

194

P. E. TETER,

Complainant,

vs.

MRS. JOHNNIE L. SIKES, W. D. OWENS  
and THE AMERICAN AGRICULTURAL CO.,

Respondents.

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_  
Answer and Cross Bill, Withdrawal of Appearance, Motion for Decrees  
Pro Confesso on Personal Service, Decrees Pro Confesso on Personal  
Service

and in behalf of Defendant upon \_\_\_\_\_

*Robert S. Duck*

Register.

P. E. TETER,

Complainant,

VS.

MRS. JOHNNIE L. SIKES,  
W. D. OWENS, and THE  
AMERICAN AGRICULTURAL  
CHEMICAL COMPANY, a Cor-  
poration,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the Respondents, Mrs. Johnnie L. Sikes, W. D. Owens, The American Agricultural Chemical Company, a Corporation, nor either of them, have any right, title, estate, claim, interest in, or encumbrance upon the following described lands, or any part thereof, to-wit:

The North half of the Northwest quarter;  
The Northwest quarter of the Northeast  
quarter; and the Southeast quarter of the  
Southwest quarter of Section 29, Township  
4 South, Range 5 East, in Baldwin County,  
Alabama;

and that the title to the same is vested in the Complainant, P. E. Teter as against the said Mrs. Johnnie L. Sikes, W. D. Owens, and The American Agricultural Chemical Company, a Corporation.

IT IS FURTHER ORDERED that the Register of the Court, within thirty (30) days from the rendition of this decree, file a certified transcript thereof, for record, in the Probate Court of Baldwin County, Alabama, and that the cost thereof be taxed in the costs of the cause.

IT IS FURTHER ORDERED that the Complainant pay the costs in this cause, for which execution may issue.

Done at Monroeville, Monroe County, Alabama, on this the  
3rd day of September, 1936.

F W Here.  
Judge of ~~the~~ 1st Judicial Circuit  
of Alabama.

*Handwritten notes:*  
Baldwin County  
Sept 20 1936

IN EQUITY.

BALDWIN COUNTY, ALABAMA.

IN THE CIRCUIT COURT OF

113131

Rebbergen

Plaintiff  
CHEMICAL COMPANY, & CO.,  
AMERICAN FERTILIZER  
W. D. OWENS, and THE  
MRS. JOHNNIE L. SIKES,

AS

Complainant

P. E. TETER,

ATTORNEY

STATE OF ALABAMA,  
BALDWIN COUNTY.

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery, hereby certify that the foregoing is a full, true, correct and complete copy of the decree rendered on the 20 day of September, 1936, in the cause of P. E. Teter, Complainant, vs. Mrs. Johnnie L. Sikes, et al, Respondents, in the Circuit Court of Baldwin County, Alabama, in Equity, as the same appears on file in my office.

WITNESS my hand and official seal of said Court on this 5th day of September, 1936.

*Signature:* R. S. Duck  
Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery.

Vertical stamp:  
Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery.  
7-5-36

*Handwritten notes:*  
20  
9/20/36

P. E. TETER,  
Complainant,  
VS.  
MRS. JOHNNIE L. SIKES,  
W. D. OWENS, and THE  
AMERICAN AGRICULTURAL  
CHEMICAL COMPANY, a Cor-  
poration,  
Respondents.

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

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

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the Respondents, Mrs. Johnnie L. Sikes, W. D. Owens, The American Agricultural Chemical Company, a Corporation, nor either of them, have any right, title, estate, claim, interest in, or encumbrance upon the following described lands, or any part thereof, to-wit:


The North half of the Northwest quarter;  
The Northwest quarter of the Northeast  
quarter; and the Southeast quarter of the  
Southwest quarter of Section 29, Township  
4 South, Range 5 East, in Baldwin County,  
Alabama;

and that the title to the same is vested in the Complainant, P. E. Teter as against the said Mrs. Johnnie L. Sikes, W. D. Owens, and The American Agricultural Chemical Company, a Corporation.

