

4631

July 20, 1959

To Whom It May Concern:

Response to the Bill Of Complaint filed in the CIRCUIT COURT of
BALDWIN COUNTY, ALABAMA, in EQUITY by IDA B. CARTER, as
Complainant and against PEARL NUMBERLYN:

I, Gussie Bullock, 5022 Spokane, Detroit, Michigan, will not agree
to sell the land in question, but would agree to give Mrs. Ida B.
Carter, the Complainant, her share in cash.

Gussie Bullock

FILED

JUL 24 1959

AUCE L. DUCK, CLERK
REGISTER

242

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ALICE JUCK, CLERK
REGISTRAR

July 20, 1959

To Whom It May Concern:

Response to the Bill of Complaint filed in the CIRCUIT COURT of
BALDWIN COUNTY, ALABAMA, in EQUITY by IDA B. CARTER, as
Complainant and against PEARL HUNGERLYN:

I, Callie Sue Beard, 4029 18th Street, Ecorse, Michigan, will not
agree to sell the land in question, but would agree to give Mrs.
Ida B. Carter, the Complainant, her share in cash.

Callie Sue Beard

FILED

JUL 24 1959

ALICE J. DUCK, CLERK
REGISTRAR

RECEIVED
JUL 24 1959
COURT CLERK
BALDWIN COUNTY
ALABAMA



FILED

JUL 24 1959

ALICE L. DUCK, CLERK
REGISTER

July 20, 1959

To Whom It May Concern:

Response to the Bill of Complaint files in the CIRCUIT COURT of
BALDWIN COUNTY, ALABAMA, IN EQUITY by IDA B. CARTER, AS
Complainant and against PEARL MUNNERYLYN:

I, Gussie Carter, 4029 13th Street, Ecorse, Michigan, will not
~~agree to sell the land in question, but would agree to give Mrs.~~
Ida B. Carter, the Complainant, her share in cash.

Gussie Carter

FILED

JUL 24 1959

ALICE J. DUCK, CLERK
REGISTER

243

RECEIVED
JUL 24 1909

FILED

JUL 24 1909

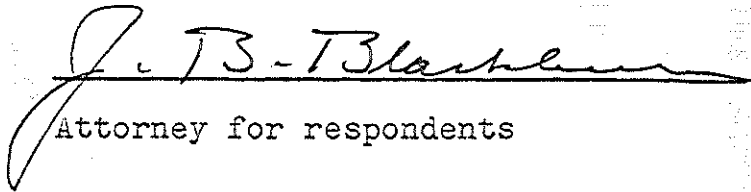
ALICE L. DUCK, CLERK
REGISTER

IDA B. CARTER,)
Complainant,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
PEARL MUNNERLYN, ET AL.,) IN EQUITY NO. 4631
Respondents.)

DEMURRER

Now come the respondents in the above entitled cause, each separately and severally, by their attorney, and demur to the Bill of Complaint and as grounds for such demurrer assign, separately and severally, the following:

1. It does not state a cause of action.


Attorney for respondents

Filed
7-24-59

DEMURRER

IDA B. CARTER,

Complainant,

VS.

PEARL MUNNERLYN, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 4631

FILED

JUL 24 1950

ALICE J. DUCK, CLERK
REGISTER

IDA B. CARTER,)	
)	
Complainant,)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
VS.)	
)	IN EQUITY
PEARL MUNNERLYN, ET AL,)	NO. 4631
)	
Respondents.)	

DECREE

This cause coming on to be heard is submitted on the stipulation made and entered into by and between Robert S. Edington; Tolbert M. Brantley; J. B. Blackburn and James R. Owen, attorneys representing all of the respondents and the complainant in the above styled cause from which stipulation it appears that the parties to this cause have agreed to divide the real property described in the bill of complaint between themselves and to sell at private sale to Wash Carter a part of the said real property to pay the costs of court, including a survey, and to pay the balance of the amount remaining to the said attorneys for their services rendered and to be rendered in this cause and it appearing to the court from the said stipulation that the said division of the said property set out in the stipulation is fair and equitable to all of the said parties concerned; it is, therefore, ORDERED, ADJUDGED AND DECREED by the court as follows:

1. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Pearl Carter Munnerlyn conveying the following described real property situated in Baldwin County, Alabama, to-wit:

Begin at the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, and run North 88° 25' West 845 feet to a point; run thence North 515 feet; run thence South 88° 25' East 845 feet; run thence South 515 feet to the point or place of beginning, containing 435,175 square feet, 10 acres, more or less.

2. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Columbus Carter conveying the following described real property situated in Baldwin County, Alabama, to-wit:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 515 feet for a point or place of beginning; run thence North 88° 25' West 845 feet to a point; run thence North 515 feet; run thence South 88° 25' East 845 feet to a point; run thence South 515 feet to the point or place of beginning, containing 435,175 square feet, 10 acres, more or less.

3. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Peter L. Carter, Susie Mae Joiner, Rebecca Williams, and Thomas Cawthon, who are all of the heirs of Elva Cawthon, conveying the following described real property situated in Baldwin County, Alabama, to-wit:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1378 feet for a point or place of beginning; run thence North 88° 25' West 673 feet; run thence North 647 feet; run thence South 88° 25' East 673 feet; run thence South 647 feet to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

4. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Callie Sue M. Beard, Reto Lee, Gussie Bullock, Marie Basset, Bertha Malva and Gussie Carter, who are all of the heirs of Avery Carter, deceased, conveying the following described real property situated in Baldwin County, Alabama, to-wit:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 2025 feet for a point or place of beginning; run thence North 88° 25' West 673 feet to a point; run thence North 647 feet, which point is the Southeast corner of Subdivision E of Section 13, Township 2 North, Range 2 East; run thence East along the South line of the said Section 13 a distance of 673 feet to a pipe; run thence South 647 feet, more or less, to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

5. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Ida Carter, conveying the following described real property situated in Baldwin County, Alabama, to-wit:

Begin at the Southeast corner of Subdivision E of Section 13, Township 2 North, Range 2 East, and run West along the South line of the said Section a distance of 673 feet to a pipe; run thence South 647 feet to a point; run thence South 88° 25' East 673 feet to a point; run thence North 647 feet, more or less, to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

6. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Sam Carter, conveying the following described real property situated in Baldwin County, Alabama, to-wit:

Begin at the Southeast corner of Subdivision E, Section 13, Township 2 North, Range 2 East, and run thence West along the South line of the said Section a distance of 673 feet to a pipe; run thence South 647 feet for a point or place of beginning; run thence South 647 feet; run thence South 88° 25' East 673 feet; run thence North 647 feet; run thence North 88° 25' West 673 feet to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

7. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Clarence Carter, Wash Carter, Samuel Carter, Lawrence Carter, Jr., Annie Seal, Rosetta Brown and Maudie McCants, heirs at law and children of Lawrence Carter, Deceased, conveying the following described real property situated in Baldwin County, Alabama, to-wit:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 north, Range 2 East, run North 88° 25' West 845 feet for a point or place of beginning; run thence North 88° 25' West 501 feet; run thence North 869 feet; run thence South 88° 25' East 501 feet; run thence South 869 feet to the point or place of beginning, containing 435,369 square feet, 10 acres, more or less.

8. That Alice J. Duck, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Wash Carter, conveying the following described real property situated in Baldwin County, Alabama, to-wit:

From the Southeast corner of the West Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1030 feet for a point or place of beginning; run thence North 348 feet; run thence North 88° 25' West 1346

feet; run thence South 509 feet; run thence South 88° 25' East 501 feet; run thence North 161 feet; run thence South 88° 25' East 845 feet to the point or place of beginning, containing 549,069 square feet, 12.6 acres, more or less.

9. That Alice J. Duck, Register, pay to Harold W. Graham, Registered Surveyor, the sum of Five Hundred Sixty Dollars (\$560.00) for his services rendered in making a survey of the above described property.

10. That Alice J. Duck, Register, pay to the attorneys in this cause the amount set opposite their names for their services rendered and to be rendered in this cause:

Tolbert M. Brantley	-	\$55.96
Robert S. Edington	-	55.96
J. B. Blackburn	-	55.96
James R. Owen	-	55.97

11. After the aforesaid conveyances have been executed and delivered by the said Alice J. Duck, she will report the execution and delivery thereof to this court for a final decree confirming all of the said conveyances.

ORDERED, ADJUDGED AND DECREED on this the 31st day of December, 1963.

J. Hubert M. Stacy

FILED

DEC 31 1963

ALICE J. DUCK, CLERK
REGISTER

IDA B. CARTER,
Complainant,
VS.
PEARL NUNNERLYN, ET AL,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 4631

ORDER APPOINTING SURVEYOR

This cause coming on to be heard is submitted on the motion of the Respondents alleging that it is necessary and to the best interest of all of the parties to this cause that the Court appoint a registered surveyor to survey and make a map or plat of all of the property involved in this cause and tax the costs of such survey as a part of the costs of this proceeding and it appearing to the Court from the said motion that the Complainant has waived notice of the filing of the said motion and has consented and agreed that the Court appoint said surveyor as prayed for in the said motion and the Court having considered said motion and being of the opinion that a said surveyor should be appointed has prayed for in the said motion, it is, therefore, ORDERED, ADJUDGED AND DECREED by the Court as follows:

1. Harold W. Graham, a registered surveyor in Baldwin County, Alabama, is hereby commissioned and ordered to survey and make a map or plat of all of the property involved in this cause and to furnish the Solicitors for the Complainant and the Solicitors for the Respondents a copy thereof.

2. Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, shall issue forthwith a commission to the said Harold W. Graham authorizing and ordering him to make the said survey and send a copy thereof to the said Harold W. Graham by registered mail, return receipt requested.

3. The costs of the said survey is hereby taxed as part of the costs of this proceeding.

ORDERED, ADJUDGED AND DECREED on this the 17th day of April, 1962.

Hubert M. Stone
Judge

IDA B. CARTER,
Complainant,
VS.
PEARL MUNNERLYN, ET AL,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 4631

COMMISSION TO MAKE SURVEY.

