

W. J. CAMPBELL,

COMPLAINANT,

VS.

THE NORTH HALF OF THE NORTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE NORTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTH HALF OF THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER, ALL IN SECTION 4, TOWNSHIP 5 SOUTH, RANGE 4 EAST, AND AGAINST THE FOLLOWING NAMED PERSONS: THOMAS P. HAMM, H.W. COZAD, CHARLES O. FORSBERG, LAURA E. OWENS, I.J. SCHILLER, E. P. LERCH, A.H. KING, ELISKA A. PARKER, LOUIS L. HARMS, ARCHIBALD J. BEVERLIN, IF LIVING, OR IF DECEASED, AGAINST THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF SUCH OF THEM AS ARE DECEASED; AND AGAINST THE ALABAMA SUMATRA AND HAVANA TOBACCO COMPANY, A CORPORATION, ITS SUCCESSORS OR ASSIGNS, AND ANY AND ALL OTHER PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR OTHER ENCUMBRANCE ON SAID LANDS OR ON ANY PART THEREOF,

RESPONDENTS.

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes your complainant, W.J. Campbell, and presents this, his bill of complaint against the following described lands in Baldwin County, Alabama, to-wit:

The North half of the North half of the Southwest Quarter of the Northeast Quarter; the South half

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 4711.

of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southwest Quarter of the Northeast Quarter; the Northeast Quarter of the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter, all in Section 4, Township 5 South, Range 4 East,

and against the following named persons: Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if living, or if deceased, against the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased; and against the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and any and all other persons, firms, associations or corporations claiming any title to, interest in, claim, lien or other encumbrance on said lands or on any part thereof and respectfully represents and shows unto your Honor as follows:

FIRST: That your complainant is over the age of 21 years and is a resident of Baldwin County, State of Alabama; that your complainant cannot ascertain whether or not Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin are dead or alive, or their residence, if any, and that the complainant has made diligent search and inquiry to ascertain the names, ages and places of residence of Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, their heirs, devisees, personal representatives and assigns; that he has inquired of numerous persons in the vicinity in which such land is located and of persons in Bay Minette, including all of the officers, and have searched the Probate and Tax Records, and upon inquiry has been unable to ascertain their names, ages and post office address, but is informed and believes and upon such information and belief

alleges that Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms and Archibald J. Beverlin or their heirs, devisees, personal representatives and assigns of the said Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms and Archibald J. Beverlin are over the age of 21 years and are non-residents of the State of Alabama, and their place of residence is unknown to complainant and cannot be ascertained; that the address or present location of the Alabama Sumatra and Havana Tobacco Company cannot be ascertained nor its stockholders, if dissolved, or its successors or assigns; that diligent search and inquiry has been made to the same.

SECOND: That your complainant is owner in fee simple and in actual possession of the said lands in Baldwin County, Alabama, described as follows, to-wit:

The North half of the North half of the Southwest Quarter of the Northeast Quarter; the South half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southwest Quarter of the Northeast Quarter; the Northeast Quarter of the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter, all in Section 4, Township 5 South, Range 4 East;

that they and those whom they claim have been in continuous peaceable adverse possession of the said lands for more than ten years next preceding the filing of this complaint and that they and those through whom they claim title to the said lands have for more than ten years next preceding the taxes on the said lands and that during such period of time no other person has assessed the said lands for taxes or paid taxes thereon, and that no other person for such period has had, or attempted to exercise any possession over the said land or claimed any right to possession thereof or any title to, interest in, claim, lien or encumbrance thereon, or to any part or parcel of the same.

EXCEPTING THAT: Your complainant alleges that the premises are subject to a mortgage to the Bay Minette Production Credit Association, said mortgage being dated August 12, 1959, and recorded in Mortgage Book 322 at Pages 599-600, Baldwin County, Alabama, Probate Records, and a mineral lease to Virgil W. Michael dated July 17, 1956 and recorded in Deed Book 249 N.S. at pages 298-300, Baldwin County, Alabama, Probate Records.

THIRD: That no suit is pending to test complainant's title to, interest in, claim, lien or encumbrance on, or right to possession of said land.

FOURTH: That title to said lands on the Records of Baldwin County, Alabama, stand in the name of your complainant; that the complainant obtained title to the following lands as stated herein:

1. The East half of the Southwest Quarter of the Northeast Quarter, and the North half of the Northwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.
 - (a) Tax deed by H.W. Cozad, by G.W. Robertson, Judge of Probate, to A.V. Campbell, dated June 18, 1941, and recorded in Deed Book 75 N.S., p. 255.
 - (b) Tax deed under assessment to "Owner Unknown", by James M. Voltz, Judge of Probate, to W.J. Hobbs, dated August 23, 1919, and recorded in Deed Book 28 N.S., p. 439-440.
 - (c) Tax deed by Charles O. Forsberg, by G.W. Robertson, Judge of Probate, to Davidson & Taylor, dated June 18, 1940, and recorded in Deed Book 71 N.S., p. 518.
 - (d) Tax deed by John C. Curry, as State Land Commissioner to A.V. Campbell, dated August 7, 1940, and recorded in Deed Book 72 N.S., p. 494-5.
 - (e) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.
 - (f) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.D. Jordan, dated January 9, 1945, and recorded in Deed Book 110 N.S., p. 387-8.
 - (g) Deed from W.D. Jordan and Vandemar Jordan, his wife, to Ruby Chavers and Ancil Chavers, dated November, 1948, and filed for record on January 13, 1949, and recorded in Deed Book 138 N.S., p. 19-20.
 - (h) Deed from W.J. Hobbs and S.A. Hobbs, his wife, to Walter Gullledge, dated September 24, 1919, and recorded in Deed Book 72 N.S., p. 400.
 - (i) Deed from Walter Gullledge and Vera May Gullledge, his wife, to J.J. Calvert, dated March 13, 1930, and recorded in Deed Book 72 N.S., p. 410.

(j) Deed from J.J. Calvert and Lula S. Calvert, his wife, to A.V. Campbell, dated August 9, 1940, and recorded in Deed Book 72 N.S., p. 344.

(k) Deed from E. Davidson and Louise T. Davidson, his wife, and H.L. Taylor and Leah Taylor, his wife, to A.V. Campbell, dated September 2, 1940, and recorded in Deed Book 72 N.S., p. 494.

(l) Deed from Ruby Chavers and Ancil Chavers, her husband, to W.J. Campbell, dated August 7, 1952, and recorded in Deed Book 186 N.S., p. 249-250.

2. The Southwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Deed from Mary L. Parker to A.V. Campbell, dated March 25, 1940, and recorded in Deed Book 71 N.S., p. 436.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(c) Deed from A.V. Campbell and Gladys Campbell, his wife, to Della Spivey and Robert L. Spivey, dated May, 1943, and recorded in Deed Book 79 N.S., p. 543.

(d) Deed from R.L. Spivey and Della Spivey, his wife, to W.J. Campbell, dated January 21, 1952, and recorded in Deed Book 174 N.S., p. 4-5.

(e) Deed from R.L. Spivey and Della Spivey, his wife, to Hugh D. McWilliams, dated January 21, 1952, and recorded in Deed Book 182 N.S., p. 456-7.

