HENRY G. HERBERT, ET AL, Complainants,	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, ET AL, Defendants.	BALDWIN COUNTY. CAUSE NO. 580.

CERTIFICATE OF REGISTER AS TO NOTICE BY REGISTERED MAIL:

I, T. W. Richerson, Register of the Circuit Court-Equity Side, State of Alabama, Baldwin County, do hereby certify that I did, on the 29th. day of March, 1926, send by registered mail postage prepaid a copy of the Bill of Complaint in this cause to the following named defendants at the respective address set opposite each defendant's name, viz:-

George Raley, 1723 East Howard Ave., Biloxi, Miss.
Grover Raley, 1125, East Howard Ave., Biloxi, Miss.
Ida Raley McCaleb, 1429 East Beach St., Biloxi, Miss.
Sophronia Raley Thornton, 246 Oak St., Biloxi, Miss.
Mike Fletcher, Scranton, Miss.
Fritz Beck, " "
Conde Fletcher, " "
Virginia Fletcher, " "
Victoria Fletcher Crebs, Scranton, Miss.
Mary Fletcher Portervan, " "
Russell Bullman " "
Gus Portervan, " "
Mrs. Silas Powell, Pascagoula, Miss.
Fred Beck " "
Lorena Valisori, Pensacola, Florida.
William Raley, New Orleans, La.
Laura Hinote Cheatem, San Antonio, Texas.
Mary Morton, West Belmont St., near St. Johns Cemetery, Pensacola, Florida.
Mellie Norris, 1221 West Belmont St., Pensacola, Fla.
Jessie Morton, " " " " " "
Agnes Hollofield" " " " " "
Mittie Ellis, 8335 Apricot Street, New Orleans, La.

that for all copies so sent by registered mail there was demanded a return receipt addressed to the Register of this Court and that return receipts were duly received for the same and filed by me as follows:- April 1st., 1926, for Mrs. Silas Powell, Mary Fletcher Portervan, Virginia Fletcher, Mike Fletcher, Sophronia Raley Thornton and Grover Raley; on March 31st., 1926 for Russell Bullman and Conde Fletcher; on April 3rd., 1926 for George Raley; on Apr. 5th., 1926 for Ida Raley McCaleb; on April 10th. 1926 for Gus Portervan; on April 13th., 1926 for Victoria Fletcher Crebs and on Apr. 23rd., 1926 for Fred Beck and Fritz Beck; May 18th., 1926 for Agnes Hollifield, Mellie Norris, Mittie Ellis and May 19th., 1926 for Jessie Morton.

Witness my hand as Register this Court this September 14th., 1926.

T. W. Richerson
As Register.

10

No. 580.

Certificate of Register as to Notice by Registered Mail.

Filed 27th, 1926.

Register.

RECORDED

HENRY G. HERBERT, et al, Complainants,	IN THE CIRCUIT COURT-EQUITY SIDE.
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, et al, Defendants.	BALDWIN COUNTY.

FINAL DECREE.

This cause is, upon written request to the Register by the complainants, submitted for final decree in vacation upon the pleadings, decrees pro confesso against all of the defendants and proof ~~and note of evidence~~ as noted by the Register.

The Court, upon consideration of this cause is of the opinion that the complainants are entitled to relief for which they pray in their Bill of Complaint and against all of the defendants.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the defendants against whom this cause is brought, namely:- Gus Portovan, Lorena Valisori, Jessie Morton, Agnes Hollifield, Mittie Ellis, Russell Bullman, Missouri Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Francis Codina, Johnny Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Josie Villar, Willie Mabry, Willie Hunter, Charles Villar, the unknown heirs at law and next of kin of Bella Smith Portovan, deceased, the unknown heirs at law and next of kin of Martin Villar, Jr., deceased, the unknown heirs at law and next of kin of Alice Hunter Mabry, deceased, the unknown heirs at law and next of kin of Bella Hunter, deceased, the unknown heirs at law and next of kin of Victoria Villar Hunter, deceased, the unknown heirs at law and next of kin of Missouri Carter

deceased, the unknown heirs at law and next of kin of Artemus Villar, deceased, the unknown heirs at law and next of kin of Gus Villar, deceased, the unknown heirs at law and next of kin of Victorine Villar Beck, deceased, The unknown heirs at law and next of kin of Phillipa Villar, deceased, the unknown heirs at law and next of kin of Frank Kee (a son of William Kee, the patentee of said lands hereinafter described), deceased, Artemus Villar alias Artemus Billard, Martin F. Villar, Bella Villar, Ella Crane, Jennie Yancey, William Yancey, Frank Yancey and Lydia Yancey Phillips, and each of them, have no right, title or interest in or hold any lien or encumbrance upon the following described lands, viz:-

> That part or portion of the William Kee Grant which is in Section Thirty-six (36) in Township Eight (8) South of Range Five (5) East, particularly described as follows, viz:- Beginning at a stake on the south side of Bay La Launch where the section line dividing section thirty-three from the William Kee Grant touches the waters edge; run thence south on said section line to the township line which divides township eight south from township nine south; thence east along said township line to the waters edge of Bay La Launch; thence following the meanders of the said Bay La Launch back to the place of beginning; containing 94½ acres, more or less, all being in Baldwin County, State of Alabama.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court, that as against the above named parties defendant and eac of them the complainants have a good and perfect title to all of said above described lands and that the title of the said complai ants to all of said land be and the same is hereby forever quiete as against the above named defendants; that a certified copy of this decree be recorded in the office of the Judge of Probate o i Baldwin County, Alabama; that a certified copy of this decree be mailed by the Register to each defendant who has not appeared and whose address is known; ~~that this decree is made subject to the provisions of section ___ of the Code of Alabama of 1923,~~ that t

complainants do pay the costs of this cause for which let execution issue.

Done this 4th day of May, 1927.

John D. Leigh
Judge of the 21St. Judicial Circuit
of Alabama.

Final
Decree

Norfolk
vs
Missouri Pacific

May 5th 1927
T D Richmond
Register

RECORDED

125

HENRY G. HERBERT ET AL, Complainants, -vs- MISSOURI BULLMAN ET AL, Defendants.	IN THE CIRCUIT COURT-EQUITY SIDE. STATE OF ALABAMA. BALDWIN COUNTY. CAUSE NO. 580.

DECREE PRO CONFESSO ON PUBLICATION.

In this cause it having been made to appear to the undersigned as Register of this court that the order of publication heretofore made in this cause on March 23rd., 1926 was published for four consecutive weeks commencing on the 27th. day of March, 1926, in the Robertsdale American, a newspaper printed in the English language published and of general circulation in Baldwin County, Alabama, that a copy of said order was posted at the door of the court house in Baldwin County, Alabama, the place where the court sits and that there was sent by registered mail another copy thereof to each of the defendants where his or her residence was shown by the Bill of Complaint or affidavit, which copies were posted and mailed within twenty days of the making of said order.

