

4488

Joe Broughton

vs.

Mavis Broughton et al

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint,

Decree Pro Confesso of Publication against George W Broughton
 Decree Pro Confesso on Personal Service against Silas Broughton
 Mavis Broughton, Mollie Broughton, Mrs. Ed Brunson and Minnie
 Broughton. Decree Pro Confesso on Registered Mail against
 Allen Frost, Lucile Frost, Joseph H Frost and Tonnie Broughton.
 Testimony as noted by the Register and dect. attached to testimony.

and in behalf of Defendant upon Answer and waiver of Hattie Page, Florence
 Rice, Verta Mary Kilpatrick, Alvinde Rabon, Annie Mae Knowles,
 Buford Frost and Margarette Hayes

John M. Blanton
 atty. for defendant

Archie French

m

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

VS.

Note of Testimony

Filed in Open Court this 1st

day of June, 1954
W. J. [Signature]
Register.

Joe Broughton

Morris Broughton
et al

vs.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, Decree
dated June 1, 1959, notice of sale by publication -
notice, testimony as noted by register -
Report of sale by commission

and in behalf of Defendant upon

Suggestion of Change of interest
in land by Morris Broughton -

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

Comes now the Respondent, Annie Mae Knowles,
one of the Respondents in the above styled cause and accepts service of
the Bill of Complaint heretofore filed in said cause; waives notice of
the filing of interrogatories in said cause, the right to cross the same;
waives notice of the taking of testimony in said cause; and consents that
the same may be taken and the cause submitted for final decree. For
answer to the Bill of Complaint heretofore filed in this cause the
Respondent says:

1.

That she admits the allegations of the complaint insofar as it
relates to the names of the parties in this cause, their ages, their
residences, but denies all other allegations contained therein.

Anna Mae Knowles

WITNESSES:

Alvilda Rakon

Wm Wallace

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MORRIS BROUGHTON, MINNIE BROUGHTON, HATTIE PAGE, FLORENCE RICE, LILLIAN LANGHAM, GEORGE WASHINGTON BROUGHTON, BUFORD B. FROST, GLENN FROST, MARGARETE HAYES, LUCILLE GROSS, MRS. DAN BRUNSON, JOSEPH HERSHEL FROST, VONCILLE FROST, BERTA MARY KILPATRICK, MELPON E. BROUGHTON, ALWILDA RABON, AND ANNIE MAE KNOWLES, TO appear and Plead, answer or demur within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by JOE BROUGHTON, as Complainant, and against Morris Broughton, et al, as Respondents.

WITNESS my hand this the 26 day of January, 1959.

Reichle
Register

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Comes now the Complainant in the above styled cause and shows unto Your Honor as follows:

1.

That the Complainant, Joe Broughton, is a resident citizen of Bay Minette, Baldwin County, Alabama, over 21 years of age.

2.

That the Respondent, Hattie Page is a resident of Bay Minette, Alabama; that the Respondent, Minnie Broughton, is a resident of Bay Minette, Alabama; that Florence Rice and Lillian Langham are residents of Point Clear, Alabama; that Morris Broughton is a resident of Sims, Alabama; that George Washington Broughton is a non-resident of the State of Alabama, and whose address cannot be ascertained after diligent inquiry; that the Respondent, Buford B. Frost, is a non-resident of the State of Alabama, and resides at 1722 Citron Street, Terry Tary, Hawaii; that the Respondent, Glenn Frost is a non-resident of the State of Alabama, and resides at Drazaria, Texas; that the Respondent, Margarete Hayes, is a non-resident of the State of Alabama, and resides at Route 3, De Funiak Springs, Florida; that the

Respondent, Lucille Gross, is a non-resident of the State of Alabama, and resides at 2712 West Hatton Street, Pensacola, Florida; that the Respondent, Mrs. Dan Bruson, is a resident of the State of Alabama, and resides at 1123 Carolina Street, Mobile, Alabama; that the Respondent, Joseph Hershel Frost, is a non-resident of the State of Alabama and resides at 6111 Alabama Street, St. Louis, Missouri; that the Respondent, Voncile Frost, is a non-resident of the State of Alabama, and resides at 2428 North 12th Avenue, Pensacola, Florida; that the Respondents, Verta Mary Kilpatrick, Melbon E. Broughton, Alwilda Rabon, and Annie Mae Knowles are residents of Bay Minette, Baldwin County, Alabama; the Complainant avers that all of the named respondents are each of sound mind and over the age of 21 years.

