

THE STATE OF ALABAMA,
Baldwin }
County.

No. 555.

CIRCUIT COURT, IN EQUITY.

O.M. Gordon, Complainant

vs.

Annie Beall Brown et al. Defendant

In this cause it is made to appear to the Register by the Bill of complaint,

that the Defendant's Katherine Jennings, Thomas Albert Jennings, George Wood, Jennings, ~~Henry & George & John~~, Robert Pitts Lesene, Elmer Adele Lesene, Robert Hamilton Lesene,

in the belief of affiant, infant s under the age of 21 years; and that a summons on the Bill of Complaint in this cause was served upon the parents and custodian

said infant s, on the By Register Mail Jan 16th, 1926. 19, and that as no one has been nominated by the said

to act as Guardian ad Litem for said infant; and it further appearing that

W.H. Hawkins, is in all respects a suitable person to act as Guardian ad Litem for said infant s; and having filed his consent in writing to act as such, it is now ordered by the Register that he is hereby appointed Guardian ad Litem in this cause for the said infant Defendant

Witness my hand, this 16th, day of March, 1926.

T.W. Peterson
Register.

ACCEPTANCE.

I, ~~N.C. Stone~~, *W.H. Hawkins* hereby accept the above appointment as Guardian ad Litem, and consent to act as such in the above cause.

Witness my hand, this 16th, day of March, 1926.

W.H. Hawkins
Guardian ad Litem.

Original

No. 555. Page

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

O.M. Gordon,

vs.

Annie Beall Brown,

APPOINTMENT AND ACCEPTANCE
OF GUARDIAN AD LITEM.

Filed Mar 16th, 1926 19

T.W. Peterson
Register.

~~RECORDED~~

~~RECORDED~~

Recorded in.....Record,

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

Register.

O. M. Gordon,

-vs-

Annie Beall Brown, et al.

)
) Circuit Court,

) Baldwin County, Alabama.

) In Equity.

Comes O. M. Gordon, by his attorney and Henry D. Moorer guardian ad litem for Elmer Adele Lesesne, Robert Pitts Lesesne, Robert Hamilton Lesesne, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings; that this cause be submitted to the Judge for final decree.

Richard Beecher Hall
for complainant

Henry D. Moorer
Guardian ad Litem

B

RECORDED

Filed Aug 9th 1926
T W Richmond
Register

RECORDED

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

O.M.Gordon, Complainant.

VS.

Annie Beall Brown et al. Respondent.

T.W.Richerson,

I

as Register and Commissioner

have called and caused to come before me W.D.Owens,

witness named in the Requirement for Oral Examination, on the 30th day of July,

1926, at the office of Register,

in Bay Minette, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Witness

doth depose and say as follows:

My name is W. D. Owens. I formerly owned N¹/₂ of S¹/₂ of Sec 35, Tp. 3S, R 4 E and W¹/₂ of NE¹/₄ of Sec 17, Tp. 4 S, R 4 E, Baldwin County, Alabama. I acquired this property from Owens Naval Stores Company

July 29, 1912, and owned these lands continuously until the latter part of the year 1925 when I sold these lands to the complainant O. M. Gordon. I was in continuous adverse possession of these lands from the date of my purchase until the date of my said sale. I turpentin- ed and timbered these lands continuously during the whole of said time. Immediately upon my sale to Mr. Gordon he went into possession of said lands and has remained in continuously continuous possession of said lands to this date. These lands were originally owned by Mr. R. H. Lesesne, C. H. Lesesne, T. A. Jennings and F. L. Dusenburry, and in sell- ing these lands on the dissolution of of the partnership they conveyed the lands to C. B. Ferdon who sold to Owens Naval Stores Company, and they put Ferdon into possession who upon his sale to the Company put the Company into possession. In the Deed to Ferdon the lands were erroneously described. I got deeds from Mr. ~~FERDON~~ Dusenburry and from all the Lesesnes who were of age. Mr. Gordon is over the age of twenty-one years and resides at Brewton, Alabama. Defendant Annie Beall Jennings is over the age of twenty-one years, the widow of T.A. Jennings and the mother of Thomas Albert Jennings, George Wood Jennings and Katherine Jennings, who are in her custody and reside with ~~her~~ her at Jennings Florida, Thomas Albert Jennings is 13 years old, George Wood Jennings is eight years old and Katherine Jennings is sixteen years old, and they with Mary Elizabeth Jennings, who is over the age of 21 and resides at Jennings Florida are the heirs and all the heirs of T. A. Jennings who died during the world war.

That Mary Esther Rich, Robert Pitts Lesesne, Emler Adele Lesesne, Robert Hamilton Lesesne are the children and all the heirs of R. H. Lesesne who died in the year 1922. ~~in~~ Mary Esther Rich is Over the age of twenty one years and resides at Gourdins, South Carolina, her post office address being Lanes, S. C. that Robert Hamilton Lesesne is 12 years old; Emler Adele Lesesne is 16 years old and Robert Pitts Lesesne is 18 years old and each of them reside at and are in the custody of Thornwell Orphanage, Clinton, South Caroli- na

That there is no suit pending to test ~~the~~ or try the validity of the right, title, claim, interest or demand or encumbrance of the said defendants or either of them in and to said lands.

On cross examination by Hon. H. D. Moorer, Guardian Ad litem.

the witness testified as follows :- I purchased the property described in the complaint from Owens Naval Stores Company, July, 29th 1922, at the time I purchased this property I was put in

possession of the property described in the complaint and have been in peaceable, open and notorious possession since the time of ~~purchase~~ purchase, until I sold same the later part of 1925, to O.M. Gordon, The Owens Naval Stores Co at the time of my purchase from them put me in possession of the property at the time of my purchase. The Owens Naval Stores Company was a Corporation,

At the time of the purchase, a deed was given and delivered to me, and it was the intention of the grantee to described and convey to me the property described in the complaint, but the description in the deed failed to describe the lands described in the complaint, although the property was delivered to me, and I immediately took possession, turpented it and cut timber on the land, and I have at all times up to the date of the sale to O.M. Gordon, exercised exclusive ownership, over the said property, paying taxes, on the same. There has been no adverse claim set up against the property by any ~~defendant~~ defendant mentioned in the complaint, or by any other person. I paid the purchase price in full for the said property;

O.M. Gordon the party to whom I sold has been and is still in possession, since I sold to him.

Redirect examination, :

The History of this title is as follows:

January 9th, 1906, R.H. Lesene, purchased the $S\frac{1}{2}$ & $S\frac{1}{2}$ of $N\frac{1}{2}$ Section 35, Tp 3 S R 4 E. from Holmes Sheffield and Co, ~~and~~ and on February 17th, 1906, he sold a $\frac{1}{4}$ interest each to T.A. Jennings, W.F. Hogan and C.H. Lesene,

R.H. Lesene, C.H. Lesene, and W.F. Hogan, and T.A. Jennings, composed the firm of R.H. Lesene and Co, On June 14th, 1906, they acquired from William Collen, the $NE\frac{1}{4}$ of Sec. 17, Tp 4 S. R. 4. E. On Oct. 27th, 1906, the partnership of R.H. Lesene was dissolved and T.A. Jennings took over all of the properties of the partnership, they executed a deed to him for the lands which were erroneously described as the $N\frac{1}{2}$ and the $S\frac{1}{2}$ of the $S\frac{1}{2}$ of Sec 35; and $E\frac{1}{2}$ of $E\frac{1}{2}$ of Section 17, T.A. Jennings, sold a third interest in the properties to F.L. Duesenberry, and a third to C.B. Ferdon, executing deed Nov 10th 1906, in which deeds the same mis-description appears; Oct 19th 1907, F.L. Duesberry sold his interest to T.A. Jennings and C.B. Ferdon by deed bearing the same mis-description, December 21st, 1907, T.A. Jennings sold his interest to H.A. Baria, by deed bearing the same mis-description. June 17th, 1908, H.A. Baria re-conveyed to T.A. Jennings by deed bearing the same mis-description. June 20th, 1908, T.A. Jennings sold his interest to C.B. Ferdon, conveying his interest in these lands to C.B. Ferdon, by deed bearing the same mis-description, January 15th, 1909, C.B. Ferdon sold these lands to Owens Naval Stores Company, a Corporation, by deed bearing the same mis-description. July 25th, 1922, Ferdon made a deed of correction properly describing the land, In 1925, I took the matter up with the parties in interest and they remembered the transaction I. Obtained a deed from C.H. Lesene and wife, R.H. Lesene having died, leaving the Lesenes named in the complaint as his heirs, T.A. Jennings having died leaving the Jennings ~~named~~ named in the complaint as his heirs,

The widow of R.H.Lesene, having married W.F.Hogan, they executed deeds of correction to me.

W. H. Owen

ORAL EXAMINATION.

I, T.W. Richerson,, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness and read over to him and he signed the same in the presence of myself Hon. W.C. Beebe and Hon. H.D. Moorer, at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proof made before me of the identity of said witness; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 30th, day of July, 1926.

T.W. Richerson (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

O.M. Gordon

vs. Complainant

Annie Beall, Brown et al.

Respondent

Oral Deposition

Filed July 30th, 1926.

T.W. Richerson, Register.