And it now appearing to the Register that Victoria Villar Hunter, Gus Portovan, Lorena Valisori, Russell Bullman, Mary Fletcher Portervan, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Jessie Hinote Francis Codina, Johnnie Fletcher, Mrs. Bill ankerson, Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missouri Bullman, Willie Mabry, Willie Hunter, Charles Villar; the heirs at law or next of kin of Bella Smith Portervan, Martin Villar, Jr. (the son of Isabella Kee Villar and Martin Villar) Alice Hunter Mabry, Bella Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (a son of Gus Villar) Gus Villar, Phillipa Villar and Francis Kee (a son of William Kee, the patentee of said lands have to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause,

Now therefore on motion of the complainants it is ordered and decreed by the Register that the Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Gus Portovan, Lorena Valisori, Russell Bullman, Mary Fletcher Portervan, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Jessie Hinote, Francis Codina, Johnnie Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missouri Bullman, Willie Mabry, Willie Hunter, Charles Villar; the heirs at law or next of kin of Bella Smith Portervan, Martin VillarJr. (the son of Isabella Kee Villar and Martin Villar) Alice Hunter Mabry, Bella Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (the son of Gus Villar), Gus Villar, Phillipa Villar and Francis Kee (a son of William Kee) the patentee of said lands.

This the 27th day of September, 1926.

T. W. Richerson
Register

No. 580.

Decree pro confesso on publication.

Filed September 27th., 1926.

Register.

RECORDED

HENRY G. HERBERT, ET AL, COMPLAINANTS,	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, ET AL, Defendants.	BALDWIN COUNTY.
	~~CAUSE NO. 560.~~

I, T. W. Richerson, Register of the Circuit Court-Equity side, Baldwin County, Alabama, hereby certify that in this cause on the affidavit of Norborne Stone as the agent and attorne and one of the solicitors of record for complainants, heretofore and filed on April 19th., 1926, I, as such Register did on April 28th., 1926, make and issue an order of publication to Mellie Norris, Jesse Morton, and Agnes Hollifield, who reside at 1221 West Belmont Street, Pensacola, Florida, Mittie Ellis who reside at 8335 Apricot Street, New Orleans, Louisiana and the same was published in the Robertsdale American, a newspaper printed in the English language and of general circulation and published in Baldwin County, Alabama for four consecutive weeks commencing on May 1st., 1926, requiring them, the above named defendants to appear and plead, answer or demur to the Bill of Complaint in this cause by the 30 day of May, 1926, or after thirty days therefrom a decree pro confesso may be taken against such of them not so appearing and pleading, answering or demurring; that a copy of said order was forwarded by mail to each of the above named parties as set out in said order and that the addresses given thereinand as shown above and that one other copy of said order was posted u at the Court House of Baldwin County, Alabama, the place where th above court sits; that said copys were posted and sent by registe ed mail within twenty days from the making of said order.

This the 1st. day of June, 1926.

T W Richerson
As Register.

9

No. 580.

Certificate of Register as
to publication.

Filed 9/27, 1926.

T. W. Kellermann
Register.

RECORDED

HENRY G. HERBERT, ET AL, Complainants,	)	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-	)	STATE OF ALABAMA,
MISSOURI BULLMAN, ET AL, Defendants.	)	BALDWIN COUNTY.
	)	CAUSE NO. 580.

MOTION FOR DECREE PRO CONFESSO ON SERVICE BY REGISTERED MAI

Motion is hereby made by the Complainants by Norborne Stone, as their Solicitor of record, for decree pro confesso aga Gus Portervan, Lorena Valisori, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fle cher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Mellie Norris, Jessie Morton, Agnes Hollifield, and Mittie Elli defendants in the above cause and for grounds thereof shows that more than thirty days have elapsed since the perfection of service on these said defendants by registered mail, which service was duly had according to law by the Register of this Court issu ing and sending to the above named defendants by registered mail postage prepaid marked "For delivery only to the person to whom addressed" and return receipt demanded address to the Register o this Court, a copy of the ill of Complaint to-gether with a summ ons to answer such Bill of Complaint within thirty days and that such receipts have been received in return and filed in this cau and that all of the same have been received more than thirty day ago and that all of said defendants have failed to answer, plead or demur to the Bill of Complaint in this cause to the date here

This 27th. day of September, 1926.

Norborne Ston

Solicitor for Complainants.

No. 580.

Motion for Decree pro confesso on service by Registered mail.

Filed Sept. 27th., 1926.
T. W. Reilman Register.

Granted Sept. 27th., 1926.
T. W. Reilman
Register.

RECORDED

HENRY G. HERBERT, et al, Complainants,	)	
-vs-	)	IN THE CIRCUIT COURT- EQUITY SIDE.
~~MISSOURI BULLMAN, et al,~~	)	STATE OF ALABAMA.
Defendants.	)	BALDWIN COUNTY.

REQUEST FOR DECREE IN VACATION.

Come the complainants by their Solicitor of record, Norborne Stone, and file this their written request with the Register of this court that the cause be submitted for final decree and show that decrees pro confesso have been taken in said cause and the cause is ready for submission for final decree and that no defenses have been interposed by the defendants.

WHEREFORE, complainants request that the Register make out his note of testimony and deliver at once all papers in said cause to the Judge for final decree.

Dated this 3 day of May, 1927.

NORBORNE STONE,
Solicitor for Complainants.

6

Request for Allowance in Vacation

Filed 5/3/27

T W Rieman
Register

RECORDED

HENRY G. HERBERT, et al, Complainants, -vs- MISSOURI BULLMAN, et al, Defendants.	IN THE CIRCUIT COURT, EQUITY SIDE STATE OF ALABAMA. BALDWIN COUNTY. CAUSE NO. 580

TO F. E. ST. JOHN, SOLICITOR OF RECORD FOR ASA B. FULLER.

Notice is hereby given that the motion of complainants this day filed to set aside the following order made and entered in this cause by the Court on September 13th., 1926, viz:

> "September 13th., 1926. Asa B. Fuller allowed to come in and be allowed to file answer and be made party respondent. Answer of Asa B. Fuller filed."

has by the Court been set down for hearing and will be heard by the Court at Bay Minette, Alabama, on September 30th., 1926.

Witness my hand as Register of Court this September 14th., 1926.

T. W. Richerson

As Register of Circuit Court, Equi
Side, Baldwin County, Alabama.

8

Henry G Herbert
vs
Missouri Buchman
et al

Filed Sept 14th 1926
T.W. Phillipson
Register

RECORDED

serve copy
on F. E. St. John
Attorney at Law
Cullman
Ala

I have executed the within by leaving a copy of same with
F. E. St. John

This 15 day of Sept 1926
J W Lambert Sheriff
D. S.

HENRY G. HERBERT, ET AL, Complainants,	)	
-vs-	)	IN THE CIRCUIT COURT-EQUITY SIDE
MISSOURI BULLMAN, ET AL, Defendants.	)	STATE OF ALABAMA.
	)	BALDWIN COUNTY.
	)	CAUSE NO. 580.

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE:

Come the Complainants in this cause by Norborne Stone, as their Solicitor of record, and file this, their motion for a decree pro confesso against Ella Crane, Jennie Yancey, William Yancey, Lydia Yancey Phillips, Frank Yancey, Artemus Villar, alia Artemus Billard and Martin F. Villar, defendants in above stated cause and for grounds thereof show that the above named Jennie Yancey, William ancey and Lydia Yancey Phillips were heretofore personally served with a summons in this cause on April 8th., 1926; that Martin F. Villar was so served on April 7th., 1926; that Frank Yancey and Mrs. Ella Crane were so served on April 19th., 1926 and that Artemus Villar, alias Artemus Billard, was s served pn April 15th., 1926; that said summons were duly served according to law and that said defendants have failed to appear and plead, answer or demur to the Bill ofComplaint in this cause to this date.

This the 27th. day of September, 1926.

Norborne Stone

As Solicitor for Complainants.

12

No. 580.

Motion for Decree pro confesso on personal service.

Filed Sept. 27th., 1926.
T. W. Richmond
Register.