(f) Deed from Hugh D. McWilliams, the husband of Laverne McWilliams, to Laverne McWilliams, dated May 27, 1952, and recorded in Deed Book 182 N.S., p. 458-9.

(g) Deed from Laverne McWilliams, a divorced woman, to W.J. Campbell, dated June 14, 1952, and recorded in Deed Book 182 N.S., p. 493.

3. The Southwest Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by John C. Curry, State Land Commissioner, to A.V. Campbell, dated March 20, 1940, and recorded in Deed Book 72 N.S., p. 112-113.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

4. The Northeast Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by Henry S. Long, as State Tax Commissioner, to J.L. Tucker, dated August 25, 1936, and recorded in Deed Book 282 N.S., p. 178-9.

(b) Deed from C. B. Mitchell and Jessie H. Mitchell, his wife, R.F. Mitchell, Jr. and Dorothy F. Mitchell, his wife, and J.L. Tucker, unmarried, to J.R. Duncan, dated January 24, 1941, and recorded in Deed Book 75 N.S., p. 25-6.

(c) Deed from J.R. Duncan and Margaret Duncan, his wife, to A.V. Campbell, dated August 31, 1942, and recorded in Deed Book 78 N.S., p. 116-117.

(d) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 1, 1959, and recorded in Deed Book 282 N.S., p. 9.

that for more than ten years next preceding the filing of this bill of complaint no other persons other than the complainant and those through whom he claims title to the said lands or any part thereof have assessed or paid taxes thereon and that he and those through whom he claims title have been in actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of the same for more than ten years next preceding the filing of this bill of complaint; that Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald J. Beverlin, if alive, or if deceased, the unknown heirs, devisees, personal representatives and assigns, and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, claim or are reputed to claim some title to, interest in, lien or encumbrance upon the said lands or some portion or parcel thereof.

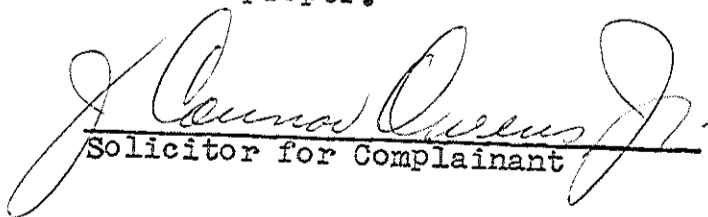
WHEREFORE, your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and by appropriate process make the said Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald J. Beverlin, if living, or if deceased, the unknown heirs, devisees, personal representatives and assigns, and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and any and all other persons, firms, associations, or corporations claiming any title to, interest in, lien or encumbrance upon the said lands, to-wit:

The North half of the North half of the Southwest Quarter of the Northeast Quarter; the South half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the

Southwest Quarter of the Southwest Quarter of the
Northeast Quarter; the Northeast Quarter of the
Northwest Quarter of the Northeast Quarter; the
Southwest Quarter of the Northwest Quarter of the
Northeast Quarter, all in Section 4, Township 5
South, Range 4 East,

or any part or parcel thereof, to be made parties defendant to this bill of complaint and by appropriate process require them and each of them separately and severally to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your complainant further prays that upon a final hearing of this cause, the Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of liens, except: that oil, gas and mineral lease heretofore mentioned, and mortgage to the Bay Minette Production Credit Association heretofore mentioned, claims to the said lands and each part and parcel thereof, is vested in your complainant, W.J. Campbell, as against Thomas F. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald J. Beverlin, if living, or if dead, the unknown heirs, devisees, personal representatives and assigns of such persons, and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and against any and all persons, firms, associations, or corporations claiming any title to, interest in, claim, lien, or encumbrance upon said lands or any part thereof, and that any and all doubts and disputes concerning the same be cleared up, and your complainant prays for such other, different or general relief as shall seem meek and proper.


Solicitor for Complainant

STATE OF ALABAMA

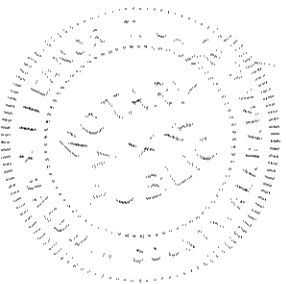
BALDWIN COUNTY

Before me, the undersigned authority in and for said County and State, personally appeared J. Connor Owens, Jr., who is known to me, and who, having been by me duly sworn, deposes and says that he is solicitor for the complainant in the above styled cause, and that the facts alleged in foregoing bill of complaint, from all information obtainable, are true, and from such information obtained he verily believes, and so states, the same to be true.

J. Connor Owens, Jr.

Sworn to and subscribed before me this the 17 day of September, 1959.

Eleanor J. Joyce
Notary Public



W.J. CAMPBELL,
COMPLAINANT,
VS.

IN THE CIRCUIT COURT OF

THE NORTH HALF OF THE NORTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE SOUTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE NORTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER: THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER, ALL IN SECTION 4, TOWNSHIP 5 SOUTH, RANGE 4 EAST, AND AGAINST THE FOLLOWING NAMED PERSONS: THOMAS P. HAMM, H.W. COZAD, CHARLES O. FORSBERG, LAURA E. OWENS, I.J. SCHILLER, E. P. LERCH, A.H. KING, ELISKA A. PARKER, LOUIS L. HARMS, ARCHIBALD J. BEVERLIN, IF LIVING, OR IF DECEASED, AGAINST THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF SUCH OF THEM AS ARE DECEASED; AND AGAINST THE ALABAMA SUMATRA AND HAVANA TOBACCO COMPANY, A CORPORATION, ITS SUCCESSORS OR ASSIGNS, AND ANY AND ALL OTHER PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR OTHER ENCUMBRANCE ON SAID LANDS OR ON ANY PART THEREOF,

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 4711.

RESPONDENTS.

Whereas, W.J. Campbell has filed his Bill of Complaint on the 21st day of September 1959, in this Court on the Equity side, claiming to be in actual peaceable possession, owning and claiming to own those certain lands, lying and being situate in the County of Baldwin, State of Alabama, described as follows, to-wit:

The North half of the North half of the Southwest Quarter of the Northeast Quarter; the South half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southeast Quarter of the Northeast Quarter; the Northeast Quarter of the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter, all in Section 4, Township 5 South, Range 4 East.

Complainant alleges in his Bill of Complaint that he holds title to the aforesaid lands by purchase as follows:

1. The East half of the Southwest Quarter of the Northeast Quarter, and the North half of the Northwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by H.W. Cozad, by G.W. Robertson, Judge of Probate, to A.V. Campbell, dated June 18, 1941, and recorded in Deed Book 75 N.S., p. 255.

(b) Tax deed under assessment to "Owner Unknown", by James M. Voltz, Judge of Probate, to W.J. Hobbs, dated August 23, 1919, and recorded in Deed Book 28 N.S., p. 439-440.

(c) Tax deed by Charles C. Forsberg, by G.W. Robertson, Judge of Probate, to Davidson & Taylor, dated June 18, 1940, and recorded in Deed Book 71 N.S., p. 518.

(d) Tax deed by John C. Curry, as State Land Commissioner, to A.V. Campbell, dated August 7, 1940, and recorded in Deed Book 72 N.S., p. 494-5.