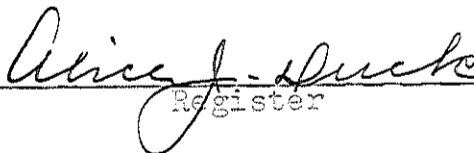
TO: Harold W. Graham
Registered Surveyor
Fairhope, Alabama

Know ye, that by virtue of an order or decree rendered in the Circuit Court of Baldwin County, Alabama, in Equity, on April 17, 1962, you were appointed to survey and make a map or plat of the following described real property situated in Baldwin County, Alabama, to-wit:

East Half of West Half of Northwest Quarter of Section 24, Township 2 South, Range 2 East and West Half of East Half of Section 24, Township 2 North, Range 2 East, containing 80 acres, more or less.

Wherefore, these are to commission and authorize you to forthwith make said survey and map or plat with all due diligence and return said survey and map or plat to this Court, together with a statement for your services rendered in and about the survey of the said property.

DATED this 17th day of April, 1962.


Register

Copy mailed
4-23-62

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PEARL MUNNERYLIN, CUSSIE CARTER, CALLY SUE MURDOCK BEARD, REXTO LEE, CUSSIE BULLOCK, MARIE BASSETT, BERTHA MALVA, COLUMBUS CARTER, SAM CARTER, PETER L. CARTER, SUSIE MAE JOINTER, REBECCA WILLIAMS, THOMAS CARTER, CLARENCE CARTER, WASH CARTER, SARONEL CARTER, LAURENCE CARTER, JR., ANNIE SEAL, ROSETTA BROWN, AND MABLE McCANTS, 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 IDA B. CARTER, as Complainant and against Pearl Munnerylyn, et al, as Respondents.

WITNESS my hand this the 25 day of June, 1959.

Deirdre J. ...
Register

IDA B. CARTER)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
VS)	BALDWIN COUNTY, ALABAMA,
PEARL MUNNERYLIN, ET AL,)	IN EQUITY
RESPONDENTS)	

TO THE HONORABLE HURST N. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Come now your Complainant in the above styled cause and respectfully shows unto Your Honor as follows:

1.

That your Complainant, Ida B. Carter, is over the age of twenty-one years and resides at Latham, Alabama, and is the owner of an undivided one seventh interest in and to the lands hereinafter described.

2.

That the Respondents' names, addresses and interest in the land hereinafter described are as follows:

Pearl Munnerylyn, Latham, Alabama, 1/7 interest.

Cussie Carter, 3107 Alcones Street, Pensacola, Florida, 1/42 interest.

Cally Sue Murdock Beard, 4027 18th Ecorse 29 North, Detroit, Michigan, 1/42 interest;

Rexto Lee, Latham, Alabama, 1/42 interest;

Cussie Bullock, 5022 Spokane, Detroit, Michigan, 1/42 interest.

Marie Basset, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
Bertha Malva, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
Columbus Carter, Latham, Alabama, 1/7 interest;
Sam Carter, 1450 E. 21st Street, Tucson, Arizona, 1/7 interest;
Peter L. Carter, 54 Johns Street, Prichard, Alabama, 1/28 interest;
Susie Mae Joiner, Magazine, Alabama, 1/28 interest;
Rebecca Williams, Latham, Alabama, 1/28 interest;
Thomas Carthon, Bay Minette, Alabama, 1/28 interest;
Clarence Carter, 57 Bennett Street, Prichard, Alabama, 1/49 interest;
Wash Carter, Latham, Alabama, 1/49 interest;
Samuel Carter, 26 Heath Street, New Port, R.I., 1/49 interest;
Laurence Carter, Jr., 68 Hancock Street, Brooklyn, N.Y., 1/49 interest;
Annie Seal, Latham, Alabama, 1/49 interest;
Rosetta Brown, Latham, Alabama, 1/49 interest;
Handie McCants, Little River, Alabama, 1/49 interest.

3.

The property your Complainant is seeking to have divided is described as follows:

East half of West half of Northwest quarter of Section 24, Township 2 North, Range 2 East, and West half of East half of Section 24, Township 2 North, Range 2 East, Baldwin County, Alabama, containing 80 acres, more or less.

4.

The Complainant alleges that the said lands cannot be equitably divided or partitioned among the joint owners thereof without a sale because there are so many heirs, part of the land is in cultivation, and part is in timber and because there are several houses on this land.

5.

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 she has employed the firm of Wilfers & Brantley, Attorneys at Law, for this purpose and that their fees as such solicitors should be ascertained and taxed as a part of the costs of this proceedings.

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ALICE J. DICK, CLERK REGISTER

JUN 21 1950

FILED

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after 10/19

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Clerk Register

Clerk Register

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Clerk Register

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STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PEARL MUNNERLYN, GUSSIE CARTER, CALLY SUE MURDOCK BEARD, REETO LEE, GUSSIE BULLOCK, MARIE BASSET, BERTHA MALVA, COLUMBUS CARTER, SAM CARTER, PETER L. CARTER, SUSIE MAE JOINER, REBECCA WILLIAMS, THOMAS CARTHON, CLARENCE CARTER, WASH CARTER, SAMUEL CARTER, LAURENCE CARTER, JR., ANNIE SEAL, ROSETTA BROWN, AND MAUDIE McCANTS, 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 IDA B. CARTER, as Complainant and against Pearl Mummerlyn, et al, as Respondents.

WITNESS my hand this the 14th day of June, 1959.


Register

IDA B. CARTER)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
VS)	BALDWIN COUNTY, ALABAMA,
PEARL MUNNERLYN, ET AL,)	IN EQUITY
RESPONDENTS)	

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

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

1.

That your Complainant, Ida B. Carter, is over the age of twenty-one years and resides at Latham, Alabama, and is the owner of an undivided one seventh interest in and to the lands hereinafter described.

2.

That the Respondents' names, addresses and interest in the land hereinafter described are as follows:

- 1 Pearl Mummerlyn, Latham, Alabama, 1/7 interest.
- Gussie Carter, 3107 Alcones Street, Pensacola, Florida, 1/42 interest.
- Callly Sue Murdock Beard, 4027 18th Ecoise 29 North, Detroit, Michigan, 1/42 interest;
- 2 Reeto Lee, Latham, Alabama, 1/42 interest;
- Gussie Bullock, 5022 Spokane, Detroit, Michigan, 1/42 interest.

- Marie Basset, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
Bertha Malva, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
3. Columbus Carter, Latham, Alabama, 1/7 interest;
Sam Carter, 1450 E. 21st Street, Tucson, Arizona, 1/7 interest;
4. Peter L. Carter, 54 Johns Street, Prichard, Alabama, 1/28 interest;
5. Susie Mae Joiner, Magazine, Alabama, 1/28 interest;
6. Rebecca Williams, Latham, Alabama, 1/28 interest;
7. Thomas Carthon, Bay Minette, Alabama, 1/28 interest;
8. Clarence Carter, 57 Bonnett Street, Prichard, Alabama, 1/49 interest;
9. Wash Carter, Latham, Alabama, 1/49 interest;
Samuel Carter, 26 Heath Street, New Port, R.I., 1/49 interest;
Laurence Carter, Jr., 68 Handock Street, Brooklyn, N.Y., 1/49 interest;
10. Annie Seal, Latham, Alabama, 1/49 interest;
11. Rosetta Brown, Latham, Alabama, 1/49 interest;
12. Maudie McCants, Little River, Alabama, 1/49 interest.

3.

The property your Complainant is seeking to have divided is described as follows:

East half of West half of Northwest quarter of Section 24, Township 2 North, Range 2 East, and West half of East half of Section 24, Township 2 North, Range 2 East, Baldwin County, Alabama, containing 80 acres, more or less.

4.

The Complainant alleges that the said lands cannot be equitably divided or partitioned among the joint owners thereof without a sale because there are so many heirs, part of the land is in cultivation, and part is in timber and because there are several houses on this land.

5.

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 she has employed the firm of Wilters & Brantley, Attorneys at Law, for this purpose and that their fees as such solicitors should be ascertained and taxed as a part of the costs of this proceedings.

THE PREMISES CONSIDERED, Your Complainant prays that the said Pearl Mummerlyn, Gussie Carter, Cally Sue Murdock Beard, Reeto Lee, Gussie Bullock, Marie Basset, Bertha Malva, Columbus Carter, Sames Carter, Peter L. Carter, Susie Mae Joiner, Rebecca Williams, Thomas Carthon, Clarence Carter, Wash Carter, Samuel Carter, Laurence Carter, Jr., Annie Seal, Rosetta Brown, Maudie McCants 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 that such orders and decrees be made and such proceedings had to the end that the above described lands may be sold for division and partition between the said joint owners; that Your Honor order a reference to ascertain a reasonable solicitor's fee, to be taxed as a part of the costs of this proceedings, ^{to be paid} /to the Complainants' solicitor of record out of the proceeds of the sale of said property. That the Complainant may have such other, further or different relief as unto Your Honor may seem meet and proper.

Winters & Brantley

BY: Allen M. Brantley
Solicitors for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority, in and for said County and State, personally appeared Ida B. Carter, who is known to me, and who having been by me first duly sworn, deposes and says, that the facts stated in the foregoing Bill of Complaint are true.

Sworn to and subscribed before me this 26 day of June, 1959.

Allen M. Brantley
Notary Public, Baldwin County, Ala.

4631

IDA B. CARTER
COMPLAINANT
VS
PEARL MUNNERLYN, ET AL,
RESPONDENTS

BILL OF COMPLAINT

Received 25 day of June 1959
and on 27 day of June 1959
I served a copy of the within A & C
on Card. Munnerlyn, Ruth Fox
Columbus, Carter, Lucea Williams,
By service on Thomas Carthow Wash
Carter, Annie Bud Rosetta Brown,
Maudie M. Carter TAYLOR WILKINS, Sheriff
By W. L. Fulbert D. S.
Fatham

Sheriff claims 360 miles at
Ten Cents per mile Total \$ 36.00
TAYLOR WILKINS, Sheriff
BY Fulbert
DEPUTY SHERIFF

FILED
JUN 25 1959
ALICE J. DUCK, CLERK
REGISTER

231

IDA B. CARTER,)	
)	
Complainant,)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
VS.)	
)	IN EQUITY
PEARL MUNNERLYN, ET AL,)	NO. 4631
)	
Respondents.)	