Recorded in

Record

Vol. _____ Page _____

Register

THE STATE OF ALABAMA,

Baldwin

County

No. 555

CIRCUIT COURT, IN EQUITY

O. M. Gordon

Complainant

vs.

Annie Bell Brown et al.

Defendant

In this cause it is made to appear to the Register by the Bill of Complaint,

that the Defendant ~~Elmer Adele Lesene, Robert Pitts Lesene,~~ Robert Hamilton Lesene, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, is

Robert Hamilton Lesene, Katherine Jennings, Thomas Albert Jennings,

George Wood Jennings,

under the age of 21 years, in the belief of affiant, infants, the age of years; and that a summons on the Bill of

Robert Hamilton Lesene, Elmer Adele Lesene, Robert Pitts Lesene,

Complaint in this cause was served upon the Defendants by registered mail in care of

Reverend Ross Lyn, President of Thornwell Orphanage, Clinton S.C.

upon Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, in care

of their mother Annie Bell Jennings, on the 18th day of January, 1926, and that as no

one has been nominated by the said Defendants,

to act as Guardian ad Litem for said infants; and it further appearing that

Hon. H. D. Moore,

is in all respects a suitable person to act as

Guardian ad Litem for said infants; and having filed his consent in writing to act as such, it is now ordered

by the Register that he is hereby appointed Guardian ad Litem in this cause for the said infants. Defendant

Witness my hand, this 8th day of July, 1926.

19 26.

ACCEPTANCE.

I, H. D. Moore,

hereby accept the above appointment as Guardian

ad Litem, and consent to act as such in the above cause.

8th day of July, 1926.

1926.

Guardian ad Litem.

[Handwritten signature]

Original

No 555. Page

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

O.M. Gordon

vs.

Annie Beall Brown et al.

APPOINTMENT AND ACCEPTANCE
OF GUARDIAN AD LITEM.

Filed July 8th, 1926.

T.W. Richardson
Register.

Recorded in Record,

Vol. Page

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 Annie Beall Brown, Mary Elizabeth
Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood
Jennings, Mary Esther Rich, Roberts Pitts Lesesne, Elmer Adele Lesesne,
and Robert Hamilton Lesene,

Non Residents, ~~to~~ 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
O. M. Gordon,

against said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings,
Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich,.....
Robert Pitts, Lesesne, Elmer Adele Lesesne, and Robert Hamilton Lesesne,

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 12th day of

January. 192 6.

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

Am Gordon

vs.

*Annie Beall Brown
et al*

Re Karby, Beeper & Hall
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this _____

day of _____ 192_____

Sheriff.

Executed this _____ day of _____

192_____

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____
Deputy Sheriff.

*Jan 12th 1926 Copy of Summons
& Copy of Complaint sent by Reg
mail to Mary Esther Beall
Mary Elizabeth Jennings, James F. Beall
Annie Beall Brown, Jennings F. Beall
& Jan 15th 1926 to Robert Hamilton, Leanne
Edwin Adelle Leanne, Robert Pitt Leanne
Also Katherine Jennings, Thomas
Albert Jennings & Geo Wood Jennings
C/o their mother*

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

Wille J. Bihler,

Joseph D. Sannerman, Ira Pittman and Holly Pittman.

of ~~non residents~~ *Walden* 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

O. H. Gordon,

against said *Wille J. Bihler, Joseph D. Sannerman, Ira Pittman and Holly Pittman,*

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 *12th* day of

January, 192*6.*

T. W. Richerson Register.

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

Copy

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

vs.

Solicitor for Complainant

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

..... 192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

Recorded in Vol. Page

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 Emilo J. Bihler,
Joseph D. Bannerman, Ira Pittman and Molly Pittman.

&& Non Residents 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 O. M. Gordon,

against said Emilo J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman,

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 12th day of January, 192

T. W. Richerson Register.

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

[Handwritten Signature]

SERVE ON.....

**Circuit Court of Baldwin County
In Equity.**

No.

SUMMONS

vs.

Solicitor for Complainant

Recorded in Vol. Page

**THE STATE OF ALABAMA,
BALDWIN COUNTY.**

Received in office this

day of 192.....

Sheriff.

Executed this day of

192.....

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

O. M. Gordon,

-vs-

Annie Beall Brown et al.

(Circuit Court,
(
(Baldwin County, Alabama.
(
(In Equity.

This cause is submitted on behalf of the complainant on original of complainant's decree pro confesso and deposition of W. D. Owens.

*And on behalf of defendants are answered
of Guardian ad litem.*

T. W. Beamon

Register in Chancery

4/11

Submission

Find any 9/11/926
T.W. Riegman
Regester

O. M. GORDON,
Complainant,

-vs-

ANNIE BEALL BROWN,
MARY ELIZABETH JENNINGS,
KATHERINE JENNINGS,
THOMAS ALBERT JENNINGS,
GEORGE WOOD JENNINGS,
MARY ESTHER RICH, ROBERT
PITTS LESESNE, ELMER
ADELE LESESNE, and
ROBERT HAMILTON LESESNE,
Defendants

Circuit Court of
Baldwin County,
Alabama

In Equity

Case No. 555

This cause coming on to be heard was submitted for final decree upon the original bill of complaint and decrees pro confesso against Annie Beall Brown, Mary Elizabeth Jennings, Mary Esther Rich, and upon answer of the guardian ad litem for Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Robert Hamilton Lesesne, Robert Pitts Lesesne and Elmer Adele Lesesne, and upon the proof as noted by the Register, and the same being considered by this court, the court is of the opinion that the complainant is entitled to the relief prayed for in his original bill of complaint.

It is therefore ordered, adjudged and decree that the said defendants, Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne and neither of them, have any right, title or interest in or claim or demand to the lands described in the original bill of complaint, to-wit:

The North half of the South half of Section 35, Township 3 South of Range 4 East;
And the West half of the Northeast quarter of Section 17, Township 4 South, Range 4 East;
Baldwin County, Alabama.

It is further ordered, adjudged and decreed by the court that the title of the said complainant, O. M. Gordon, to said property as against the said defendants and each of them be and the same is hereby quieted.

It is further ordered that the Register
record this decree in the office of the Judge
of Probate of Baldwin County, Alabama

It is further ordered and decreed that the complainant pay
the costs of this proceedings for which let execution issue.

This decree is subject to the statutes made and provided.

Done at Bay Minette, this the 9th day of August, 1926.

John D. Leigh
Judge

Final Deeree

Filed Aug 9th 1926
T. W. Richardson
Register

RECORDED

Bay Minette, Ala.,

7/17

1928

J W Richardson

Bay Minette - Ala.

IN ACCOUNT WITH

G. W. Humphries

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Deed Tax and
Mortgage Tax

Rec. Fee

Total

Deed
Rec. Mort. from

to

To Rec Deed of Mrs. Zulow vs Emil J. Butler, et al

*Cash
Mrs. Zulow
Bay Minette*

75

75

AFTER FIVE DAYS RETURN TO

T. W. RICHEISON
CLERK OF THE CIRCUIT COURT AND
REGISTER IN CHANCERY
BAY MINETTE, ALABAMA.

REGISTERED
NO. 666



*Returned
qualifier
not
here*

RETURN RECEIPT REQUESTED.

(Deliver to addressee only)
(Return receipt demanded)

Molly Pittman
~~Bay Minette~~ Fla.

FEE PAID 3 CENTS

AFTER FIVE DAYS RETURN TO

T. W. RICHEISON
CLERK OF THE CIRCUIT COURT AND
REGISTER IN CHANCERY
BAY MINETTE, ALABAMA

REGISTERED
665

*Returned
not
here*

RETURN RECEIPT REQUESTED.

(Deliver to addressee only)
(Return receipt demanded)

Ira Pittman,
~~Bay Minette~~ Fla.

FEE PAID 4 CENTS

RECEIPT FOR REGISTERED ARTICLE NO. 681

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Edwin Adelle Lescane
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 682

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Thomas Albert Jennings
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 683

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Katherine Jennings
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 684

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Robert Pitts Lescane
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

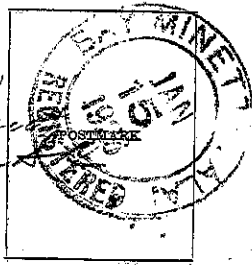
Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 685

fee paid. class postage paid. (Date) 192

From J.W. Richardson

Addressed to Robert Hamilton Lusane
to Rev. Ross Potts, Pasadena
of Thornwood Parkways, Clueta



Accepting employee will place initials in space below, indicating restricted delivery.

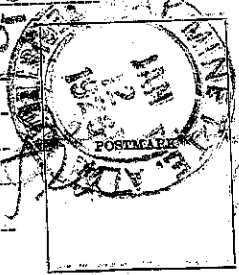
receipt fee Special delivery fee
restricted to addressee { in person _____
or order _____ Postmaster, per _____

RECEIPT FOR REGISTERED ARTICLE NO. 668

fee paid. class postage paid. (Date) 1925

From J.W. Richardson

Addressed to Mary G. ...



