

552

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

Damon C. Gresham,

of Baldwin 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 Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by ~~James Cross~~ Cross,

Mery Emmons Gresham,

against said Damon C. Gresham,

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, T. W. Richerson, Register of said Circuit Court, this 25th day of January 1926.

*T. W. Richerson* Register.

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

*Original*

SERVE ON \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity.

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

SUMMONS

Damon C. Gresham,

vs.

Mary Emmons Gresham,  
Respondent &  
Cross Complainant

*Serve Copy on Stone  
v Stone Atty for  
Damon C. Gresham*

Hybart. Hare & Dickey  
Solicitor for <sup>Cross</sup> Complainant

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

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

day of \_\_\_\_\_ 192\_\_\_\_\_

Sheriff.

Executed this *26<sup>th</sup>* day of  
*January* 192*6*

by leaving a copy of the within Summons with  
*J. S. Stone Atty*  
*for Plaintiff* Defendant.

*W. R. Stewart*  
Sheriff.

By \_\_\_\_\_ Deputy Sheriff.

RECORDED

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 Mary J. Gresham,

of Conecuh 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 Summons, and there to answer, plead or demur, without oath, to a <sup>amended</sup> Bill of Complaint lately exhibited by

Daymon C. Gresham,

against said

Mary J. Gresham.

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, T. W. Richerson, Register of said Circuit Court, this 11th day of March, 1926

T. W. Richerson Register.

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

3/ Original on  
Answered Complaint

SERVE ON  
Circuit Court of Baldwin County  
In Equity.

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

SUMMONS

Daymon C. Gresham

vs.

Mary J. Gresham.

Conceuk Co.

Stone & Stone.

Solicitor for Complainant

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

GO Dickey atty  
for Draft

RECORDED

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this \_\_\_\_\_  
day of \_\_\_\_\_ 192\_\_

Sheriff.

Executed this Thy 22 day of  
March 1926

by leaving a copy of the within Summons with  
Geo. Kieley the  
Defendants Defendant.

attorney  
W. M. Boyfield Sheriff.

By \_\_\_\_\_  
Deputy Sheriff.

RECORDED

vs.

*Maxwellan Dubson*  
*et - al*

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

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

*pleadings & decess process*  
*Testimony of J K Mc Cleve Miss Helen Graham*  
*Miss Helen Smith*

and in behalf of Defendant upon -----

*G. W. McCremon*

Register.

DAYMON C. GRESHAM )  
 )  
 -vs- )  
 )  
 MARY EMMONS GRESHAM. )

STATE OF ALABAMA. BALDWIN COUNTY.  
CIRCUIT COURT-EQUITY SIDE.

ORIGINAL BILL FOR DIVORCE FOR ABANDONMENT.

TO THE HON. JOHN D. LEIGH, JUDGE OF THE TWENTY-FIRST  
JUDICIAL CIRCUIT SITTING IN EQUITY:

Your Orator, Daymon C. Gresham respectfully represents unto your Honor that he is over the age of 21 years and is now and has been for more than three years next immediately proceeding the filing of this complaint for divorce a bona fide resident of Baldwin County, State of Alabama, residing near Rabon in said county and state and brings this complaint against Mary Emmons Gresham, who is over the age of 21 years who resides at present in ~~Con-~~<sup>Con-</sup>ecuh county near Waubeek. Complainant alleges that he and the said Mary Emmons Gresham were married on 20th of February, 1909 and that they lived together as man and wife until the month of February, 1923, when she voluntarily abandoned complainant while living at Rabon, Baldwin County, Alabama and that she has never since returned to him. That of said marriage were born the following children; Ruth Gresham a girl 13 years of age, Claude Gresham, a boy 15 years of age and Evie Mae Gresham a girl 9 years of age. That complainant is amply able to care for and support said children and is a fit and proper person to have the care of the same.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, complainant prays the court that such orders be made and process issued which will make the said Mary Emmons Gresham respondent to this Bill of Complaint and that she be required to plead, answer or demur within the time allowed by law.

PRAYER FOR RELIEF.

