

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

HELEN GRAHAM,

-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 E. page 388 of the records of Baldwin County, Alabama, said land being situated in Baldwin County, Alabama, and any and all persons, other than those herein named or described, claiming any right, title or interest therein, against the unknown heirs and devisees of Maximillian Dubroca, and against the non-resident defendants, 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, Illinois, and Jack Kelly, Chicago, Illinois.

Notice is hereby given that Helen Graham, on the 5th day of January, 1926, filed a bill of complaint in Equity in the Circuit Court of Baldwin County, Alabama, claiming to be in the actual peaceable possession under claim of right, and claiming to own absolutely and in fee simple said lands, 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 Deed Book E. page 388 of the records of Baldwin County, said lands being situated in Baldwin County, Alabama.

Complainant alleges in her bill of complaint that the title to said lands stands on the records of the Probate Court of Baldwin County, Alabama, in the name of Maximillian Dubroca, and that complainant claims title to said lands by inheritance from Louisa Graham, who died in February, 1906, and also by adverse possession of said land by said complainant.

Complainant further alleges that she has paid the taxes on said property for the last ten years next preceding the

filing of her bill of complaint, and during said time she has been in the actual peaceable possession of said land, claiming to own the same, and that during said time no one else has paid taxes thereon or been in possession thereof. Complainant further alleges that she and the said Louisa Graham under whom she claims title, have paid the taxes on said land for twenty years or more next preceeding the filing of her bill of complaint, and during said time the said Louisa Graham and Complainant, in succession, have been in the actual peaceable possession of said land, claiming to own the same, and during said time no one else has paid taxes thereon or been in possession thereof, and that the bill of complaint is filed for the purpose of establishing her title to and interest in said land, and clearing up all doubts and disputes concerning the same.

Witness my hand this 6th day of January
1926.

T. W. Richmond

Register Circuit Court of
Baldwin County, Alabama.

I hereby certify that the foregoing is a true and correct copy of the notice of the pendency of the bill of complaint in the above entitled cause, as drawn and signed by the undersigned, as Register of the Circuit Court of Baldwin County, Alabama.
Dated this 6th day of January, 1926.

T. W. Richmond

Register of the Circuit Court of
Baldwin County, Alabama.

Helen Graham

THE STATE OF ALABAMA } Office of the Judge of
BALDWIN COUNTY } the Probate Court
I, W. D. STAPLETON, Judge of said Court in and for
said County, do hereby certify that the within instrument
was filed in this office for record on the 7th
day of June 1926, at 8
o'clock A.M. and I further certify that the
same is duly recorded in Record Book No. 3848
Page 197 and duly exemplified.
Witness my hand this 13th day of June
1926
By W. D. Stapleton Judge of Probate Court

L. M. Robinson
1/9/36 8 am 100/101

HOGAN & MITCHELL

ATTORNEYS
AND COUNSELLORS-AT-LAW
FIRST NATIONAL BANK BUILDING
MOBILE, ALA.

January 7th, 1926.

Hon. T. W. Richerson,
Clerk Circuit Court,
Baldwin County, Alabama.

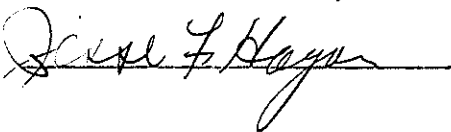
Dear Sir:

We are enclosing herewith an order signed
by Judge Leigh, directing that notice in the Graham case
be published in the Baldwin County Times.

Very truly yours,

HOGAN & MITCHELL,

By



January 14th 1926.

Hon T.W. Richardson

Register Circuit Court.

Baldwin Co.

Bayminnette. Ala.

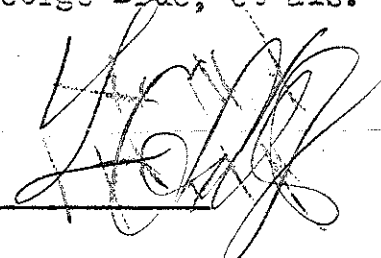
Dear Sir:

Will you please send me a copy of the original bill
in the matter of Helen Graham against George Brue, et als.

Thanking you I am,

Yours truly,

DictFKHJr/m



*Copy mailed
Jan 15th 1926
F. K. H. Jr.
Register*

JESSE F. HOGAN

WALTER MITCHELL, JR.

LAW OFFICES

HOGAN & MITCHELL

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

August 2nd, 1926.

Hon. T. W. Richerson,
Clerk Circuit Court,
Bay Minette, Alabama.