STIPULATION

This stipulation made and entered into by and between Robert S. Edington; Tolbert M. Brantley; J. B. Blackburn and James R. Owen, attorneys representing all of the Respondents and the Complainant in the above styled cause, WITNESSETH:

WHEREAS, the complainant heretofore on to-wit, June 25, 1959, filed this suit in the Circuit Court of Baldwin County, Alabama, seeking a sale for division of the following described property situated in Baldwin County, Alabama, to-wit:

East Half of West Half of Northwest Quarter,
Section 24;
West Half of East Half of Section 24, Township
2 North, Range 2 East, containing 80 acres,
more or less.

WHEREAS, it appears that it is to the best interest of all of the parties to said cause that the said property not be sold for division, but that it be equitably divided among all of the parties to the said suit since it appears that there are certain improvements situated on the said property; and

WHEREAS, it appears that the said property can be equitably divided among the parties to this suit and all of the said parties and their said attorneys have agreed to a division in kind thereof in accordance with this stipulation;

NOW, THEREFORE, the parties to this cause acting by and through their respective attorneys agree as follows:

1. That the Circuit Court of Baldwin County, Alabama, divide and order conveyed to the parties as hereinafter set out the said property as hereinafter set out:

A. To Pearl Carter Munnerlyn, the following:

Begin at the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, and run North 88° 25' West 845 feet to a point; run thence North 515 feet; run thence South 88°

25' East 845 feet; run thence South 515 feet to the point or place of beginning containing 435,175 square feet, 10 acres, more or less.

B. To Columbus Carter, the following:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 515 feet for a point or place of beginning; run thence North $88^{\circ} 25'$ West 845 feet to a point; run thence North 515 feet; run thence South $88^{\circ} 25'$ East 845 feet to a point; run thence South 515 feet to the point or place of beginning, containing 435,175 square feet, 10 acres, more or less.

C. To Peter L. Carter, Susie Mae Joiner, Rebecca Williams, and Thomas Cawthon, who are all of the heirs of Elva Cawthon:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1378 feet for a point or place of beginning; run thence North $88^{\circ} 25'$ West 673 feet; run thence North 647 feet; run thence South $88^{\circ} 25'$ East 673 feet; run thence South 647 feet to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

D. To Callie Sue M. Beard, Reto Lee, Gussie Bullock, Marie Basset; Bertha Malva and Gussie Carter, who are all of the heirs of Avery Carter, deceased, the following:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 2025 feet for a point or place of beginning; run thence North $88^{\circ} 25'$ West 673 feet to a point; run thence North 647 feet, which point is the Southeast corner of Subdivision E of Section 13, Township 2 North, Range 2 East; run thence East along the South line of the said Section 13 a distance of 673 feet to a pipe; run thence South 647 feet, more or less, to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

E. To Ida Carter, the following:

Begin at the Southeast corner of Subdivision E of Section 13, Township 2 North, Range 2 East, and run West along the South line of the said Section a distance of 673 feet to a pipe; run thence South 647 feet to a point; run thence South $88^{\circ} 25'$ East 673 feet to a point; run thence North 647 feet, more or less, to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

F. To Sam Carter, the following:

Begin at the Southeast corner of Subdivision E,

Section 13, Township 2 North, Range 2 East, and run thence West along the South line of the said Section a distance of 673 feet to a pipe; run thence South 647 feet for a point or place of beginning; run thence South 647 feet; run thence South 88° 25' East 673 feet; run thence North 647 feet; run thence North 88° 25' West 673 feet to the point or place of beginning, containing 435,431 square feet, 10 acres, more or less.

G. To Clarence Carter; Wash Carter; Samuel Carter; Lawrence Carter, Jr.; Annie Seal; Rosetta Brown and Maudie McCants, heirs at law and children of Lawrence Carter, deceased, the following:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 88° 25' West 845 feet for a point or place of beginning; run thence North 88° 25' West 501 feet; run thence North 869 feet; run thence South 88° 25' East 501 feet; run thence South 869 feet to the point or place of beginning, containing 435,369 square feet, 10 acres, more or less.

2. After all of the above described parcels have been conveyed to the parties as aforesaid there will be a parcel of land containing approximately 12.6 acres remaining which said property is described as follows:

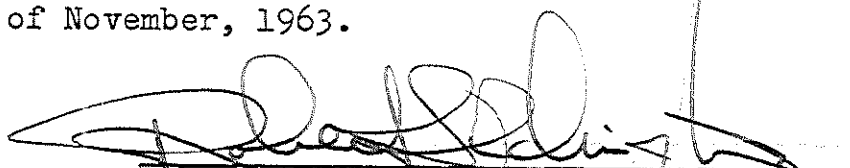
From the Southeast corner of the West Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1030 feet for a point or place of beginning; run thence North 348 feet; run thence North 88° 25' West 1346 feet; run thence South 509 feet; run thence South 88° 25' East 501 feet; run thence North 161 feet; run thence South 88° 25' East 845 feet to the point or place of beginning, containing 549,069 square feet, 12.6 acres, more or less.

It is stipulated and agreed that Nine Hundred Dollars (\$900.00) is a fair and reasonable market value for this said parcel of land and Wash Carter has offered to pay Nine Hundred Dollars (\$900.00) for the said property and it is stipulated and agreed by all of the parties to this cause acting by and through their respective attorneys that the Court make and enter an order or decree authorizing the sale and conveyance of this parcel of land to the said Wash Carter for the sum of Nine Hundred Dollars (\$900.00) and that this amount be paid into Court for payment of the survey

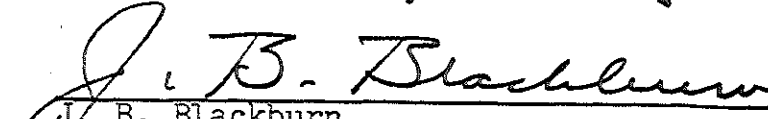
heretofore prepared of the said property by Harold W. Graham, Registered Surveyor, which amount is Five Hundred Sixty Dollars (\$560.00) and the balance of said amount be used to pay the costs of this proceeding and the balance to be divided between the attorneys for the parties as follows: Tolbert M. Brantley, \$ 55⁹⁶; Robert S. Edington, \$ 55⁹⁶; J. B. Blackburn, \$ 55⁹⁶; James R. Owen, \$ 55⁹⁷.


3. It is further stipulated and agreed that after the said conveyances aforesaid have been executed and delivered that this Court will make and enter a final decree confirming all of the above conveyances to the parties aforesaid.

IN WITNESS WHEREOF, Robert S. Edington, Tolbert M. Brantley, J. B. Blackburn and James R. Owen, as attorneys for all of the parties to this cause have hereunto set their hands and affixed their seals on this the 15th day of November, 1963.


Robert S. Edington


Tolbert M. Brantley


J. B. Blackburn


James R. Owen

STATE OF ALABAMA)
*
MOBILE COUNTY)

I, Robert D. Walker, a Notary Public, within and for said County in said State, hereby certify that Robert S. Edington, whose name is signed to the foregoing instrument and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 14th day of November, 1963.


Notary Public, Mobile County, Alabama

NOTARY PUBLIC, STATE OF ALABAMA BY LARGE
BY COMMISSION EXPIRES OCT. 4, 1968

STATE OF ALABAMA)
*
BALDWIN COUNTY)

I, June B. Hedger, a Notary Public, within and for said County in said State, hereby certify that Tolbert M. Brantley, whose name is signed to the foregoing instrument and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand on this the 12th day of November, 1963.

June B. Hedger
Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
*
BALDWIN COUNTY)

I, Ernestine R. Sims, a Notary Public, within and for said County in said State, hereby certify that J. B. Blackburn and James R. Owen, whose names are signed to the foregoing instrument and who are known to me, acknowledged before me on this day that, being informed of the contents of the instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand on this the 15th day of November, 1963.

Ernestine R. Sims
Notary Public, Baldwin County, Alabama

257

FILED
DEC 31 1963
ALICE L. DUCK, CLERK
REGISTER

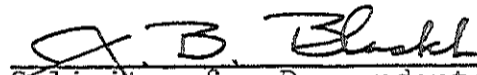
IDA B. CARTER,
Complainant,
VS.
PEARL MUNNERLYN, ET AL,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 4631

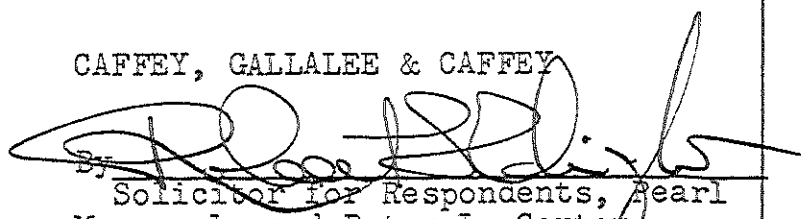
MOTION FOR SURVEY

Now come the Respondents in the above styled cause and show unto the Court and your Honor that it is necessary and to the best interest of all of the parties hereto that the Court appoint a registered surveyor to survey and make a map or plat of all of the property involved in this cause and tax the costs of such survey as a part of the costs of this proceeding.

WHEREFORE, the Respondents pray that the Court will make and enter an order or decree appointing a registered surveyor to survey and make a map or plat of the property involved in this cause and tax the costs thereof as a part of the costs of this proceeding.

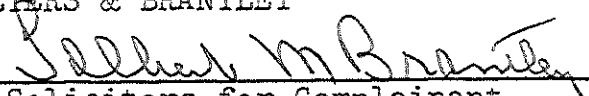

Solicitor for Respondents, Gussie Carter, Cally Sue Murdock Beard, Reto Lee, Gussie Bullock, Marie Basset, Bertha Malva, Columbus Carter, Sam Carter, Susie Mae Joiner, Rebecca Williams, Thomas Carthon, Clarence Carter, Wash Carter, Samuel Carter, Lawrence Carter, Jr., Annie Seal, Rosetta Brown and Maudie McCants.