Complainant prays that upon the final hearing of this cause that your Honor will grant unto him a divorce from the bonds of matrimony from the said Mary Emmons Gresham, that he be permitted to again re-marry and that the custody of said children, Claude Gresham, Ruth Gresham and Evie Mae Gresham be awarded to him and he will in duty bound ever pray, etc.

*Daymon C. Gresham*  
\_\_\_\_\_  
STONE & STONE,  
Solicitors for Complainant.

FOOT NOTE: The Respondent is required to answer each and every paragraph of the above bill of complaint from one to three inclusive but not under oath as oath to same is expressly waived.

*Daymon C. Gresham*  
\_\_\_\_\_  
STONE & STONE,  
Solicitors for Complainant.

1st  
W. H. ...  
...  
...  
...  
...

Original Bill

Filed  
Dec 31 1928

J. W. Richardson  
Register

RECORDED

HELEN GRAHAM,

Complainant

No. .... vs.

Lots 19 and 20, etc.,

Mary Brue, et al.,

Defendants.

BALDWIN

Circuit Court of Mobile County

Bay Minette, Alabama

IN EQUITY

In this cause Complainant, by her Solicitor, presents the Certificate of the Register showing that publication has been properly made and perfected against the Defendants: against the lands described in the Bill of Complaint, viz:

Lots 19 and 20 in a plat of lots surveyed by Gavin B. Yuille, Jr., on lands belonging to Cyrus Sibley, Esq., in Township 5 South, Range 2 East, which plat is recorded in Book E. page 388 of the Records of Baldwin County, Alabama;

against any and all persons other than those expressly named in the Bill of Complaint claiming any right, title or interest in said lands, and against the unknown heirs and devisees of Maximillian Dubroca, Octavia Neely, Ida Bell Mandeville, Gertrude Mandeville, Irene Dubroca, Vera Dubroca, Catherine Dubroca, Joseph Kelly and Jack Kelly

as required by law; and it appearing that more than 30 days have elapsed since the period specified in the order of publication, and that the above named defendants

have failed to appear and plead, answer or demur to the allegations of the Bill of Complaint on file, it is ordered that the same be taken as confessed against them all and each of them,

In Term Time.



Register



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**CIRCUIT COURT**  
of ~~MOBILE~~ <sup>Bay Minette</sup> ~~COUNTY~~ <sup>Mobile</sup> ALABAMA

Bay Minette, ~~Mobile~~ Alabama  
IN EQUITY

No. ....

Helen Graham,  
Complainant

VS.

lots 19 and 20, etc., and  
heirs of Maximillian Dubroca,

**Decree Pro Confesso on Publication**

*Filed Mar 29th 1926*  
*J. W. Richardson*  
*Register*

Ent. .... Page .....

HELEN GRAHAM,

Complainant

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

Lots 19 and 20, etc.,

Mary Brue, et al.,

Defendant

BALDWIN

Circuit Court of Mobile County

Bay Minnet Mobile, Alabama

IN EQUITY

In this cause, it appearing that the Defendants

Mary Brue, Corinna Brue, Wilmer Brue, Maximillian Brue, Georgia C. Brue, Fannie McCartle, Leo Brue, Adelaide Chastang, Maude Chastang, Ben Brue, Clewis Brue, Ollie Brue, Clotilde Brue, Lavanta Brue, Cleve Brue, Pauline Brue, Odile B. Thompson, Felicia Dubroca, Odile Dubroca, Floise Guizon, Anna Kelly Webster, Marcellita Dubroca,

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

In Term Time

*D. M. Peterson*

Register

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**CIRCUIT COURT**

Baldwin County  
~~MOBILE COUNTY~~  
Bay Minette, Alabama.  
~~Bay Minette, Alabama~~

IN EQUITY

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

Helen Graham,

VS.

lots 19 and 20 etc.,

Marz Brue, et al.,

**DECREE PRO CONFESSO**

*Filed Mar 29th*

*D. W. Reeves* 192 *le*  
*Register*

RECORDED

Ent. \_\_\_\_\_ Page \_\_\_\_\_

HELEN GRAHAM,

Plaintiff,

-vs-

Lots 19 and 20 in a plat of lots surveyed by Gavin B. Yuille, Jr., on lands belonging to Cyrus Sibley, Esq., in Township 5 South, Range 2 East, which plat is recorded in Book 5, page 368 of the Records of Baldwin County, Alabama; and any and all persons other than those hereinafter named or described, claiming any right, title or interest therein, and against the unknown heirs and devisees of Maximillian Dubroca, and against Mary Brue, et al.,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY.  
NO. \_\_\_\_\_

It is hereby ordered that notice of the pendency of the Bill of Complaint in the foregoing cause shall be published for four consecutive weeks in the Baldwin County Times, a newspaper having a general circulation, and published in Baldwin County, Alabama.