(e) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(f) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.D. Jordan, dated January 9, 1945, and recorded in Deed Book 110 N.S., p. 387-8.

(g) Deed from W.D. Jordan and Vandemar Jordan, his wife, to Ruby Chavers and Ancil Chavers, dated November, 1948, and filed for record on January 13, 1949, and recorded in Deed Book 138 N.S., p. 19-20.

(h) Deed from W.J. Hobbs and S.A. Hobbs, his wife, to Walter Gullledge, dated September 24, 1919, and recorded in Deed Book 72 N.S., p. 400.

(i) Deed from Walter Gullledge and Vera May Gullledge, his wife, to J.J. Calvert, dated March 13, 1930, and recorded in Deed Book 72 N.S., p. 410.

(j) Deed from J.J. Calvert and Lula S. Calvert, his wife, to A.V. Campbell, dated August 9, 1940, and recorded in Deed Book 72 N.S., p. 344.

(k) Deed from E. Davidson and Louise T. Davidson, his wife, and H.L. Taylor and Leah Taylor, his wife, to A.V. Campbell, dated September 2, 1940, and recorded in Deed Book 72 N.S., p. 494.

(1) Deed from Ruby Chavers and Ancil Chavers, her husband, to W.J. Campbell, dated August 7, 1952, and recorded in Deed Book 186 N.S., p. 249-250.

2. The Southwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Deed from Mary L. Parker to A.V. Campbell, dated March 25, 1940, and recorded in Deed Book 71 N.S., p. 436.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(c) Deed from A.V. Campbell and Gladys Campbell, his wife, to Della Spivey and Robert L. Spivey, dated May, 1943, and recorded in Deed Book 79 N.S., p. 543.

(d) Deed from R.L. Spivey and Della Spivey, his wife, to W.J. Campbell, dated January 21, 1952, and recorded in Deed Book 174 N.S., p. 4-5.

(e) Deed from R.L. Spivey and Della Spivey, his wife, to Hugh D. McWilliams, dated January 21, 1952, and recorded in Deed Book 182 N.S., p. 456-7.

(f) Deed from Hugh D. McWilliams, the husband of Laverne McWilliams, to Laverne McWilliams, dated May 27, 1952, and recorded in Deed Book 182 N.S., p. 458-9.

(g) Deed from Laverne McWilliams, a divorced woman, to W.J. Campbell, dated June 14, 1952, and recorded in Deed Book 182 N.S., p. 493.

3. The Southwest Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by John C. Curry, State Land Commissioner, to A.V. Campbell, dated March 20, 1940, and recorded in Deed Book 72 N.S., p. 112-113.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

4. The Northeast Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by Henry S. Long, as State Tax Commissioner, to J.L. Tucker, dated August 25, 1936, and recorded in Deed Book 282 N.S., p. 178-9.

(b) Deed from C.B. Mitchell and Jessie H. Mitchell, his wife, R.F. Mitchell, Jr. and Dorothy F. Mitchell, his wife, and J.L. Tucker, unmarried, to J.R. Duncan, dated January 24, 1941, and recorded in Deed Book 75 N.S., p. 25-6.

(c) Deed from J.R. Duncan and Margaret Duncan, his wife, to A.V. Campbell, dated August 31, 1942, and recorded in Deed Book 78 N.S., p. 116-117.

(d) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 1, 1959, and recorded in Deed Book 282 N.S., p. 9.

Complainant further alleges that he and those through whom he claims have, for more than ten years next preceding the filing of said Bill of Complaint, have been in actual, peaceable, adverse possession of said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of, assessed or paid taxes on said lands or any part thereof and that the Bill of Complaint is filed for the purpose of establishing their title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from the Bill of Complaint, the same being verified, that the ages, names and places of residence and post office addresses of the defendants, Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if alive, or if deceased, the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased, are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained; that the address or present location of the Alabama Sumatra and Havana Tobacco Company cannot be ascertained nor its stockholders, if dissolved, or its successors or assigns; that diligent search and inquiry has been made to the same; it is therefore ORDERED, ADJUDGED and DECREED that notice of the pendency of said suit be given to the defendants, Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald J. Beverlin, if living, or if deceased, the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased, and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, by publication once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama.

Witness my hand and seal this the 21st day of September, 1959.

4711

W.J. CAMPBELL,
COMPLAINANT,
VS.

IN THE CIRCUIT COURT OF

THE NORTH HALF OF THE NORTH HALF OF THE SOUTH-WEST QUARTER OF THE NORTH-EAST QUARTER: THE SOUTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE NORTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE SOUTH HALF OF THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER: THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER: THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER, ALL IN SECTION 4, TOWNSHIP 5 SOUTH, RANGE 4 EAST, AND AGAINST THE FOLLOWING NAMED PERSONS: THOMAS P. HAMM, H.W. COZAD, CHARLES O. FORSBERG, LAURA E. OWENS, I.J. SCHILLER, E. P. LERCH, A.H. KING, ELISKA A. PARKER, LOUIS L. HARMS, ARCHIBALD J. BEVERLIN, IF LIVING, OR IF DECEASED, AGAINST THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF SUCH OF THEM AS ARE DECEASED; AND AGAINST THE ALABAMA SUMATRA AND HAVANA TOBACCO COMPANY, A CORPORATION, ITS SUCCESSORS OR ASSIGNS, AND ANY AND ALL OTHER PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR OTHER ENCUMBRANCE ON SAID LANDS OR ON ANY PART THEREOF,

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 4711.

RESPONDENTS.

Notice is hereby given Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if living, or if deceased the unknown heirs, devisees, personal representatives and assigns of such of them as may be deceased; and the

FILED 10-14-59 11:30 P.M. RECORDED IN BOOK 5 PAGE 349-53 JUDGE OF PROBATE

Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns or its stockholders, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance upon the following described lands in Baldwin County, Alabama, to-wit:

The North half of the North half of the Southwest Quarter of the Northeast Quarter; the South half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southwest Quarter of the Northeast Quarter; the Northeast Quarter of the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter, all in Section 4, Township 5 South, Range 4 East.

That W.J. Campbell has filed his Bill of Complaint on the 21st day of *September*, 1959, in this Court on the Equity side claiming to be in actual peaceable possession, owning and claiming to own that certain land, lying and being situated in the County of Baldwin, State of Alabama, described above herein. Complainant alleges in his Bill of Complaint that he acquired title to said land by the following:

1. The East half of the Southwest Quarter of the Northeast Quarter, and the North half of the Northwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.
 - (a) Tax deed by H.W. Cozad, by G.W. Robertson, Judge of Probate, to A.V. Campbell, dated June 18, 1941, and recorded in Deed Book 75 N.S., p. 255.
 - (b) Tax deed under assessment to "Owner Unknown", by James M. Voltz, Judge of Probate, to W.J. Hobbs, dated August 23, 1919, and recorded in Deed Book 28 N.S., p. 439-440.
 - (c) Tax deed by Charles O. Forsberg, by G.W. Robertson, Judge of Probate, to Davidson & Taylor, dated June 18, 1940, and recorded in Deed Book 71 N.S., p. 518.
 - (d) Tax deed by John C. Curry, as State Land Commissioner, to A.V. Campbell, dated August 7, 1940, and recorded in Deed Book 72 N.S., p. 494-5.
 - (e) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.
 - (f) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.D. Jordan, dated January 9, 1945, and recorded in Deed Book 110 N.S., p. 387-8.
 - (g) Deed from W.D. Jordan and Vandemar Jordan, his wife,

to Ruby Chavers and Ancil Chavers, dated November, 1948, and filed for record on January 13, 1959, and recorded in Deed Book 138 N.S., p. 19-20.