CAFFEY, GALLALEE & CAFFEY


Solicitor for Respondents, Pearl Munneryln and Peter L. Carter.

Now comes the Complainant in the above styled cause, by her Solicitors, and waives notice of the filing of the foregoing motion and consents and agrees that the Court appoint a registered surveyor to survey the property involved in this cause and tax the costs thereof as a part of the costs of this proceeding.

WILTERS & BRANTLEY

By 
Solicitors for Complainant

IDA B. CARTER,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
PEARL MUNNERLYN, et al,	X	IN EQUITY
Respondents	X	CASE NO. 4631

MOTION TO SET CAUSE FOR A HEARING

Now comes the Complainant by her Solicitor and moves the Court to set the above styled cause for a hearing on January 9, 1963 at 10:00 a.m.

William M Brantley

 Solicitor for Complainant

.....

ORDER SETTING CAUSE FOR HEARING

This cause shall be and hereby is, on Motion of Complainant, set for trial on January 9, 1963 at 10:00 a.m.

ORDERED on this the 20 day of December, 1962

Hubert M. Hall

 Hubert M. Hall, Judge of 28th Judicial
 Circuit Court, Baldwin County, Alabama

Please send a copy of the foregoing Motion and Order to:

James R. Owen
 Attorney at Law
 Bay Minette, Alabama

Robert S. Edington
 Attorney at Law
 First National Bank Building
 Mobile, Alabama

FILED

DEC 20

ALICE J. DUCK, CLERK

December 2, 1981

IN RE: Ida B. Carter

v.

Equity Case No. 4631

Pearl Munnerlyn

LETTER BRIEF IN SUPPORT OF MOVANT WASH
CARTER'S MOTION TO CORRECT CLERICAL
ERRORS PURSUANT TO RULE 60 (a).

FACTS

On December 31, 1963, the Honorable Hubert M. Hall, sitting as Chancellor in Equity for Baldwin County, Alabama, issued a decree in the above styled case. The complaint in this case prayed for an equitable division of real property located in Baldwin County, Alabama, which was the subject of the suit, and the decree ordered the division to be made in separate parcels as apportioned to the various parties in regard to their respective interests in the real estate. The original property divided consisted of 82.6 acres more or less, being divided into seven 10 acre parcels and one 12.6 acre parcel. The decree ordered the Register to issue a Register's Deed pursuant to the decree, and Movant Wash Carter was thereby granted the 12.6 acre parcel. [Recorded in Baldwin County Probate Book 340, Page 125] It is that portion of the decree (paragraph 8) ordering the division of the 12.6 acres from the res, and the legal description of this parcel found in the Register's Deed made pursuant to the decree where the Movant Carter charges clerical error. Both the decree (paragraph 8) and the Register's Deed describe Carter's parcel from the division, as follows:

From the Southeast corner of the West Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1030 feet for a point or place of beginning; run thence North 348 feet; run thence North 88° 25' West 1346 feet; run thence South 509 feet; run thence South 88° 25' East 501 feet; run thence North 161 feet; run thence South 88° 25' East 845 feet to the point or place of beginning, containing 549,069 square feet, 12.6 acres, more or less. (Emphasis added).

This description of Carter's portion of the division was obviously a mistake made as a result of a clerical error, as may be seen by viewing the entirety of the decree and by examining the original complaint. In the first seven paragraphs of the decree where the seven 10 acre parcels are described, paragraphs 1-4 and 7 each begin their description, as follows:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter. . . .
(Emphasis added)

It is the critical underlined portion of the descriptions of five of the seven 10 acre parcels, which is missing from Wash Carter's description of his 12.6 acre parcel. Carter now asks this Honorable Court to correct this obvious clerical, scrivener's error by amending the original decree and to order the Register to record a new deed to Carter reflecting the correction.

THE LAW

A.R.C.P. 60(a) reads, as follows:

RELIEF FROM JUDGMENT OR ORDER

(a) Clerical Mistakes. Clerical mistakes orders, or other parts of the record and errors therein arising from oversight or omission may be corrected by the court at any time of its own initiative or on the motion of any party and after such notice if any, as the court orders. . . (Emphasis added).

Movant Carter first asserts that the error is clear as seen from the face of record. Should one attempt to locate Carter's property by the description included in the decree and his Register's Deed, one would find that it begins at a point not even within the boundaries of the original property divided in the suit. Further, one would find Carter residing on only a portion of the property included in the erroneous description; Carter has been in peaceful possession of a 12.6 acre parcel for eighteen years which consists of that property in Baldwin County, Alabama that one would find by inserting the below underlined phrase, which we have placed in parenthesis into Carter's present description, as follows:

From the Southwest corner of the West Half
of (the East Half of) the Northwest Quarter
of Section 24,...

In order for the Court not to adjudicate rights and interests in property that was never before the Court, such a correction is needed. Further, all of the parties to this suit received their pro rata share of the division apparently without error, and have no reason to complain, as the correction could not effect their substantive rights, but will only correctly supply a good land description so that the records may reflect the proper fitting together of the puzzle which is caused by an equitable division. By inserting the above parenthesized and underlined phrase into Carter's description, the final piece of the puzzle needed to reflect what the original property subject to division looked like will be supplied into place.

Movant Carter has served a copy of his motion upon the other attorney's who originally represented the parties to this action.

Movant relies on the case of United States v. 706.98 Acres of Land, 158 F. Supp. 272,275 (W.D. Ark. 1958), a copy of which is attached to this brief. There the court interpreted the federal counterpart to A.R.C.P. 60(a). The U. S. Government condemned land in 1933 but the decree's land description recited the property as being in Range 26, and the Government moved the court in 1956 to correct a clerical error, as the land should have been described as in Range 27. The court there, twenty-three years after the original decree was issued, held the motion to be in order absent notice to the parties so long as no extrinsic evidence was required and the error appeared on the face of the record. Although the 706.98 Acres of Land case is authority for the proposition that no notice need be given, and the Rule itself states that notice is not always required, Movant has served the attorney of parties, even though there are no rights substantially affected should this Honorable Court grant our motion.

Respectfully submitted,

OWEN AND BALL

By: 
James R. Owen

CIRCUIT COURT
BALDWIN CO., ALA.
FILED

DEC 9 1981

EUNICE G. TINDAL
REGISTER

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IDA B. CARTER,

*

Complainant,

*

vs.

*

Equity Case No. 4631

PEARL MUNNERLYN, et al,

*

Respondents,

*

MOTION TO CORRECT CLERICAL MISTAKE
IN JUDGMENT

Comes now, MOVANT WASH CARTER, party to the above styled cause, and shows to the Court as follows:

1. On December 31, 1963, this Court entered a judgment in the above styled action providing in part (paragraph 8) that the Movant Wash Carter should be decreed as owning an indefeasible fee simple absolute to the following described real property situated in Baldwin County, Alabama:

From the Southeast corner of the West Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1030 feet for a point or place of beginning; run thence North 348 feet; run thence North $88^{\circ} 25'$ West 1346 feet; run thence South 509 feet; run thence South $88^{\circ} 25'$ East 501 feet; run thence North 161 feet; run thence South $88^{\circ} 25'$ East 845 feet to the point or place of beginning, containing 549,069 square feet, 12.6 acres, more or less.

2. The said judgment contains a clerical error in that a scrivener's error resulted in the omission of a phrase in said description.

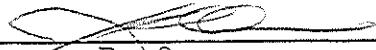
3. The error is obvious on the face of the judgment as the description of the real property decreed as belonging to the Movant Wash Carter would consist of and include property never brought within the jurisdiction or purview of the Court by the Original pleadings in this action for equitable division

of real property.

4. The said judgment contains a clerical error in that the said description of the real property made the subject of this action should begin as follows:

From the Southeast corner of the West Half
of the East Half of the Northwest Quarter. . .
(continued otherwise as above)

WHEREFORE, Movant prays this Honorable Court to amend and correct its said judgment nunc pro tunc as pursuant to Rule 60(a), and to order the Register of the Circuit Court of Baldwin County, Alabama to execute and deliver a conveyance to Wash Carter reflecting the amendment and correction.


James R. Owen
Attorney for Movant Wash Carter
410 Courthouse Square
Bay Minette, Alabama 36507

CIRCUIT COURT
BALDWIN CO., ALA.
FILED


DEC 9 1981

EUNICE G. TINDAL
REGISTER

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the above and foregoing pleading upon counsel for the opposing party by mailing a copy thereof to him, postage prepaid and properly addressed to his office in Mobile, Bay Minette, Alabama.

This 8th day of Dec. 1981



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IDA B. CARTER, *
Complainant, *
vs. * Equity Case No. 4631
PEARL MUNNERLYN, et al, *
Respondents, *

ORDER

It appearing to the Court that the judgment heretofore entered by the clerk in the above styled cause is not a correct memorial of the judgment as rendered and announced by this court in that through inadvertence and clerical error there was an omission from the record of said judgment of a phrase in the description of real property decreed as belonging in indefeasible fee simple absolute to Wash Carter, and that said description in the judgment as set out in paragraph 8 thereof should read as follows:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1030 feet for a point or place of beginning; run thence North 348 feet; run thence North 88° 25' West 1346 feet; run thence South 509 feet; run thence South 88° 25' East 501 feet; run thence North 161 feet; run thence South 88° 25' East 845 feet to the point or place of beginning, containing 549,069 square feet, 12.6 acres, more or less.

It is therefore ORDERED, ADJUDGED AND DECREED by the Court as follows:

1. That the judgment heretofore entered by the Court in the above styled cause on December 31, 1963, be, and the same is hereby corrected to conform to the actual judgment intended by striking the real property description ordering Wash Carter to have 12.6 acres of land, and by including the above corrected

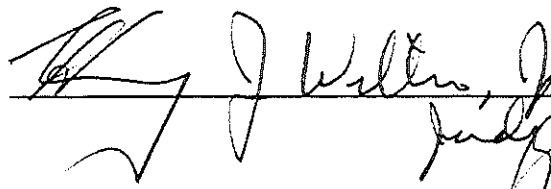
Vol. 169 - Page 484

real property description of 12.6 acres of land for that originally found in paragraph 8 of said judgment.