Dated January 7th, 1926.

*John D. Leigh*  
\_\_\_\_\_  
JUDGE.

Daymon C. Gresham

vs.

Mary J. Gresham.

In the Circuit Court of Baldwin County,  
Alabama.

IN EQUITY.

Comes the Respondent and for answer to the amendment to  
the original bill in this cause says:

1st.

Respondent denies each and every allegation contained  
in said amendment.

2nd.

Respondent denies that she has ever committed acts of  
adultery with one W. H. White.

3rd.

Respondent alleges that the true facts of the separation  
of Complainant and Respondent are as alleged in Respondents answer  
and Cross-bill to Original Bill in this cause.

4th.

Respondent alleges that she is a proper and fit person to  
have the care, custody and control of the three minor children,  
Claud Gresham, Ruth Gresham and Evie Mae Gresham and that Daymon  
C. Gresham is not a fit and proper person to have the care, custody  
and control of said minor children.

Hybart, Hare and Dickey

Attorneys for Respondent and  
Cross Complainant.

Daymon C. Gresham

vs.

Mary J. Gresham.

In the Circuit Court of Baldwin County,  
Alabama.

IN EQUITY.

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the original bill in this cause says:

1st.

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in said amendment.

2nd.

Respondent denies that she has ever committed acts of  
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C. Gresham is not a fit and proper person to have the care, custody  
and control of said minor children.

Hybart, Hare and Dickey

Attorneys for Respondent and  
Cross Complainant.

DAYMON C. GRESHAM

vs.

MARY J. GRESHAM

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT OF FLORIDA

IN AND FOR THE COUNTY OF ALACHUA

IN REPLY.

COMES THE RESPONDENT AND FOR ANSWER TO THE AMENDMENT OF PETITION

Filed this the 12th. day of April, 1926.

Register.

Answer to amendment to original Bill.

Mary J. Gresham

Daymon C. Gresham

RECORDED

RECORDED

RECORDED

the original bill in this cause says:

That

and

and

and

of having the care and control of the three minor children, namely Gresham, Mary Gresham and Daymon Gresham, and that Gresham and Daymon Gresham have the care and control of the two minor children, namely Gresham and Daymon Gresham.

HABER, HARRIS and DICKER

Attorneys for Respondent and

Complainant.

Please file.

STATE OF ALABAMA.

IN THE CIRCUIT COURT-EQUITY SIDE.

BALDWIN COUNTY.

STATE OF ALABAMA.

BALDWIN COUNTY.

DAYMON C. GRESHAM

-vs-

MARY J. GRESHAM.

AMENDMENT TO ORIGINAL BILL:

Comes the Complainant by his attorneys, Stone & Stone, and amends the original bill of complaint filed in this cause and for further grounds of complaint, complainant alleges that the respondent, Mary J. Gresham, committed adultery with one W. H. White, that the said W. H. White moved her from the domicile provided by complainant to a point near Flomaton, Alabama, on or about February, 1924 and to-wit: Thursday February, 25th., 1925, committed adultery with W. H. White and complainant has never condoned said offense and that said Mary J. Gresham is not a fit and proper person to have the care, custody and control of the three minor children, Claude Gresham, Ruth Gresham and Evie Mae Gresham.

STONE & STONE, ATTYS.

By-

*Frank Stone*



DAYMON C. GRESHAM

-vs-

MARY EMMON GRESHAM

CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA.

EQUITY SIDE.

The Answer of Daymon C. Gresham to the Cross Bill filed by the Respondent, Mary Emmon Gresham to the original Bill of Complaint filed by Daymon C. Gresham.

Complainant denies the allegations of the first, second and third paragraph of said Cross Bill and demands strict proof thereof.