3.

The Complainant further shows unto the Court that he and the Respondents are the joint owners of the following described land located in Baldwin County, Alabama, to-wit:

Northwest quarter of Southeast quarter of Section 34,
Township 2 South, Range 2 East, less approximately 2
acres used for public roads.

That said lands cannot be equitably divided because of the respective interest of the parties to this suit and further because part of this land is in timber, part in cultivation and because there is a house on this land.

4.

That the Complainant is the owner of an undivided $7/14$ interest in and to the lands described in the Bill of Complaint, less an undivided $4/14$ mineral interest therein.

That the Respondents' interests are as follows: Minnie Broughton, Hattie Page, Florence Rice, Lillian Langham, Morris Broughton, George Washington Broughton, an undivided $1/14$ interest each; Melbon Broughton, Verta Mary Kilpatrick, Alwilda Rabon, Annie Mae Knowles, an undivided $1/14$ mineral interest each; Buford Frost, Glenn Frost, Margarete Hayes, Lucille Gross, Mrs. Dan Brunson, Joseph Hershel Frost, Voncile Frost, an undivided $1/98$ interest each.

5.

That the Complainant further shows unto Your Honor that it is necessary for the Complainant to employ a solicitor to institute this proceeding for partition and division by a sale of the aforesaid property; that he

has employed the firm of Wilters & Brantley, attorneys at law, for this purpose, and that their fee as such solicitor should be ascertained and taxed as a part of the cost of this proceeding.

WHEREFORE, premises considered, your Complainant prays that all parties Respondent be made parties to this Bill of Complaint and that the process of this court issue to the Respondents and each of them requiring them to plead, answer or demur to the foregoing Bill of Complaint within the time prescribed by law.

Premises considered, your Complainant prays that on a final hearing of this cause, Your Honor will:

1. Decree that the property is jointly owned by the Complainant and Respondents.
2. Decree that the Complainant and Respondents own this land in the proportion set out in this bill of complaint.
3. Decree that it is necessary that a sale be held by the Register of this court for the purpose of partition and division of said lands among the joint owners thereof and issue an order that a sale be made.
4. Order a reference to ascertain a solicitor fees to be taxed as a part of the cost of this proceeding to be paid Complainant's Solicitors of record out of the proceeds of the sale of said property.

Your Complainant prays for such other, further or different relief as in equity may be meet and just.

Wilters & Brantley

BY:

Robert M Brantley
Solicitors for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, the undersigned authority, in and for said County, in said State, Joe Broughton, who is known to me and who having been by me first duly sworn, deposes and says: that he has read the foregoing Bill of Complaint and the matters alleged therein are true.

Sworn to and subscribed before me this 21 day of January, 1959.

Robert M Brantley
Notary Public,

Received 27 day of Jan 1959
and on 27 day of Jan 1959
I served a copy of the within Bill of Complaint
on Melbon Broughton
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.
Cross road

Sheriff claims 14 miles at 1.40
Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff
BY _____ DEPUTY SHERIFF

Please Serve:
Melbon Broughton - Bay Minette
Morris " Sims
Lillian Langham - Point Clear
Mrs Dan Brunson 1123 W
Hotton St Mobile

4488 1031481
20 Nov.
E

JOE BROUGHTON
COMPLAINANT
VS
9 King
MORRIS BROUGHTON, ET AL,

RESPONDENTS
10 Wade
Mrs. Dan Brunson

BILL OF COMPLAINT

FILED

JAN 26 1959

ALICE J. DUCK, CLERK
REGISTER

Melbon Broughton

RECEIVED

MAR 9 1959

SHERIFF'S OFFICE

Received 26 day of Feb 1959
and on 3 day of March 1959
I served a copy of the within Bill of Complaint
on Melbon Broughton

By service on _____
TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.
White house forks

Received 26 day of Feb 1959
and on 6 day of Mar 1959
I served a copy of the within Bill of Complaint
on Lillian Langham

By service on Lillian Langham
TAYLOR WILKINS, Sheriff
By John D. S.
John Chan

Sheriff claims 100 miles at
Ten Cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff
BY John DEPUTY SHERIFF

RETURNED
Not found in my County after diligent
search and inquiry.
RAY D. BRIDGES, Sheriff
By _____ D. S.