Granted Sept. 27th., 1926.
T. W. Richmond
Register.

RECORDED

HENRY G. HERBERT ET AL, Complainants,	)	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-	)	STATE OF ALABAMA.
MISSOURI BULLMAN ET AL, Defendants.	)	BALDWIN COUNTY.
	)	CAUSE NO. 580.

MOTION FOR DECREE PRO CONFESSON ON PUBLICATION:

Motion is hereby made by the complainants by Norborne Stone, as their solicitor of record, for a decree pro confesson on publication against the following named defendants in the above cause, viz:- Gus Portovan, Lorena Valisori, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Francis Codina, Johnnie Fletcher, Mrs. Bill Ankerson, Jessie Hinote, Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missouri Bullman, Willie Mabry, Willie Hunter, Charles Villar; the heirs at law and next of kin of Bella Smith Portovan, Martin Villar Jr. (the son of Isabella Kee Villar and Martin Villar) Alice Hunter Mabry, Bella Hunter, Victoria Villar Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (the son of Gus Villar) Gus Villar, Phillipa Villar and Francis Kee (a son of William Kee, the patentee of said land) and for grounds thereof shows that more than thirty days have elapsed since the perfection of publication was made under the order of this court in this cause made on April 26th., 1926; and it having been shown by due proof that said defendants are non-residents of the State of Alabama and over the age of twenty-one years and they having failed to answer, plead or demur to the Bill of Complaint in this cause to the date hereof.

This the 27th. day of September, 1926.

Norborne Stone

As Solicitor for Complainants.

13

No. 580.

Motion for Decree pro confesso on publication.

Filed Sept., 27th., 1926.

T. W. Richmond
Register.

Granted-Sept. 27th., 1926.

T. W. Richmond
Register.

RECORDED

HENRY G. HERBERT ET AL, Complainants,	)	IN THE CIRCUIT COURT-EQUITY SIDE.
-vs-	)	STATE OF ALABAMA.
MISSOURI BULLMAN ET AL,	)	BALDWIN COUNTY.
Defendants.	)	Cause No. 580.

I, T. W. Richerson, Register of the Circuit Court, Equity side Baldwin County, Alabama, hereby certify that in this cause and on the affidavit of Frank Barchard, Sr., one of the complainants heretofore made and filed in this cause on March 23rd., 1926, I, as such Register, did on March 23rd.,1926, make and issue an order of publication to William Raley, who resides in New Orleans, Louisiana, Ida Raley McCaleb, who resides at 1429 East Beach Street, Biloxi, Mississippi; George Raley, who resides at 1723 East Howard Avenue, Biloxi, Mississippi; Sophroina Raley Thornton, who resides at 246 Oak Street, Biloxi, Mississippi; Grover Raley, who resides at 1125 East HowardAvenue, Biloxi, Mississippi; Louise Yancey Potter, who resides in College Park, Atlanta, Georgia; Laura Hinote Cheatem, who resides in San Antonio, Texas; Gus Portovan, who resides at Scranton, Mississippi; Lorena Valisori, who resides at Pensacola, in the State of Florida; Mary Moton, who resides on West Belmont Street, near St. Johns Cemetery, Pensacola, Florida; Russell Bullman, Mary Fletcher Porterman, Victoria Vletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, who reside in Scranton, Mississippi; Mrs. Silas Powell and Fred Beck, who reside in Pascagoula, Mississippi; Jessie Hinote, Francis Codina, Johnnie Fletcher, and Mrs. Bill Ankerson, whose present address or place of residence are unknown; Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missouri Bullman, Willie Mabry, Willie Hunter and Charles Villar whose present address or place of residence are unknown, but when last heard from they resided in or near Pensacola and in the State of Florida; the heirs at law and next of kin of Bella Smith Porterman, Martin Villar Jr., (the son of Isabella Kee Villar and Martin Villar) Alice Hunter Mabry, Bella Hunter, Victoria Villar Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (the son of Gus Villar) Gus Villar, Phillipa Villar and Frank Kee (a son of William Kee, the patentee of said lands) and the same was published in the Robertsdale American a newspaper published and of general circulation in Baldwin County Alabama, printed in the English Language for four consecutive weeks commencing on March 27th., 1926 requiring them, the above named parties defendant, to appear and plead, answer or demur to the Bill of Complaint in this cause by the 28th. day of April, 1926, or after thirty days therefrom a decree pro confesso may be taken against such of them no so appearing and pleading, answering or demurring; that a copy of said order was forwarded by mail to William Raley, Ida Raley McCaleb, George Raley, Sophronia Raley Thornton, Grover Raley, Gus Portovan, Lorena Valirori, Mary Moton, Buesell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginian Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, and Fred Beck, addressed to each of them at their respective addresses set out in the affidavit, order of publication and as above shown and that one other copy of said order was posted up at the door of the Court House of Baldwin County, Alabama, the place where the court sits; that said copies were posted and sent by registered mail within twenty days from the making of said order

This the 24th. day of April, 1926.

T W Richerson
As Register.

15

No. 580.

Certificate of Register as to Publication.

Filed Sept 27th 1926.

[illegible]

Register.

HENRY G. HERBERT, ET AL, Complainants,	)	
-vs-	)	IN THE CIRCUIT COURT -EQUITY SIDE.
MISSOURI BULLMAN, ET AL, Defendants.	)	STATE OF ALABAMA.
	)	BALDWIN COUNTY.
	)	CAUSE. NO 580.

DECREE PRO CONFESSO ON PERSONAL SERVICE:

In this cause it having been made to appear to the undersigned T. W. Richersonn, as Register of this Court, that summons requiring the defendants Mrs. Ella Crane, Jennie Yancey, William Yancey, Lydia Yancey Phillips, Frank Yancey, Artemus Villar, alias Artemus Billard and Martin F. Villar to appear and plead, answer or demur to the Bill of Complaint in this cause within thirty days after the service of said summons upon each of them was duly served by the Sheriff of Baldwin County, Alabama on Mrs. Ella Crane, Jennie Yancey, William Yancey, Lydia Yancey Phillips, Frank Yancey, Artemus Villar, alias Artemus Billard and Martin F. Villar, more than 30 days ago

And the said defendants having failed to appear and plead, answer or demur to the said Bill of Complaint to this day, it is now therefore on motion of complainants by their Solicitor of record, prdered and decreed that the Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Mrs. Ella Crane, Jennie Yancey, William Yancey, Lydia Yancey Phillips, Frank Yancey, Artemus Villar, alias Artemus Billard and Martin F. Villar, defendants aforesaid.

This the 27th. day of September, 1926.

T. W. Richerson
As Register.

16

No. 580.

Decree pro confesso on personal service.

Filed Sept. 27th., 1926.

T. W. Richmond
Register.

RECORDED

HENRY G. HERBERT, ET AL, Complainants,	IN THE CIRCUIT COURT-EQITY SIDE
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, ET AL, Defendants.	BALDWIN COUNTY.
	CAUSE NO. 580.

MOTION FOR DECREE PRO CONFESSO ON PUBLICATION:

Motion is hereby made by the complainants by Norborne Stone, as their Solicitor of record, for a decree pro confesso on publication against the following named defendants in this cause, viz: Mellie Norris, Jesse Morton, Agnes Hollifield and Mittie Ellis and for grounds hereof shows that more than thirty days have elapsed since the perfection of publication was made under the order of this court in this cause made on April 28th., 1926; and it having been shown by due proof that said defendants are non-residents of the State of Alabama and over the age of twenty-one years and they having failed to answer, plead or demur to the amended bill of complaint in this cause to the date hereof

This the 27th. day of September, 1926.

