

NANCY SCOTT BENTON,)
COMPLAINANT,	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
V.)) IN THE CIRCUIT COURT OF
Grace Scott, Tom Scott, Mary Belle Scott Franklin, John Watts Scott, Elizabeth G	aston) BALDWIN COUNTY,
Scott, a minor, Stephen Kyle Scott, a minor,) ALABAMA, IN RQUITY.
Marguerita W. Scott, a minor T. J. Scott,) NO
Mary Adelaide Pierrepont, Alva Scott Garfield, Taylor S. Gay, Dorothy Gay))
Fullerton, Lois Gay Chandler and William David Gay		5
RESPONDENTS)

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY, SITTING IN EQUITY:

Comes your Complainant, Nancy Scott Benton, and respect-fully shows unto the Court as follows:

1. That she is over the age of twenty-one years and is a bona fide resident citizen of Calhoun County, Alabama; that the Respondents, Grace Scott, Tom Scott, Mary Belle Scott Franklin, John Watts Scott, T. J. Scott, Mary Adelaide Pierrepont, Alva Scott Garfield, Taylor S. Gay, Dorothy Gay Fullerton, William David Gay, and Lois Gay Chandler, are each over the age of twenty-one years; that Respondent, Stephen Kyle Scott is a minor slightly over fourteen years of age; Respondent, Marguerita W. Scott is a minor approximately twelve years of age; and Respondent, Elizabeth Gaston Scott is a minor approximately six years of age; and their places of residence are as follows:

Grace Scott, Womans Club, Mobile, Alabama

Tom Scott, 4815 25th Road, North, Arlington, Va.

Mary Belle Scott Franklin, Rt. 2, Box 202, Ft. Myers, Florida

John Watts Scott, Rt. 1, Box 43, Jemison, Alabama

Elizabeth Gaston Scott, a minor, is in the care, custody and control of her mother, Elizabeth Z. Scott, Box 444, Tuskegee, Alabama:

Stephen Kyle Scott and Marguerite W. Scott, minors, are in the care, custody and control of their mother, Madeleine G. Scott, in Fairhope, Alabama;

T. J. Scott, Scottswood Farm, Madison, N. H.

Mary Adelaide Pierrepont, Box 4, Ridgefield, Conn.

Alva Scott Garfield, #3 Hawthorne Lane, Concord, Mass.

Taylor S. Gay, c/o Phillips Petroleum Company, 80 Broadway, New York 5, N. Y.

William David Gay, 1019 Petroleum Building, Tulsa, Okla.

Dorothy Gay Fullerton, R.F.D. 1, Vienna, Virginia or c/o The Knitting Comer Yarns, 520 North Randolph, Arlington, Virginia

Lois Gay Chandler (Mrs. Hazen Chandler) Chicago, Illinois

2. Your Complainant further alleges that she and the above named respondents are joint owners or tenants in common of the following described property situated in the County of Baldwin, State of Alabama:

Lot Two of Section Eighteen in Township Nine South of Range Five East of the St. Stephens Meridian, Alabama, containing one hundred sixty acres and fifty-nine hundredths of an acre.

3. The parties hereto own the above described property in the following undivided interests:

llowing undivided interests:	
Nancy Scott Benton	One-eighteenth (1/18)
John Watts Scott	One-eighteenth (1/18)
Mary Belle Scott Franklin	One-eighteenth (1/18)
Tom Scott	One-eighteenth (1/18)
Stephen Kyle Scott	One-fifty-fourth (1/54)
Elizabeth Gaston Scott	One-fifty-fourth (1/54)
Marguerita W.Scott	One-fifty-fourth (1/54)
T. J. Scott	One-ninth (1/9)
Alva Scott Garfield	One-ninth (1/9)
Mary Adelaide Pieérepont	One-ninth (1/9)
Taylor S. Gay	One-twelfth (1/12)
William David Gay	One-twelfth (1/12)

One-twelfth (1/12)

One-twelfth (1/12)

Dorothy Gay Fullerton

Lois Gay Chandler

- 4. Your Complainant further alleges that a partition among the joint owners or tenants in common in accordance with the foregoing fractional shares will be to the interest of all of said parties.
- 5. Your Complainant further alleges that she has employed the firm of Knabe and Nachman, Attorneys at Law, Montgomery, Alabama, to file this bill and to prosecute the same, and that said firm is entitled to the payment of a reasonable fee from the common estate for service rendered to the common estate.