EXECUTED
This 9 day of March 1959
by serving a copy of the within on
Morris Broughton
RAY D. BRIDGES, Sheriff
By E. King D. S.

EXECUTED
This 10 day of March 1959
by serving a copy of the within on
Mrs. Dan Brunson
RAY D. BRIDGES, Sheriff
By W. Wade D. S.

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Comes now the Respondent, Alwilda Rabon,

one of the Respondents in the above styled cause and accepts service of the Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, the right to cross the same; waives notice of the taking of testimony in said cause; and consents that the same may be taken and the cause submitted for final decree. For answer to the Bill of Complaint heretofore filed in this cause the

Respondent says:

1.

That she admits the allegations of the complaint insofar as it relates to the names of the parties in this cause, their ages, their residences, but denies all other allegations contained therein.

Alwilda Rabon

WITNESSES:

Guy L. Still

Wm Wallace

Filed Feb. 26, 1959

Alice J. Duck, Register

Wm. Shreve
and others

Wm. Shreve
and others

WITNESSES:

residents, and denies all other allegations contained therein.
relates to the names of the parties in this case, their ages, their

that ~~the~~ the affidavits of the complaint insofar as it
is.

Respondent says:

answer to the bill of complaint heretofore filed in this case
the same may be taken and the same submitted for final decision
advised notice of the taking of testimony in said case and consents that
the filing of interrogatories in said case, the right to cross the same
the bill of complaint heretofore filed in said case and accepts service of
one of the respondents in the above styled case and accepts service of

Consent now the Respondent: William Shreve

RESPONDENTS

WILLIAM SHREVE, ET AL.

AS

COMPLAINANT

FOR RECORDATION

IN EQUITY

BETWEEN EQUALLY ATTORNEY

IN THE CIRCUIT COURT OF

FILED
FEB 26 1959

ALICE J. DUCK, CLERK
REGISTER

Alvin

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. _____

LEGAL NOTICE

In this cause it appearing from affidavit that the Respondent, George Washington Broughton, is over the age of 21 years, and is a non-resident of the State of Alabama; that his residence cannot be ascertained after reasonable inquiry.

It is therefore ordered that George Washington Broughton plead, answer or demor to the allegations of the Bill of Complaint filed against him in this cause on or before the 27th day of February, 1959, or upon the expiration of thirty days from said date the same will be taken as confessed against him. It is further ordered that notice of this order be published for once a week for four consecutive weeks in the Baldwin Times, a newspaper published in the County of Baldwin, State of Alabama.


Register

Wilters & Brantley

Solicitors for the Complainant.

4488

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENT

LEGAL NOTICE

FILED

JAN 26 1959

W. J. DUCK, CLERK
REGISTER

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

DECREE

This cause coming on to be heard and is submitted for final decree upon the pleadings and proof as noted by theregister and the same having been heard and considered by the court, it is Ordered, Adjudged and Decreed that the Complainant is entitled to the relief prayed for in his bill of complaint in this cause.

It appearing further to the court that answers and waivers were signed in this cause by Hattie Page, Florence Rice, Verta Mary Kilpatrick, Alwilda Rabon, Annie Mae Knowles, Buford Frost and Margarete Hayes, and that a decree pro confesso was rendered against the following named persons on personal service: Lillian Langham, Morris Broughton, Melbon Broughton, Minnie Broughton and Mrs. Dan Brunson. That a decree pro confesso was rendered against the following named persons, who was served by Registered Mail: Glenn Frost, Lucille Gross, Joseph H. Frost, and Vencille F. Logsdon. That a decree pro confesso has been rendered against George Broughton, who was served by publication. That each of the parties in this suit are over the age of 21 years and of sound mind and that it further appears to the court that all parties have been properly served and are properly before the court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED as follows:

1. That the Complainant and Respondents are the joint owners of the following described land located in Baldwin County, Alabama, to-wit:

Northwest quarter of Southeast quarter of Section 34, Township 2 South, Range 2 East, less approximately 2 acres used by public roads.