IT IS FURTHER ORDERED that the Register of the Court, within thirty (30) days from the rendition of this decree, file a certified transcript thereof, for record, in the Probate Court of Baldwin County, Alabama, and that the cost thereof be taxed in the costs of the cause.

IT IS FURTHER ORDERED that the Complainant pay the costs in this cause, for which execution may issue.

Done at Monroeville, Monroe County, Alabama, on this the  
3<sup>rd</sup> day of September, 1936.

  
Judge of the 21st Judicial Circuit  
of Alabama.

The State of Alabama,  
Baldwin County.

No. 194 CIRCUIT COURT IN EQUITY.

P. E. TETER,

Complainant

vs.

MRS. JOHNNIE L. SIKES; W. D. OWENS and THE AMERICAN AGRICULTURAL CO.,  
Defendant.

In this cause it appears to the Register

that a summons requiring the Defendant, Mrs. Johnnie L. Sikes,

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

was served upon her by the Sheriff of Crenshaw County, Alabama, on the 10th day of February 19 36

And the said Defendant, having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Beebe & Hall, Solicitors for Complainant,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Mrs. Johnnie L. Sikes

Defendant aforesaid.

This 28th day of August 19 36

Robert S. Duck Register.

The State of Alabama,  
Baldwin County.

No. 194 CIRCUIT COURT IN EQUITY.

P. E. FETER

Complainant

vs.

MRS. JOHNNIE L. SIKES, W. D. OWENS and THE AMERICAN  
AGRICULTURAL CHEMICAL COMPANY

Defendant

In this cause it appears to the REGISTER

that a summons requiring the Defendant W. D. OWENS

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

was served upon him by the Sheriff of BALDWIN County, Alabama, on the  
29th day of February 1936.

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint  
to this date, it is now, therefore, on motion of BEEBE & HALL, Attorneys for  
Plaintiff,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things  
taken as confessed against the said W. D. OWENS

Defendant aforesaid.

This 23rd day of JULY 1936

Robert S. Duck

Register.

P. E. TETER,

Complainant,

VS.

JOHNNIE L. SIKES, et al,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. 194.

ANSWER AND CROSS BILL.

Now comes Johnnie L. Sikes, one of the Respondents in the above entitled cause, and for answer to the Bill of Complaint in said cause, and to each and every count thereof separately and severally, and for this her Cross Bill, says:

1. This Respondent admits the allegations contained in paragraph numbered "First" of the Bill of Complaint.

2. This Respondent admits that she is over twenty-one years of age and a resident of Crenshaw County, Alabama, as alleged in paragraph "Second" of the Bill of Complaint, but she is not informed and therefore denies each and all other allegations of the said paragraph numbered "Second".

3. This Respondent denies that the Complainant owns and that he is in the quiet and peaceable possession of the lands described in paragraph numbered "Third" of the Bill of Complaint.

4. This Respondent claims to own said lands described in the Bill of Complaint, namely, the North Half of the Northwest Quarter; Northwest Quarter of the Northeast Quarter and the Southeast Quarter of the Southwest Quarter of Section 29, Township 4 South, Range 5 East, in Baldwin County, Alabama, under a tax title arising out of a tax sale held on to-wit, June 1, 1922, wherein the said lands were sold to W. S. Sikes and W. R. Sikes, under whom this Respondent claims title. This Respondent further alleges that she and those under whom she claims title have been in possession of the said property since on to-wit, June 12, 1925, and that

the Complainant, P. E. Teter, W. D. Owens and the American Agricultural Chemical Company, a Corporation, claim, or are reputed to claim some right, title or interest in or encumbrance upon the said lands, and she hereby calls upon the said Complainant, P. E. Teter, W. D. Owens and the American Agricultural Chemical Company, a Corporation, and each of them, to set forth and specify their respective title, claim or interest in or encumbrance upon the said lands, and by what instrument the same is derived and created.