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays that the said Grace Scott, Tom Scott, Mary Belle Scott Franklin, John Watts Scott, Elizabeth Gaston Scott, a minor, Stephen Kyle Scott, a minor, Marguerita W. Scott, a minor, T. J. Scott, Mary Adelaide Pierrepont, Alva Scott Garfield, Taylor S. Gay, Dorothy Gay Fullerton, Lois Gay Chandler, and William David Gay, be made parties Respondent to this her bill of complaint, and that the process of this Court be issued and served upon each of them as required by law, and upon Madeline G. Scott as the mother and person in charge of the said minor children, namely, Stephen Kyle Scott and Marguerita W. Scott, and upon Elizabeth Z. Scott as the mother and person in charge of the said minor child, namely, Elizabeth Gaston Scott, to the end that said Respondents may be brought into this Court and be required to plead, answer or demur to this bill of complaint in the time and in the manner provided by law and in accordance with the rules of this Court; that a guardian ad litem be appointed in due time to represent the interests of said minor children at the hearing of this cause.

And Complainant further prays that this Court upon hearing shall ascertain and declare the rights, titles and interests of each of the parties to this suit and to give judgment according to the rights of the parties.

And Complainant further prays that this Court will order

adjudge and decree that a partition of the foregoing described property shall be made in accordance with the interests of the joint owners or tenants in common as specified in this bill of complaint. And your Complainant further prays for such other, further and different relief to which she may in equity and good conscience be entitled and which this Court may deem necessary and proper in the premises. Complainant further prays that the Court will order, adjudge and decree that her Attorneys, Knabe and Nachman, Attorneys at Law, Montgomery, Alabama, be awarded a reasonable attorney's fee and that the same be ordered, adjudged and decreed payable out of the common estate for services rendered to the common estate. And in duty bound, your Complainant will ever pray, etc.

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KNABE AND NACHMAN BY Solicitors for Complainant	Mancy Scott Ben	Scory ton, Compla	
STATE OF ALABAMA) MONTGOMERY COUNTY)			e de la companya de l
Before me, Gloria	J. Elder	, a	Notary
Public in and for said State at	Large, personal	ly appeared	Nancy
Scott Benton, who is known to me	, who being dul	y sworn, de	poses on
oath and says as follows:			
That the foregoing bil	ll of complaint ·	was prepare	d under

That the foregoing bill of complaint was prepared under her direction; that she has read the foregoing bill of complaint, and that the statements therein made are true and correct.

Mancy Scott Benton
Nancy Scott Benton

SWORN TO AND SUBSCRIBED before me this <u>lst</u> day of June, 1957.

Notary Public in and for the State of Alabama at Large

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The State of Alabama, (· · · · · · · · · · · · · · · · · · ·	t Court, Baldwin	County
Baldwin County. No.	4048		
<i>)</i>			TERM, 19
TO ANY SHERIFF OF THE STATE OF	ALABAMA:		
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You Are Hereby Commanded to Summon	GRACE SCOTT	ET AL	
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o appear and plead, answer or demur, within	thirty days from the	service hereof, to th	e complaint filed
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the Circuit Court of Baldwin County, State of GRACE SCOTT ET AL. NANCY SCOTT BENTON	thirty days from the Alabama, at Bay Mi	nette, against	, Defendant
to appear and plead, answer or demur, within the Circuit Court of Baldwin County, State of GRACE SCOTT ET AL. ON NANCY SCOTT BENTON Witness my hand this 10th da	thirty days from the Alabama, at Bay Mi	nette, against	, Defendant

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The State of Alabama Baldwin County	
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Plaintiff's Attorney	Sheriff
Defendant's Attorney	Deputy Sheriff

NANCY SO	COTT BENTON,)		
VS.	Complainant,)	IN THE CIRCUIT COURT OF	
V.D. ★)	BALDWIN COUNTY, ALABAMA	
GRACE SO	COTT, ET AL,)	IN EQUITY NO. 4048	
ħ	lespondents.)		

DECREE DISMISSING CAUSE

This cause coming on to be heard on this date, being the date heretofore set by the rules of this court for the calling of the equity docket thereof, and it appearing to the court that at the time this suit was filed there was pending in this court a case in which Taylor Scott Gay, as Executor of the Estate of Mary Belle Scott Gay, also known as Mary Belle Gay, Deceased, was complainant, and John Watts Scott, et al, were respondents, which was a proceeding involving the same parties and the same property as this suit, because of all of which this suit should be dismissed; upon consideration of all of which it is, therefore, ORDERED, ADJUDGED AND DECREED by the court as follows:

- 1. This cause shall be and it is hereby dismissed.
- 2. The costs of this proceeding are hereby taxed against the complainant, for which execution may issue.