*Daymon C. Gresham*

Daymon C. Gresham,

By, STONE & STONE  
His Solicitors.

Daymon C. Gresham )

vs. )

Mary Emmons Gresham. )

Circuit County of Baldwin County,

Alabama.

IN EQUITY.

Answer of the respondent to the bill of complaint  
in the above named cause:

FIRST:

Respondent admits that complainant and respondent are both over the age of twenty one years and were married to each other on the 20th. day of February, 1909, and lived together as man and wife until February, 1923. Respondent admits that she resides at present in Escambia County near Waubeek.

SECOND:

Respondent is informed and so alleges that complainant does not reside in Baldwin County, Alabama, but resides in Alexandria, Louisiana, and has resided in Alexandria, Louisiana, for the past two years.

THIRD:

Respondent denies that she voluntarily abandoned complainant, but alleges the truth to be that complainant, without fault on her part, abandoned respondent, and that for a long period before complainant and respondent separated respondent had been forced to labor for the support of herself, her three children and her husband on account of his failure to do so; that some time before the separation complainant had made life unbearable to this respondent; had committed actual violence upon her person and had threatened the life of respondent; that respondent was forced to decline complainants offer to again live with him to escape his cruel treatment and to earn a livelihood for herself and children. Respondent admits that after their separation she has not since lived with the complainant.

FOURTH:

Further answering said bill of complaint respondent  
admits that ~~she~~ <sup>three</sup> children were born to her and complainant after their marriage, and that their names and ages are substantially as set forth in said bill.

Respondent alleges that the said three children, Claud Gresham, Ruth Gresham and Evie Mae Gresham reside with her and have resided with respondent and that respondent has had the care, custody and control of said children all their lives, and that this respondent, by her work and labor, has supported maintained and cared for her three children.

She further shows that she is a woman of good moral character, thrifty and ~~vigilant~~ energetic, and, that while she is not a woman of great means, she is able, willing and anxious to have the custody, rearing and education of her three children. She further shows that it will be to their interest for her to have their custody and rearing.

She further shows that on account of his idle and thriftless life complainant has not in the past supported either her or the children and that he is not a fit or suitable person to have the custody, rearing, education and maintenance of said children.

FIFTH:

And for further answer to said bill and separately to each paragraph thereof, and by way also of cross bill, this respondent alleges:

1st.

That since their marriage and prior to their separation her husband, Daymon C. Gresham, has committed actual violence on her person which ~~were~~ was attended with danger to her life or health; that he has repeatedly made threats that he would commit violence on her person. She further alleges and charges that by reason of such conduct on the part of her husband and the threats he has made as well as his non-support of herself and children, she was forced to separate from her said husband and that from his conduct there is reasonable apprehension that her said husband will, if the opportunity is given him, commit actual violence on respondents person to such an extent as will endanger her life or health.

2nd.

That her three children, Claud Gresham, a boy 15 years of

age, Ruth Gresham, a girl 13 years of age, and Evie Mae Gresham, a girl 9 years of age, are now and have been during their entire <sup>lives</sup> ~~life~~ residing with respondent and that this respondent should retain their custody and rearing. She further shows that she is able, and willing, and that she is a suitable person to have the custody and control of her said children and the right to rear, maintain and educate them.

3rd.

She further shows that while she is willing, and, by her labor, is able to maintain and educate her said children, it is the duty of the said Daymon C. Gresham, her husband, to provide for the maintenance and support of herself and said children. She further shows that it has become necessary for her to employ solicitors to represent her in this suit for divorce and that pending this suit this Honorable Court should make an allowance for ~~her~~ support of this respondent out of the estate of her husband, the said Daymon C. Gresham, suitable to his estate and the condition in life of this respondent and the complainant.

She further shows that the Court should also, pending this suit for divorce, make an order allowing her reasonable solicitors fees to be paid her solicitors and that this Court should by proper orders and decrees, require the said Daymon C. Gresham to pay to this respondent for her support pending this suit for divorce, such allowance as may be made by this Court under the facts herein set forth and should also require him to pay to her solicitors a reasonable fee for services to be rendered this respondent pending her suit for divorce.