5. This Respondent admits that no suit other than this suit is pending to enforce or test the validity of her title to or interest in the said lands.

6. This Respondent denies each and all other allegations of the said Bill of Complaint which are not herein specifically answered herein.

#### PRAYER FOR PROCESS.

The said Johnnie L. Sikes, having now answered the said Bill of Complaint, prays that this her answer may be taken and treated in all respects as a Cross-Bill and that the said P. E. Teter, W. D. Owens and the American Agricultural Chemical Company, a Corporation, and each of them be made parties respondent to this her Cross-Bill and that they have notice of same according to the rules and practice of this honorable Court.

#### PRAYER FOR RELIEF.

This Respondent and Cross-Complainant prays that upon a final hearing of this cause, it be adjudged and decreed that she is the owner of the said property as against the Cross-Respondents and each of them; that it be adjudged and decreed that the Cross-Respondents and each of them have no right, title, claim or interest in or encumbrance upon the said lands or any part thereof and that title to the said land be quieted and established in this Respondent and Cross-Complainant as against the Cross-Respondents and each of them, that they, and each of them be forever enjoined from assert-



ing or attempting to assert, claiming or attempting to claim any right, title, claim or interest in, lien or encumbrance on or possession of the said lands or any part thereof. This Respondent and Cross-Complainant further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn  
Solicitor for Respondent and Cross-Complainant.

FOOT NOTE: The said Complainant and Cross-Respondent, and each of them, are required to answer each and every allegation of the foregoing Cross-Bill, but not under oath, the benefit whereof is hereby expressly waived.

J. B. Blackburn  
Solicitor for Respondent and Cross-Complainant.

P. E. TETER,  
Complainant.

vs.

MRS. JOHNNIE L. SIKES et al.,  
Respondents.

IN THE CIRCUIT COURT OF  
BALDRIN COUNTY, ALABAMA.  
IN EQUITY. NO. \_\_\_\_\_

Comes the Respondent, Mrs. Johnnie L. Sikes, and moves the Court to set aside, on this her application, the final decree entered against her by this Court on, to-wit: the 3rd day of September, 1936, and also the decree Pro Confesso, rendered against her on to-wit: the 28<sup>th</sup> day of August ~~September~~ 1936, by this Court, and for grounds for this motion sets forth separately and severally the following:

1. Your Movant, who was one of the Respondents in this cause had, at the time said decrees were rendered, and now has, a good and valid defense against the Bill of Complaint as filed by the Complainant in this cause as well as a good and valid Cross-complaint as against said Bill of Complaint and as against the other Respondents herein. That said defense and Cross-complaint consists in and is as follows: That your Movant, after said bill of complaint was filed, and before said decrees were rendered, filed in this cause an answer and Cross-bill to said bill of complaint, which answer and cross-bill is hereby expressly referred to and made a part hereof. That your movant attaches hereto, and makes a part hereof, the letter and agreement marked "Exhibit A." That, relying upon said letter and agreement your Movant permitted a decree or decrees to be rendered or entered against her. That the amount or sum of \$366.00 set out in said letter, has not been paid, nor was said money deposited or left with the Baldwin County Bank, in said letter. That none of the agreements outlined out in said letter or agreement have been complied by the Complainant, P. E. Teter, all to the inj

The State of Alabama,  
Baldwin County.

No. 194 CIRCUIT COURT IN EQUITY.

P. E. TETER

Complainant

vs.

MRS. JOHNNIE L. SIKES, W. D. OWENS and THE AMERICAN AGRICULTURAL CHEMICAL COMPANY, Defendant

Motion is hereby made for a Decree Pro Confesso against

THE AMERICAN AGRICULTURAL CHEMICAL COMPANY

Defendant

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

This 20th day of JULY 1936

Beebe & Hall

Solicitors

The State of Alabama,  
Baldwin County.

{ No. 194 CIRCUIT COURT IN EQUITY.

P. E. TEEER Complainant

vs.