Accepting employee will place initials in space below, indicating restricted delivery.

receipt fee Special delivery fee
restricted to addressee { in person _____
or order _____ Postmaster, per _____

6369

PT FOR REGISTERED ARTICLE NO. 1200

fee paid. class postage paid. (Date) 12, 1926

from _____
Addressed to _____



Accepting employee will place initials in space below, indicating restricted delivery.

receipt fee _____ Special delivery fee _____
restricted to addressee { in person _____
or order _____ Postmaster, per _____

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Elma Adell Duesene
(Signature or name of addressee)

(Signature of addressee's agent)

JAN 16 1926

Date of delivery _____ 1926

Form 3511

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Robert Seaver
(Signature or name of addressee)

(Signature of addressee's agent)

1926

Date of delivery _____ 1926

Form 3511

Handwritten notes and signatures on the right side of the receipt, including a vertical signature and the date 1926.

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Kathleen Ferris
(Signature of name of addressee)

John A. Ferris
(Signature of addressee's agent)

Date of delivery _____ 192

FORM 321

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

J. Albert Ferris
(Signature of name of addressee)

John A. Ferris
(Signature of addressee's agent)

Date of delivery _____ 192

FORM 321

RETURN RECEIPT.

19128

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

J. M. Brown
(Signature of name of addressee)

J. M. Brown
(Signature of addressee's agent)

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Mary Esther Rich
(Signature or name of addressee)

(Signature of addressee's agent)

Date of delivery _____ 192

FORM 2511

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Robert W. [illegible]
(Signature or name of addressee)

(Signature of addressee's agent)

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Henry Bell Johnson
(Signature of name of addressee)
Henry Bell Johnson
(Signature of addressee's agent)

Date of delivery _____ 192

Form 3311

—111—

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Henry Bell Johnson
Henry Bell Johnson

Henry Bell Johnson
(Signature of name of addressee)
Henry Bell Johnson
(Signature of addressee's agent)

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY

R. B. Vail, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Legal Notice of

O. M. Gordon No 555

vs

Annie Beall Brown, Mary Elizabeth Jennings and others

Was published in said Newspaper for 6 consecutive weeks in the following

| | | |
|--------------------------|----------------|---------------|
| <i>January 14, 1926</i> | Vol. <u>36</u> | No. <u>50</u> |
| <i>January 20, 1926</i> | Vol. <u>36</u> | No. <u>51</u> |
| <i>January 28, 1926</i> | Vol. <u>36</u> | No. <u>52</u> |
| <i>February 4, 1926</i> | Vol. <u>37</u> | No. <u>1</u> |
| <i>February 11, 1926</i> | Vol. <u>37</u> | No. <u>2</u> |
| <i>February 18, 1926</i> | Vol. <u>37</u> | No. <u>3</u> |

the undersigned this 16th day of

1926

sworn at Court.

R. B. Vail
Publisher.

LEGAL NOTICE

The Circuit Court, Baldwin County, Alabama. In equity No. 555. This the 12th day of January, 1926.

O. M. Gordon, No. 555 vs. Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne.

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for the Complainant, that the Defendants, Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne, are non-residents of the State of Alabama, that Annie Beall Brown and Mary Elizabeth Jennings

have taken over the care of said children and reside at and near Bay Minette, Alabama. Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, whose ages are between thirteen and eight years, respectively, and they reside with and under the custody of their mother, the late Mrs. Annie Beall Brown.

Mary Elizabeth Rich is over the age of twenty-one years and resides at and near Bay Minette, Alabama. The postoffice being at South Carolina, the postoffice being at South Carolina, that Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are minors, who are between seven and thirteen years, respectively, and they reside at and are in the custody of the late Mrs. Ophelia Johnston, South Carolina, their postoffice address being at said place, in the absence of said mother, it is therefore ordered with publication, be made in the Baldwin Times, a newspaper published at Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks during the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne to answer or demur to the Bill of Complaint in this cause by the 1st day of March, 1926, or after thirty days thereafter a decree in Confesso may be taken against them.

T. W. RICHMOND

Ruckaby, Beebe and Hall, Register

Largest Weekly Circulation in South Alabama

Bay Minette, Ala., 4/1/26

M J W Richardson

ck

THE BALDWIN TIMES

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Gordon vs Brown et al #555

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R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail, being duly sworn, deposes and says that he is
the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Was published in said Newspaper for 4 consecutive weeks in the following

| | | |
|----------------------|----------------|---------------|
| <u>Jan 14 - 1926</u> | Vol. <u>36</u> | No. <u>50</u> |
| <u>Jan 21 - 1926</u> | Vol. <u>36</u> | No. <u>51</u> |
| <u>Jan 28 - 1926</u> | Vol. <u>36</u> | No. <u>52</u> |
| <u>Feb 4 - 1926</u> | Vol. <u>37</u> | No. <u>1</u> |

he undersigned this 7th day of Feb 1926

R. B. Vail
Publisher.

LEGAL NOTICE

The Circuit Court, Baldwin County, Alabama, in equity No. 555, this the 12th day of January, 1926

Owen Gordon, No. 555 vs. Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for the Complainant, that the Defendants Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama; that Annie Beall Brown and Mary Elizabeth Jennings are each over the age of twenty-one years and reside at and their Post Office address is Jennings, Florida; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, whose ages are sixteen, thirteen and eight years, respectively, and they reside with and are in the custody of their mother the aforesaid Annie Beall Brown; that Mary Elizabeth Rich is over the age of twenty-one years and resides at and their Post Office address is Gordon, Washington County, Alabama; that Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama and their ages are nineteen, seven and thirteen years, respectively, and they reside at and are in the custody of the Thornwell Orphanage, Office address being at said place, in care of said orphanage, it is therefore ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks requiring the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne to answer or demur to the Bill of Complaint in this cause by the 15th day of February, 1926, or after thirty days therefrom a decree Pro Confesso may be taken against them.

T. W. RICHMOND,
Rickarby Beebe and Hall Register

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes O. M. Gordon and humbly complaining
against Annie Beall Brown, Mary Elizabeth Jennings, Katherine
Jennings, Thomas Albert Jennings, George Wood Jennings, Mary
Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, and Robert
Hamilton Lesesne, respectfully shows unto Your Honor as follows:

FIRST

That your complainant is over the age of
twenty-one years, and resides in Escambia County, Alabama;

That Annie Beall Brown was formerly the wife
of T. A. Jennings, and is over the age of twenty-one years; that
Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jen-
nings and George Wood Jennings are the children of T. A. Jennings;
that the said T. A. Jennings is dead; that the said Annie Beall
Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert
Jennings and George Wood Jennings are all of the heirs of said
T. A. Jennings; that the said Annie Beall Brown is over the

age of twentyone years; that Mary Elizabeth Jennings is over the age of twentyone years; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, ages sixteen, thirteen and eight years respectively; that the said Annie Beall Brown is a resident of Jennings, Florida; that Mary Elizabeth Jennings is also a resident of Jennings, Florida; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are also residents of Jennings, Florida, and reside with, and are in the custody of their mother, the said Annie Beall Brown; that Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, Robert Hamilton Lesesne are the children of R. H. Lesesne; that the said R. H. Lesesne died intestate, in the state of South Carolina, prior to June 18th, 1922; that his widow, Sallie A. Lesesne, who afterwards married one W. F. Hogan, died on June 18th, 1922; that the aforesaid Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, Robert Hamilton Lesesne are the children of and all of the heirs of the said R. H. Lesesne, deceased; that the said Mary Esther Rich is over the age of twentyone years, and resides at Gourdins, Williamsburg County, South Carolina, her post office address being Lanes, South Carolina; that Robert Pitts Lesesne was seventeen years of age on December 13th, 1924; that Elmer Adele Lesesne was fifteen years old December 5th, 1924; that Robert Hamilton Lesesne was eleven years of age August 6th, 1924; that the said Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are in the Thornwell

Orphanage, Clinton, South Carolina, and are in the custody of Reverend L. Ross Lynn, president of Thornwell Orphanage, Clinton, South Carolina; that the post office addresses of the aforesaid defendants are the same, as their residence, except as otherwise alleged above;

SECOND.

That your complainant is the owner of, and is in the peaceable possession of, the following described lands, situated in the County of Baldwin, to-wit:

N $\frac{1}{2}$ of the S $\frac{1}{2}$ Section Thirtyfive, T. 5 S., R. 4 E., and the W $\frac{1}{2}$ of the NE $\frac{1}{4}$ Section Seventeen, T. 4 S., R. 4 E.;

THIRD.

That the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne each claims or is reputed to claim some right, title, claim, interest or demand in, or encumbrance upon the aforesaid lands, or some part thereof; that there is no suit pending in any court to try or test the validity of the right, title, claim, interest or demand in, or encumbrance of the aforesaid defendants in and to the aforesaid lands;

FOURTH.

Wherefore your complainant calls upon the aforesaid defendants and each of them to set

forth and specify what right, title, interest, claim or demand in, or encumbrance upon, the aforesaid lands he or she has, or claims, and how and by what instrument or instruments or in what manner the said right, title, interest, claim or demand in, or encumbrance upon said lands is created or derived.

WHEREFORE, your complainant prays that the aforesaid Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, Robert Hamilton Lesesne, be made party defendants to this bill of complaint, and by appropriate process of this court be required to plead, answer or demur hereto, within the time and under the usual penalties prescribed by law and under the practice of this honorable court.

And your complainant further prays that, upon the final hearing of this cause, this court will make and enter a decree, adjudging that the aforesaid defendants, and each of them, have no right, title, interest, claim or demand in or to, or encumbrance upon the aforesaid lands, or any part thereof; and that the title to said lands be quieted and established in your complainant against the aforesaid defendants and each of them.