(h) Deed from W.J. Hobbs and S.A. Hobbs, his wife, to Walter Gullledge, dated September 24, 1919, and recorded in Deed Book 72 N.S., p. 400.

(i) Deed from Walter Gullledge and Vera May Gullledge, his wife, to J.J. Calvert, dated March 13, 1930, and recorded in Deed Book 72 N.S., p. 410.

(j) Deed from J.J. Calvert and Lula S. Calvert, his wife, to A.V. Campbell, dated August 9, 1940, and recorded in Deed Book 72 N.S., p. 344.

(k) Deed from E. Davidson and Louise T. Davidson, his wife, and H.L. Taylor and Leah Taylor, his wife, to A.V. Campbell, dated September 2, 1940, and recorded in Deed Book 72 N.S., p. 494.

(l) Deed from Ruby Chavers and Ancil Chavers, her husband, to W.J. Campbell, dated August 7, 1952, and recorded in Deed Book 186 N.S., p. 249-250.

2. The Southwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Deed from Mary L. Parker to A.V. Campbell, dated March 25, 1940, and recorded in Deed Book 71 N.S., p. 436.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(c) Deed from A.V. Campbell and Gladys Campbell, his wife, to Della Spivey and Robert L. Spivey, dated May, 1943, and recorded in Deed Book 79 N.S., p. 543.

(d) Deed from R.L. Spivey and Della Spivey, his wife, to W.J. Campbell, dated January 21, 1952, and recorded in Deed Book 174 N.S., p. 4-5.

(e) Deed from R.L. Spivey and Della Spivey, his wife, to Hugh D. McWilliams, dated January 21, 1952, and recorded in Deed Book 182 N.S., p. 456-7.

(f) Deed from Hugh D. McWilliams, the husband of Laverne McWilliams, to Laverne McWilliams, dated May 27, 1952, and recorded in Deed Book 182 N.S., p. 458-9.

(g) Deed from Laverne McWilliams, a divorced woman, to W.J. Campbell, dated June 14, 1952, and recorded in Deed Book 182 N.S., p. 493.

3. The Southwest Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by John C. Curry, State Land Commissioner, to A.V. Campbell, dated March 20, 1940, and recorded in Deed Book 72 N.S., p. 112-113.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

4. The Northeast Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by Henry S. Long, as State Tax Commissioner, to J.L. Tucker, dated August 25, 1936, and recorded in Deed Book 282 N.S., p. 178-9 .

(b) Deed from C.B. Mitchell and Jessie H. Mitchell, his wife, R.F. Mitchell, Jr. and Dorothy F. Mitchell, his wife, and J.L. Tucker, unmarried, to J.R. Duncan, dated January 24, 1941, and recorded in Deed Book 75 N.S., p. 25-6.

(c) Deed from J.R. Duncan and Margaret Duncan, his wife, to A.V. Campbell, dated August 31, 1942, and recorded in Deed Book 78 N.S., p. 116-117.

(d) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 1, 1959, and recorded in Deed Book 282 N.S., p. 9;

that the said Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald J. Beverlin, if alive, or if deceased, the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased; and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns or its stockholders, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or other encumbrance upon the above described lands.

Complainant further alleges that he and those through whom he claims, have for more than ten years next preceding the filing of said Bill of Complaint, been in the actual peaceable possession of the said land and had annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereof and that the Bill of Complaint is filed for the purpose of establishing his title to and interest in the said lands and clearing up doubts and disputes concerning the same.

And it appearing from said Bill of Complaint, the same being duly verified, that the names, ages and places of residence and post office addresses of the said defendants, Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald

J. Beverlin, if living, or if deceased, the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased, are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained; that the address or present location of the Alabama Sumatra and Havana Tobacco Company cannot be ascertained nor its stockholders, if dissolved, or its successors or assigns; that diligent search and inquiry has been made to the same.

And an order having been made and entered that notice of the pendency of said suit be given by publication once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama.

It is therefore ordered that the said Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms and Archibald J. Beverlin, if alive, or if deceased, the unknown heirs, devisees, personal representatives and assigns of such of them as may be deceased, and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns or its stockholders, and any and all other persons, firms, associations, corporations claiming any title to, interest in, claim, lien or encumbrance upon the said lands as described above; appear and plead, answer or demur to the said Bill of Complaint within sixty days after the first publication of this notice, namely the 25th day of November, 1959.

Witness my hand this the 2/5th day of September, 1959.

Richard J. Smith
Register, Circuit Court, Baldwin
County, Alabama, in Equity

J. Connor Owens, Jr.
Solicitor for Complainant

W.J. CAMPBELL,
COMPLAINANT,
VS.

IN THE CIRCUIT COURT OF

THE NORTH HALF OF THE
NORTH HALF OF THE SOUTH-
WEST QUARTER OF THE NORTH-
EAST QUARTER; THE SOUTH
HALF OF THE SOUTHEAST
QUARTER OF THE SOUTHWEST
QUARTER OF THE NORTHEAST
QUARTER; THE NORTH HALF OF
THE SOUTHEAST QUARTER OF
THE SOUTHWEST QUARTER OF
THE NORTHEAST QUARTER; THE
SOUTH HALF OF THE NORTHEAST
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QUARTER; THE SOUTHWEST
QUARTER OF THE NORTHWEST
QUARTER OF THE NORTHEAST
QUARTER, ALL IN SECTION 4,
TOWNSHIP 5 SOUTH, RANGE 4
EAST, AND AGAINST THE FOL-
LOWING NAMED PERSONS:
THOMAS P. HAMM, H.W. COZAD,
CHARLES C. FORSBERG, LAURA
E. OWENS, I.J. SCHILLER, E.
P. LERCH, A.H. KING, ELISKA
A. PARKER, LOUIS L. HARMS,
ARCHIBALD J. BEVERLIN, IF
LIVING, OR IF DECEASED,
AGAINST THE UNKNOWN HEIRS,
DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF
SUCH OF THEM AS ARE DECEASED;
AND AGAINST THE ALABAMA SUMATRA AND HAVANA TOBACCO COMPANY, A CORPORATION, ITS SUCCESSORS OR ASSIGNS, AND ANY AND ALL OTHER PERSONS, FIRMS ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR OTHER ENCUMBRANCE ON SAID LANDS OR ON ANY PART THEREOF,

BALDWIN COUNTY, ALABAMA,

IN EQUITY NO. 4711

RESPONDENTS.