That their interest in and to this property is as follows: Joe Broughton, the Complainant, $\frac{7}{11}$, less a $\frac{4}{11}$ mineral interest; Minnie Broughton $\frac{1}{11}$ interest; Hattie Page $\frac{1}{11}$ interest; Florence Rice, $\frac{1}{11}$ interest; Lillian Langham $\frac{1}{11}$ interest; Morris Broughton $\frac{1}{11}$ interest; George Washington Broughton $\frac{1}{11}$ interest; Melbon Broughton $\frac{1}{11}$ mineral interest; Verta Mary Kilpatrick $\frac{1}{11}$ mineral interest; Alwilda Rabon $\frac{1}{11}$ mineral interest;

Annie Mae Knowles 1/14 mineral interest; Buford Frost 1/98 interest; Glenn Frost 1/98 interest; Margarete Hayes 1/98 interest; Lucille Gross 1/98 interest; Mrs. Dan Brunson 1/98 interest; Joseph Hershel Frost 1/98 interest; Voncille Frost Logsdon 1/98 interest.

2. That said real property cannot be equitably divided among the owners thereof without a sale of the same for division.

3. That Alice J. Duck, as Commissioner, be and she is hereby authorized and directed to sell on _____ day of _____, 1959, at public outcry, for cash, in front of the South door of the court house of Baldwin County, Alabama, during the legal hours of sale to the highest bidder, the property herein above described, after first giving notice by publication in the Baldwin Times a newspaper of general circulation published in Baldwin County, Alabama, once a week for three consecutive weeks of the time, place and terms of sale and a description of the property.

4. That Alice J. Duck, as Commissioner, shall immediately, upon the making of said sale, in the manner and form prescribed herein report her actions herein to the court, so that the same may be confirmed or rejected, as may seem meet and proper.

5. That upon the coming in of the Commissioner's report, and after the same has laid over for the time prescribed by law, the court will proceed to ascertain a reasonable attorneys fee to be paid Complainant's solicitors for their services in this cause and will also fix and ascertain the value of the mineral interest of those parties who had a mineral interest only in and to the aforesaid property. All other questions reserved.

Done this _____ day of June, 1959.

Circuit Judge

JIMMY FAULKNER
PUBLISHER

THE BALDWIN TIMES

BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA.
BALDWIN COUNTY.

E R Morrisette, Jr. being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Joe Broughton vs. Morris Broughton

LEGAL NOTICE
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
CASE NO. 4488
JOE BROUGHTON,
COMPLAINANT
VS
MORRIS BROUGHTON, ET AL,
RESPONDENTS
LEGAL NOTICE
In this cause it appearing from affidavit that the Respondent, George Washington Broughton, is over the age of 21 years, and is a non-resident of the State

COST STATEMENT

163 WORDS @ 6 1/2 cents \$ 10. 60
I hereby certify this is correct, due and unpaid (paid).

E. R. Morrisette Jr.
Editor.

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

Date of 1st publication January 29, 1959 Vol. 71 No. 3

Date of 2nd publication February 5, 1959 Vol. 71 No. 4

Date of 3rd publication February 12, 1959 Vol. 71 No. 5

Date of 4th publication February 19, 1959 Vol. 71 No. 6

Subscribed and sworn before the undersigned this 19 day of Feb, 1959.

Oscentay Martin
Notary Public, Baldwin County.

E. R. Morrisette Jr.
Editor.

JOE BROUGHTON,
Complainant

vs

MORRIS BROUGHTON, Et al,
Respondents

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 4488

REPORT OF REGISTERS SALE


Whereas on the 1st day of June, 1959, Your Honor entered a decree in the above styled cause directing the Register to sell parcel of land described in said decree.

The undersigned as Register of this court, did give notice by advertisement in the Baldwin Times a newspaper published at Bay Minette, Baldwin County, Alabama, three consecutive weeks prior to the sale, that on the 13th day of July, 1959, during the legal hours of sale she as such Register would offer for sale at public outcry, in front of the Courthouse the parcel of land described in said order directing the sale, and at such place and time she did offer the said parcel of land for sale; in said manner and did offer and receive bids for said parcel of land. At such sale Joe Broughton being the highest best and last bidder therefor did purchase said parcel at the sum of Six Thousand, ~~a~~Six Hundred and no/100 (\$6,600.00) said parcel described at follows:

Northwest quarter of Southeast quarter of
Section 34, Township 2 South, Range 2 East,
less approximately 2 acres used by public
roads.