And your complainant prays for such other, further and different relief, as in equity he

shall be entitled to receive.

Richard Beebe Hall
Solicitors for complainant.

Each of the defendants named in the foregoing bill of complaint is required to answer all of the allegations therein contained, paragraphs ONE to FOUR inclusive, but not under oath, oath being hereby expressly waived.

Richard Beebe Hall
Solicitors for complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned notary public in and for said county and state, this day personally appeared W. O. Beebe, who being by me duly sworn, deposes and says that he is of counsel for the complainant in the foregoing bill of complaint, and that as counsel for said complainant, he has made diligent inquiries to ascertain the names, ages and post office addresses of the heirs and devisees of T. A. Jennings, who was the same person as Thomas Albert Jennings; and of R. H. Lesesne, who was the same person as Robert H. Lesesne; and who were formerly in the turpentine business together, associated with C. H. Lesesne and W. F. Kogan, under the firm name of R. H. Lesesne & Company, operating in Baldwin County, Alabama, during the year 1906; that the said T. A. Jennings and R. H. Lesesne are both dead; that he has inquired with reference to the heirs of the said T. A. Jennings, of various persons in Pensacola, Florida, the place of the residence of said T. A. Jennings, including his former business associates, who are now operating

Lurton Company of Pensacola; that he inquired of Annie Beall Brown, his former wife, who was during the lifetime of said T. A. Jennings, known as Annie Beall Jennings, and who after his death married one L. S. Brown; that he has made a diligent search of the records of Baldwin County, Alabama, and of the records of Pensacola, Florida, and that he was informed by those from whom he inquired, and also ascertained from the records of the County Court of Escambia County, Florida, at Pensacola, Florida, the same being the court of Probate of Escambia County, Florida; that the heirs of said T. A. Jennings are the persons named in the foregoing bill of complaint; that the said T. A. Jennings left a last will and testament, duly admitted to Probate, and record, in said court, as will operate on the record and minutes thereof, in which will the aforesaid lands were not specifically devised, and that Annie Beall Jennings, his wife, Mary Elizabeth Jennings, Katherine Jennings and Thomas Albert Jennings are named as residuary devisees;

That in his search for the heirs of the said R. H. Lesesne, he made inquiries of various persons in Pensacola, namely Mr. H. A. Lurton, W. H. Knowles, and F. L. Dusenbury, now of New Orleans, Louisiana, who owned the turpentine business, formerly operated by the said R. H. Lesesne & Company; that he made a diligent search of the records of Baldwin County, Alabama, and of Escambia County, Florida, and that he made inquiry through his associate counsel in this case,

E. G. Rickarby, Esq., of the only persons known to him to bear the name Lesesne, namely the Lesesnes of Mobile; that he also made inquiry of various persons living in the vicinity of the lands described in said bill; that he made inquiry of all of the officers at the court of Baldwin County, Alabama; that he searched the tax records and the list of the post office addresses of the tax payers, as kept by the tax officers of that county; that from the aforesaid search, he learned that the said R. H. Lesesne had lived in this county only a short while, having come from Williamsburg County, South Carolina; that he inquired of attorneys of Kingstree, the county seat of said county, namely Messrs. Lee & Shuler, and through them ascertained that they had known the said R. H. Lesesne, and also his brother, C. H. Lesesne, who was associated with him for many years, and had been counsel for them, and that the said R. H. Lesesne was dead, that he died intestate prior to June 18th, 1922, and that his widow, Sallie A. Lesesne, who afterwards married W. F. Hogan, died on June 18th, 1922, and that the heirs of the aforesaid Robert H. Lesesne were as named in the aforesaid bill of complaint, and that their post office addresses were as named therein.

The said attorneys, Messrs. Lee & Shuler, reported by various correspondence, that they had personally interviewed said C. H. Lesesne, and had examined the probate records of Williamsburg County,

South Carolina, and that the persons named in the
aforesaid bill of complaint as the heirs of R. H. Lesesne
were shown by the said records to be his heirs, and all
of his heirs, and that the said C. H. Lesesne advised
him that they were his heirs, and all of his heirs.

Affiant further says that he has made
inquiry from various persons and various sources, not
named above, but which are omitted from this affi-
davit, because his inquiries from such sources were of
a negative character.

W. C. Beebe

Sworn to and subscribed before me, this 7th day
of January 1926.

Charles Oscar

Notary Public, Baldwin County, Alabama.

TO THE HONORABLE JOHN D. LEE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING;

James O. E. Gordon and humbly complaining against Hulle J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman, respectfully shows unto your Honor as follows:

FIRST

Your complainant is over the age of twenty one years and a resident of Escambia County, Alabama; that Hulle J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman are each over the age of twenty one years; that your complainant has made due diligent search and inquiry to ascertain their place of residence and Post Office address; that the place of residence of Hulle J. Bihler is Chicago, Illinois; that he has been unable upon diligent inquiry to ascertain a more particular address and that he has made diligent inquiry to ascertain the same; that he is informed and believes that the place of residence and Post Office address of Ira Pittman and Molly Pittman is Bagdad, Florida; that he has been informed and believes that the place of residence and Post Office address of Joseph D. Bannerman is Panama, Florida; and upon such information and belief alleges that Ira Pittman and Molly Pittman are residents of and their Post Office address is Bagdad, Florida, and that Joseph D. Bannerman is a resident of and his Post Office address is Panama, Florida.

SECOND

That your complainant is the owner of, and is in the peaceable possession of, the following described lands, situated in the County of Baldwin, State of Alabama, to-wit:

Southwest quarter of Section Twelve, Township Six South, Range Five East, and the Southeast quarter of the Northwest quarter, the Northeast quarter of the Southwest quarter, and the West half of the Southeast quarter of Section Twenty-four, Township Four South, Range Five East.

THIRD

That the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman each claim, or is reputed to claim some right, title, claim, interest or demand in, or encumbrance upon the aforesaid lands, or some part thereof; that there is no suit pending in any court to try or test the validity of the right, title, claim, interest or demand in, or encumbrance of the aforesaid defendants in and to the aforesaid lands;

FOURTH

Wherefore your complainant calls upon the aforesaid defendants and each of them to set forth and specify what right, title, interest, claim or demand in, or encumbrance upon, the aforesaid land he or she has, or claims, and how and by what instrument or instruments or in what manner the said right, title, interest, claim or demand in, or encumbrance upon said lands is created or derived.

WHEREFORE, your complainant prays that the aforesaid Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman be made party defendants to this bill of complaint, and by appropriate process of this court be required to plead, answer or demur hereto, within the time and under the usual penalties prescribed by law and under the practice of this honorable court.

And your complainant further prays that, upon the final hearing of this cause, this court will make and enter a decree, adjudging that the aforesaid defendants, and each of them, have no right, title, interest, claim, or demand in or to, or encumbrance upon the aforesaid lands, or any part thereof; and that the title to said lands be quieted and established in your complainant against the aforesaid defendants and each of them.

And your complainant prays for such other, further and different relief, as in equity he shall be entitled to receive.

Richard Beebe
Solicitors for complainant

Each of the defendants named in the foregoing bill of complaint is required to answer all of the allegations therein contained, Paragraphs ONE to FOUR inclusive, but not under oath, oath being hereby expressly waived.

Richard Beebe & Hall
Solicitors for complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Charles Oscar, the undersigned Notary Public, this day personally appeared W. C. Beobe, who being by me duly sworn, deposes and says that he is counsel for O. E. Gordon in that suit to quiet title, filed in the Circuit Court of Baldwin County, Alabama, in equity, by O. E. Gordon, against Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as such attorney and agent for the said O. E. Gordon, he has made diligent inquiry to ascertain the place of residence and Post Office address of the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as to the said Emile J. Bihler he has inquired of the lawyers of Bay Minette; that he has made a search of the records of Baldwin County, Alabama; that he has inquired of the Tax Officers of said county; that he has examined the tax records of said county; that he has made inquiry of the Probate Judge of said county; that he had made inquiry of various persons, old residents in Baldwin County, Alabama; that he has been informed by the persons from whom he has inquired that said Emile J. Bihler is a resident of Chicago, Illinois, that he has been unable to ascertain from such inquiry the Post Office address of said Emile J. Bihler except Chicago, Illinois; and as to the said Joseph D. Bannerman, Ira Pittman and Molly Pittman, he has made inquiries of Stanley Waters, H. W. Waters and E. M. Waters, each of whom are residents of Gateswood, Alabama, near the land involved in this suit, and have resided there for many years; that he has examined the tax records and the Probate records in Baldwin County, Alabama; that he has made inquiry of the tax officers and of the Probate Judge of Baldwin County, Alabama, and of the various practicing attorneys and old residents of Bay Minette, Alabama, and of other old residents at Gateswood, Alabama, inquiring as to the present Post Office address and place of residence of the said Joseph D. Bannerman, Ira Pittman and Molly Pittman; that he has made inquiry in the city of Mobile of various persons, particularly of Dr. Joseph D. Trammell, who at one time owned those lands described

as being in Section Twenty four, Township Four South, Range Five East, Baldwin County, Alabama; that he had inquired of various persons in the city of Pensacola, Florida; namely, one Molly Pittman, resident at 105 Romana Street, and of Charles L. Bannerman, 1222 East Gadsden Street, and that none of the aforesaid persons knew of the present whereabouts of Ira Pittman and Molly Pittman except E. W. Waters, who informed him that they are residents of and their Post Office address is Bagdad, Florida; that the said Charles L. Bannerman claimed to the affiant that he was the son of Joseph D. Bannerman; and that the said Joseph D. Bannerman was now residing at and his Post Office address is Panama, Florida.