Norborne Stone

Solicitor for Complainants.

No. 580. 17

Motion for Decree pro confession on Publication.

Filed September 27th., 1926.

Register.

Granted September 27th., 1926.

Register.

HENRY G. HERBERT, ET AL, Complainants,	IN THE CIRCUIT COURT-EQUITY SIDE.
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, ET AL, Defendants.	BALDWIN COUNTY.
	CAUSE NO. 580.

DECREE PRO CONFESSO ON PUBLICATION:

In this cause it having been made to appear to the undersigned as Register of this Court that the order of publicat ion heretofore made in this cause on April 28th., 1926, and publ ished for four consecutive weeks commencing on May 1st., 1926, i the Robertsdale American, a newspaper printed in the English lan guage and of general circulation and published in Baldwin County Alabama; that a copy of said order was posted up at the door of the Court House of Baldwin County, Alabama, the place where the Court sits and that there was sent by registered mail another co thereof to each of the defendants where his or her residence or address was shown by the amended Bill or affidavit, which copies were posted and mailed within twenty days from the making of said order. And it now appearing to the Register that Mellie No is, Jessie Morton, Agnes Hollifield and Mittie Ellis having to t date hereof failed to demur, plead to or answer the Bill of Com- plaint in this cause.

It is now therefore on motion of complainants ordere and decreed by the Register that the Bill of Complaint in this cause be and it hereby is in all things taken as confessed again the said Mellie Norris, Jessie Morton, Agnes Hollifield and Mitt Ellis.

This the 27th. day of September, 1 926.

T. C. Richerson

As Register.

18

No. 580.

Decree pro confesso on
Publication.

Filed Sept. 27th., 1926.

D. W. Richmond
Register.

RECORDED

HENRY G. HERBERT, ET AL, Complainants,	)	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-	)	STATE OF ALABAMA.
MISSOURI BULLMAN, ET AL, Defendants.	)	BALDWIN COUNTY.
	)	CAUSE NO. 580.

DECREE PRO CONFESSO ON SERVICE BY REGISTERED MAIL:

In this cause it having been made to appear to the Register that a copy of the Bill of Complaint, to-gether with a summons to answer the same within thirty days of the service thereof has been issued and sent by Registered mail by the Register of this Court postage prepaid marked "For delivery only to the person to whom addressed" and return receipt demanded addressed to the Register of this Court, to the following named defendants, viz:- Gus Portervan, Lorena Valisori, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Mellie Norris, Jessie Morton, Agnes Hollifield and Mittie Ellis and that such receipts for all of the above named defendants have been received in return and filed in this cause by the Register more than thirty days ago and that all of said defendants so served have failed to appear, plead, answer or demur to the Bill of Complaint to this date; it is now therefore, on motion of complainants by Norborne Stone, their Solicitor of record, ordered and decreed that the said Bill of Complaint in this cause be and is hereby is in all things taken as confessed against the said above named defendants.

This the 27th. day of September, 1926.

~~Norborne Stone~~

~~As Solicitor for Complainants~~

T W Richerson
Register

1c

No. 580.

~~Motion for~~

Decree pro confesso on
service by registered mail.

Filed Sept. 27th., 1926.
T. W. Richmond
Register.

Granted Sept 27/926
T. W. Richmond
Register

RECORDED

HENRY G. HERBERT, et al, Complainants,	IN THE CIRCUIT COURT-EQUITY SIDE.
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, et al, Defendants.	BALDWIN COUNTY.

NOTE OF EVIDENCE.

This cause is submitted for final decree in vacation upon the following:-

FOR COMPLAINANTS:-

Original Bill.
Amendment to original bill of April 19th., 1926
Affidavits of Non-residence.
Orders of publication by Register.
Affidavits of publication
Affidavits of Register as to publication.
Affidavits of Register as to service by registered mail
Motion for decree pro confesso on personal service.
Motion for decree pro confesso on service by registered mail.
Motion for decree pro confesso on service by publication.
Decree pro confesso by register on personal service.
Decree pro confesso by Register on service by registered mail.
Decree pro confesso by Register on service by publication.
Amendment to original bill filed April 30th., 1927.
Request for decree in vacation.

FOR DEFENDANTS:-

IN WITNESS WHEREOF, I hereunto set my hand as Register of said court this the 3 day of May, 1927.

T. B. Richmond
Register.

Note of Evi-
dence.

Filed May 3-
1927.

T W Rickman
Register

P.A.Frederick, Complainant,

vs. No. 581 In Baldwin Circuit Court, in equity.

Caldwell Real Estate & Improvement Co., et als., Defendants .

Note of Evidence

For Complainant :-

Certified copy of patent from United State to Holly,Baptiste and Stephenson.
Tax Deed from Judge of Probate to George H. Hoyle .
Certified copy of Will of George H.Hoyle .
Certified copy of decree probating said will of Hoyle's .
Certifieed copy of deed from Evie D.Hoyle to Warren W. Worcester .
Deed from W.W.Worcester to Warren O., Rosa, & Olive M. Worcester .
Deed from Warren O., Rosa, & Olive M. Worcester, to Edward/ George H., & J.T.Worcester.
Power of attorney from Edward Worcester to J.T.Worcester .
Power of attorney from George H. Worcester to J.T.Worcester .
Power of attorney from Warren O.Worcester to J.T.Worcester .
Certified copy of will of Warren W. Worcester .
Certified copy of decree probating said will of Worcester 's .
Deed from Edward Worcester et al., to Paul A.Frederick :- original and certified copy .
Certified copy of tax sale against Jesse Darling ; certified by probate judge; and by State Auditor .
Certified copy of assessment of S.E.I/4 of S.E.I/4 sec.29,T.7 S., R.2 E., to Hoyle/ estate for I920.
" " " " " " " " " " " " " " I921
" " " " " " " " " " " " to Worcester I922
" " " " " " " " " " " " " " I923
" " " " " " " " " " " " " " I924
" " " " " " " " " " " " " " I925
" " " " " " " " " " " " " " I926
" " " " " " " " " " " " Worcester est.
Documentary evidence of payment of taxes, for each of said ye ars , on said assessments .
Admissions express and implied from answer of Caldwell Real Estate & Impr't Co.
Decrees pro confesso against successors in interest to Holly, Baptiste and Stephenson.
Depositions of complainant's witnesses S. C. Jenkins, D.B.Cobbs, J.N.Seabury, J.T. Worcester, and Paul A.Frederick .
Cross-examination of defendant's witness Chas. A. Slocumb.

Attest :-

T.W.Reimer Register .

4

Complainants
Note of
Testimony

Filed Aug 27/928
P. W. Nelson
Registrar

RECORDED

Paul A.Frederick, Complainant,

vs. In Baldwin Circuit Court, In Equity .

The Caldwell Real Estate & Improvement Co. , et als., Defendants .

Affidavit for Publication.

The State of Alabama,

~~Baldwin~~ Mobile County.

Before me Leighton Moore, a Notary Public in and for said county in said State, this day personally came Paul A. Frederick, who being duly sworn deposes and says that he is the complainant in the above entitled cause pending in the ciruit court of Baldwin County, Alabama, and that he is familiar with the allegations contained in the bill in said cause, and has read the allegations thereof. He further deposes and says upon oath that the allegations of said bill, so far as made as on information or belief he is informed and verily believes them to be true, and so far as made as of his knowledge the same are true as made . He makes this affidavit, to verify the bill of com - plaint, that an order of publication , and publication in a newspaper, may be made of notice to the successors in interest whoever they are , of Wm.DForest Holly, J.Baptiste, and D.Stephenson, of the filing and pendency of said bill of complaint .