Dear Sir:

In the case of Helen Graham vs. Dubroca, et al.,
please issue a commission to Miss K. C. Cuthbert to take the
depositions of the following witnesses, viz:

J. K. McClure,

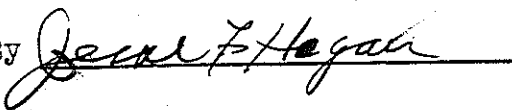
Miss Helen Graham,

Mrs. Helen Smith.

Very truly yours,

HOGAN & MITCHELL,

By



HOGAN & MITCHELL

ATTORNEYS
AND COUNSELLORS-AT-LAW
FIRST NATIONAL BANK BUILDING
MOBILE, ALA.

January 4th, 1925.

Hon. T. W. Richerson,
Clerk Circuit Court,
Baldwin County,
Bay Minette, Ala.

Dear Sir:

~~We are enclosing herewith a notice to be~~
published against the non-resident defendants in the case
of Helen Graham vs. certain lands. Before publishing
this notice, will you not please ascertain from the news-
papers in which such notices are ordinarily published, the
cost thereof, and advise us before having the notice
published. I want to keep the costs down as low as
possible.

Very truly yours,

HOGAN & MITCHELL,

BY

Jesse F. Hogan

HOGAN & MITCHELL
ATTORNEYS
AND COUNSELLORS-AT-LAW
FIRST NATIONAL BANK BUILDING
MOBILE, ALA.

January 4, 1926.

Hon. E. W. Richerson,
Clerk Circuit Court,
Bay Minette, Ala.

Dear Sir:

We have corrected some clerical errors in the
~~original bill in the case of Helen Graham vs. Maximilian~~
Dubroca. I shall be glad if you will substitute the
enclosed bill for the original bill sent to you. We are en-
closing his pendens notice and notice of publication in this
case.

With best wishes for a happy and prosperous New
Year, we beg to remain,

Very truly yours,

HOGAN & MITCHELL,

By

Jesse F. Hogan

Weldon W. ...

THE STATE OF ALABAMA } Office of the Judge of
BALDWIN COUNTY } the Probate Court
I, W. D. STAPLETON, Judge of said Court in and for
said County, do hereby certify that the within instrument
was filed in this office for record on the 7th
day of June 1926, at 6 o'clock P.M. and I further certify that the
same is duly recorded in Record Book No. 387
Page 197 and duly exemplified.
Witness my hand this 15th day of June
W. D. Stapleton Judge of Probate Court,
By _____

W. D. Stapleton

1926 June 15

HOGAN & MITCHELL

ATTORNEYS
AND COUNSELLORS-AT-LAW
FIRST NATIONAL BANK BUILDING
MOBILE, ALA.

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Baldwin County, Alabama.

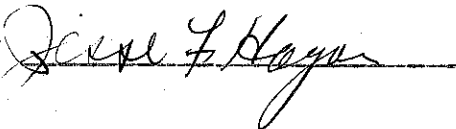
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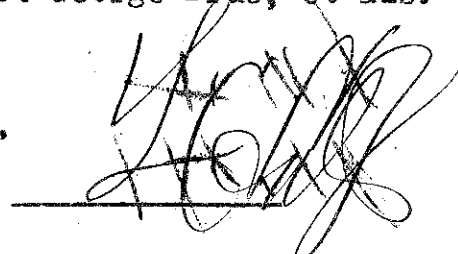
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JESSE F. HOGAN

WALTER MITCHELL, JR.

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HOGAN & MITCHELL

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

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J. K. McClure,

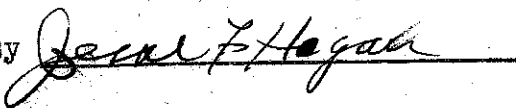
Miss Helen Graham,

Mrs. Helen Smith.

Very truly yours,

HOGAN & MITCHELL,

By



HOGAN & MITCHELL

ATTORNEYS
AND COUNSELLORS-AT-LAW
FIRST NATIONAL BANK BUILDING
MOBILE, ALA.

January 4th, 1925.

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Baldwin County,
Bay Minette, Ala.

Dear Sir:

We are enclosing herewith a notice to be published against the non-resident defendants in the case of Helen Graham vs. certain lands. Before publishing this notice, will you not please ascertain from the newspapers in which such notices are ordinarily published, the cost thereof, and advise us before having the notice published. I want to keep the costs down as low as possible.

Very truly yours,

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January 4, 1926.

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Clerk Circuit Court,
Bay Minette, Ala.

Dear Sir:

We have corrected some clerical errors in the original bill in the case of Helen Graham vs. Maximillian Dubroca. I shall be glad if you will substitute the enclosed bill for the original bill sent to you. We are enclosing lis pendens notice and notice of publication in this case.

With best wishes for a happy and prosperous New Year, we beg to remain,

Very truly yours,

HOGAN & MITCHELL,

By Jesse F. Hogan