And the said bidder having paid into this Court the amount of said bid and your Register of this Court holds the same subject to the approval by this Court of such sale and subject to further orders of and directions of this Court.

This 13 day of July, 1959.


Register in Equity.

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. _____

LEGAL NOTICE

In this cause it appearing from affidavit that the Respondent, George Washington Broughton, is over the age of 21 years, and is a non-resident of the State of Alabama; that his residence cannot be ascertained after reasonable inquiry.

It is therefore ordered that George Washington Broughton plead, answer or demor to the allegations of the Bill of Complaint filed against him in this cause on or before the 27th day of February, 1959, or upon the expiration of thirty days from said date the same will be taken as confessed against him. It is further ordered that notice of this order be published for once a week for four consecutive weeks in the Baldwin Times, a newspaper published in the County of Baldwin, State of Alabama.

Register

Wilters & Brantley

Solicitors for the Complainant.

Solicitors for the Complainant.

Wilfers & Brantley

Register

times, a newspaper published in the County of Baldwin, State of Alabama.

be published for once a week for four consecutive weeks in the Baldwin

confessed against him. It is further ordered that notice of this order

the expiration of thirty days from said date the same will be taken

him in this cause on or before the 25th day of February, 1929, or upon

answer or demurrer to the allegations of the Bill of Complaint filed

if he therefore ordered that George Washington Proughnion plead,

ascertained after reasonable inquiry.

non-resident of the State of Alabama that his residence cannot be

George Washington Proughnion, is over the age of 21 years, and is a

In this cause it appearing from affidavit that the Respondent,

LEGAL NOTICE

RESPONDENTS

CASE NO. _____

MORRIS BROUGHTON, ET AL,

IN EQUITY

VS

BALDWIN COUNTY, ALABAMA,

COMPLAINANT

IN THE CIRCUIT COURT OF

THE BOUNTY

4488

FILED
JAN 26 1929

ALICE I. DUCK, CLERK
REGISTER

distribution in Baldwin County, Alabama?

A. Yes sir.

Q. Have you looked at the file in this case - the case of Joe Broughton vs. Morris Broughton, etal?

A. I have not examined it closely, but I will do so.

Q. Assuming that this case - that the property involved in this suit was 40 acres of land that sold for \$6,600.00 and that there were 14 tenants in common involved in the litigation; that it was uncontested - Do you have an opinion of the reasonable Attorneys' fee for the handling of the suit?

A. Yes sir.

Q. What is your opinion?

A. In my opinion a reasonable Attorneys' fee would be in the neighborhood of \$700.00 to \$800.00.

J. CONNOR OWENS, BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

Examination by Mr. Brantley.

Q. What is your name, please?

A. Connor Owens.

Q. You are an Attorney at Law, presently practicing in Bay Minette, Alabama?

A. I am.

Q. As such, have you conducted the sale of lands for minerals or had mineral sales in your office bought and sold?

A. I have.

Q. Are you familiar with the current price of minerals in Baldwin County?

A. I am.

Q. Are you familiar with the price of minerals in this particular area - NW $\frac{1}{4}$ of SE $\frac{1}{4}$, Sec. 34, Tp. 2 South, Range 2 East?

A. Yes. I understand that all of Baldwin County is considered

to be, with the exception of the extreme north portion, rank wild-cat and the price is fairly uniform over the entire County, with the exception of South Carlton Field in the North end of the County.

Q. In your opinion, what is the value of minerals or one mineral acre in Baldwin County, Alabama?

A. Roughly \$10.00 an acre; maybe 50¢ more or less a mineral acre.

Q. Would the number of acres involved in a tract affect the sale price?

A. Yes.

Q. Assuming that there was 40 acres involved, what, in your opinion, would be the value of the minerals per acre?

A. In otherwords, instead of being widely spread -- It would bring a lesser price.

Q. Assuming this was less than 40 acres, would this be more or less?

A. Less.

Q. Assuming that you had an undivided interest in a 40 acre tract, would the price be more or less per mineral acre?

A. Less.

Q. Mr. Owens, are you familiar with the Baldwin County fee system and price charged by Attorneys generally in a suit for partition and division?

A. Yes.

Q. Assuming that a 40 acre tract of land was sold for partition and division, and brought \$6,600.00, and that there were 14 tenants in common, and the suit was uncontested. What, in your opinion, would be a reasonable Attorney's fee for the Attorneys representing the Complainant?