Affiant further deposes and says that the successsors in interest of said Wm.DeForest Holly, J.Baptiste, and D.Stephenson, are unknown , and cannot be ascertained after diligent enquiry, which has been made to ascertain them, but their names, residences, and ages are unknown.

Paul A. Frederick

Sworn to and subscribed before me
this April 15th 1926.

Leighton Moore
Notary Public
Mobile
In and for ~~Baldwin~~ County, Alabama .

Paul A.Frederick, Complainant,

vs. In Baldwin Circuit Court, In Equity .

The Oakwell Real Estate & Improvement Co. , et als., Defendants .

Affidavit for Publication.

The State of Alabama,

Baldwin County.

Before me [illegible] a [illegible] and for said county in said State, this day personally came Paul A. Frederick who being duly sworn deposes and says that he is the complainant in the above entitled cause pending in the circuit court of Baldwin County, Alabama and that he is familiar with the allegations contained in the bill in said cause, and has read the allegations thereof. He further deposes and says upon oath that the allegations of said bill, so far as made on information or belief he is informed and verily believes them to be true, and so far as made of his own knowledge the same are true as made . He makes this affidavit, to verify the bill of complaint, that an order of publication , and publication in a newspaper, may be made of notice to the successors in interest whoever they are , of Wm.Forrest Holly, J.Baptiste, and D.Stephenson, of the filing and pendency of said bill of complaint .

Affiant further deposes and says that the successors in interest of said Wm.Forrest Holly, J.Baptiste,and D.Stephenson, are unknown , and cannot be ascertained after diligent enquiry, which has been made to ascertain them, but their names, residences, and ages are unknown.

Sworn to and subscribed before me

this April 1925.

In and for Baldwin County, Alabama .

Filed Apr 16 1925
J. W. Quinn Clerk
By Deputy

Notice for Publication

Paul A. Frederick
vs.
Oakwell Real Estate and Improvement Co. et al.

PAUL A.FREDERICK COMPLAINANT	)	IN THE CIRCUIT COURT
-VS-	)	OF BALDWIN COUNTY
CALDWELL REAL ESTATE & IMPROVEMENT COMPANY ET AL. DEFENDANTS.	)	ALABAMA
	)	IN EQUITY.

Now comes Caldwell Real Estate & Improvement Company, a corporation and for answer to the bill of complaint filed in said Court by Paul A. Frederick against this Defendant and Henry M. Caldwell says:

1. Defendant has no knowledge or information as to the averments contained in the first paragraph of the bill.

2. Defendant denies that Complainant is in the peaceable possession of the tract of land described as the Southeast quarter of the Southeast quarter of Section 29, in Township 7, South of Range 2 East, being lot No. twelve in said section located in Baldwin County, Alabama, and Defendant also denies that Complainant is the owner of said land.

3. This Defendant is the owner of said land and has been in the adverse possession of the same for more than twenty years last passed, all the while paying taxes thereon and exercising acts of ownership over said land, which possession has been open, continuous, peaceable and under claim of right. Defendant avers that Henry M. Caldwell, who is now dead and has been for a great many years last passed, acquired the ownership of said land by a deed of conveyance made by Albert F. Wilson and wife in the year 1893, the said Wilson being at that time the owner of said land and having a good title thereto. The title of the said Albert F. Wilson was acquired by him by a deed of conveyance by the heirs of L.M. Wilson in the year 1892 and the said L.M.

Wilson acquired title to said land by a deed of conveyance from Jesse Darling in the year 1883.

4. The said Henry M. Caldwell departed this life on the 7th day of March, 1895, but prior to his death he convey the said property by good and sufficient conveyance to the said Caldwell Real Estate & Improvement Company which Company has owned said property ever since that time.

And now having fully answered, Defendant prays to be hence dismissed with its reasonable costs.

Adams, Winston, Greer & Mahaffey

Stone & Stone

Solicitors for Defendant.

Henry G.Herbert ,et al
Complainants.
vs.
Missouri Bullman, et al
Defendants.

In the Circuit Court
Equity Side.
State of Alabama.Baldwin
County.

No--

TO THE HON.THE CIRCUIT COURT OF BALDWIN COUNTY,STATE OF ALABAMA, AND THE HON.JOHN D.LEIGH, JUDGE THEREOF, SITTING IN EQUITY:-

Come your Complainants,Hery G.Herbert, Tina F.Herbert, and Frank Barcherd,Sr.,and exhi bit this , their Bill of Complaint, against William Raley, Ida Raley McCaleb,George Raley,Sophronia Raley Thornton,Grover Raley,Louise Yancey Potter,Laura Hinote Cheatem, Gus Portovan,Lorena Valisori, Mary Moton,Rusell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher,Fritz Beck,Mrs. Silas Powell,Fred Beck, Alice Hinote, Ruby Hinote Williams, Carrie Hinote Revel,Jesse Hinote,Francis Codina,Johnnie Fletcher, Mrs. Bill Ankerson, Mrs. Elizabeth Selirio, Angelo Selirio,Josie Villar, Willie Mabr y. Willie Hunter,Charles Villar, the unkown heirs at law and next of kin of Bella Smith Portevan, who is dead and who died intestate,the unknown heirs at law and next of kin of Martin Villar, Jr,.who is dead, and who died intestate, the unknown heirs at law and next of kin of Alice Hunter Mabry, who is dead, and who died intestate,of Bella Hunter, who is dead and who died intestate, of Victoria Villar Hunter, who is dead and who died intestate of Missouri Carter, who is dead and who died intestate, of Artemus Villar,who is dead and who died intestate,of Gus Villar,who is dead and who died intestate,of Victoria Villar Beck, who isdead and who died intestate, and of Frank Kee (a son of William Kee, the patentee of the lands hereinafter described) who is dead and who died intestate, Artemus Villar, alias Artemus Billard, Martin F.Villar,Bella Villar,Ella Crane,Jennie Yancey,William Yancey,Frank Yancey, Lydia Yancey Phillips,Louise Yancey Potter,Fred D.Raley, Anna Raley,Harrison,Ella Raley Banks, Nora Raley Walker,David Raley,Leon C.Raley,and Ethel Raley Allen, and show unto your Honor and unto this Honorable Court, as follo

1. That your Complainants are all over the age of twenty-one yea Herny G.Herbert and Tina F.Herbert,residing in Chicago ,Illinois and Frank Barchard, Sr, residing in Foley,Baldwin County, Alabama; that the subject matter of this cause is real property located in Baldwin County,Alabama,.