W. C. Rube

Sworn to and subscribed to before me, this the 27 day of
January, 1926.

Orsola Oscar
Notary Public
Baldwin County, Alabama

Owen Gordon

vs.

Annie Beall Brown, Mary
Elizabeth Jennings, Katherine
Jennings, Thomas Albert Jennings,
George Wood Jennings, Mary Esther
Rich, Robert Pitts Lesesne, Elmer
Adele Lesesne and Robert Hamilton
Lesesne.

The Circuit Court, Baldwin County,

Alabama. In equity. § 555.

This the 12th day of January, 1926.

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for the Complainant, that the Defendants Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama; that Annie Beall Brown and Mary Elizabeth Jennings are each over the age of twenty-one years and reside at, and their Post Office address is Jennings, Florida; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, whose ages are sixteen, thirteen and eight years, respectively, and they reside with and are in the custody of their mother the aforesaid Annie Beall Brown; that Mary Elizabeth Rich is over the age of twenty-one years and resides at and her Post Office address is Courdine, Williamsburg County, South Carolina, her Post Office being Lanes, South Carolina; that Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are minors whose ages are nineteen, seventeen and thirteen years, respectively, and they reside at and are in the custody of the Thoruwell Orphanage, Clinton, South Carolina, their Post Office address being at said place, in care of said orphanage; it is therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne to answer or demur to the Bill of Complaint in this cause by the 13 day of February 1926, or after thirty days therefrom a decree Pro Confesso may be taken against them.

TO THE HONORABLE JOHN D. LEE, JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY SITTING;

Comes O. M. Gordon and humbly complaining against Emile J.
Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman, respectfully
shows unto your Honor as follows;

FIRST

Your complainant is over the age of twenty one years and a
resident of Escambia County, Alabama; that Emile J. Bihler, Joseph
D. Bannerman, Ira Pittman and Molly Pittman are each over the age of
twenty one years; that your complainant has made due diligent search
and inquiry to ascertain their place of residence and Post Office
address; that the place of residence of Emile J. Bihler is Chicago,
Illinois; that he has been unable upon diligent inquiry to ascertain
a more particular address and that he has made diligent inquiry to
ascertain the same; that he is informed and believes that the place of
residence and Post Office address of Ira Pittman and Molly Pittman is
Bagdad, Florida; that he has been informed and believes that the place
of residence and Post Office address of Joseph D. Bannerman is Panama,
Florida; and upon such information and belief alleges that Ira Pittman
and Molly Pittman are residents of and their Post Office address is
Bagdad, Florida, and that Joseph D. Bannerman is a resident of and his
Post Office address is Panama, Florida.

SECOND

That your complainant is the owner of, and is in the peaceable
possession of, the following described lands, situated in the County of
Baldwin, State of Alabama, to-wit;

Southwest quarter of Section Twelve, Township Six South,
Range Five East, and the Southeast quarter of the North-
west quarter, the Northeast quarter of the Southwest
quarter, and the West half of the Southeast quarter of
Section Twenty-four, Township Four South, Range Five East.

THIRD

That the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman each claim, or is reputed to claim some right, title, claim, interest or demand in, or encumbrance upon the aforesaid lands, or some part thereof; that there is no suit pending in any court to try or test the validity of the right, title, claim, interest or demand in, or encumbrance of the aforesaid defendants in and to the aforesaid lands;

FOURTH

Wherefore your complainant calls upon the aforesaid defendants and each of them to set forth and specify what right, title, interest, claim or demand in, or encumbrance upon, the aforesaid land he or she has, or claims, and how and by what instrument or instruments or in what manner the said right, title, interest, claim or demand in, or encumbrance upon said lands is created or derived.

WHEREFORE, your complainant prays that the aforesaid Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman be made party defendants to this bill of complaint, and by appropriate process of this court be required to plead, answer or demur hereto, within the time and under the usual penalties prescribed by law and under the practise of this honorable court.

And your complainant further prays that, upon the final hearing of this cause, this court will make and enter a decree, adjudging that the aforesaid defendants, and each of them, have no right, title, interest, claim, or demand in or to, or encumbrance upon the aforesaid lands, or any part thereof; and that the title to said lands be quieted and established in your complainant against the aforesaid defendants and each of them.

And your complainant prays for such other, further and different relief, as in equity he shall be entitled to receive.

Richard B. Beckwith
Solicitors for complainant

Each of the defendants named in the foregoing bill of complaint is required to answer all of the allegations therein contained, Paragraphs ONE to FOUR inclusive, but not under oath, oath being hereby expressly waived.

Richard Riche & Hall
Solicitors for complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Charles Oscar, the undersigned Notary Public, this day personally appeared W. C. Beede, who being by me duly sworn, deposes and says that he is counsel for O. M. Gordon in that suit to quiet title, filed in the Circuit Court of Baldwin County, Alabama, in equity, by O. M. Gordon, against Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as such attorney and agent for the said O. M. Gordon, he has made diligent inquiry to ascertain the place of residence and Post Office address of the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as to the said Emile J. Bihler he has inquired of the lawyers of Bay Minette; that he has made a search of the records of Baldwin County, Alabama; that he has inquired of the Tax Officers of said county; that he has examined the tax records of said county; that he has made inquiry of the Probate Judge of said county; that he had made inquiry of various persons, old residents in Baldwin County, Alabama; that he has been informed by the persons from whom he has inquired that said Emile J. Bihler is a resident of Chicago, Illinois, that he has been unable to ascertain from such inquiry the Post Office address of said Emile J. Bihler except Chicago, Illinois; and as to the said Joseph D. Bannerman, Ira Pittman and Molly Pittman, he has made inquiries of Stanley Waters, E. W. Waters and E. M. Waters, each of whom are residents of Gateswood, Alabama, near the land involved in this suit, and have resided there for many years; that he has examined the tax records and the Probate records in Baldwin County, Alabama; that he has made inquiry of the tax officers and of the Probate Judge of Baldwin County, Alabama, and of the various practising attorneys and old residents of Bay Minette, Alabama, and of other old residents at Gateswood, Alabama, inquiring as to the present Post Office address and place of residence of the said Joseph D. Bannerman, Ira Pittman and Molly Pittman; that he has made inquiry in the city of Mobile of various persons, particularly of Dr. Joseph D. Trammell, who at one time owned those lands described

as being in Section Twenty four, Township Four South, Range Five East, Baldwin County, Alabama; that he had inquired of various persons in the city of Pensacola, Florida; namely, one Molly Pittman, resident at 105 Romans Street, and of Charles L. Bannerman, 1222 East Gadsden Street, and that none of the aforesaid persons knew of the present whereabouts of Ira Pittman and Molly Pittman except E. W. Waters, who informed him that they are residents of and their Post Office address is Bagdad, Florida; that the said Charles L. Bannerman claimed to the affiant that he was the son of Joseph D. Bannerman; and that the said Joseph D. Bannerman was now residing at and his Post Office address is Panama, Florida.

W. C. Becke

Sworn to and subscribed to before me, this the 27th day of
January, 1926.

Charles Oscar
Notary Public
Baldwin County, Alabama

Bay Minette, Ala.,

7/17

1928

J W Richardson

Bay Minette - Ala.

IN ACCOUNT WITH

G. W. Humphries

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Deed Tax and Mortgage Tax

Rec. Fee

Total

Deed
Rec. Mort. from

to

Is Rec Deed of Mrs. Gulon vs Emil J. Butler, et al

*Cam
Mrs. Gulon
Bay Minette*

75

75

AFTER FIVE DAYS RETURN TO

T. W. RICHESON
CLERK OF THE CIRCUIT COURT AND
REGISTER IN CHANCERY
BAY MINETTE, ALABAMA.

REGISTERED
NO. 666



*Returned
not
qualify here*

RETURN RECEIPT REQUESTED.

(Deliver to addressee only)
(Return receipt demanded)

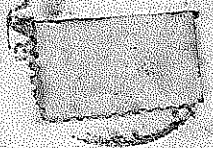
Molly Pittman
~~Bay Minette~~ Fla.

FEE PAID 3 CENTS

AFTER FIVE DAYS RETURN TO

T. W. RICHESON
CLERK OF THE CIRCUIT COURT AND
REGISTER IN CHANCERY
BAY MINETTE, ALABAMA

REGISTERED
665



*Returned
not
qualify here*

RETURN RECEIPT REQUESTED.

(Deliver to addressee only)
(Return receipt demanded)

Ira Pittman,
~~Bay Minette~~ Fla.

FEE PAID 4 CENTS

RECEIPT FOR REGISTERED ARTICLE NO. 681

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Edwin Adelle Lescane
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 682

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Thomas Albert Jennings
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 683

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Katherine Jennings
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 684

15 fee paid, class postage paid. (Date) 192

From F.W. Richardson
Addressed to Robert Pitts Lescane
c/o Ross Pitts Pounding
Thornwall Oklahoma, Chickor & Co.



Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee [initials] Special delivery fee

Delivery restricted to addressee { in person or order } Postmaster, per [initials]

RECEIPT FOR REGISTERED ARTICLE NO. 685

fee paid. class postage paid. (Date) 192

From J.W. Richardson

Addressed to Robert Hamilton Lusane
to Rev. Ross Potts, Pasadena
of Thornwood Parkways, Clueta



Accepting employee will place initials in space below, indicating restricted delivery.

receipt fee Special delivery fee

restricted to addressee { in person or order } Postmaster, per

RECEIPT FOR REGISTERED ARTICLE NO. 668

fee paid. class postage paid. (Date) 1925

From J.W. Richardson

Addressed to Mary G. ...



Accepting employee will place initials in space below, indicating restricted delivery.

receipt fee Special delivery fee

restricted to addressee { in person or order } Postmaster, per

6369

PT FOR REGISTERED ARTICLE NO. 1200

fee paid. class postage paid. (Date) 12, 1926

from _____
Addressed to _____



Accepting employee will place initials in space below, indicating restricted delivery.

receipt fee _____ Special delivery fee _____
restricted to addressee { in person _____
or order _____ Postmaster, per _____

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Elma Adell Duesene
(Signature or name of addressee)

(Signature of addressee's agent)

JAN 16 1926

Date of delivery _____ 1926

Form 3511

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Robert Seaver
(Signature or name of addressee)

(Signature of addressee's agent)

1926

Date of delivery _____ 1926

Handwritten notes: "Filed Jan 16 1926" and "Robert Seaver" written vertically.

Form 3511

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Kathleen Ferris
(Signature of name of addressee)

John A. Ferris
(Signature of addressee's agent)

Date of delivery _____ 192

FORM 321

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

J. Albert Ferris
(Signature of name of addressee)

John A. Ferris
(Signature of addressee's agent)

Date of delivery _____ 192

FORM 321

RETURN RECEIPT.

19128

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

J. M. Brown
(Signature of name of addressee)

J. M. Brown
(Signature of addressee's agent)

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Mary Esther Rich
(Signature of name of addressee)

(Signature of address agent)

Date of delivery _____ 192

FORM 2511

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Robert W. [illegible]
(Signature of name of addressee)

(Signature of address agent)

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Henry Bell Johnson
(Signature of addressee)
Henry Bell Johnson
(Signature of addressee's agent)

Date of delivery _____ 192

Form 3311

—111—

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Henry Bell Johnson
Henry Bell Johnson

Henry Bell Johnson
(Signature of addressee)
Henry Bell Johnson
(Signature of addressee's agent)

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY

R. B. Vail, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Legal Notice of

O. M. Gordon No 555

vs

Annie Beall Brown, Mary Elizabeth Jennings and others

Was published in said Newspaper for 6 consecutive weeks in the following

| | | |
|--------------------------|----------------|---------------|
| <i>January 14, 1926</i> | Vol. <u>36</u> | No. <u>50</u> |
| <i>January 21, 1926</i> | Vol. <u>36</u> | No. <u>51</u> |
| <i>January 28, 1926</i> | Vol. <u>36</u> | No. <u>52</u> |
| <i>February 4, 1926</i> | Vol. <u>37</u> | No. <u>1</u> |
| <i>February 11, 1926</i> | Vol. <u>37</u> | No. <u>2</u> |
| <i>February 18, 1926</i> | Vol. <u>37</u> | No. <u>3</u> |

the undersigned this 16th day of

1926

sworn at Court.

R. B. Vail
Publisher.

LEGAL NOTICE

The Circuit Court, Baldwin County, Alabama. In equity No. 555. This the 12th day of January, 1926.

O. M. Gordon, No. 555 vs. Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne.

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for the Complainant, that the Defendants Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama, that Annie Beall Brown and Mary Elizabeth Jennings

have taken over the care of said children and reside at and near Bay Minette, Alabama. Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors whose ages are between thirteen and eight years, respectively, and reside with and under the custody of their mother, the late Mrs. Annie Beall Brown. Mary Elizabeth Rich is over the age of twenty-one years and resides at and near Bay Minette, Alabama.

Georgiana Williamsburg, County South Carolina, the Postoffice being at and near Bay Minette, Alabama. Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are minors who are between seven and thirteen years, respectively, and reside at and are in the custody of the late Mrs. Ophelia Johnston, South Carolina, their Postoffice address being at said place, in the absence of said mother, to be therefor ordered with publication, be made in the Baldwin Times, a newspaper published at Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks during the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne to answer or demur to the Bill of Complaint in this cause by the 1st day of March, 1926, or after thirty days thereafter a decree in Confesso may be taken against them.

T. W. RICHMOND

Ruckaby, Beebe and Hall, Register

Largest Weekly Circulation in South Alabama

Bay Minette, Ala., 4/1/26

M J W Richardson

ck

THE BALDWIN TIMES

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

Gordon vs Brown et al #555

Run Jan 14-21-28-Feb 4 - 369 ads 4 1/2

1661

Largest Weekly Circulation in South Alabama

Bay Minette, Ala., 9/5/26

M Rickorby Beebe & Hill

THE BALDWIN TIMES

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

• Notice of O.M. Gordon No 555 vs A.B. Brown et al
381 words @ 6 1/2

\$24 77

run 6 times

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail, being duly sworn, deposes and says that he is
the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Was published in said Newspaper for 4 consecutive weeks in the following

| | | |
|----------------------|----------------|---------------|
| <u>Jan 14 - 1926</u> | Vol. <u>36</u> | No. <u>50</u> |
| <u>Jan 21 - 1926</u> | Vol. <u>36</u> | No. <u>51</u> |
| <u>Jan 28 - 1926</u> | Vol. <u>36</u> | No. <u>52</u> |
| <u>Feb 4 - 1926</u> | Vol. <u>37</u> | No. <u>1</u> |

he undersigned this 7th day of June 1926

R. B. Vail
Publisher.

LEGAL NOTICE

The Circuit Court, Baldwin County, Alabama, in equity No. 555, this the 12th day of January, 1926

Owen Gordon, No. 555 vs. Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for the Complainant, that the Defendants Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama; that Annie Beall Brown and Mary Elizabeth Jennings are each over the age of twenty-one years and reside at and their Post Office address is Jennings, Florida; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, whose ages are sixteen, thirteen and eight years, respectively, and they reside with and are in the custody of their mother the aforesaid Annie Beall Brown; that Mary Elizabeth Rich is over the age of twenty-one years and resides at and her Post Office address is Gordon, Washington County, Alabama; that Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama and their ages are nineteen, seven and thirteen years, respectively, and they reside at and are in the custody of the Thornwell Orphanage, Office address being at said place, in care of said orphanage, their Post Office address being at said place. In the case of said publication being made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks requiring the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne to answer or demur to the Bill of Complaint in this cause by the 15th day of February, 1926, or after thirty days therefrom a decree Pro Confesso may be taken against them.

T. W. RICHMOND,
Richard Beebe and Hall Register

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes O. M. Gordon and humbly complaining
against Annie Beall Brown, Mary Elizabeth Jennings, Katherine
Jennings, Thomas Albert Jennings, George Wood Jennings, Mary
Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, and Robert
Hamilton Lesesne, respectfully shows unto Your Honor as follows:

FIRST

That your complainant is over the age of
twenty-one years, and resides in Escambia County, Alabama;

That Annie Beall Brown was formerly the wife
of T. A. Jennings, and is over the age of twenty-one years; that
Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jen-
nings and George Wood Jennings are the children of T. A. Jennings;
that the said T. A. Jennings is dead; that the said Annie Beall
Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert
Jennings and George Wood Jennings are all of the heirs of said
T. A. Jennings; that the said Annie Beall Brown is over the

age of twentyone years; that Mary Elizabeth Jennings is over the age of twentyone years; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, ages sixteen, thirteen and eight years respectively; that the said Annie Beall Brown is a resident of Jennings, Florida; that Mary Elizabeth Jennings is also a resident of Jennings, Florida; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are also residents of Jennings, Florida, and reside with, and are in the custody of their mother, the said Annie Beall Brown; that Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, Robert Hamilton Lesesne are the children of R. H. Lesesne; that the said R. H. Lesesne died intestate, in the state of South Carolina, prior to June 18th, 1922; that his widow, Sallie A. Lesesne, who afterwards married one W. F. Hogan, died on June 18th, 1922; that the aforesaid Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, Robert Hamilton Lesesne are the children of and all of the heirs of the said R. H. Lesesne, deceased; that the said Mary Esther Rich is over the age of twentyone years, and resides at Gourdins, Williamsburg County, South Carolina, her post office address being Lanes, South Carolina; that Robert Pitts Lesesne was seventeen years of age on December 13th, 1924; that Elmer Adele Lesesne was fifteen years old December 5th, 1924; that Robert Hamilton Lesesne was eleven years of age August 6th, 1924; that the said Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are in the Thornwell

Orphanage, Clinton, South Carolina, and are in the custody of Reverend L. Ross Lynn, president of Thornwell Orphanage, Clinton, South Carolina; that the post office addresses of the aforesaid defendants are the same, as their residence, except as otherwise alleged above;

SECOND.