A. Roughly, 10% of the \$6,600.00

C E R T I F I C A T E:

I hereby certify that the foregoing, consisting of pages 1 to 3, both inclusive, is a true and correct transcript of the testimony as taken by me in this cause on the 20th day of July, 1959.

This the 20th day of July, 1959.

Louise Durkinburg
Official Court Reporter

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

Ø
IN THE CIRCUIT COURT OF
Ø
BALDWIN COUNTY, ALABAMA,
Ø
IN EQUITY
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Comes now the Respondent, Melbon Broughton, one of the Respondents in the above styled cause and accepts service of the Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, the right to cross the same; waives notice of the taking of testimony in said cause; and consents that the same may be taken and the cause submitted for final decree. For answer to the Bill of Complaint heretofore filed in this cause the Respondent says:

That he admite the allegations of the complaint insofar as it relates to the names of the parties in this cause, their ages, their residences, but denies all other allegations contained therein.

Melbon E. Broughton

WITNESSES:

Gary J. Wilkins, Jr.
Eulyn Watts

ALICE L. DUCK, CLERK
REGISTER

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APR 13 1959

ALICE J. DUCK, CLERK
REGISTER

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THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

Joe Broughton _____ Complainant

Vs.

Morris Broughton, et al, _____ Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 29th day of January, 1959, 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 29th day of January 1959 and _____

And it now further appearing to the Register Alice J. Duck that the said George W. Broughton _____

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant _____, ordered and decreed by the Register Alice J. Duck _____ that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said George W. Broughton _____

This 14 day of April 1959

166

Alice J. Duck Register.

JOE BROUGHTON,		IN THE CIRCUIT COURT OF
Complainant,		BALDWIN COUNTY, ALABAMA
vs.		
MORRIS BROUGHTON, ET AL.,		IN EQUITY. NO. 4488.
Respondents.		

Now comes Minnie Broughton, one of the Respondents in this cause and shows unto this court that since the commencement of this suit she has obtained the interest of Morris Broughton, Lillian E. Langham, and the heirs of Renie Frost, Deceased. The said Respondent, Minnie Broughton, now owns an undivided four-fourteenths interest in and to all of the property which is the subject of this suit, less an undivided three-fourteenths interest in and to all oil, gas and other minerals situated in, on or under the said property. The deeds under which your Respondent obtained her interest in this property were filed for record in the Office of the Probate Judge of Baldwin County, Alabama, on June 30, 1959.

FILED

JUL 2 1959

ALICE J. DUCK, CLERK
REGISTER

Respectfully submitted,


Solicitor for Respondent, Minnie Broughton.

4488

FILED

JUL 2 1959

CLERK
REGISTER

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

DECREE PRO CONFESSO ON REGISTERED MAIL

In this cause it being made to appear to the court by the allegations of the Bill of Complaint that the Respondents Glenn Frost, resides at Drazaria, Texas; Lucille Gross lives at 2712 W. Hatten Street, Pensacola, Florida; Joseph H. Frost lives at 6111 Alabama Street St. Louis, Missouri; and Voncille Logsdon lives at 2428 N. 1201 Avenue, Pensacola, Florida; and that a copy of the original bill in this cause together with a summons to answer said bill within thirty days from the service thereof was deposited in the Registered Mail in the post office at Bay Minette, Alabama, by the Register of this court and mailed to each of the above named Respondents and addressed to those addresses appearing after their names, and that the said Respondents above named received the same in person on the following dated: Glenn Frost March 2, 1959; Lucille Gross February 28, 1959, Joseph H. Frost March 2, 1959, and Voncille Logsdon February 28, 1959, as shown by the return receipts received and filed in this cause, and the said Respondents each having failed to demur, plead to, or answer the said bill to the date hereof;

It is now, therefore, on the motion of the Complainant's Solicitor, ordered and decreed by the said bill of complaint in this cause be and it is hereby in all things taken as confessed against Glenn Frost, Lucille Gross, Joseph H. Frost, Voncille Logsdon.

This 14 day of April, 1959.