ORDERED, ADJUDGED AND DECREED on this the 16th day of July, 1957.

Thebers mittee

NANCY SCOTT BENTON,

VS.

Complainant,

GRACE SCOTT, ET AL,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 4048

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and William David Gay

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TO THE HOPOMBLE JUNGES OF THE CIRCUIT COURT OF EALLWIN COUNTY, STITLES IN EQUILY:

fully shows unto the Court as follows:

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Grace Scott.

Votans Club. Nobilo. Alabama

Ton Scott.

4815 25th Road, North, Arlianton, Va.

Mary Belle Scott Franklin, Rt. 2, Don 202, Ft. Myors, Florida

John Watts Scott,

Rt. 1, Box 45, Jemison, Alabama

Lizabeth Caston Scott, a minor, is in the core, custody and control of her mether, Elizabeth 2. Scott, Son 444, Tusingas, Alabam;

Scoples Kyle Scott and Margaerite W. Scott, minors, are in the care, custody and control of their mother, Madeleina G. Scott, in Pairhope, Alabama;

T. J. Scott, Scottswood Farm, Madison, N. L.

Mary Adelaide Pierrupost, Doz 4, Ridgefield, Coms.

Alva Scott Carfield, #3 Masthorne Lane, Concord, Mass.

Taylor S. Gay, c/o Fallips Petroleum Company, 80 Drosdawy, Now York S. N. T.

William David Cay, 1019 Potroleum Building, Tulse, Oale.

Derothy Gay Fullerton, E.F.D. 1, Vinna, Virginia or C/o The Knitting Comer Tarns, 520 North Emodolph, Arlington, Virginia

Lois Cay Chambier (Are. Hazen Chambler) Chicago, Illinois

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Lot Two of Section Eightoen in Township Nine South of Sange Five Rest of the St. Stephens Maridian, Lisbana, containing one hundred sixty acres and fifty-nine hundredths of an acre.

3. The parties hereto one the above described property in the following multipled interprets:

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- 4. Your Complainant further alleged that a partition among the joint consens or tenants in common in accordance with the foregoing fractional charge will be to the inverses of all of said parties.
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WELLIUR, 188 PRINCIPL CONSTRARD, your Completence prays that the said Grace Scott, Ion Scott, Mary Ballo Scott Franklin, John Watte Scott, Elizabeth Costen Scott, a minor, Staphen Nyle Scott, e minor, Marguerita W. Scott, & minor, T. J. Scott, Mary Adelaide Pierrepont, Alva Scott Garfield, Taylor S. Cay, Dorothy Cay Fellorton, Lois Cay Committee, and William David Cay, he made parties Respondent to this best bill of completes, and their the process of this Court be issued and served upon each of them as required by law, and upon Madeline G. Scott as the mother and person is charge of the said winer children, nowly, Stephen Kyle Scott and Margnerite V. Scott, and upon Elizaboth 2. Scott as the nother and person in charge of the said minor child, namely, Elizabeth Gaston Scott, to the end that said Respondonts may be brought into this Court and be required to plead, enough or denue to this bill of complaint in the time and in the number provided by law and in assordance with the rules of this Court; that a Cuerdies od litem to appointed in the time to represent the interests of said minor children at the bouring of this cause.

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June 17.

The State of Alabama,		uit Court, Baldwin C	•
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Defenda	int's Attorney						176	eputy Sheriff

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Grace Scott, Tom Scott,
Mary Belle Scott Franklin,
John Watts Scott, Elizabeth Gaston
Scott, a minor,
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TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY, SITTING IN EQUITY:

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MO.

Comes your Complainant, Nancy Scott Renton, and respectfully shows unto the Court as follows:

1. That she is over the age of twenty-one years and is a bona fide resident citizen of Calhoun County, Alabama; that the Respondents, Grace Scott, Tom Scott, Mary Belle Scott Franklin, John Watts Scott, T. J. Scott, Mary Adelaide Pierrepont, Alva Scott Garfield, Taylor S. Gay, Dorothy Gay Fullerton, William David Gay, and Lois Gay Chandler, are each over the age of twenty-one years; that Respondent, Stephen Kyle Scott is a minor slightly over fourteen years of age; Respondent, Marguerita W. Scott is a minor approximately twelve years of age; and Respondent, Elizabeth Gaston Scott is a minor approximately six years of age; and their places of residence are as follows:

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2. Your Complainant further alleges that she and the shove named respondents are joint owners or tenants in common of the following described property situated in the County of Baldwin, State of Alabama:

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Lois Gay Chandler

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