That your complainant is the owner of, and is in the peaceable possession of, the following described lands, situated in the County of Baldwin, to-wit:

N $\frac{1}{2}$ of the S $\frac{1}{2}$ Section Thirtyfive, T. 5 S., R. 4 E., and the W $\frac{1}{2}$ of the NE $\frac{1}{4}$ Section Seventeen, T. 4 S., R. 4 E.;

THIRD.

That the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne each claims or is reputed to claim some right, title, claim, interest or demand in, or encumbrance upon the aforesaid lands, or some part thereof; that there is no suit pending in any court to try or test the validity of the right, title, claim, interest or demand in, or encumbrance of the aforesaid defendants in and to the aforesaid lands;

FOURTH.

Wherefore your complainant calls upon the aforesaid defendants and each of them to set

forth and specify what right, title, interest, claim or demand in, or encumbrance upon, the aforesaid lands he or she has, or claims, and how and by what instrument or instruments or in what manner the said right, title, interest, claim or demand in, or encumbrance upon said lands is created or derived.

WHEREFORE, your complainant prays that the aforesaid Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne, Robert Hamilton Lesesne, be made party defendants to this bill of complaint, and by appropriate process of this court be required to plead, answer or demur hereto, within the time and under the usual penalties prescribed by law and under the practice of this honorable court.


And your complainant further prays that, upon the final hearing of this cause, this court will make and enter a decree, adjudging that the aforesaid defendants, and each of them, have no right, title, interest, claim or demand in or to, or encumbrance upon the aforesaid lands, or any part thereof; and that the title to said lands be quieted and established in your complainant against the aforesaid defendants and each of them.

And your complainant prays for such other, further and different relief, as in equity he

shall be entitled to receive.


Solicitors for complainant.

Each of the defendants named in the foregoing bill of complaint is required to answer all of the allegations therein contained, paragraphs ONE to FOUR inclusive, but not under oath, oath being hereby expressly waived.


Solicitors for complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned notary public in and for said county and state, this day personally appeared W. O. Beebe, who being by me duly sworn, deposes and says that he is of counsel for the complainant in the foregoing bill of complaint, and that as counsel for said complainant, he has made diligent inquiries to ascertain the names, ages and post office addresses of the heirs and devisees of T. A. Jennings, who was the same person as Thomas Albert Jennings; and of R. H. Lesesne, who was the same person as Robert H. Lesesne; and who were formerly in the turpentine business together, associated with C. H. Lesesne and W. F. Kogan, under the firm name of R. H. Lesesne & Company, operating in Baldwin County, Alabama, during the year 1906; that the said T. A. Jennings and R. H. Lesesne are both dead; that he has inquired with reference to the heirs of the said T. A. Jennings, of various persons in Pensacola, Florida, the place of the residence of said T. A. Jennings, including his former business associates, who are now operating

Lurton Company of Pensacola; that he inquired of Annie Beall Brown, his former wife, who was during the lifetime of said T. A. Jennings, known as Annie Beall Jennings, and who after his death married one L. S. Brown; that he has made a diligent search of the records of Baldwin County, Alabama, and of the records of Pensacola, Florida, and that he was informed by those from whom he inquired, and also ascertained from the records of the County Court of Escambia County, Florida, at Pensacola, Florida, the same being the court of Probate of Escambia County, Florida; that the heirs of said T. A. Jennings are the persons named in the foregoing bill of complaint; that the said T. A. Jennings left a last will and testament, duly admitted to Probate, and record, in said court, as will operate on the record and minutes thereof, in which will the aforesaid lands were not specifically devised, and that Annie Beall Jennings, his wife, Mary Elizabeth Jennings, Katherine Jennings and Thomas Albert Jennings are named as residuary devisees;

That in his search for the heirs of the said R. H. Lesesne, he made inquiries of various persons in Pensacola, namely Mr. H. A. Lurton, W. H. Knowles, and F. L. Dusenbury, now of New Orleans, Louisiana, who owned the turpentine business, formerly operated by the said R. H. Lesesne & Company; that he made a diligent search of the records of Baldwin County, Alabama, and of Escambia County, Florida, and that he made inquiry through his associate counsel in this case,

E. G. Rickarby, Esq., of the only persons known to him to bear the name Lesesne, namely the Lesesnes of Mobile; that he also made inquiry of various persons living in the vicinity of the lands described in said bill; that he made inquiry of all of the officers at the court of Baldwin County, Alabama; that he searched the tax records and the list of the post office addresses of the tax payers, as kept by the tax officers of that county; that from the aforesaid search, he learned that the said R. H. Lesesne had lived in this county only a short while, having come from Williamsburg County, South Carolina; that he inquired of attorneys of Kingstree, the county seat of said county, namely Messrs. Lee & Shuler, and through them ascertained that they had known the said R. H. Lesesne, and also his brother, C. H. Lesesne, who was associated with him for many years, and had been counsel for them, and that the said R. H. Lesesne was dead, that he died intestate prior to June 18th, 1922, and that his widow, Sallie A. Lesesne, who afterwards married W. F. Hogan, died on June 18th, 1922, and that the heirs of the aforesaid Robert H. Lesesne were as named in the aforesaid bill of complaint, and that their post office addresses were as named therein.

The said attorneys, Messrs. Lee & Shuler, reported by various correspondence, that they had personally interviewed said C. H. Lesesne, and had examined the probate records of Williamsburg County,

South Carolina, and that the persons named in the
aforesaid bill of complaint as the heirs of R. H. Lesesne
were shown by the said records to be his heirs, and all
of his heirs, and that the said C. H. Lesesne advised
him that they were his heirs, and all of his heirs.

Affiant further says that he has made
inquiry from various persons and various sources, not
named above, but which are omitted from this affi-
davit, because his inquiries from such sources were of
a negative character.

W. C. Beebe

Sworn to and subscribed before me, this 7th day
of January 1926.

Charles Oscar

Notary Public, Baldwin County, Alabama.

TO THE HONORABLE JOHN D. LEE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING;

James O. E. Gordon and humbly complaining against Hulle J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman, respectfully shows unto your Honor as follows:

FIRST

Your complainant is over the age of twenty one years and a resident of Escambia County, Alabama; that Hulle J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman are each over the age of twenty one years; that your complainant has made due diligent search and inquiry to ascertain their place of residence and Post Office address; that the place of residence of Hulle J. Bihler is Chicago, Illinois; that he has been unable upon diligent inquiry to ascertain a more particular address and that he has made diligent inquiry to ascertain the same; that he is informed and believes that the place of residence and Post Office address of Ira Pittman and Molly Pittman is Bagdad, Florida; that he has been informed and believes that the place of residence and Post Office address of Joseph D. Bannerman is Panama, Florida; and upon such information and belief alleges that Ira Pittman and Molly Pittman are residents of and their Post Office address is Bagdad, Florida, and that Joseph D. Bannerman is a resident of and his Post Office address is Panama, Florida.

SECOND

That your complainant is the owner of, and is in the peaceable possession of, the following described lands, situated in the County of Baldwin, State of Alabama, to-wit:

Southwest quarter of Section Twelve, Township Six South, Range Five East, and the Southeast quarter of the Northwest quarter, the Northeast quarter of the Southwest quarter, and the West half of the Southeast quarter of Section Twenty-four, Township Four South, Range Five East.

THIRD

That the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman each claim, or is reputed to claim some right, title, claim, interest or demand in, or encumbrance upon the aforesaid lands, or some part thereof; that there is no suit pending in any court to try or test the validity of the right, title, claim, interest or demand in, or encumbrance of the aforesaid defendants in and to the aforesaid lands;

FOURTH

Wherefore your complainant calls upon the aforesaid defendants and each of them to set forth and specify what right, title, interest, claim or demand in, or encumbrance upon, the aforesaid land he or she has, or claims, and how and by what instrument or instruments or in what manner the said right, title, interest, claim or demand in, or encumbrance upon said lands is created or derived.

WHEREFORE, your complainant prays that the aforesaid Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman be made party defendants to this bill of complaint, and by appropriate process of this court be required to plead, answer or demur hereto, within the time and under the usual penalties prescribed by law and under the practice of this honorable court.

And your complainant further prays that, upon the final hearing of this cause, this court will make and enter a decree, adjudging that the aforesaid defendants, and each of them, have no right, title, interest, claim, or demand in or to, or encumbrance upon the aforesaid lands, or any part thereof; and that the title to said lands be quieted and established in your complainant against the aforesaid defendants and each of them.

And your complainant prays for such other, further and different relief, as in equity he shall be entitled to receive.

Richard Beebe
Solicitors for complainant

Each of the defendants named in the foregoing bill of complaint is required to answer all of the allegations therein contained, Paragraphs ONE to FOUR inclusive, but not under oath, oath being hereby expressly waived.