Register

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

DECREE PRO CONFESSO ON PERSONAL SERVICE

In this cause it being made to appear that a summons requiring the Respondents, Lillian Langham, Morris Broughton, Melbon Broughton, Mrs. Dan Brunson, and Minnie Broughton to appear and plead to or answer the Bill of Complaint in this cause, within thirty days from the service upon them and that Lillian Langham was duly served on the 26th day of February, 1959, and Morris Broughton on the 9th day of March, 1959, and Melbon Broughton on the 26th day of February, 1959, and Mrs. Dan Brunson on the 10th day of March, 1959, and Minnie Broughton on the 27th day of January, 1959, and the said Respondents and each of them have failed to plead, to, answer or demur to the said bill to the date hereof, it is Now, Therefore, on the motion of the Complainant's Solicitor, ordered and decreed that the said bill of complaint in this cause be, and it hereby is in all things taken as confessed against Lillian Langham, Morris Broughton, Melbon Broughton, Mrs. Dan Brunson, and Minnie Broughton.

Done this 14 day of April, 1959.

Alfred Duck
Register

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE

Now comes the Complainant, Joe Broughton, in the above styled cause and shows unto the Register that a summons was issued out of this court on the 26 day of Jan, 1959, directed to Lillian Langham, Morris Broughton, Melbon Broughton, Mrs. Dan Brunson, and Minnie Broughton, Respondents herein, ordering each of them to appear and plead, answer or demur within thirty days from the service thereof to the Bill of Complaint in this cause; that a copy of said summons was duly on Lillian Langham by proper officers on the 26th day of February, 1959, and upon Morris Broughton on the 9th day of March, 1958, and on Melbon Broughton on the 26th day of February, 1959, and on Mrs. Dan Brunson on the 10th day of March, 1959, and on Minnie Broughton on the 27th day of January, 1959, and that the said Respondents and each of them have to the date hereof failed to plead, answer or demur to the said bill of complaint:

WHEREFORE, Complainant moves that a decree pro confesso be entered against the said Respondents and each of them.

Done this the 14th day of April, 1959.

Wilters & Brantley

BY:

Arthur M. Brantley
Solicitors for the Complainant

Motion

FILED

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ALICE J. DUCK, CLERK
REGISTER

JOE BROUGHTON,
COMPLAINANT

VS

MORRIS BROUGHTON, ET AL

RESPONDENTS

Pursuant to terms and provisions of a decree rendered in this cause on the 1st day of June, 1959, the undersigned as Commissioner, will sell at public outcry, to the highest bidder for cash, at the front door of the Courthouse in Bay Minette, Baldwin County, Alabama, at 11:30 o'clock A.M. on the 13th day of July, 1959, the following described property situated in Baldwin County, Alabama, to-wit:

Northwest quarter of Southeast quarter of
Section 34, Township 2 South, Range 2 East,
less approximately 2 acres used by public
roads.

The said sale will be made for the purpose of making a division among the joint owners of said property.

Dated this 1st day of June, 1959.



Alice J. Duck
As Commissioner

Wilters & Brantley
Solicitors for Complainant.

JOE BROUGHTON

COMPLAINANT

VS

MORRIS BROUGHTON, ET AL,

RESPONDENTS

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

MOTION FOR DECREE PRO CONFESSO ON REGISTERED MAIL.

Comes the Complainant in the above styled cause and shows unto the Register that a summons was directed to the Respondents, Glenn Frost, Lucille Gross, Joseph H. Frost, and Voncille Logsdon, together with a copy of the Bill of Complaint in this cause was issued and forwarded by registered mail ~~on the _____ day of January, 1959,~~ to each of the Respondents' place of residence as shown by the Bill of Complaint. The postage on said letters were post paid and the same marked for delivery to addressee only and return receipt demanded. Said demanded return receipts each bears the signatures of the Respondents herein above named and were duly received and filed for record in this cause. The dates of these receipts are as follows: Glenn Frost March 2, 1959; Lucille Gross, February 28, 1959; Joseph H. Frost March 2, 1959; and Voncille Logsdon February 28, 1959, and the said Respondents have to the date hereof failed to plead, answer or demur to the Bill of Complaint, all of which appears of record in this cause.

WHEREFORE, the Complainant moves that a decree pro confesso be entered against the said Respondents.

Done this 14 day of April, 1959.

Winters & Brantley

BY:

Robert M. Brantley
Solicitors for the Complainant

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FILED

APR 14 1959

ALICE I. DUCK, CLERK
REGISTER