2. That it is ordered that this order correcting the record of said judgment be entered nunc pro tunc as of December 31, 1963, that being the date when said judgment was originally made and entered.

3. That Eunice Tindal, as Register of the Circuit Court of Baldwin County, Alabama, make, execute and deliver a conveyance to Wash Carter conveying the above, herein correctly described real property situated in Baldwin County, Alabama, as pursuant to this correction of judgment.

Dated this 10 day of December, 1981.



Judge

CIRCUIT COURT
BALDWIN CO., ALA.
FILED

DEC 11 1981

EUNICE G. TINDAL
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

CORRECTION REGISTER'S DEED

THIS INDENTURE, made and entered into on this the 11th day of December, 1981, by and between EUNICE N. TINDAL, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, hereinafter referred to as the party of the first part, and WASH CARTER, hereinafter referred to as the party of the second part,

W I T N E S S E T H :

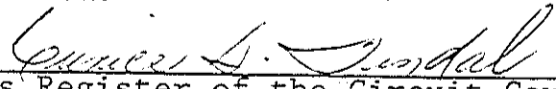
The party of the first part, for and in consideration of the sum of One Dollar (\$1.00) and other good and valuable consideration to her this day in hand paid by the party of the second part the receipt whereof is hereby acknowledged, has and by these presents does hereby GRANT, BARGAIN, SELL AND CONVEY unto the said party of the second part the following described real property situated in Baldwin County, Alabama, to-wit:

From the Southeast corner of the West Half of the East Half of the Northwest Quarter of Section 24, Township 2 North, Range 2 East, run North 1030 feet for a point or place of beginning; run thence North 348 feet; run thence North 88° 25' West 1346 feet; run thence South 509 feet; run thence South 88° 25' East 501 feet; run thence North 161 feet; run thence South 88° 25' East 845 feet to the point or place of beginning, containing 549,069 square feet 12.6 acres, more or less.

TO HAVE AND TO HOLD unto the said party of the second part his heirs and assigns, together with all and singular, the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

This is a correction deed and is made, executed and delivered in strict accordance with the terms and provisions of a decree rendered by the Circuit Court of Baldwin County, Alabama on December 10, 1981 in the case of IDA B. CARTER, complainant, vs. PEARL MUNNERLYN, et al, respondents which is Case No. 4631 and is made to correct errors in the description in that certain deed from ALICE J. DUCK as Register to WASH CARTER which deed is dated December 31, 1963 and recorded in Deed Book 340, N.S. Page 125 in Baldwin County, Alabama records.

IN WITNESS WHEREOF, Eunice N. Tindal, as Register of the Circuit Court of Baldwin County, Alabama, in Equity, has hereunto set her hand and affixed the seal of the said court on the day and year first above written.


As Register of the Circuit Court of Baldwin County, Alabama, in Equity.

STATE OF ALABAMA)
*
BALDWIN COUNTY)

I, _____ a Notary Public, within and for said County in said State, hereby certify that Eunice N. Tindal, whose name as Register of the Circuit Court of Baldwin County, Alabama in Equity, 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 the conveyance, she, in her capacity as Register, aforesaid, executed the same voluntarily on the day the same bears date.

Given under my hand on this the _____ day of December, 1981

Notary Public, Baldwin County, Al
Vol. 169 Page 486

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PEARL MUNNERLYN, GUSSIE CARTER, GALLY SUE MURDOCK BEARD, REETO LEE, GUSSIE BULLOCK, MARIE BASSET, BERTHA MALVA, COLUMBUS CARTER, SAM CARTER, PETER L. CARTER, SUSIE MAE JOINER, REBECCA WILLIAMS, THOMAS CARTER, CLARENCE CARTER, WASH CARTER, SAMUEL CARTER, LAURENCE CARTER, JR., ANNIE SEAL, ROSETTA BROWN AND MAUDIE McCANTS, 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 IDA B. CARTER, As Complainant and against Pearl Munnerlyn, et al, as Respondents.

WITNESS my hand this the 25 day of June, 1959.

Reigo J. Muck
Register

IDA B. CARTER)	
)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
)	
? VS)	BALDWIN COUNTY, ALABAMA,
)	
PEARL MUNNERLYN, ET AL,)	IN EQUITY
)	
RESPONDENTS)	

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

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

1.

That Your Complainant, Ida B. Carter, is over the age of twenty-one years and resides at Latham, Alabama, and is the owner of an undivided one seventh interest in and to the lands hereinafter described.

2.

That the Respondents' names, addresses and interest in the land hereinafter described are as follows:

- Pearl Munnerlyn, Latham, Alabama, 1/7 interest;
- Gussie Carter, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
- Gally Sue Murdock Beard, 4027 18th Ecoise 29 North, Detroit, Michigan, 1/42 interest;
- Reeto Lee Latham, Alabama, 1/42 interest;
- Gussie Bullock, 5022 Spokane, Detroit, Michigan, 1/42 interest;

Marie Basset, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
Bertha Malva, 3107 Alcones Street, Pensacola, Florida, 1/42 interest;
Columbus Carter, Latham, Alabama, 1/7 interest;
Sam Carter, 1450 E. 21st Street, Tucson, Arizona, 1/7 interest;
Peter L. Carter, 54 Johns Street, Prichard, Alabama, 1/28 interest;
Susie Mae Joiner, Magazine, Alabama, 1/28 interest;
Rebecca Williams, Latham, Alabama, 1/28 interest;
Thomas Carthon, Bay Minette, Alabama, 1/28 interest;
Clarence Carter, 57 Bonnett Street, Prichard, Alabama, 1/49 interest;
Wash Carter, Latham, Alabama, 1/49 interest;
Samuel Carter, 26 Heath Street, New Port, R.I., 1/49 interest;
Laurence Carter, Jr., 68 Handock Street, Brooklyn, N.Y., 1/49 interest;
Annie Seal, Latham, Alabama, 1/49 interest;
Rosetta Brown, Latham, Alabama, 1/49 interest;
Naudie McCants, Little River, Alabama, 1/49 interest.

3.

The property your complainant is seeking to have divided is described as follows:

East half of West half of Northwest quarter of Section 24
Township 2 North, Range 2 East, and West half of East half of
Section 24, Township 2 North, Range 2 East, Baldwin County,
Alabama, containing 80 acres, more or less.

4.

The Complainant alleges that the said lands cannot be equitably divided or partitioned among the joint owners thereof without a sale because there are so many heirs, part of the land is in cultivation, and part is in timber and because there are several houses on this land.

5.

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 she has employed the firm of Wilters & Brantley, Attorneys at Law, for this purpose and that their fees as such solicitors should be ascertained and taxed as a part of the costs of this proceedings.

THE PREMISES CONSIDERED, your Complainant prays that the said Pearl Mannerlyn, Gussie Carter, Cally Sue Murdock Beard, Reeto Lee, Gussie Bullock, Marie Basset, Bertha Malva, Columbus Carter, Sam Carter, Peter L. Carter, Susie Mae Joiner, Rebecca Williams, Thomas Carthon, Clarence Carter, Wash Carter, Samuel Carter, Laurence Carter, Jr., Annie Seal, Rosetta Brown, Maudie McCants 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 that such orders and decrees be made and such proceedings had to the end that the above described lands may be sold for division and partition between the said joint owners; that Your Honor order a reference to ascertain a reasonable solicitors fee, to be taxed as a part of the costs of this proceedings, to be paid to the Complainant's solicitor of record out of the proceeds of the sale of said property. That the Complainant may have such other, further or different relief as unto Your Honor may seem meet and proper.

Winters & Brantley

BY: James M. Brantley
Solicitors for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said County and State, personally appeared Ida B. Carter, who is known to me, and who having been by me first duly sworn, deposes and says, that the facts stated in the foregoing bill of complaint are true.

Ida B. Carter

Sworn to and subscribed before me this 25 day of June, 1959.

James M. Brantley
Notary Public, Baldwin County, Ala.

shown to and understood before me this 25th day of June, 1933.

John H. ...
John H. ...

John H. ...

containing full of contents and name.

do not first duly sworn, deposes and says that the facts stated in the

foregoing appeared in the ...

before me, the undersigned being duly qualified in and for said County and State.

BEFORE ME

STATE OF ...

Notary Public for the County of ...
John H. ...

Witness my hand and seal this 25th day of June, 1933.

Under

and after, appear in different relation as unto your name and name and

of the business of the sale of said machinery.

of this proceeding, to be held to the defendant, a collector of

to ascertain a reasonable collection for the sale of said

relation between the said joint owners and your name and name

and to the end that the facts described herein may be said for distribution

received by you and that their orders and demands be made and such proceedings

that they be referred to their names as shown to the same within the time

within the time to make default judgments to this end of collecting said

order, being order, insurance order, ...

order, being order, insurance order, ...

insurance order, being order, insurance order, ...

THE UNDERSIGNED CERTAINLY, Your Commissioner under these the said laws.


FILED
JUN 25 1933
ALICE J. DUCK, CLERK REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PEARL HOWARD, PEARL MUNNERLYN, GUSSIE CARTER, CALLY SUE MURDOCK BEARD, REETO LEE, GUSSIE BULLOCK, MARIE BASSET, BERTHA MALVA, COLUMBUS CARTER, SAM CARTER, PETER L. CARTER, SUSIE MAE JOINER, REBECCA WILLIAMS, THOMAS CARTON, CLARENCE CARTER, WASHCARTER, SAMUEL CARTER, LAURENCE CARTER, JR., SANNIE SEAL, ROSETTA BROWN, MAUDIE McCANIS, ROSE MURPHY, LULA TANNER 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 IDA B. CARTER, as Complainant and against Pearl Howard, et al, as Respondents.

WITNESS my hand this the 10 day of July, 1959.


Register

IDA B. CARTER)	IN THE CIRCUIT COURT OF
COMPLAINANT)	BALDWIN COUNTY, ALABAMA,
VS)	IN EQUITY
PEARL HOWARD, ET AL,)	
RESPONDENTS)	

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

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

1.

That the Complainant is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama.