2. That William Raley,who resides in New Orleans, Louisana, Ida Raley McCaleb, who resides at 1429 East Beach Street, Biloxi, Mississippi, George Raley, who resides at 1723 East Howard Avenue, Biloxi, Mississippi, Sophronia Raley Thornton, who resides at 246 Oak Street, Biloxi, Mississippi, Grover,Raley, who reside at 1125 East Howard Avenue, Biloxi, Mississippi, Louise Yancey Potter, who resides in College Park, Atlanta, Georgia, Laura Hinote Cheatem, who resides in San Antonio, Texas, Gus Portova who resides at Scranton, Mississippi, Lorena Valisori, who resides at Pensacola, in the State of Florida, Mary Moton, who resides on West Belmont Street, near St. Johns Cemetery, Pensacola, Florida, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher Conde Fletcher, Mil Fletcher, Fritz Beck, who reside in Scranton, Mississippi, Mrs. Silas Powell,and Fred Beck,who reside in Pascagoula, Mississipp all are non-residents of the State of Alabama. That the present address or place of residence of Jesse Hinote , Francis Codin Johnnie Fletcher,Mrs. Bill Ankerson, Elizabeth Selirio,Josie Villar, Bella Villar, Missouri Bullman,Willie Mabry,Willie Hun and Charles Villar,are unknown but when last heard from they resided out of the State of Alabama,and complainants are informed and believe and allege upon such information and beli that they are non residents of the State of Alabama, That the particular addresses and places of residence of the defendants named in this paragraph are unknown to complainants and could not and cannot be ascertained, although diligent inquiries

have been made complainants to that end, That thae parties sefendant ~~s~~ the following are residents of the State of Alabama, Viz: Fred D. Raley, Ans Anna Raley Harr ison, who reside at Bayou La Batre, Alabama, Ella Raley Banks, and Nora Raley Walker, who reside at No.3 Harris Street, Mobile Alabama, David Raley, No 2. Harris Street, Mobile Alabama, Leon C. Raley, Jackson Alabama, Ethel Raley Allen, 815 Bay Avenue Mobile Alabama, Ella Crane, Stockton, Alabama, Jennie Yancey, William Yancey, and Lydia Yancey Phillips, Daphne Alabama, Frank Yancey, Spanish Fort, Alabama, Alice Hinote, Ruby Hinote Williams, and Carrie Hinote Revel, Broad Street, Mobile, Alabama, Artemus Villar, alias Artemus Billard, Marlow, Alabama, and Martin F. Villar, whe resides at Elberta, Alabama,; that ~~aaaa~~ the more particular addresses or places of residence of the above named resident defendants could not and cannot be ascertained by complainants, although dilligent inquiries have been made to that end. That Bella Smith Portervan, Martin Villar, Jr., the son of Isabella Kee Villar and Martin Villar, Alice Hunter Mabry, Bella Hunter, Victoria Villar Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (the son of Gus Villar) Gus Villar, Philipa Villar, and Frank Kee (a son of William Kee, the patentee of lands herein described) are all dead, having died intestate, but the names or places of residence or whereabouts of the heirs at law, next of kin or devisees of such deceased persons are unknown to complainants and could not and cannot be ascertained, although they have made diligent inquiry to that end; such unknown heirs at law and next of kin, complainants are informed and believe, are nom residents of the State of Alabama, and complainants allege, upon such information and belief them to be non-residents of the State of Alabama; such unkown heirs at law and next of kin of said deceased persons are made unknown parties defendant to this cause and complainants sue them as unknown defendants because they are nemessary parties.

That all of the parites defendant whose names are set forth herein are over the age of twenty-one years; that as to the unknown parties defendant, complainants on making diligent inquiry , were informed and they believe and complainants allege upon such information and belief that all of such unknown parties defendants are over the age of twenty-one years.

3. That the complainanst claim to own in their own right, and have been continuously for more than twenty years and still are in peaceable possession of the following described lands, always claiming to own the same, viz:

That part of portion of the William Kee grant which is in Section Thiry Six (36) in Township Eight(8) South of Range Five (5) East, particularly described as follows, viz:-Beginning at a stake on the South side of Bay La Launch where the Section line dividing section thirty three from the William Kee Grant touches the waters edge,; run thence south on said section line to the Township line which devides Township Eight(South from Township Nine South, thence East along said Township line to the waters edge of Bay La Launch ; thence following the meanders of the said Bay La Launch, back to the place of beginning; containing 94½ acres, more or less all being in Baldwin County, State of Alabama.

4. That ~~aaaaaaaaaa~~ each of the defendaants above namad claims or is reputed to claim some right, title or interest in oor encumbrance upon, the said lands and your complainants hereby call upon each of above nemed defendants to set forth and specify his or her title or claim, interest or encumbrance upon the said lands or any part thereof and how and by what instrument the same is derived and created.

5. That no suit is pending to enforce or test the validity o f such tiitle , claim or encumbrance asserted by the defendants or any of them or by anyone else, there being no pending litigations involving in any way the title of said lands.

THEREFORE THE PREMISES CONSIDERED, your complainants respectfully pray that the above named parties against whom this cause is brought be made parties defendant to this bill of complaint and all brought into Court by publication or through some ~~aaaa~~ such other orders, decress or processes as may be appropiate in the premises, That upon a final hearing of this cause that it be rendered, adjudged and decreed that the above named parties against whom this cause is brought, and each of them, have no right, title or interest in or hold any lien or encumbrance upon the lands hereinabove described, or any part thereof and that as against the said parties and each of

that such other, further and different relief be granted as may be equitable in the premises and as in duty bound, they will ever pray, etc.

Stone & Stone,
Solicitors for Complainant.

FOUR BOND:

The defendants and each of them are required to answer each paragraph of the foregoing bill of complaint from one to five both inclusive, but answer under oath is hereby expressly waived.

Stone & Stone
Solicitors for Complainant.

8537 SUMMONS—Original.

MOORE PTG CO BAY MINETTE

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 Lorena Valisori,

Pensacola Fla.

of Pensacola, Fla. 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

Henry G. Herbert et al.

against said Lorena Valisori

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 26th day of March, 192 6.

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry G. Herbert et al.

vs.

Lorena Valdsori.

Stone & Stone.

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.

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

The State of Alabama,
Baldwin County.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mary Moton,
W.Belmont St (Near St Johns Cemetery) Pensacola Fla,

of Pensacole, &&&& 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 Henry G.Herbert et al.

against said Mary Moton,

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 26th day of March, 6 192

T W Richerson Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the 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 Leon C.Raley, (Jackson,Ala.)

of Clarke 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 Henry C.Herbert, Tina F.Herbert and Frank Berchard,Sr.,

against said Leon C.Raley,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th, day of March, 1925.

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

Henry O. Herbert, et al.

vs.

Leon C. Raley,
Jackson, Alabama.

Stone & Stone.
Solicitor for Complainant.

Recorded in Vol. ..... Page .....

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this .....
day of ..... 192...

..... Sheriff.

Executed this April 2nd day of
..... 192 10

by leaving a copy of the within summons with
I left copy with
Leon Raley in person
Defendant.

Alfred Dusheck
Sheriff.
Leon

By Lesson Silverthorn Deputy Sheriff.

NOTICE OF LIS PENDENS.

Henry G. Herbert, et al.,
Complainants.

-vs-

Missouri Bullman, et al.,
Defendants.

CIRCUIT COURT---------- EQUITY SIDE.

STATE OF ALABAMA,
BALDWIN COUNTY.

- - - - -

NOTICE OF LIS PENDENS.

IN THE CIRCUIT COURT----------EQUITY SIDE.

STATE OF ALABAMA, BALDWIN COUNTY.

CAUSE NUMBERED _____.

HENRY G. HERBERT, TINA F. HERBERT AND FRANK BARCHARD, SR.,

Complainants.