She further shows that on final decree she should be allowed permanent alimony out of the estate of her said husband in such sum or sums as the Court may deem right and proper.

4th.

That the said Daymon C. Gresham is over the age of twenty one years and has submitted himself to the jurisdiction of this Court.

THE PREMISES CONSIDERED, this respondent prays:

1. That the foregoing answer may be treated and taken as a cross bill and that the said Daymon C. Gresham be made party defendant thereto and required to answer the same as required by law and the rules of this Honorable Court.

2. That pending this litigation, a decree and order shall be rendered requiring and directing the said Daymon C. Gresham to pay for the support of cross complainant such a sum or sums out of his estate as may be deemed suitable and proper by the Court, and that he also be required to pay over to cross complainants solicitors a reasonable fee for services rendered and to be rendered cross complainant in this divorce suit, same to be in such amount or sum as the Court may fix and that, ~~and~~ ~~that~~ all such orders, references and decrees may be had as are necessary and proper in the premises.

3. That on final hearing of this cause, Your Honor will render a decree dissolving the bonds of matrimony existing between cross complainant and cross respondent, Daymon C. Gresham, and allowing her to marry again, and also awarding to her the custody of her said children Claud Gresham, Ruth Gresham and Evie Mae Gresham, and decreeing that the said Daymon C. Gresham shall pay to cross complainant permanent alimony in such sum or sums as the Court may order and direct.

4. Cross complainant prays for such other, further and general relief as under the facts and in equity and good conscience she may be entitled to.

Hybart, Hare and Dickey  
Solicitors for cross complainant  
Mary Emmons Gresham.

NOTE:

The respondent, Daymon C. Gresham, is required to answer the allegations contained in each paragraph of the foregoing cross bill, but not under oath answer under oath being hereby expressly waived.

Hybart, Hare and Dickey  
Solicitors for cross complainant  
Mary Emmons Gresham.

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

Your oratrix, Helen Graham, of the City and County of Mobile, State of Alabama, who is over the age of twenty-one years, respectfully exhibits this her bill of complainant against that ~~in Baldwin County, Alabama,~~  
~~certain land described as follows:~~

Lots 19 and 20 in a plat of lots surveyed by Gavin B. Yuille, Jr., on lands belonging to Cyrus Sibley, Esq., in Township 5 South, Range 2 East, which plat is recorded in Book E. page 388 of the Records of Baldwin County, Alabama;

and any and all persons other than those hereinafter named or described, claiming any right, title or interest therein, and against the unknown heirs and devisees of Maximillian Dubroca, and against Mary Brue, Corinna Brue, Wilmer Brue, Maximillian Brue, Georgia C. Brue, Vannie McCartle, Leo Brue, Adelaide Chastang, Maud Chastang, Ben Brue, Clewis Brue, Ollie Brue, Clotilde Brue, Lavarta Brue, Cleve Brue, Pauline Brue, Odile B. Thompson, Marcellita Dubroca, Octavia Neely, Ida Belle Mandeville, Gertrude Mandeville, Irene Dubroca, Vera Dubroca, Felicia Dubroca, William Dubroca, Odile Dubroca, Eloise Guizon, Anna Kelly Webster, Joseph Kelly, Jack Kelly and Catherine Dubroca, who are believed by your oratrix to be all of the heirs and devisees of the said Maximillian Dubroca.

And humbly complainant your oratrix represents unto Your Honor as follows:-

1. That your oratrix claims to own the above described land absolutely and in fee simple, and that she is in the actual peaceable possession of the same, and has been in the actual peaceable possession of the same for more than ten years next preceding the filing of this bill. She further shows that Louisa Graham, who is the aunt of your oratrix, owned said lands in her lifetime, and that the said Louisa Graham died in February 1906, and that your oratrix was the only heir of the said Louisa Graham, and that the said Louisa Graham died intestate;

and that your oratrix has been in the actual, peaceable, exclusive, continuous possession of said lands ever since the death of the said Louisa Graham, claiming to own the same, and that the said Louisa Graham had been in the actual, peaceable, hostile, continuous, exclusive and adverse possession of said lands from 1874 up to the time of her death in 1906, as aforesaid.