DECREE

This cause coming on to be heard is submitted for final decree upon behalf of the complainant, upon the original Bill of Complaint and upon the service, Decree Pro Confesso, appointment, acceptance and answer of Guardian ad Litem, pleading and proof as noted by the Register; and the same being considered by the Court,

the Court is of the opinion, does find, ascertain and decree, that due and proper notice of the pendency of the said Bill of Complaint against the said lands and the said defendants, Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if living, or if deceased, against the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased; and against the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and any and all other persons, firms, associations or corporations claiming any title to, interest in, claim, lien or other encumbrance on said lands or on any part thereof, has been given in the manner required by law, and that the complainant is entitled to the relief as prayed for in the Bill of Complaint.

IT IS THEREFORE FOUND, ASCERTAINED, ORDERED, ADJUDGED AND DECREED by the Court that the said complainant, W.J. Campbell, who is over the age of twenty-one years, at the time of the filing of the said Bill of Complaint and at the time of the submission of this cause for final decree, the complainant was and is in the actual and peaceable possession, claiming to own the same absolutely, and in fee simple of all that certain tract of land situated in the County of Baldwin, State of Alabama, described as follows, to-wit:

The North Half of the North Half of the Southwest Quarter of the Northeast Quarter; the South Half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North Half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southwest Quarter of the Northeast Quarter; the Northeast Quarter of the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter, all in Section 4, Township 5 South, Range 4 East;

That the title to said lands on the Records of Baldwin County stand in the name of your complainant; that the complainant obtained title to the following lands as stated herein:

1. The East Half of the Southwest Quarter of the Northeast Quarter, and the North Half of the Northwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by H.W. Cozad, by G.W. Robertson, Judge

of Probate, to A.V. Campbell, dated June 18, 1941, and recorded in Deed Book 75 N.S., p. 255.

(b) Tax deed under assessment to "Owner Unknown", by James M. Voltz, Judge of Probate, to W.J. Hobbs, dated August 23, 1919, and recorded in Deed Book 28 N.S., p. 439-440.

(c) Tax deed by Charles O. Forsberg, by G.W. Robertson, Judge of Probate, to Davidson & Taylor, dated June 18, 1940, and recorded in Deed Book 71 N.S., p. 518.

(d) Tax deed by John C. Curry, as State Land Commissioner to A.V. Campbell, dated August 7, 1940, and recorded in Deed Book 72 N.S., p. 494-5.

(e) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(f) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.D. Jordan, dated January 9, 1945, and recorded in Deed Book 110 N.S., p. 387-8.

(g) Deed from W.D. Jordan and Vandemar Jordan, his wife, to Ruby Chavers and Ancil Chavers, dated November, 1948, and filed for record on January 13, 1949, and recorded in Deed Book 138 N.S., p. 19-20.

(h) Deed from W.J. Hobbs and S.A. Hobbs, his wife, to Walter Gullede, dated September 24, 1919, and recorded in Deed Book 72 N.S., p. 400.

(i) Deed from Walter Gullede and Vera May Gullede, his wife, to J.J. Calvert, dated March 13, 1930, and recorded in Deed Book 72 N.S., p. 410.

(j) Deed from J.J. Calvert and Lula S. Calvert, his wife, to A.V. Campbell, dated August 9, 1940, and recorded in Deed Book 72 N.S., p. 344.

(k) Deed from E. Davidson and Louise T. Davidson, his wife, and H.L. Taylor and Leah Taylor, his wife, to A.V. Campbell, dated September 2, 1940, and recorded in Deed Book 72 N.S., p. 494.

(l) Deed from Ruby Chavers and Ancil Chavers, her husband, to W.J. Campbell, dated August 7, 1952, and recorded in Deed Book 186 N.S., p. 249-250.

2. The Southwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Deed from Mary L. Parker to A.V. Campbell, dated March 25, 1940, and recorded in Deed Book 71 N.S., p. 436.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(c) Deed from A.V. Campbell and Gladys Campbell, his wife, to Della Spivey and Robert L. Spivy, dated May, 1943, and recorded in Deed Book 79 N.S., p. 543.

(d) Deed from R.L. Spivey and Della Spivey, his wife, to W.J. Campbell, dated January 21, 1952, and recorded in Deed Book 174 N.S., p. 4-5.

- (e) Deed from R.L. Spivey and Della Spivey, his wife, to Hugh D. McWilliams, dated January 21, 1952, and recorded in Deed Book 182 N.S., p. 456-7.
- (f) Deed from Hugh D. McWilliams, the husband of Laverne McWilliams, to Laverne McWilliams, dated May 27, 1952, and recorded in Deed Book 182 N.S., p. 458-9.
- (g) Deed from Laverne McWilliams, a divorced woman, to W.J. Campbell, dated June 14, 1952, and recorded in Deed Book 182 N.S., p. 493.
3. The Southwest Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.
- (a) Tax deed by John C. Curry, State Land Commissioner, to A.V. Campbell, dated March 20, 1940, and recorded in Deed Book 72 N.S., p. 112-113.
- (b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.
4. The Northeast Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.
- (a) Tax deed by Henry S. Long, as State Tax Commissioner, to J.L. Tucker, dated August 25, 1936, and recorded in Deed Book 282 N.S., p. 178-9.
- (b) Deed from C.B. Mitchell and Jessie H. Mitchell, his wife, R.F. Mitchell, Jr. and Dorothy F. Mitchell, his wife, and J.L. Tucker, unmarried, to J.R. Duncan, dated January 24, 1941, and recorded in Deed Book 75 N.S., p. 25-6.
- (c) Deed from J.R. Duncan and Margaret Duncan, his wife, to A.V. Campbell, dated August 31, 1942, and recorded in Deed Book 78 N.S., p. 116-117.
- (d) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 1, 1959, and recorded in Deed Book 282 N.S., p.9;

that for more than ten years next preceding the filing of this Bill of Complaint no other persons than the complainant and those through whom they claim title to the said lands or any part thereof have assessed or paid taxes thereon and that they and those through whom they claim title have been in actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of the same for more than ten years next preceding the filing of this Bill of Complaint.

IT IS THEREFORE FURTHER ORDERED, ADJUDGED AND DECREED, that the said W.J. Campbell, at the time of the filing of the Bill of Complaint in this cause and at this time had and has the fee simple to the above described lands, subject however, to a mortgage to the Bay Minette Production Credit Association, said mortgage being

dated August 12, 1959, and recorded in Mortgage Book 322 at Pages 599-600, Baldwin County, Alabama, Probate Records, and to a certain oil, gas and mineral lease to Virgil W. Michael dated July 17, 1956, and recorded in Deed Book 249 N.S., at pages 298-300, Baldwin County, Alabama, Probate Records, and to each and every part and parcel thereof, that none of the defendants, Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms and Archibald J. Beverlin, if living, or if dead the unknown heirs, devisees, and personal representatives, and assigns of such of them as are deceased, nor the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, nor any and all persons, firms, associations or corporations have any title to, interest in, claim, lien or encumbrance on said lands or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the title hereby quieted and established in and declared to be in the said W.J. Campbell, shall inure to the benefit of all persons deriving title to said lands or any part therein, from or through the said W.J. Campbell, and the said title so quieted and established in him shall be treated and considered as established in favor of the said W.J. Campbell, and all persons deriving title through him.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a certified copy of this decree be, by the Register of this Court, recorded in the Office of the Judge of Probate of Baldwin County, Alabama, in which County the said land lies, within thirty days from the date of this decree, and that the cost thereof be taxed as a part of the cost in this proceeding.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said W.J. Campbell, be and he is hereby taxed with the cost of this proceeding for which let execution issue.