2.

That the Respondents are each over the age of twenty-one years and their names and places of residence are as follows: Pearl Howard, 952 St. Meader Street, Mobile, Alabama; Pearl Munnerlyn, Latham, Alabama; ¹Gussie Carter, 3107 Alcones Street, Pensacola, Florida; ²Cally Sue Murdock Beard, 4027-18th Street, Ecoise 29 North, Detroit, Michigan; Reeto Lee, Latham, Alabama; ³Gussie Bullock, 5022 Spokane, Detroit, Michigan; ⁴Marie Basset, 3107 Alcones Street, Pensacola, Florida; ⁵Bertha Malva, 3107 Alcones Street, Pensacola, Florida; ⁶Columbus Carter, Latham, Alabama; ⁷Sam Carter, 1450 E. 21st Street, Tucson, Arizona; ⁸Peter L. Carter, 54 Johns Street, Prichard, Alabama; Susie Mae Joiner, Magazine, Alabama; Rebecca Williams, Latham, Alabama;

Thomas Carthon, Bay Minette, Alabama; Clarence Carter, 57 Bonnett Street, Prichard, Alabama; Wash Carter, Latham, Alabama; ⁷Samuel Carter, 26 Heath Street, New Port, R. I.; ⁸Laurence Carter, Jr., 68 Handock Street, Brooklyn N.Y.; Annie Seal, Latham, Alabama; Rosetta Brown, Latham, Alabama; Maudie McCants, Little River, Alabama; Rose Murphy, 55¹/₄ Fisher Alley, Mobile, Alabama; Lula Tamer, 105¹/₂ Pecan Street, Mobile, Alabama.

3.

That the land herein in controversy is situated in Baldwin County, Alabama, and is described as follows:

Subdivision E of Fractional Section 13, Township 2 North, Range 2 East, and further described as the Southwest subdivision E of Fractional Section 13, Township 2 North, Range 2 East, containing 53¹/₂ acres.

4.

That the Complainant is the owner of and is in peaceable possession of the aforesaid land. That the Complainant and Hilary H. Carter, the person through whom she claims title, acquired title to the above described land by being in the actual, peaceable, adverse, open exclusive, hostile and uninterrupted possession of said land, claiming ownership thereof for a period of more than twenty consecutive years next preceding the time of the filing of this Bill of Complaint.

5.

That the said respondents or one of them claim or are reputed to claim some right, title, claim or interest in, lien or encumbrance upon the above described land or some part or parcel thereof and the Complainant calls upon them and each of them to set forth and specify their right, title, claim or interest in, lien or encumbrance upon the said land or any part or parcel thereof, and to show how and by what instrument or instruments the same is derived or created.

6.

That there is no suit pending to enforce or test the validity of the Complainant's right and title to said land, or to enforce or test the validity of the Respondents' right, title, claim, or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof.

WHEREFORE, your Complaint prays that this Honorable Court take jurisdiction of the cause made by this BILL of Complaint and take the said Pearl Howard, Pearl Hunsberry, Gussie Carter, Gilly Sue Harlock Howard, Neelo Lee, Gussie Bullock, Marie Basset, Bertha Milne, Callistus Carter, Sam Carter, Peter L. Carter, Susie Mae Joiner, Rebecca Williams, Thomas Carter, Clarence Carter, Wash Carter, Samuel Carter, Lawrence Carter, Sr., Annie Seal, Rosetta Brown, Maudie Adams, Rose Murphy, Lela Foster, and the respondents hereto, and by appropriate process require them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complaint further prays that upon a final hearing of this cause this Honorable Court will make and enter an order and decree adjudging and declaring that the said Respondents have no right, title, claim or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof, and that the title to the said lands be quieted and established in this complaint as against the said Respondents; and that the said Respondents be forever enjoined from asserting or attempting to assert or from claiming or attempting to claim any right, title, claim, or interest in, lien or encumbrance upon the said lands or any part or parcel thereof.

Winters & Brantley
 BY: Robert M. Brantley
 Solicitor for the Complainant

STATE OF ALABAMA
 BALDWIN COUNTY

Before me, the undersigned authority, in and for said county, in said State, personally appeared Ida B. Carter, who is known to me, and who being by me first duly sworn, deposes and says that I have had the foregoing BILL of Complaint read to me and the matters and things stated therein untrue and correct.

Ida B. Carter

Sworn to and subscribed before me this 13 day of July, 1959.

Robert M. Brantley
 Notary Public, Baldwin County, Alabama

IDA B. CARTER
COMPLAINANT
VS
PEARL HOWARD, ET AL,
RESPONDENTS

BILL OF COMPLAINT

FILED
JUL 10 1950
ALICE J. DUCK, CLERK
REGISTER

returned or recalled

Ida B. Carter

Pearl M. Howard

STATE OF ALABAMA
BALDWIN COUNTY

TO ALL SHERIFFS OF THE STATE OF ALABAMA:

You are hereby commanded to summon PAUL HOWARD, PAUL HENNINGSEN, SUSAN CARTER, CALVIN HENNINGSEN, RUTH LEE, GEORGE BULLOCK, MARIE BASSSET, BERTHA MALVA, COLUMBUS CARTER, SAM CARTER, PETER L. CARTER, SUSAN MAE JOHNS, BESSIE WILLIAMS, HENRIETTA CARTER, CLARENCE CARTER, WALKER CARTER, MARGARET CARTER, LAURENCE CARTER, JR., AMIE ANN, ROBERTA BROWN, MARRIE MORGAN, BOSS HENRIET, MELA TAYLOR 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 IDA B. CARTER, as Complainant against Paul Howard, et al, as Defendants.

WITNES my hand this the 10 day of July, 1957.

Ida B. Carter

IDA B. CARTER

COMPLAINANT

VS

PAUL HOWARD, ET AL,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Come now the Complainant in the above styled cause and show unto Your Honor as follows:

1.

That the Complainant is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama.

2.

That the Defendants are each over the age of twenty-one years and their names and places of residence are as follows: Paul Howard, 332 St. Sander Street, Mobile, Alabama; Paul Henningsen, Latham, Alabama; Susan Carter, 3107 Alcones Street, Pensacola, Florida; Sally Mae Harlock Board, 1427-1428 Street, Box 29 North, Detroit, Michigan; Ruth Lee, Latham, Alabama; George Bullock, 3022 Spokane, Detroit, Michigan; Marie Bassset, 3107 Alcones Street, Pensacola, Florida; Bertha Malva, 3107 Alcones Street, Pensacola, Florida; Columbus Carter, Latham, Alabama; Carter, 1150 E. 21st Street, Tucson, Arizona; Peter L. Carter, 2 John Street, Prichard, Alabama; Susan Mae Johns, Megenico, Alabama; Rebecca Williams, Latham, Alabama;

Thomas Carthan, Bay Minette, Alabama; Clarence Carter, 57 Hancock Street, Prichard, Alabama; Wash Carter, Lathas, Alabama; Samuel Carter, 26 South Street, New Port, R. I.; Lawrence Carter, Jr., 68 Hancock Street, Brooklyn N.Y.; Annie Deal, Lathas, Alabama; Rosetta Brown, Lathas, Alabama; Wendie Roberts, Little River, Alabama; Rosa Murphy, 531 Fisher Alley, Mobile, Alabama; Lela Fanner, 1051 Pecos Street, Mobile, Alabama.

3.

That the land herein in controversy is situated in Baldwin County, Alabama, and is described as follows:

Subdivision B of Fractional Section 13, Township 2 North, Range 2 East, and further described as the southwest subdivision B of Fractional Section 13, Township 2 North, Range 2 East, containing 53 1/2 acres.

4.

That the Complainant is the owner of and is in peaceable possession of the aforesaid land. That the Complainant and Hilary H. Carter, the person through whom she claims title, acquired title to the above described land by being in the actual, peaceable, adverse, open exclusive, hostile and uninterrupted possession of said land, claiming ownership thereof for a period of more than twenty consecutive years next preceding the time of the filing of this Bill of Complaint.

5.

That the said respondents or one of them claim or are reputed to claim some right, title, claim or interest in, lien or encumbrance upon the above described land or some part or parcel thereof and the Complainant calls upon them and each of them to set forth and specify their right, title, claim or interest in, lien or encumbrance upon the said land or any part or parcel thereof, and to show how and by what instrument or instruments the same is derived or created.

6.

That there is no suit pending to enforce or test the validity of the Complainant's right and title to said land, or to enforce or test the validity of the respondents' right, title, claim, or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof.

WHEREAS, your Complainant prays that this Honorable Court take jurisdiction of the case made by this Bill of Complaint and take the said Paul Howard, Paul Humphreys, Sammie Carter, Billy Lee Harbort Harrel, Louis Lee, Sammie Holloway, Marie Russell, Martin Miller, Columbus Carter, Sam Carter, Peter L. Carter, Louis Lee Palmer, Rebecca Williams, Thomas Carthon, Clarence Carter, Mack Carter, Samuel Carter, Lawrence Carter, Jr., Louis Earl, Rosetta Brown, Sammie Roberts, Ross Murphy, John Tucker, parties respondents hereto, and by appropriate process require them to plead, answer or doer to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of this cause this Honorable Court will take and enter an order and decree adjusting and determining that the said respondents have no right, title, claim or interest in, lien or encumbrance upon the said lands, or any part or parcel thereof, and that the title to the said lands be quieted and established in this complaint as against the said respondents; and that the said respondents be forever enjoined from asserting or attempting to assert or from claiming or attempting to claim any right, title, claim or interest in, lien or encumbrance upon the said lands or any part or parcel thereof.

Witness my hand and seal of office
 this 10th day of July, 1959
 Albert M. Brantley
 Clerk of the Court

STATE OF ALABAMA

BARBERS COUSIN

Before me, the undersigned authority, do and for said county, in said State, personally appeared Ida B. Carter, who is known to me, and who being by me first duly sworn, deposes and says that I have had the foregoing Bill of Complaint read to me and the matters and things stated therein are true and correct.

Ida B. Carter

Sworn to and subscribed before me this 10 day of July, 1959.