MRS. JOHNNIE L. SIKES, W. D. OWENS and THE AMERICAN AGRICULTURAL CHEMICAL COMPANY, Defendant.s

Motion is hereby made for a Decree Pro Confesso against W. D. OWENS

Defendant

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

This 20th day of JULY 19 36

Beebe + Hall Solicitor,

The State of Alabama,  
Baldwin County.

{ No. 194 CIRCUIT COURT IN EQUITY.

P. E. EETER

Complainant

vs.

MRS. JOHNNIE L. SIKES, W. D. OWENS and THE AMERICAN  
AGRICULTURAL CHEMICAL COMPANY

Defendant.

In this cause it appears to the

REGISTER

that a summons requiring the Defendant THE AMERICAN AGRICULTURAL CHEMICAL CO.

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

was served upon him by the Sheriff of MONTGOMERY County, Alabama, on the  
12th day of February 19 36

And the said Defendant... having failed to demur, plead to or answer the said Bill of Complaint  
to this date, it is now, therefore, on motion of BEEBE & HALL, Attorneys for  
Plaintiff,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things  
taken as confessed against the said THE AMERICAN AGRICULTURAL CHEMICAL COMPANY

Defendant aforesaid.

This 23rd day of JULY 19 36

Robert L. Duck Register.

P. E. TETER,  
Complainant,

VS.

MRS. JOHNNIE L. SIKES,  
ET AL,

Respondents.

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

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, IN EQUITY:

Comes your Complainant, P. E. Teter, and humbly com-  
plaining against the Respondents, Mrs. Johnnie L. Sikes, W. D.  
Owens, and the American Agricultural Chemical Company, respect-  
fully represents and shows unto your Honor and this Honorable  
Court as follows:

FIRST:

That your Complainant is a bona fide resident of  
Baldwin County, Alabama, over twenty-one years of age.

SECOND:

That the Respondent, Mrs. Johnnie L. Sikes is over  
twenty-one years of age and a resident of Luverne, Crenshaw  
County, Alabama; that W. D. Owens is over twenty-one years of  
age and a resident of Atmore, Escambia County, Alabama; that  
the American Agricultural Chemical Company is a Corporation  
with offices in Montgomery, Montgomery County, Alabama.

THIRD:

Your Complainant alleges that he is in the quiet and  
peaceable possession of certain lands in Baldwin County, Ala-  
bama, claiming to own the same in fee simple, said lands being  
described as follows:

The North half of the Northwest quarter;  
the Northwest quarter of the Northeast  
quarter and the Southeast quarter of the

Southwest quarter of Section 29, Township  
4 South of Range 5 East.

FOURTH:

Complainant further alleges that the Respondents, Mrs. Johnnie L. Sikes, W. D. Owens, and the American Agricultural Chemical Company, claim, or are reputed to claim, some right, title or interest in or incumbrance upon said lands.

FIFTH:

Complainant further alleges that no suit is pending to question or test the validity of such claim, right, title, or interest in, or incumbrance of the said Respondents or either of them, and the Complainant therefore calls upon the Respondents, separately and severally, to set forth and specify their right, title, or interest in, or incumbrance upon said lands and to show how and by what instrument the same is derived and created.

PRAYER FOR PROCESS

WHEREFORE, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint, and by appropriate process make the said Mrs. Johnnie L. Sikes, W. D. Owens, and the American Agricultural Chemical Company respondents to this Bill of Complaint, requiring 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.

PRAYER FOR RELIEF.

Complainant further prays that upon a final hearing of this cause this Honorable Court establish the title of Complainant in and to the lands herein described and further find and decree that neither Mrs. Johnnie L. Sikes, W. D. Owens and the American Agricultural Chemical Company, nor either of them have any claim, right, title, or interest in, or incumbrance upon the said lands

herein described, or any part thereof, and grant unto your Complainant such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

Beebe & Hall  
Solicitors for Complainant.