-vs-

WILLIAM RALEY, IDA RALEY McCALEB, GEORGE RALEY, SOPHRONIA RALEY THORNTON, GROVER RALEY, LOUISE YANCEY POTTER, LAURA HINOTE CHEATEM GUS PORTOVAN, LORENA VALISORI, MARY MOTON, RUSSELL BULLMAN, MISSOU BULLMAN, MARY FLETCHER PORTERMAN, VICTORIA FLETCHER CREBS, VIRGINIA FLETCHER, CONDE FLETCHER, MIKE FLETCHER, FRITZ BECK, MRS. SILAS POWELL, FRED BECK, ALICE HINOTE, RUBY HINOTE WILLIAMS, CARRIE HINOTE, JESSE HINOTE, FRANCIS CODINA, JOHNNIE FLETCHER, MRS. BILL ANKERSON, ELIZABETH SELIRIO, ANGELO SELIRIO, JOSIE VILLAR, WILLIE MABRY, WILLIE HUNTER, CHARLES VILLAR, ARTEMUS VILLAR (alias Artemu Billard), MARTIN F. VILLAR, BELLA VILLAR, ELLA CRANE, JENNIE YANCEY, WILLIAM YANCEY, FRANK YANCEY, LYDIA YANCEY PHILLIPS, LOUISE YANCEY, FRED D. RALEY, ANNA RALEY HARRISON, ELLA RALEY BANKS, NORA RALEY WALKER, DAVID RALEY, LEON C. RALEY, ETHEL RALEY ALLEN, the unknown heirs at law and next of kin of the following named person all of whom died intestate, viz; BELLA SMITH PORTOVAN, MARTIN VILL JR., ALICE HUNTER MABRY, BELLA HUNTER, VICTORIA VILLAR HUNTER, MISOURI CARTER, ARTEMUS VILLAR, GUS VILLAR, VICTORINE VILLAR BECK, PHILLIPA VILLAR and FRANK KEE, (Frank Kee being a son of William Kee the original patentee of the lands described hereinafter).

Defendants .

NOTICE IS HEREBY GIVEN, that a suit has been commenced by the above named complainants and in the above named court and against the above named defendants, and which suit is now pending, wherein complainants claim to own in their own right and allege that they have been continuously for more than twenty years and still are in the peaceable possession of the following described lands, always claiming to own the same, viz:-

That part or portion of the William Kee Grant which is in Section Thirty-six (36) in Township Eight (8) South of Range Five (5) East, particularly described as follows, viz:-Beginning at a stake on the South (s) side of Bay La Launch where the section line dividing Section Thirty-three (33) from the William Kee Grant touches the water's edge; run thence south on said section line to the Township line which divides Township Eight South (8S) from Township Nine South (9S); thence East (E) along said Township Line to the water's edge of Bay La Launch; thence following the meanders of the said Bay La Launch back to the place of beginning; containing 94½ acres, more or less, all being in Baldwin County, State of Alabama.

that each of the defendants above named claims or is reputed to claim some right, title or interest in or encumbrance upon the said lands and calling upon the defendants above named, and each of them, to set forth and specify his or her title or claim, inte est or encumbrance upon said lands or any part thereof and how ar by waht instrument the same is derived and created. Complainants in said cause allege further that no suit is pending to enforce c test the validity of such title, claim, or encumbrance asserted b the defendants or any of them or by anyone else, there being no suit pending involving in any way the title to said lands.

Complainants pray for and seek the following relief, viz:- "That upon a final hearing of this cause that it be rendered, adjudged and decreed that the above named parties against whom this cause is brought, and ~~each~~ of them, have no right, title or interest in or hald any lien or encumbrance in or upon the lands therein described, or any part thereof and that as against the said parties and each of them your complainants have a good and perfect title to all of said lands and that their said title to said land be forever quieted as against the above named defendant and each of them; should complainants be mistaken in the relief herein sought then that such other, further and different relief be granted as may be equitable in the premises and, as in duty bound, they will ever pray, etc.,"
releif being sought against all of the said defendants, both know and unknown.

Dated this March 25th, 1926.

STONE & STONE,

By, [signature]
As Solicitors for
Complainants.

HENRY G. HERBERT, et al, Complainants,	IN THE CIRCUIT COURT-EQUITY
-vs-	SIDE, STATE OF ALABAMA,
MISSOURI BULLMAN, et al, Defendants.	BALDWIN COUNTY.

Comes the complainants and by leave of the court first had and obtained, further amend the original bill of complaint as filed in this cause by striking therefrom as party defendants the following persons, viz:- William Raley, Ida Raley McCaleb, George Raley, Sophronia Raley Thornton, Grover Raley, Fred D. Rale Anna Raley Harrison, Ella Raley Banks, Nora Raley Walker, David Raley, Leon C. Raley, Ethel Raley Allen, Louise Yancy Potter, Alice Hinote, Ruby Hinote Williams, Carrie Hinote Revel and Jesse Hinote.

NORBORNE STONE,
Solicitor for Complainants.

Amendment to Bill 2

Herbert, et al
vs
Bueman, et. al.,

Filed 4/30/27.

T W Rieman
Register

RECORDED

HENRY G. HERBERT, et al, Complainants, -vs- MISSOURI BULLMAN, et al, Defendants.	IN THE CIRCUIT COURT-EQUITY SID STATE OF ALABAMA. BALDWIN COUNTY.

Come your complainants by Stone & Stone, their Solicitors of record, and amend the original Bill of Complaint filed in this cause by striking Mary Moton as a party defendant and by adding the following named persons as parties defendant,, viz: Nellie Morris, who resides at 1221 West Belmont Street, Pensacola, Florid Jesse Morton, who resides at 1221 West Belmont Street, Pensacola, Florida, Agnes Hollifield, who resides at 1221 West Belmont Street Pensacola, Florida and Mittie Ellis, who resides at 8335 Apricot Street, New Orleans, Louisiana and all of whom are over the age of twenty-one years.

STONE & STONE,
Solicitors for Complainants.

3

Herbert, et al
vs
Buckmaster et al

Amendment
to complaint

RECORDED

Filed April
28, 1926

T W Reilman
Register

HENRY G. HERBERT, et al,
Complainants,

-vs-

MISSOURI BULLMAN, et al,
Defendants.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA. BALDWIN COUNTY
No._____

TO THE HON. THE CIRCUIT COURT OF BALDWIN COUNTY, STATE OF ALABAMA, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY:-

Come your complainants, Henry G. Herbert, Tina F. Herbe and Frank Barchard, Sr., and exhibit this, their Bill of Complain against William Raley, Ida Raley McCaleb, George Raley, Sophronia Raley Thornton, Grover Raley, Louise Yancey Potter, Laura Hinote Cheatem, Gus Portovan, Lorena Valisori, Mary Moton, Russell Bull-man, Missouri Bullman, Mary Fletcher Porterman, Victoria Fletche Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz B Mrs. Silas Powell, Fred Beck, Alice Hinote, Ruby Hinote Williams Carrie Hinote Revel, Jesse Hinote, Francis Codina, Johnnie Flet-cher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Jos Villar, Willie Mabry, Willie Hunter, Charles Villar, the unknown heirs at law and next of kin of Bella Smith Portovan, who is dea and who died intestate, the unknown heirs at law and next of kin of Martin Villar Jr., who is dead, and who died intestate, the u known heirs at law and next of kin of Alice Hunter Mabry, who is dead, and who died intestate, of Bella Hunter, who is dead and who died intestate, of Victoria Villar Hunter, who is dead and who died intestate, of Missouri Carter, who is dead and who died intestate, of Artemus Villar, who is dead and who died intestate of Gus Villar, who is dead and who died intestate, of Victorine Villar Beck, who is dead and who died intestate, of Phillipa Vil who is dead and who died intestate, and of Frank Kee (a son of William Kee, the patentee of the lands hereinafter described) w is dead and who died intestate, Artemus Villar, alias Artemus Bi ard, Martin F. Villar, Bella Villar, Ella Crane, Jennie Yancey, William Yancey, Frank Yancey, Lydia Yancey Phillips, ~~Louise Yanc Potter,~~ Fred D. Raley, Anna Raley Harrison, Ella Raley Banks, No Raley Walker, David Raley, Leon C. Raley and Ethel Raley Allen a show unto your Honor and unto this honorable court, as follows:-

1. That your complainants are all over the age of twenty-one years, ~~Henry G. Herbert and Tina F. Herbert residing in Chicago, Cook County, State of Illinois, and Frank Barchard, Sr.,~~ residing in ~~Foley,~~ Baldwin County, Alabama; that the subject matter of this cause is real property located in Baldwin County, Alabama.