Albert M. Brantley
 Clerk of the Court

3
 10
 2
 40

ALL INFORMATION CONTAINED
 HEREIN IS UNCLASSIFIED
 DATE 07-10-2009 BY 60322 UCBAW

4643

Faint, illegible text, likely bleed-through from the reverse side of the page.

Edward M. Mullen

Edward M. Mullen

Edward M. Mullen

FILED
JUL 10 1959
ALICE J. DUCK, CLERK REGISTER

Maria Beach, 2107 Alameda Street, Panama City, Florida, 1/12 interest;
Bertha Baker, 2107 Alameda Street, Panama City, Florida, 1/12 interest;
Columbus Carter, Latham, Alabama, 1/7 interest;
Sam Carter, 1150 E. 21st Street, Tucson, Arizona, 1/7 interest;
Peter L. Carter, 21 Johns Street, Prichard, Alabama, 1/28 interest;
Marie Mae Jaker, Moundville, Alabama, 1/28 interest;
Robert Williams, Latham, Alabama, 1/28 interest;
Thomas Carlton, Bay Minette, Alabama, 1/28 interest;
Clarence Carter, 57 Bennett Street, Prichard, Alabama, 1/9 interest;
Wash Carter, Latham, Alabama, 1/9 interest;
Samuel Carter, 26 South Street, New Port, N.Y., 1/9 interest;
Lawrence Carter, Jr., 63 Hancock Street, Brooklyn, N.Y., 1/9 interest;
Annie Seal, Latham, Alabama, 1/9 interest;
Bertha Brown, Latham, Alabama, 1/9 interest;
Rudie Roberts, Little River, Alabama, 1/9 interest.

3.

The property your complainant is seeking to have divided is described as follows:

East half of West half of Northwest quarter of Section 21,
Township 2 North, Range 2 East, and West half of East half of
Section 21, Township 2 North, Range 2 East, Baldwin County,
Alabama, containing 80 acres, more or less.

4.

The complainant alleges that the said lands cannot be equitably divided or partitioned among the joint owners thereof without a sale because there are so many heirs, part of the land is in cultivation, and part is in timber and because there are several houses on this land.

5.

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 she has employed the firm of Wilburn & Brambley, Attorneys at Law, for this purpose and that their fees as such solicitors should be ascertained and taxed as a part of the costs of this proceedings.

THE PREMISES CONSIDERED, Your Complainant prays that the said Pearl
 Hammerlyn, Cassie Carter, Gally Sue Harlock Beard, Beato Lee, Cassie Bullock,
 Marie Bassett, Bertha Malva, Columbus Carter, James Carter, Peter L. Carter,
 Susie Mae Joiner, Rebecca Williams, Thomas Carthon, Clarence Carter, Wash
 Carter, Samuel Carter, Lawrence Carter, Jr., Annie Seal, Rosetta Brown,
 Annie Holants 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 that such orders and decrees be made and such proceedings
 had to the end that the above described lands may be sold for division and
 partition between the said joint owners; that Your Honor order a reference
 to ascertain a reasonable solicitor's fee, to be taxed as a part of the costs
 of this proceedings, ^{to be paid} to the Complainant's solicitor of record out of
 proceeds of the sale of said property. That the Complainant may have such
 other, further or different relief as unto Your Honor may seem meet and
 proper.

Handwritten notes on the left margin, including "P 1021" and other illegible scribbles.

FILED stamp

WIDE I DICK REGISTER CLERK

Winters & Brantley

BY: Albert M Brantley
 Solicitors for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned authority, in and for said County and State, personally appeared Ida B. Carter, who is known to me, and who having been by me first duly sworn, deposes and says, that the facts stated in the foregoing Bill of Complaint are true.

Ida B. Carter

Sworn to and subscribed before me this 25 day of June, 1959.

Albert M Brantley
 Notary Public, Baldwin County, Ala.

70000 M 10000

James
Kenneth B. Hill

STATE OF MISSISSIPPI
COUNTY OF [illegible]
[illegible text]

70000 M 10000

*85A
016
4643
#677
380*

Clarence

*30X
4631
Clarence Carter
Susie Mae Carter
17 Peter L. Carter
44*

FILED

JUN 25 1959
ALICE J. DUCK,
CLERK,
REGISTER

30

SHERIFF'S RETURN

Received on the 30th day of June, 1959 and on the 30th day of June, 1959 this citation was executed by serving a copy of the same on Clarence Carter, and on the 1st day of July, 1959 I served a copy of the same on Susie Mae Carter and on the 17th day of July, 1959 I served a copy of the same on Peter L. Carter and this citation is herewith returned to court.

RAY D. BRIDGES, SHERIFF
BY: *J. Smith*
J. Hall D.S.

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

IDA B. CARTER,)
)
) COMPLAINANT)
)
) VS.) ANSWER OF SAM CARTER,
)
) RESPONDENT
)
) PEARL MUNNERLYN, ET AL,)
)
) RESPONDENTS)

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

Comes now your Respondent in the above styled cause and
respectfully shows unto Your Honor as follows:

1.

Answering Paragraph 1 of said Complaint, Respondent admits
the matter set out therein.

2.

Answering Paragraph 2 of said Complaint, Respondent, to the
best of his information, believes the matters set out therein to
be true.

3.

Answering Paragraph 3 of said Complaint, Respondent, to the
best of his information, believes the matters set out therein to
be true.

4.

Answering Paragraph 4 of said Complaint, Respondent denies
that said lands cannot be equitably divided or partitioned among
the joint owners thereof without a sale; as to the other matters
set out therein, Respondent admits the same.

5.

Answering Paragraph 5 of said Complaint, Respondent denies
that Complainant's solicitor's fees should be taxed as a part
of the costs of this proceedings; as to the other matters set out
therein, Respondent alleges that he does not have sufficient

LAW OFFICES OF
DAVID G. WATKINS
802 VALLEY NATIONAL BUILDING
TUCSON 1, ARIZONA
TELEPHONE MAIN 4-2491

July 21, 1959

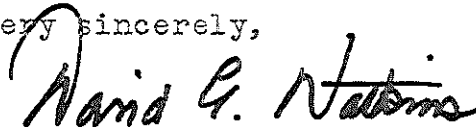
Mrs. Alice J. Duck
Circuit Court Clerk
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is an answer of Sam Carter, Respondent, in the matter of Ida B. Carter vs Pearl Munnerlyn, et al. Due to the short time for filing the answer, I submit this with the understanding that local counsel will be retained to handle the matter there.

If anything in the nature of an appearance fee is due, kindly inform me and I shall take care of the matter.

Very sincerely,



David G. Watkins

DGW:ml
Encl.

AIR MAIL

AFTER 5 DAYS RETURN TO

Callie Sue Beard
4029 18th Street

Ecorse 29, Mich.

CERTIFIED
No. 444475
MAIL

Deliver to Addressee Only

Alice J. Duck, Circuit Clerk
BALDWIN COUNTY
Bay Minette, Ala.



CERTIFIED:
For Delivery Only To Person
To Whom Addressed

RETURN RECEIPT REQUESTED

Return Receipt Requested



AFTER 5 DAYS RETURN TO

Gussie Bullock

5022 Spokane

Detroit 4, Mich

CERTIFIED

No. 444472

MAIL

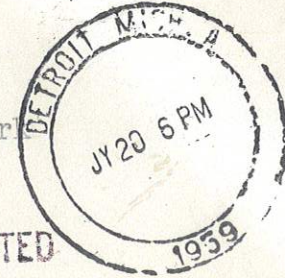
Deliver to Addressee Only

Alice J. Duck, Circuit Clerk
BALDWIN COUNTY
Bay Minette, Ala.

RETURN RECEIPT REQUESTED

CERTIFIED:
For delivery Only To Person
To Whom Addressed

Return Receipt Requested





AFTER 5 DAYS RETURN TO

Gussie Carter

4029 18th Street

Boorse 29, Mich.

CERTIFIED:
For Delivery Only To Person
To Whom Addressed

Return Receipt Requested

CERTIFIED
No. 444474
MAIL

Deliver to Addressee Only

Alice J. Duck, Circuit Clerk
BALDWIN COUNTY
Bay Minette, Ala.

RETURN RECEIPT REQUESTED



LAY MINETTE
JUL
22
1959
ALA.

ALICE J. DUCK, Circuit Clerk
BALDWIN COUNTY
BAY MINETTE, ALA.



2/76
RETURNED TO SENDER
By Brooklyn, N. Y. P. O.
JUL 28 1959

Use Deliverable As Addressed
Do not Post Again in this
Envelope or Wrapper

CERTIFIED
No. 194654
MAIL

CERTIFIED:
For Delivery Only To Person
To Whom Addressed
Return Receipt Requested

Laurence Carter, Jr.
68 Handock Street
Brooklyn, N.Y.

UNCLAIMED

A.

BROOKLYN, N.Y.
JUL 28
12:30 PM
1959

BREVOORT ST

BAY MINETTE
JUL 30
1959
ALA.

ALA.
JUL 30
1959

Copy - M. H. D. D. H.
Museum of Science
7-13-59
JH

ALICE J. DUCK, Circuit Clerk
BALDWIN COUNTY
BAY MINETTE, ALA.



CERTIFIED
No 676562
MAIL

CERTIFIED:
For Delivery Only To Person
To Whom Addressed
Return Receipt Requested

RETURNED TO WRITER

REASON CHECKED
Unclaimed.....Refused.....
Unknown.....
Insufficient address.....
Moved, Left no address.....
No such office in state.....
Do not remain in this envelope

FINAL NOTICE

Gussie Carter
3107 Alcones Street
Pensacola, Florida

Notified
7-13-59
JUL 13 1959

FINAL NOTICE

BIY NINETTE
JUL 28
1959
ALA.

PENSACOLA
JUL 27
5-PM
1959
FLA.



BIY NINETTE
JUL
28
1959
ALA.

Date 7-3- 19 59 Receipt No. 425

M Alice Duck Circuit Clerk

Has paid for rent of Box No. 239

For period ending Sept 30, 19 59 \$ 2.25

Received payment A. G. Weaver Postmaster.