2. That your oratrix and her said aunt, Louisa Graham, have paid taxes on said lands from 1874 continuously to the present time; and that no other party or parties have paid any taxes on said lands within the aforesaid period since 1874;

3. That no one except your oratrix and the said Louisa Graham has had possession of any part of said lands since 1874, and that no one claims said lands except your oratrix; the title to said lands stands upon the records of the Probate Court of Baldwin County, Alabama, in the name of Maximillian Dubroca, who is dead, and that said Maximillian Dubroca left as heirs all of the respondents hereinabove named;

4. That no suit is pending to test your oratrix's title to, interest in or right to the possession of said lands;

5. That the said Mary Brue, Corinna Brue, Wilmer Brue, Maximillian Brue, Georgia C. Brue, Vannie McCartle, Leo Brue, Adelaide Chastang, Maud Chastang, Ben Brue, Clewis Brue, Ollie Brue, Clotilde Brue, Lavarta Brue, Cleve Brue, Pauline Brue, Odile B. Thompson, Marcellita Dubroca, Octavia Neely, Ida Belle Mandeville, Gertrude Mandeville, Irene Dubroca, Vera Dubroca, Felicia Dubroca, William Dubroca, Odile Dubroca, Eloise Guizon, Anna Kelly Wewster, Joseph Kelly, Jack Kelly and Catherine Dubroca, claim or are reputed to claim some right, title or interest in or encumbrance upon said lands, and your oratrix calls upon them and each of them to set forth and specify his title, claim interest or incumbrance, and how and by what instrument the same is derived and created.

6. That your oratrix does not know whether the parties made defendant hereto claim said lands or any part thereof. Neither does your oratrix know the names or addresses of any of the heirs or devisees of the said Maximillian Dubroca, other than

as set out hereinafter. And your oratrix is informed and believes, and upon such information and belief avers that the respondents named hereinabove constitute all of the heirs and devisees of the said Maximillian Dubroca. Your oratrix further shows that she has made diligent efforts to ascertain the names and addresses of all persons having or claiming to have any right, title or interest in said land, and the names and addresses of the heirs and devisees of such persons, as at any time within ten years next preceding the filing of this bill, paid any taxes on said land or any interest therein, or who may have had possession of any part of said land or who other than your oratrix, claimed said lands, or any part thereof, or any interest therein, or if they or any of them be dead, then the names and addresses of the heirs and devisees of such deceased persons; and that in the prosecution of such efforts, your oratrix had made an abstract of the title to said land, had the public records of Baldwin County examined, corresponded with and interviewed all available persons, who were supposed to know or might have information concerning the names, ages and addresses of the heirs and devisees of the said Maximillian Dubroca.

And your oratrix prays that your Honor will establish her title to said lands and will clear up all doubts and disputes concerning the same, and that your Honor will decree the title to said land to be in your oratrix, absolutely and in fee simple; and that your Honor will decree that the respondents have no right, title or interest in or encumbrance upon said land or any part thereof. Your oratrix further prays that the Register be required to file for record a certified copy of said decree in the office of the Probate Judge of this County.

And if your oratrix has not asked for the proper relief, your oratrix further prays that she may have such other and further relief in the premises as the nature of her case shall require, and as to your Honor may seem meet.