Done at Bay Minette, Alabama, this the 21st day of January, 1960.

Hubert M. Stone
Judge

W.J. CAMPBELL,
COMPLAINANT,
VS.
CERTAIN LANDS,
RESPONDENTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY NO. 4711.

DECREE PRO CONFESSO

In this cause it appears to the Register, Alice J. Duck, that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 24th day of September, 1959, in the Baldwin Times, a newspaper published in Bay Minette, Alabama, and that a copy of said order was posted at the Courthouse door in Bay Minette, Baldwin County, Alabama, on the 24th day of September, 1959.

And it now further appearing to the Register, Alice J. Duck, that the said Defendants, and each of them having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of complaint, ordered and decreed by the Register, Alice J. Duck, that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E. P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if living, or if deceased, against the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased, and against the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and against any and all other persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance on said lands or any part or parcel thereof.

This the 27 day of November, 1959.


Register

No. _____

W. J. CAMPBELL,
Complainant
vs.
CERTAIN LANDS,
Respondent

DECREE PRO CONFESSO

The State of Alabama, BALDWIN County.

IN CIRCUIT COURT IN EQUITY.

W.J. CAMPBELL, Complainant

vs.

CERTAIN LANDS, Defendant

Oral examination before the Register of the following witnesses:

W.J. Campbell

A.V. Campbell

J. Connor Owens, Jr.

who reside in Alabama, said examination being conducted in Bay Minette Alabama,

on this the 7th day of December, 1959, and there being present

W.J. Campbell, A.V. Campbell, J. Connor Owens, Jr.,

Telfair J. Mashburn, Guardian ad litem.

The said _____ being first sworn to speak the truth, the whole truth, and nothing but the

truth, testified as follows: My name is J. Connor Owens, Jr. and I am Solicitor of record for W.J. Campbell in that certain suit filed by W.J. Campbell against Certain Lands described in the Bill of Complaint filed in this cause and against the following people: Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.F. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, and Archibald J. Beverlin, on the 21st day of September, 1959. I searched the records of Baldwin County, Alabama, both in the Probate Court and in the Tax Assessor's Office for the addresses of any of the above named parties. I could not ascertain whether they are living or dead, and if dead, whether or not they left any heirs. The same inquiry was made to the officers in the Courthouse and to people in the vicinity where the land lies. The same search was made as to the Alabama Sumatra and Havana Tobacco Company, a corporation, and I could not find any stockholders or officers of the same or their addresses. I am informed and upon such information believe that all of the above named persons are over the age of 21 years and are non-residents of the State of Alabama.

My name is W. J. Campbell and I am the Complainant in a case filed in the Circuit Court of Baldwin County against Certain Lands on the 21st day of September, 1959. I do not know the names or addresses or anything about the persons named in the case. I claim title to all the lands described in the Bill of Complaint. I acquired title to most of the lands described in the Bill of Complaint from my father. I bought 20 acres of land from Ruby Chavers and Ancil Chavers, her husband. I bought all this land about 1952. Since I purchased this land I cleaned it up and built a dairy barn on it and two houses. I fenced all this land. I have about 30 acres in cultivation and the rest of it in permanent pasture. I have maintained this land without

The State of Alabama,

.....County.

IN CIRCUIT COURT, IN EQUITY

vs. Complainant,

Defendant

Deposition Taken Before Register on Oral Examination

FILED

Deposition of _____

JAN 21 1960

for **ALICE J. DUON, CLERK**
ALICE J. DUON, REGISTER

Filed _____ day of _____, 19____

Published by order of the Court, _____

day of _____, 19____

Register

W.J. CAMPBELL,
COMPLAINANT,
VS.
CERTAIN LANDS,
RESPONDENTS.

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

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
NO. 4711.

NOTICE OF TIME AND PLACE OF TAKING TESTIMONY

To the unknown heirs, devisees and personal representatives of Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if dead, and the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and to Jeffrey J. Mashburn, Jr., guardian ad litem for them;

Notice is hereby given that the testimony of A.V. Campbell and W.J. Campbell, witnesses for the Complainant in the above styled cause will be taken orally before Anne B. Owens, commissioner, heretofore duly appointed, at the office of J. Connor Owens, Jr., Attorney for the Complainant, at 1:30 o'clock, P.M. on the 30th day of November, 1959.

Anne B. Owens
Commissioner

Received copy of foregoing this the 27th day of November, 1959, and waive further notice.

Jeffrey J. Mashburn
Guardian ad Litem

4711

Notice of Service
and Place of
Taking Testimony

W.J. CAMPBELL,
COMPLAINANT,
VS.
CERTAIN LANDS,
RESPONDENTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY NO. 4711.

APPLICATION FOR ORAL EXAMINATION OF THE COMPLAINANT AND WITNESSES

Comes the Complainant in the above styled cause and requests the oral examination of W.J. Campbell & A.V. Campbell as witnesses for the Complainant, who reside in Baldwin County, State of Alabama, and suggests Anne B. Owens of the Town of Bay Minette, as a suitable person to act as commissioner to take the deposition of said witnesses.

Witness my hand this the 17 day of November, 1959.

J. Connor Owens, Jr.
Solicitor

The foregoing notice was this day served on me by J. Connor Owens, Jr., Solicitor for Complainant.

This the 27th day of November, 1959.

J. J. Madhure

W. J. CAMPBELL,

COMPLAINANT,

VS.

THE NORTH HALF OF THE NORTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE NORTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTH HALF OF THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER OF THE NORTHEAST QUARTER; THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER, ALL IN SECTION 4, TOWNSHIP 5 SOUTH, RANGE 4 EAST, AND AGAINST THE FOLLOWING NAMED PERSONS: THOMAS F. HAMP, H. M. COZAD, CHARLES C. FORSBERG, LAURA E. OWENS, I. J. SCHILLER, R. F. LERCH, A. H. KING, ELISKA A. PARKER, LOUIS L. HARRIS, ARCHIBALD J. BEVERLIN, IF LIVING, OR IF DECEASED, AGAINST THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF SUCH OF THEM AS ARE DECEASED; AND AGAINST THE ALABAMA SUMATRA AND HAVANA TOBACCO COMPANY, A CORPORATION, ITS SUCCESSORS OR ASSIGNS, AND ANY AND ALL OTHER PERSONS, FIRMS ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR OTHER ENCUMBRANCE ON SAID LANDS OR ON ANY PART THEREOF.

RESPONDENTS.