(Post office) [Signature]

REGULATIONS REGARDING COLLECTION OF BOX RENT

Collections shall be made on or before the beginning of a quarter for the entire quarter or in advance for the current fiscal year. Box patrons and agencies of the Federal Government are permitted to pay rental on post office boxes in advance for not more than one full fiscal year, July 1 to June 30, next, or for the quarters remaining in the fiscal year. *When a patron, including Government agencies, surrenders a box prior to the expiration of the period for which rental has been paid, no portion of the rental shall be refunded.* When a box is rented after the beginning of a quarter, rent must be collected pro rata for the remainder of the quarter, except that rental for the entire quarter should be collected from a box holder who pays for the right to continue the use of a box which he held during the previous quarter. If a box holder fails to renew his right to his box on or before the last day of the period for which rented, the box shall then be closed and offered for rent and the mail placed in the general delivery, unless deliverable by carrier.

ALICE J. DUCK, Circuit Clerk

BALDWIN COUNTY

BAY MINETTE, ALA.

*not at
no order
95 # 671*

CERTIFIED
No. 194638
MAIL

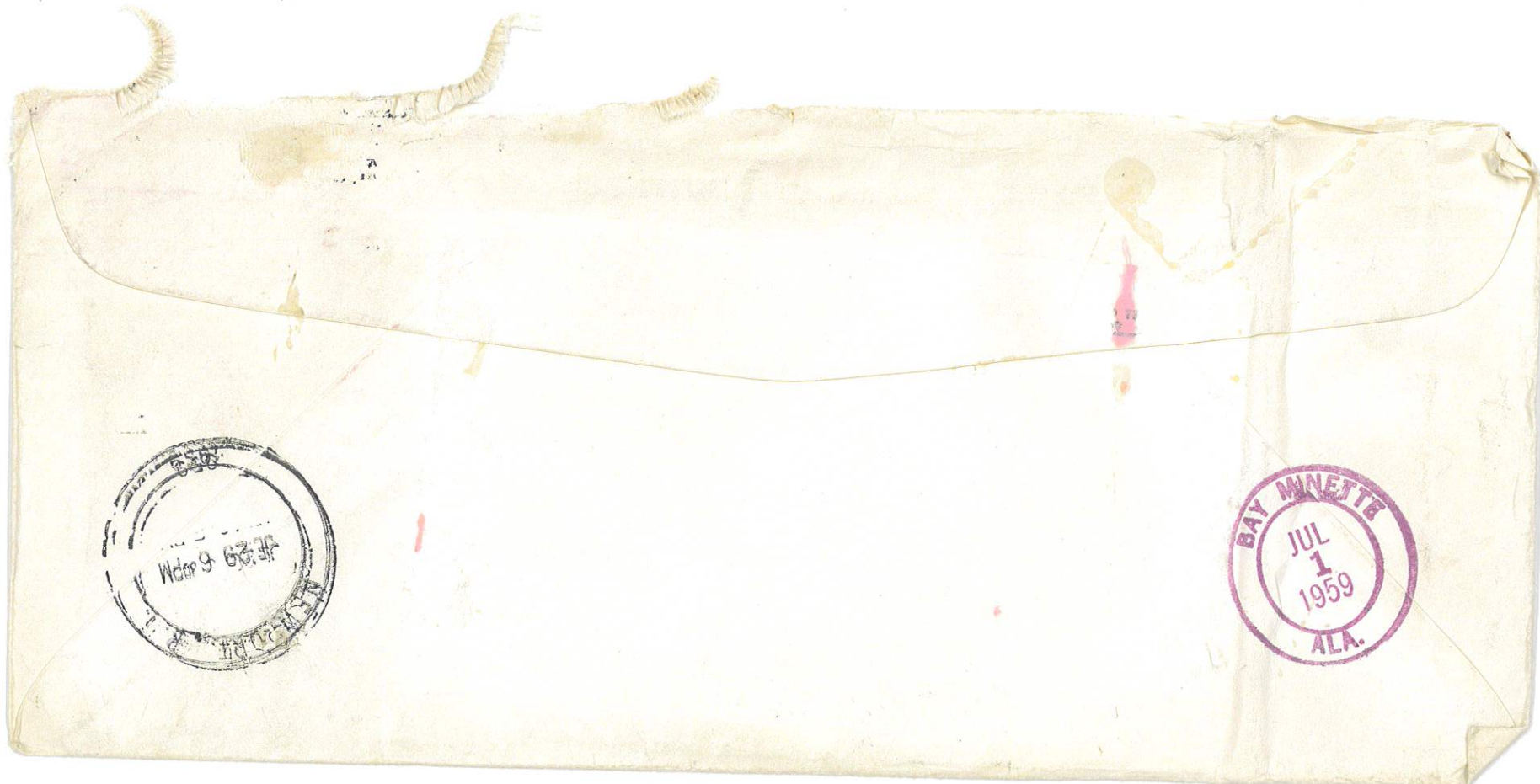
CERTIFIED:
For Delivery Only To Person
To Whom Addressed
Return Receipt Requested

Reason checked
Reason CHECKED
Unclaimed... Refused...
For better address...
Moved, Let us address...
No such office in...
Reason checked



Samuel Carter
26 Heath St.
New Port, R.I.

BAY MINETTE
JUN 26
7 PM.
1959
ALA.



637
Wden 9 637
H. C. H. H. H.

BAY MINETTE
JUL 1
1959
ALA.

PO: OFFICE DEPARTMENT
OFFICIAL BUSINESS

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

POSTMARK OF
DELIVERING OFFICE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

← RETURN
TO

REGISTERED NO.	NAME OF SENDER Alice J. Duck, Register
CERTIFIED NO. 194638	STREET AND NO. OR P. O. BOX P.O. Box 239
INSURED NO.	CITY, ZONE AND STATE Bay Minette, Alabama

C55-16-71548-4

POD Form 3811 Jan. 1958

1631

1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver *ONLY* to addressee

Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE *(must always be filled in)*

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED

ADDRESS WHERE DELIVERED *(only if requested in item # 1)*

POSTMARK OF
DELIVERING OFFICE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

← RETURN TO

POD Form 3811 Jan. 1958

REGISTERED NO.	NAME OF SENDER
CERTIFIED NO.	STREET AND NO. OR P. O. BOX
INSURED NO.	CITY, ZONE AND STATE

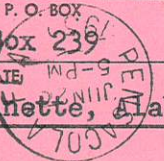
Alice J. Duck

194640

P.O. Box 239

INSURED NO.

Bay Minette, Alabama



CSS-16-71548-4

HIRE THE HANDICAPPED
IT'S GOOD BUSINESS

4631

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver *ONLY* to addressee

Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE *(must always be filled in)*

Bertha Malde

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

FILED
JUN 29 1959
POST OFFICE
CLERK
REGISTER

DATE DELIVERED

JUN 27 1959

ADDRESS WHERE DELIVERED *(only if requested in item #1)*

POSTMARK OF
DELIVERING OFFICE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

← RETURN TO

REGISTERED NO.

NAME OF SENDER

Alice J. Duck

CERTIFIED NO.

STREET AND NO. OR P. O. BOX

194646

P.O. Box 239

INSURED NO.

CITY, ZONE AND STATE

Bay Minette, Alabama



C55-16-71548-4

pd Form 3811 Jan. 1958
HIRE THE HANDICAPPED
IT'S GOOD BUSINESS

4631

1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver ONLY to addressee

Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

Marie Bassett

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED

ADDRESS WHERE DELIVERED (only if requested in item #1)

JUN 27 1959

ALICE L. DUNK, CLERK REGISTER

JUN 29 5 59

FILED



INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

REGISTERED NO.	NAME OF SENDER
	Alice J. Duck Register
CERTIFIED NO.	STREET AND NO. OR P. O. BOX
194649	P.O. Box 239
INSURED NO.	CITY, ZONE AND STATE
	Bay Minette, Alabama

4631

1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver *ONLY* to addressee

Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

Missie Carter

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED

6/30

ADDRESS WHERE DELIVERED (only if requested in item #)

FILED
JUL 6 1959
MAIL ROOM, REGISTERED MAIL

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

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



POSTMARK OF
DELIVERING OFFICE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

← RETURN
TO

POD Form 3811 Jan. 1958

REGISTERED NO.	NAME OF SENDER Alice J. Duck, Clerk
CERTIFIED NO. 194637	STREET AND NO. OR P. O. BOX P.O. Box 239
INSURED NO.	CITY, ZONE AND STATE Bay Minette, Alabama

C55-16-71548-4

4631

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver *ONLY* to addressee

Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE *(must always be filled in)*

Sam Carter

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED

JUN 30 1959

ADDRESS WHERE DELIVERED *(only if requested in item #1)*

MAILED
JUL 6 - 1959
FILED
U.S. DEPT. OF POSTS
CLEVELAND, OHIO

4631

1-INSTRUCTIONS TO DELIVERING EMPLOYEE

Deliver ONLY to addressee

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(Additional charges required for these services)

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SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

Gussie E. Bullock

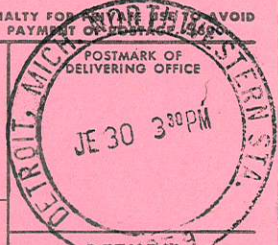
SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

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DATE DELIVERED

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JUN 30 1959

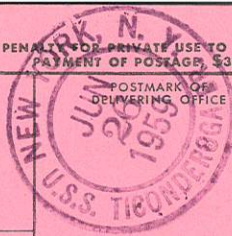


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RETURN TO

REGISTERED NO.	NAME OF SENDER Alice J. Duck
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INSURED NO.	CITY, ZONE AND STATE Bay Minette, Alabama

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REGISTERED NO.	NAME OF SENDER <i>Alvin A. Kunk</i>
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1-INSTRUCTIONS TO DELIVERING EMPLOYEE

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J. H. Lawrence

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FILED
JUL 2 1950
MET. DIV. CLERK
REGISTER

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1-INSTRUCTIONS TO DELIVERING EMPLOYEE

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Katie Beard

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MIDT. DIV. CLERK, REGISTER



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	Bay Minette, Alabama

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