Richard Beebe & Hall
Solicitors for complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Charles Oscar, the undersigned Notary Public, this day personally appeared W. C. Beebe, who being by me duly sworn, deposes and says that he is counsel for O. E. Gordon in that suit to quiet title, filed in the Circuit Court of Baldwin County, Alabama, in equity, by O. E. Gordon, against Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as such attorney and agent for the said O. E. Gordon, he has made diligent inquiry to ascertain the place of residence and Post Office address of the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as to the said Emile J. Bihler he has inquired of the lawyers of Bay Minette; that he has made a search of the records of Baldwin County, Alabama; that he has inquired of the Tax Officers of said county; that he has examined the tax records of said county; that he has made inquiry of the Probate Judge of said county; that he had made inquiry of various persons, old residents in Baldwin County, Alabama; that he has been informed by the persons from whom he has inquired that said Emile J. Bihler is a resident of Chicago, Illinois, that he has been unable to ascertain from such inquiry the Post Office address of said Emile J. Bihler except Chicago, Illinois; and as to the said Joseph D. Bannerman, Ira Pittman and Molly Pittman, he has made inquiries of Stanley Waters, H. W. Waters and E. M. Waters, each of whom are residents of Gateswood, Alabama, near the land involved in this suit, and have resided there for many years; that he has examined the tax records and the Probate records in Baldwin County, Alabama; that he has made inquiry of the tax officers and of the Probate Judge of Baldwin County, Alabama, and of the various practicing attorneys and old residents of Bay Minette, Alabama, and of other old residents at Gateswood, Alabama, inquiring as to the present Post Office address and place of residence of the said Joseph D. Bannerman, Ira Pittman and Molly Pittman; that he has made inquiry in the city of Mobile of various persons, particularly of Dr. Joseph D. Trammell, who at one time owned those lands described

as being in Section Twenty four, Township Four South, Range Five East, Baldwin County, Alabama; that he had inquired of various persons in the city of Pensacola, Florida; namely, one Molly Pittman, resident at 105 Romana Street, and of Charles L. Bannerman, 1222 East Gadsden Street, and that none of the aforesaid persons knew of the present whereabouts of Ira Pittman and Molly Pittman except E. W. Waters, who informed him that they are residents of and their Post Office address is Bagdad, Florida; that the said Charles L. Bannerman claimed to the affiant that he was the son of Joseph D. Bannerman; and that the said Joseph D. Bannerman was now residing at and his Post Office address is Panama, Florida.

W. C. Rube

Sworn to and subscribed to before me, this the 27 day of
January, 1926.

Orsola Oscar
Notary Public
Baldwin County, Alabama

Owen Gordon

vs.

Annie Beall Brown, Mary
Elizabeth Jennings, Katherine
Jennings, Thomas Albert Jennings,
George Wood Jennings, Mary Esther
Rich, Robert Pitts Lesesne, Elmer
Adele Lesesne and Robert Hamilton
Lesesne.

The Circuit Court, Baldwin County,

Alabama. In equity. § 555.

This the 12th day of January, 1926.

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for the Complainant, that the Defendants Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are non-residents of the State of Alabama; that Annie Beall Brown and Mary Elizabeth Jennings are each over the age of twenty-one years and reside at, and their Post Office address is Jennings, Florida; that Katherine Jennings, Thomas Albert Jennings and George Wood Jennings are minors, whose ages are sixteen, thirteen and eight years, respectively, and they reside with and are in the custody of their mother the aforesaid Annie Beall Brown; that Mary Elizabeth Rich is over the age of twenty-one years and resides at and her Post Office address is Courdine, Williamsburg County, South Carolina, her Post Office being Lanes, South Carolina; that Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne are minors whose ages are nineteen, seventeen and thirteen years, respectively, and they reside at and are in the custody of the Thoruwell Orphanage, Clinton, South Carolina, their Post Office address being at said place, in care of said orphanage; it is therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Annie Beall Brown, Mary Elizabeth Jennings, Katherine Jennings, Thomas Albert Jennings, George Wood Jennings, Mary Esther Rich, Robert Pitts Lesesne, Elmer Adele Lesesne and Robert Hamilton Lesesne to answer or demur to the Bill of Complaint in this cause by the 13 day of February 1926, or after thirty days therefrom a decree Pro Confesso may be taken against them.

TO THE HONORABLE JOHN D. LEE, JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY SITTING;

Comes O. M. Gordon and humbly complaining against Emile J.
Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman, respectfully
shows unto your Honor as follows;

FIRST

Your complainant is over the age of twenty one years and a
resident of Escambia County, Alabama; that Emile J. Bihler, Joseph
D. Bannerman, Ira Pittman and Molly Pittman are each over the age of
twenty one years; that your complainant has made due diligent search
and inquiry to ascertain their place of residence and Post Office
address; that the place of residence of Emile J. Bihler is Chicago,
Illinois; that he has been unable upon diligent inquiry to ascertain
a more particular address and that he has made diligent inquiry to
ascertain the same; that he is informed and believes that the place of
residence and Post Office address of Ira Pittman and Molly Pittman is
Bagdad, Florida; that he has been informed and believes that the place
of residence and Post Office address of Joseph D. Bannerman is Panama,
Florida; and upon such information and belief alleges that Ira Pittman
and Molly Pittman are residents of and their Post Office address is
Bagdad, Florida, and that Joseph D. Bannerman is a resident of and his
Post Office address is Panama, Florida.

SECOND

That your complainant is the owner of, and is in the peaceable
possession of, the following described lands, situated in the County of
Baldwin, State of Alabama, to-wit;

Southwest quarter of Section Twelve, Township Six South,
Range Five East, and the Southeast quarter of the North-
west quarter, the Northeast quarter of the Southwest
quarter, and the West half of the Southeast quarter of
Section Twenty-four, Township Four South, Range Five East.

THIRD

That the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman each claim, or is reputed to claim some right, title, claim, interest or demand in, or encumbrance upon the aforesaid lands, or some part thereof; that there is no suit pending in any court to try or test the validity of the right, title, claim, interest or demand in, or encumbrance of the aforesaid defendants in and to the aforesaid lands;

FOURTH

Wherefore your complainant calls upon the aforesaid defendants and each of them to set forth and specify what right, title, interest, claim or demand in, or encumbrance upon, the aforesaid land he or she has, or claims, and how and by what instrument or instruments or in what manner the said right, title, interest, claim or demand in, or encumbrance upon said lands is created or derived.

WHEREFORE, your complainant prays that the aforesaid Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman be made party defendants to this bill of complaint, and by appropriate process of this court be required to plead, answer or demur hereto, within the time and under the usual penalties prescribed by law and under the practise of this honorable court.

And your complainant further prays that, upon the final hearing of this cause, this court will make and enter a decree, adjudging that the aforesaid defendants, and each of them, have no right, title, interest, claim, or demand in or to, or encumbrance upon the aforesaid lands, or any part thereof; and that the title to said lands be quieted and established in your complainant against the aforesaid defendants and each of them.

And your complainant prays for such other, further and different relief, as in equity he shall be entitled to receive.

Richard B. Beckwith
Solicitors for complainant

Each of the defendants named in the foregoing bill of complaint is required to answer all of the allegations therein contained, Paragraphs ONE to FOUR inclusive, but not under oath, oath being hereby expressly waived.

Richard Riche & Hall
Solicitors for complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Charles Oscar, the undersigned Notary Public, this day personally appeared W. C. Beede, who being by me duly sworn, deposes and says that he is counsel for O. M. Gordon in that suit to quiet title, filed in the Circuit Court of Baldwin County, Alabama, in equity, by O. M. Gordon, against Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as such attorney and agent for the said O. M. Gordon, he has made diligent inquiry to ascertain the place of residence and Post Office address of the said Emile J. Bihler, Joseph D. Bannerman, Ira Pittman and Molly Pittman; that as to the said Emile J. Bihler he has inquired of the lawyers of Bay Minette; that he has made a search of the records of Baldwin County, Alabama; that he has inquired of the Tax Officers of said county; that he has examined the tax records of said county; that he has made inquiry of the Probate Judge of said county; that he had made inquiry of various persons, old residents in Baldwin County, Alabama; that he has been informed by the persons from whom he has inquired that said Emile J. Bihler is a resident of Chicago, Illinois, that he has been unable to ascertain from such inquiry the Post Office address of said Emile J. Bihler except Chicago, Illinois; and as to the said Joseph D. Bannerman, Ira Pittman and Molly Pittman, he has made inquiries of Stanley Waters, E. W. Waters and E. M. Waters, each of whom are residents of Gateswood, Alabama, near the land involved in this suit, and have resided there for many years; that he has examined the tax records and the Probate records in Baldwin County, Alabama; that he has made inquiry of the tax officers and of the Probate Judge of Baldwin County, Alabama, and of the various practising attorneys and old residents of Bay Minette, Alabama, and of other old residents at Gateswood, Alabama, inquiring as to the present Post Office address and place of residence of the said Joseph D. Bannerman, Ira Pittman and Molly Pittman; that he has made inquiry in the city of Mobile of various persons, particularly of Dr. Joseph D. Trammell, who at one time owned those lands described

as being in Section Twenty four, Township Four South, Range Five East, Baldwin County, Alabama; that he had inquired of various persons in the city of Pensacola, Florida; namely, one Molly Pittman, resident at 105 Romans Street, and of Charles L. Bannerman, 1222 East Gadsden Street, and that none of the aforesaid persons knew of the present whereabouts of Ira Pittman and Molly Pittman except E. W. Waters, who informed him that they are residents of and their Post Office address is Bagdad, Florida; that the said Charles L. Bannerman claimed to the affiant that he was the son of Joseph D. Bannerman; and that the said Joseph D. Bannerman was now residing at and his Post Office address is Panama, Florida.

W. C. Becke

Sworn to and subscribed to before me, this the 27th day of
January, 1926.

Charles Oscar
Notary Public
Baldwin County, Alabama