IN THE CIRCUIT COURT OF

STATE OF ALABAMA, BALDWIN COUNTY

Filed 1-27-60 3:00 P.M.
 Recorded Deed book 288 page 290-4
 W. J. Stewart
 Judge of Probate

BALDWIN COUNTY, ALABAMA,

IN EQUITY NO. 4711

DECREE

This cause coming on to be heard is submitted for final decree upon behalf of the complainant, upon the original Bill of Complaint and upon the service, Decree Pro Confesso, appointment, acceptance and answer of Guardian ad Litem, pleading and proof as noted by the Register; and the same being considered by the Court,

the Court is of the opinion, does find, ascertain and decree, that due and proper notice of the pendency of the said Bill of Complaint against the said lands and the said defendants, Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harns, Archibald J. Beverlin, if living, or if deceased, against the unknown heirs, devisees, personal representatives and assigns of such of them as are deceased; and against the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, and any and all other persons, firms, associations or corporations claiming any title to, interest in, claim, lien or other encumbrance on said lands or on any part thereof, has been given in the manner required by law, and that the complainant is entitled to the relief as prayed for in the Bill of Complaint.

IT IS THEREFORE FOUND, ASCERTAINED, ORDERED, ADJUDGED AND DECREED by the Court that the said complainant, W.J. Campbell, who is over the age of twenty-one years, at the time of the filing of the said Bill of Complaint and at the time of the submission of this cause for final decree, the complainant was and is in the actual and peaceable possession, claiming to own the same absolutely, and in fee simple of all that certain tract of land situated in the County of Baldwin, State of Alabama, described as follows, to-wit:

The North Half of the North Half of the Southwest Quarter of the Northeast Quarter; the South Half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North Half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southwest Quarter of the Northeast Quarter; the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter; all in Section 4, Township 5 South, Range 4 East;

That the title to said lands on the Records of Baldwin County stand in the name of your complainant; that the complainant obtained title to the following lands as stated herein:

1. The East Half of the Southwest Quarter of the Northeast Quarter, and the North Half of the Northwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by H.W. Cozad, by G.W. Robertson, Judge

of Probate, to A.V. Campbell, dated June 18, 1941, and recorded in Deed Book 75 N.S., p. 255.

(b) Tax deed under assessment to "Owner Unknown", by James M. Voltz, Judge of Probate, to W.J. Hobbs, dated August 23, 1919, and recorded in Deed Book 28 N.S., p. 439-440.

(c) Tax deed by Charles O. Forsberg, by G.W. Robertson, Judge of Probate, to Davidson & Taylor, dated June 18, 1940, and recorded in Deed Book 71 N.S., p. 518.

(d) Tax deed by John C. Curry, as State Land Commissioner to A.V. Campbell, dated August 7, 1940, and recorded in Deed Book 72 N.S., p. 494-5.

(e) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(f) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.D. Jordan, dated January 9, 1945, and recorded in Deed Book 110 N.S., p. 387-8.

(g) Deed from W.D. Jordan and Vandemar Jordan, his wife, to Ruby Chavers and Ancil Chavers, dated November, 1948, and filed for record on January 13, 1949, and recorded in Deed Book 138 N.S., p. 19-20.

(h) Deed from W.J. Hobbs and S.A. Hobbs, his wife, to Walter Gullede, dated September 24, 1919, and recorded in Deed Book 72 N.S., p. 400.

(i) Deed from Walter Gullede and Vera May Gullede, his wife, to J.J. Calvert, dated March 13, 1930, and recorded in Deed Book 72 N.S., p. 410.

(j) Deed from J.J. Calvert and Lula S. Calvert, his wife, to A.V. Campbell, dated August 9, 1940, and recorded in Deed Book 72 N.S., p. 344.

(k) Deed from E. Davidson and Louise T. Davidson, his wife, and H.L. Taylor and Leah Taylor, his wife, to A.V. Campbell, dated September 2, 1940, and recorded in Deed Book 72 N.S., p. 494.

(l) Deed from Ruby Chavers and Ancil Chavers, her husband, to W.J. Campbell, dated August 7, 1952, and recorded in Deed Book 186 N.S., p. 249-250.

2. The Southwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Deed from Mary L. Parker to A.V. Campbell, dated March 25, 1940, and recorded in Deed Book 71 N.S., p. 436.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(c) Deed from A.V. Campbell and Gladys Campbell, his wife, to Della Spivey and Robert L. Spivy, dated May, 1943, and recorded in Deed Book 79 N.S., p. 543.

(d) Deed from R.L. Spivey and Della Spivey, his wife, to W.J. Campbell, dated January 21, 1952, and recorded in Deed Book 174 N.S., p. 4-5.

(e) Deed from R.L. Spivey and Della Spivey, his wife, to Hugh D. McWilliams, dated January 21, 1952, and recorded in Deed Book 182 N.S., p. 456-7.

(f) Deed from Hugh D. McWilliams, the husband of Laverne McWilliams, to Laverne McWilliams, dated May 27, 1952, and recorded in Deed Book 182 N.S., p. 458-9.

(g) Deed from Laverne McWilliams, a divorced woman, to W.J. Campbell, dated June 14, 1952, and recorded in Deed Book 182 N.S., p. 493.

3. The Southwest Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by John C. Curry, State Land Commissioner, to A.V. Campbell, dated March 20, 1940, and recorded in Deed Book 72 N.S., p. 112-113.

(b) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

4. The Northeast Quarter of the Northwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by Henry S. Long, as State Tax Commissioner, to J.L. Tucker, dated August 25, 1936, and recorded in Deed Book 282 N.S., p. 178-9.

(b) Deed from C.B. Mitchell and Jessie H. Mitchell, his wife, R.P. Mitchell, Jr. and Dorothy F. Mitchell, his wife, and J.L. Tucker, unmarried, to J.R. Duncan, dated January 24, 1941, and recorded in Deed Book 75 N.S., p. 25-6.

(c) Deed from J.R. Duncan and Margaret Duncan, his wife, to A.V. Campbell, dated August 31, 1942, and recorded in Deed Book 78 N.S., p. 116-117.

(d) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 1, 1959, and recorded in Deed Book 282 N.S., p. 9;

that for more than ten years next preceding the filing of this Bill of Complaint no other persons than the complainant and those through whom they claim title to the said lands or any part thereof have assessed or paid taxes thereon and that they and those through whom they claim title have been in actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of the same for more than ten years next preceding the filing of this Bill of Complaint.

IT IS THEREFORE FURTHER ORDERED, ADJUDGED AND DECREED, that the said W.J. Campbell, at the time of the filing of the Bill of Complaint in this cause and at this time had and has the fee simple to the above described lands, subject however, to a mortgage to the Bay Minette Production Credit Association, said mortgage being

dated August 12, 1959, and recorded in Mortgage Book 322 at Pages 599-600, Baldwin County, Alabama, Probate Records, and to a certain oil, gas and mineral lease to Virgil W. Michael dated July 17, 1956, and recorded in Deed Book 249 M.S., at pages 298-300, Baldwin County, Alabama, Probate Records, and to each and every part and parcel thereof, that none of the defendants, Thomas F. Hamm, H.W. Cozad, Charles C. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Bliska A. Parker, Louis L. Harms and Archibald J. Beverlin, if living, or if dead the unknown heirs, devisees, and personal representatives, and assigns of such of them as are deceased, nor the Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns, nor any and all persons, firms, associations or corporations have any title to, interest in, claim, lien or encumbrance on said lands or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the title hereby quieted and established in and declared to be in the said W.J. Campbell, shall inure to the benefit of all persons deriving title to said lands or any part therein, from or through the said W.J. Campbell, and the said title so quieted and established in him shall be treated and considered as established in favor of the said W.J. Campbell, and all persons deriving title through him.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a certified copy of this decree be, by the Register of this Court, recorded in the Office of the Judge of Probate of Baldwin County, Alabama, in which County the said land lies, within thirty days from the date of this decree, and that the cost thereof be taxed as a part of the cost in this proceeding.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said W.J. Campbell, be and he is hereby taxed with the cost of this proceeding for which let execution issue.