FOOT NOTE:

The Respondents and each of them are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs First to Fifth, inclusive, but not under oath, oath being hereby expressly waived.

Beebe & Hall  
Solicitors for Complainant.



The State of Alabama, {  
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mrs Johnnie L Sikes,  
W D Owens. and American Agricultural Chemical Co.

of \_\_\_\_\_ County, to be and appear before the Judge of the Circuit Court  
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by  
P E Teter.

against said Mrs Johnnie L Sikes. W D Owens. and the American Agricultural  
Chemical. Co

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 6th day  
of February 1936

Robert S Duck Register

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

# CHANCERY EXECUTION

## BILL OF COSTS

No. 174

*J. E. Little*  
VS.  
*Johanna L. Little et al*

PLAINTIFF

DEFENDANT

FEES OF REGISTER	Dollars	Cents	Brought Forward	\$
Filing each bill and other papers	16	00		1310
Issuing each subpoena	2	50	For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
Issuing each copy thereof	2	00	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Entering each return thereof	15	00	Each notice sent by mail to creditor	15
For each order of publication	1	00	Filing receipting for and docketing each claim, etc.	25
Issuing Writ of injunction	1	50	For all entries on subpoena docket, etc.	50
For each copy thereof	50	00	For all entries on commission docket, etc.	50
Entering each return thereof	15	00	Making final record. per 100 words	15
Issuing Writ of Attachment	1	00	Certified copy of decree	1 00
Entering each return thereof	15	00	Report of divorce to State Health Office (Acts 1915)	50
Docketing each case	1	00		
Entering each appearance	25	00	<b>TOTAL FEES OF REGISTER</b>	<b>1310</b>
Issuing each decree pro confesso on per se	1	00		
Issuing each decree pro confesso on publica	1	00	<b>FEES OF SHERIFF</b>	<b>2160</b>
Each order appointing guardian	1	00	Serving and returning subpoena on deft.	\$1 50
Any other order by Register	50	00	Serving and returning subpoena for witness	65
Issuing Commission to take testimony	50	00	Levy and attachment	3 00
Receiving and filing	10	00	Entering and returning same	25
Endorsing each package	10	00	Selling property attached	75
Entering order submitting cause	50	00	Impanelling Jury	75
Entering any other order of court	25	00	Executing Writ of possession	2 50
Noring all testimony	50	00	Collecting execution for costs	1 50
Abstract of cause, etc.	1	00	Serving and returning sci. fa., each	65
Entering each decree	75	00	Serving and returning notice	65
For every 100 words over 500	15	00	Serving and returning writ of injunction	1 50
Taking account, etc.	3	00	Serving and returning writ of exeat	1 50
Taking testimony, etc.	15	00	Taking and approving bonds, each	75
Each report, 500 words or less	2	50	Collecting money on execution	2 50
For every 100 words over 500	15	00	Making Deed	2 50
Amount claimed less than \$500, etc	2	00	Serving and returning application, etc.	1 00
Issuing each subpoena	25	00	Serving attachment, contempt of court	1 50
Witness certificate, each	25	00		
Issuing execution, each	75	00	<b>TOTAL FEES OF SHERIFF</b>	<b>900</b>
Entering each return	15	00		
Taking and approving bond, each	1	00	<b>RECAPITULATION</b>	<b>900</b>
Making copy of bill, etc	15	00	Register's Fees	2160
Each notice not otherwise provided for	50	00	Sheriff's Fees	900
Each certificate or affidavit, with seal	50	00	Commissioner's Fees	300
Each certificate or affidavit, no seal	25	00	Solicitor's Fees	125
Hearing and passing on application, etc.	3	00	Witness Fees	300
Each settlement with Receiver, etc.	3	00	Guardian Ad Litem	300
Examining each voucher of Receiver, etc	10	00	Printer's Fees	300
Examining each answer, etc.	3	00	Trial Tax	3 00
Recording resignation, etc.	75	00	Recording Decree in Probate Court	3 00
Entering each certificate to Supreme Court	50	00		
Taking questions and answers, etc	25	00	<b>TOTAL</b>	<b>3485</b>
For all other ser relating to such proceedings	1	00		
For services in proceeding to relieve minors, etc., same fee as in similar cases.				
Commission on sales, etc: 1st \$100, 2 per cent; all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent.				
Sub Total Carried Forward				