And may it please your Honor to grant to your oratrix the writ of summons of the State of Alabama, to be directed to the said Mary Brue, Old Shell Road, Mobile, Alabama, Corinna Brue, Old Shell Road, Mobile, Ala., Wilmer Brue, Old Shell Road, Mobile, Ala., Maximillian Brue, Fischer's Alley, Mobile, Ala., Georgia C. Brue, Scott Street, Mobile, Ala., Fannie McCartle, Pillans Street, Mobile, Ala., Leo Brue, Fisher's Alley, Mobile, Alabama, Adelaide Chastang, Buck's Crossing, Mobile, Ala., Maude Chastang, Davis Avenue, Mobile, Ala., Ben Brue, Scott street, Mobile, Ala., Clewis Brue, Scott street, Mobile, Ala., Ollie Brue, Scott Street, Mobile, Ala., Clotilde Brue, Scott street, Mobile, Ala., Lavarta Brue, Scott street, Mobile, Ala., Cleve Brue, Scott street, Mobile, Ala., Pauline Brue, Marmotte street, Mobile, Ala., Odile B. Thompson, Brasil and Kennedy streets, Mobile, Ala. Felicia Dubroca, Marmotte street, Mobile, Ala., William Dubroca, Fisher's Alley, Mobile, Ala., Odile Dubroca, Fisher's Alley, Mobile, Ala., Eloise Guizon, Marmotte street, Mobile, Ala., Anna Kelly Webster, Prichard, Ala., Marcellita Dubroca, Foulminville, Ala., % Priest, thereby commanding them and every one of them, personally to appear before your Honor in this Honorable Court within thirty days from the service thereof, and then and there to answer all and singular the premises, and to stand to and abide such order and decree therein as to this Honorable Court shall seem meet; and your oratrix would further pray that your Honor direct the Register of this Court to make out and superintend the appropriate order of publication against said lands hereinabove described, and any and all persons, other than those herein named or described, claiming any right, title or interest therein, and against the unknown heirs and devisees of Maximillian Dubroca, and to the non-resident defendants Octavia Neely, Chicago, Ill., Ida Belle Mandeville, Chicago, Illinois, Gertrude Mandeville, Chicago, Illinois, Irene Dubroca, Cincinnati, Ohio, Vera Dubroca, Cincinnati, Ohio, Catherine Dubroca, Cincinnati, Ohio, Joseph Kelly, Chicago, Ill., and Jack Kelly, Chicago, Ill., commanding them and every one of them, within thirty days after the

period specified in the order of publication to appear before your Honor in this Honorable Court, and then and there to answer all and singular the premises, and to stand to and abide such order and decree therein as to this Honorable Court shall seem meet; and that your Honor will direct the Register to make out and superintend and record in the office of the Probate Judge of this County, as a lis pendens, a copy of said notice certified by said Register as being correct; and your oratrix shall ever pray, etc.

Helen L Graham.

Hoyou Mitchell  
Solicitors for Complainant.

Note: The respondents and each of them are hereby required to answer the allegations of the Bill of Complaint from paragraph one to paragraph six, inclusive, but not under oath, oath to answer being expressly waived.

Hoyou Mitchell  
Solicitors for Complainant.

STATE OF ALABAMA,

COUNTY OF MOBILE.

Before me, K. C. Cuthbert, a Notary Public in and for said County in said State, on the 4th day of January, 1926, personally appeared Helen Graham, known to me, whose name is signed to the above Bill of Complaint, and being sworn by me she stated that she had read the above bill of complaint subscribed by her, and knows the contents thereof, and that the same are true of her own knowledge, except as to matters which are therein stated to be on her information and belief, and as to those matters she is informed and believes them to be true.

Helen L. Graham

Subscribed and sworn to before me

on this 4th day of January, 1926.

K. C. Cuthbert  
Notary Public, Mobile County, Alabama.

STATE OF ALABAMA,

COUNTY OF MOBILE.

Before me, K. C. Cuthbert, a Notary Public in and for said County in said State, on the 4th day of January, 1926, personally appeared Helen Graham, the complainant in the foregoing cause, and being sworn by me stated that in her belief Octavia Neely, Ida Belle Mandeville, Gertrude Mandeville, Irene Dubroca, Vera Dubroca, Catherine Dubroca, Joseph Kelly and Jack Kelly hereinabove mentioned as respondents, are non-residents of this State, but affiant believes that their residences are as follows: Octavia Neely, Chicago, Ill., Ida Belle Mandeville, Chicago, Ill., Gertrude Mandeville, Chicago, Illinois, Irene Dubroca, Cincinnati, Ohio, Vera Dubroca, Cincinnati, Ohio, Catherine Dubroca, Cincinnati, Ohio, Joseph Kelly, Chicago, Ill., and Jack Kelly, Chicago, Ill., and that affiant believes that all of the said respondents are over the age of twenty-one years.

Helen L. Graham.

Subscribed and sworn to before me  
on this 4th day of January, 1926.

K. C. Cuthbert  
Notary Public, Mobile County, Alabama.

1st

Original Bill

Filed Jan 5<sup>th</sup> 1924  
D. W. Williams  
Register

RECORDED