Done at Bay Minette, Alabama, this the 21 day of January, 1960.

Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree entered by the Judge of the Circuit Court in above stated cause, which said decree is on file and enrolled in my office.

WITNESS MY HAND AND SEAL THIS THE 21 day of Jan, 1960

Alice J. Duck
Register of Circuit Court, in Equity

Hubert M. Hall

Judge

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: ANNE B. OWENS

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine

W.J. CAMPBELL and A.V. CAMPBELL

a witness in behalf of W.J. CAMPBELL, as Complainant, in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

W.J. CAMPBELL, Complainant

and

CERTAIN LANDS, Respondent S,

on oath, to be by you administered, upon them
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness the 27th day of November

, 19 59.

Archie J. Duck
Register

Commissioner's Fee, \$

Witness' Fees, \$

NO. _____

STATE of ALABAMA
Baldwin County

CIRCUIT COURT

Complainant

vs.

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

[Faint, mostly illegible text, likely bleed-through from the reverse side of the page. The text is arranged in several vertical columns.]

THE BALDWIN TIMES

BALDWIN COUNTY

Alabama's Best County's Best Newspaper

JIMMY FAULKNER
PUBLISHER

BAY MINETTE, ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA.
BALDWIN COUNTY.

E. R. Morrisette, Jr. being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

W. J. Campbell, Complainant

COST STATEMENT

1926 WORDS @ 6 1/2 cents \$ 125.19

I hereby certify this is correct, due and unpaid (paid).

E. R. Morrisette, Jr.

Editor.

was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication Sept. 24, 1959 Vol. 71 No. 37

Date of 2nd publication Oct. 1, 1959 Vol. 71 No. 38

Date of 3rd publication Oct. 8, 1959 Vol. 71 No. 39

Date of 4th publication Oct. 15, 1959 Vol. 71 No. 40

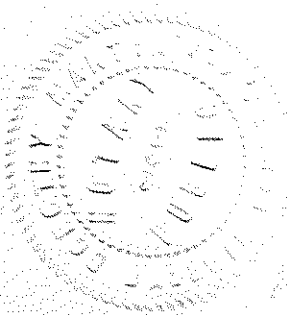
Subscribed and sworn before the undersigned this 15 day of Oct, 1959.

Dorothy Martin

Notary Public, Baldwin County.

E. R. Morrisette, Jr.

Editor.



Probate Judge

W.J. CAMPBELL,
COMPLAINANT,
VS.

IN THE CIRCUIT COURT OF

THE NORTH HALF OF THE NORTH HALF OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE NORTH HALF OF THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTH HALF OF THE NORTHEAST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE NORTHEAST QUARTER; THE NORTHEAST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER; THE SOUTHWEST QUARTER OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER, ALL IN SECTION 4, TOWNSHIP 5 SOUTH, RANGE 4 EAST, AND AGAINST THE FOLLOWING NAMED PERSONS:

BALDWIN COUNTY, ALABAMA,

THOMAS P. HAMM, H.W. COZAD, CHARLES O. FORSBERG, LAURA E. OWENS, I.J. SCHILLER, E. P. LERCH, A.H. KING, ELISKA A. PARKER, LOUIS L. HARMS, ARCHIBALD J. BEVERLIN, IF LIVING, OR IF DECEASED, AGAINST THE UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND ASSIGNS OF SUCH OF THEM AS ARE DECEASED: AND AGAINST THE ALABAMA SUMATRA AND HAVANA TOBACCO COMPANY, A CORPORATION, ITS SUCCESSORS OR ASSIGNS, AND ANY AND ALL OTHER PERSONS, FIRMS, ASSOCIATIONS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, CLAIM, LIEN OR OTHER ENCUMBRANCE ON SAID LANDS OR ON ANY PART THEREOF,

IN EQUITY

NO. 4711.

RESPONDENTS.

Notice is hereby given Thomas P. Hamm, H.W. Cozad, Charles O. Forsberg, Laura E. Owens, I.J. Schiller, E.P. Lerch, A.H. King, Eliska A. Parker, Louis L. Harms, Archibald J. Beverlin, if living, or if deceased, the unknown heirs, devisees, personal representatives and assigns of such of them as may be deceased; and the

Alabama Sumatra and Havana Tobacco Company, a corporation, its successors or assigns or its stockholders, and any and all persons, firms, associations or corporations claiming any title to, interest in, claim, lien or encumbrance upon the following described lands in Baldwin County, Alabama, to-wit:

The North half of the North half of the Southwest Quarter of the Northeast Quarter; the South half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the North half of the Southeast Quarter of the Southwest Quarter of the Northeast Quarter; the South half of the Northeast Quarter of the Southwest Quarter of the Northeast Quarter; the Southwest Quarter of the Southwest Quarter of the Northeast Quarter; the Northeast Quarter of the Northwest Quarter of the Northeast Quarter; the Southwest Quarter of the Northwest Quarter of the Northeast Quarter, all in Section 4, Township 5 South, Range 4 East.

That W.J. Campbell has filed his Bill of Complaint on the *21st* day of *September*, 1959, in this Court on the Equity side claiming to be in actual peaceable possession, owning and claiming to own that certain land, lying and being situated in the County of Baldwin, State of Alabama, described above herein. Complainant alleges in his Bill of Complaint that he acquired title to said land by the following:

1. The East half of the Southwest Quarter of the Northeast Quarter, and the North half of the Northwest Quarter of the Southwest Quarter of the Northeast Quarter, Section 4, Township 5 South, Range 4 East.

(a) Tax deed by H.W. Cozad, by G.W. Robertson, Judge of Probate, to A.V. Campbell, dated June 18, 1941, and recorded in Deed Book 75 N.S., p. 255.

(b) Tax deed under assessment to "Owner Unknown", by James M. Voltz, Judge of Probate, to W.S. Hobbs, dated August 23, 1919, and recorded in Deed Book 28 N.S., p. 439-440.

(c) Tax deed by Charles C. Forsberg, by G.W. Robertson, Judge of Probate, to Davidson & Taylor, dated June 18, 1940, and recorded in Deed Book 71 N.S., p. 518.

(d) Tax deed by John C. Curry, as State Land Commissioner, to A.V. Campbell, dated August 7, 1940, and recorded in Deed Book 72 N.S., p. 494-5.

(e) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.J. Campbell, dated September 6, 1952, and recorded in Deed Book 186 N.S., p. 251.

(f) Deed from A.V. Campbell and Gladys Campbell, his wife, to W.D. Jordan, dated January 9, 1945, and recorded in Deed Book 110 N.S., p. 387-8.

(g) Deed from W.D. Jordan and Vandemar Jordan, his wife,