**The State of Alabama,** }  
Baldwin County }

No. \_\_\_\_\_  
Circuit Court, In Equity

Term, 193\_\_

To any Sheriff of the State of Alabama—GREETING:

You are hereby commanded, That of the goods and chattels, lands and tenements of \_\_\_\_\_

Defendant

you cause to be made the sum of \_\_\_\_\_ Dollars,

which \_\_\_\_\_ Plaintiff

recovered of \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of \_\_\_\_\_

Dollars,

costs o' suit, and have the same to render to the said \_\_\_\_\_ and make return of this Writ and the execution thereof, according to law.

Interest from \_\_\_\_\_ 193\_\_ to date of collection.

Witness my hand, this \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_

Register

The State of Alabama, }  
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

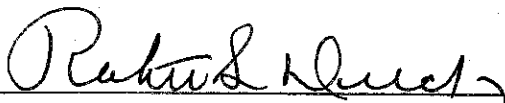
WE COMMAND YOU, That you summon Mrs Johnnie I. Sikes.  
W D Owens. and American Agricultural Chemical Co.

of \_\_\_\_\_ County, to be and appear before the Judge of the Circuit Court  
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by  
P E Teter.

against said Mrs Johnnie I. Sikes. W D Owens. and the American Agricultural C  
Chemical. Co

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 6th day  
of February 1936



Register

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

The State of Alabama, }  
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mrs Johnnie I Sikes  
W D Owens. and the American Agricultural Chemical. Co.

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

P.E.Teter.

against said Mrs Johnnie I Sikes. W D Owens. and the American.  
Agricultural Chemical .Co/

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 6th day  
of February. 193 6

Robert S. Duck Register

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

The State of Alabama,  
Baldwin County.

No. 194 CIRCUIT COURT IN EQUITY.

P. E. TETER,

Complainant

vs.

MRS. JOHNNIE L. SIKES? W. D. OWENS and THE AMERICAN AGRICULTURAL  
COMPANY, Defendant

Motion is hereby made for a Decree Pro Confesso against MRS. JOHNNIE L. SIKES

Defendant

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

This 28th day of August 1936

*Ruby Hall*

Solicitor

The State of Alabama, }  
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon W D OWENS. AND the  
AMERICAN AGRICULTURAL. CHEMICAL. COMPANY.

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

Johnnie I. Sikes. Respondent. and Cross Compliantant.

against said W D Owens. and the American Agricultural. Chemical Co.

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 11th day  
of March. 1936

Robert S. Duck Register

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

The State of Alabama, }  
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon W D OWENS, AND THE  
AMERICAN AGRICULTURAL CHEMICAL COMPANY.

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

Johnnie I. Sikes. Respondent and Cross Complainant.

against said W D OWENS, and the American Agricultural Chemical Co.

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 11th day  
of March, 1933

 Register

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

RECORDED  
*Duck*  
Page *6-483*

No. ....

Page *6-483*

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

vs.

**MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE**

Filed *July 20,* 19 *36*

*Robert S. Duck*

Register.

Recorded in ..... Record.

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

Register.



REC'D  
DUCK  
Page 6-782

No. \_\_\_\_\_

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

vs.

**MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE**

Filed July 20, 1936

Robert S. Duck  
Register.

Recorded in \_\_\_\_\_ Record,

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

RECORDED  
Auek  
8-24-1

Serve on F. D. OWENS

Circuit Court of Baldwin County  
IN EQUITY

No. 194

SUMMONS

P. N. PETER.

VS.

Johnnie I. Sikes, et al.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_\_

\_\_\_\_\_  
SHERIFF

Executed this 6 day of \_\_\_\_\_

Sept 193\_\_\_\_\_

by leaving a copy of the within Summons with

F. D. Owens

\_\_\_\_\_  
Defendant

M. H. Williams

Sheriff

By C. W. ...  
Deputy Sheriff

Bebe & ...  
Attorney for Complainant

198  
R.H. Cameron

RECORDED  
6-3-18  
S. H. Smith

THE STATE OF ALABAMA,

BALDWIN COUNTY

Serve on American Agricultural  
Montgomery EQUITY  
Circuit Court of Baldwin County

No. 194

SUMMONS

P. H. Teter/

RECEIVED IN OFFICE

MAR 13 1936

Harwood Peterson, Sheriff

vs.

Johnnie T. Sikes. et al.

Received in office this \_\_\_\_\_ day of \_\_\_\_\_, 193\_\_

SHERIFF

Executed this 13 day of

March 1936

by leaving a copy of the within Summons with  
R.H. Cameron, Mgr.

Defendant

Harwood Peterson

Sheriff

By J. H. Jones, Deputy Sheriff

Baebe & Hall,  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

RECORDED

6-28-36

Serve on W. D. Owens.

Circuit Court of Baldwin County  
IN EQUITY

No. 194

SUMMONS

P. B. TETTER

THE STATE

BALDWIN

Received in office this

day of

*[Signature]*

Executed this

*[Signature]*

by leaving a copy of th

*W. D. Owens*

vs.

Mrs. J. Sikes et al

*[Signature]*

By

*L. Sikes*

Beebe & Hall

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

No. \_\_\_\_\_

Page: \_\_\_\_\_

The State of Alabama,  
Baldwin County.

CIRCUIT COURT, IN EQUITY

vs.

MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE

Filed August 28, 1936

Randy S. Sikes  
Register.

Recorded in \_\_\_\_\_ Record.

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

RECORDED  
6-30-32

Serve on Mrs Johnnie I Sikes

Circuit Court of Baldwin County

Summons in Equity

No. 194

SUMMONS

P. R. TEMPER

THE STATE OF ALABAMA,

BALDWIN COUNTY

*[Signature]*

Received in office this

12th

day of July, 1934

*[Signature]*

SHERIFF

Executed this 10 day of

July

1934

by leaving a copy of the within Summons with

Mrs. Johnnie I. Sikes

VS.

Mrs Johnnie I Sikes et al

Defendant

W. G. Hollington

Sheriff

By J. F. Moore

Deputy Sheriff

Beebe & Hall  
Solicitor for Complainant



RECORDED  
6-302

THE STATE OF ALABAMA,

BALDWIN COUNTY

Serve on The American

Agricultural Chemical Co.  
Circuit Court of Baldwin County

Mary Ann Sikes  
IN EQUITY

No. 194

SUMMONS

P. R. TERRY

vs.

Mrs. Johnnie I Sikes et al.

Bebe & Hall

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

95

Received in office this

RECEIVED IN OFFICE

FEB 8 - 1936

Haygood P. Atkinson  
SHERIFF

Executed this 12 day of

Feb

1936

by leaving a copy of the within Summons with

The American Agricultural Chemical Co.

Defendant

Haygood P. Atkinson

Sheriff

By Hayne Sikes

Deputy Sheriff

*Original*

194 RECORDED

*Duck*  
6-302

P. E. TETER,

Complainant,

VS.

MRS. JOHNNIE L. SIKES,  
ET AL.

Respondents.

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

BILL OF COMPLAINT.

Filed this *6<sup>th</sup>* day *Feb.* 19 *36*

*Robert S. Duck,*

Clerk-Register

*7.*



INDEXED  
Book  
6-483

No. .... Page .....

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

vs.

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE**

Issued July 20, 1936  
Robert A. Ruck  
Register.

Moore Printing Company, Bay Minette, Ala.