2. That William Raley, who resides in New Orleans, Louisiana, Ida Raley McCaleb, who resides at 1429 East Beach Street, Biloxi, Mississippi, George Raley, who resides at 1723 East Howard Avenue, Biloxi, Mississippi, Sophronia Raley Thornton, who resides at 246 Oak Street, Biloxi, Mississippi, Grover Raley, who resides at 1125 East Howard Avenue, Biloxi, Mississippi, Louise Yancey Potter, who resides in College Park, Atlanta, Georgia, Laura Hinot Cheatem, who resides in San Antonio, Texas, Gus Portovan, who resides at Scranton, Mississippi, Lorena Valisori, who resides at Pensacola, in the State of Florida, Mary Moton, who resides on West Belmont Street, near St. Johns Cemetery, Pensacola, Florida, Russell Bullman, ~~Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher,~~ Conde Fletcher, Mike Fletcher, Fritz Beck, who reside in Scranton, Mississippi, Mrs. Silas Powell and Fred Beck, who reside in Pascagoula, Mississippi, are all non-residents of the State of Alabama. That the present address or place of residence of Jesse Hinote, Francis Codina, Johnnie Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missouri Bullman, Willie Mabry, Willie Hunter and Charles Villar are unknown but when last heard from they resided out of the State of Alabama and complainants are informed and believe and allege upon such information and belief that they are non-residents of the State of Alabama. That the more particular addresses and places of residence of the defendants above named in this paragraph are unknown to complainants and could not and cannot be ascertained, although diligent inquiries have been made by complainants to that end. That of the parties defendant the following are residents of the State of Alabama, viz:- Fred D. Raley and Anna Raley Harrison, who reside at Bayou La Batre, Alabama, Ella Raley Banks and Nora Raley Walker, who reside at No. 3 Harris Street, Mobile, Alabama, David Raley, No. 3 Harris Street, Mobile, Alabama, Leon C. Raley, Jackson, Alabama,

Ethel Raley Allen, 815 Bay Avenue, Mobile, Alabama, Ella Crane, Stockton, Alabama, Jennie Yancey, William Yancey, and Lydia Yance Phillips, Daphne, Alabama, Frank Yancey, Spanish Fort, Alabama, Alice Hinote, Ruby Hinote Williams and Carrie Hinote Revel, Broad Street, Mobile, Alabama, Artemus Villar alias Artemus Billard, Ma low, Alabama and Martin F. Villar, who resides at Elberta, Alabam that the more particular addresses or places of residence of the above named resident defendants could not and cannot be ascertain by complainants, although diligent inquiries have been made to that end. That Bella Smith Portervan, Martin Villar, Jr., the so of Isabella Kee Villar and Martin Villar, Alice Hunter Mabry, Bell Hunter, Victoria Villar Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (the son of Gus Villar) Gus Villar, Phillip Villar and Frank Kee (a son of William Kee, the patentee of lands herein described) are all dead, having died intestate, but the names or places of residence or whereabouts of the heirs at law, next of kin or devisees of such deceased persons are unknown to co plainants and could not and cannot be ascertained, although they have made diligent inquiry to that end; such unknown heirs at law and next of kin, complainants are informed and believe, are non-residents of the State of Alabama and complainants allege, upon such information and belief them to be non-residents of the State of Alabama; such unknown heirs at law and next of kin of said deceased persons are made unknown parties defendant to this cause and complainants sue them as unknown defendants because they are necess ary parties.

That all of the parties defendant whose names are set fort herein are over the age of twenty-one years; that as to the unknown parties defendant, complainants on making diligent inquiry, were informed and they believe and complainants allege upon such information and belief that all of such unknown parties defendants are over the age of twenty-one years.

5. That the complainants claim to own in their own right, and have been continuously for more than twenty years and still are in the peaceable possession of the following described lands, always claiming to own the same, viz:-

That part or portion of the William Kee Grant which is in Section Thirty-six (36) in Township Eight (8) South of Range Five (5) Eas particularly described as follows, viz:- Beginning at a stake on the south side of Bay La Launch where the section line dividing section thirty three from the William Kee Grant touches the water edge; run thence south on said section line to the township line which divides Township Eight South from Township Nine South; then East along said Township line to the waters edge of Bay La Launch thence following the meanders of the said Bay La Launch back to t place of beginning; containing 94½ acres, more or less, all being in Baldwin County, State of Alabama.

4. That each of the defendants above named claims or is reputed to claim some right, title or interest in or encumbrance upon, the said lands and your complainants hereby call upon each above named defendants to set forth and specify his or her title or claim, interest or encumbrance upon the said lands or any part thereof and how and by what instrument the same is derived and created.

5. That no suit is pending to enforce or test the validity of such title, claim or encumbrance asserted by the defendant or any of them or by anyone else, there being no pending ligigations involving in any way the title to said lands.

THEREFORE, THE PREMISES CONSIDERED, your complainants respectfully pray that the above named parties against whom this cause is brought be made parties defendant to this Bill of Complai and all brought into court by publication or through such other orders, decrees or processes as may be appropriate in the premises

That upon a final hearing of this cause that it be rendered, adjudged and decreed that the above named parties against whom this cause is brought, and each of them, have no right, titl or interest in or hold any lien or encumbrance upon the lands here inabove described, or any part thereof and that as against the sai parties and each of them, your complainants have a good and perfect title to all of said lands and that their said title to said land be forever quieted as against the above named defendants and

each of them; should complainants be mistaken in the relief herein sought then that such other, further and different relief be granted as may be equitable inthe premises and as in duty bound, they will ever pray, etc.

STONE & STONE,
Solicitors for Complainants.

FOOT NOTE:-

The defendants and each of them are required to answer each paragraph of the foregoing Bill of Complaint from one to five both inclusive, but answer under oath is herey expressly waived.

STONE & STONE,
Solicitors for Complainants.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned a Notary Public in and for said county in said State, personally appeared Frank Barchard, Sr who is known to me and who, after being by me first duly and legally sworn according to law, doth depose and say under oath as follows:-

That his name is Frank Barchard, Sr., he is over the age of twenty-one years and is a bona fide resident and citizen o Foley, in Baldwin County, Alabama; that he is fully and duly authorized to make this affidavit for himself, as one of the complainants, and for Henry G. Herbert and Tina F. Herbert, the other complainants in the cause of Henry G. Herbert, et al, as complainants versus Missouri Bullman, et al, defendants, in the Circuit Court, Equity side, State of Alabama, Baldwin County.

That he has read the Bill of Complaint in said cause to which this affidavit is attached and is fully informed as to and knows the contents thereof and that all of the matters and facts therein alleged and stated are true and correct as therein written.

That the places of residence of William Raley, Ida Raley McCaleb, George Raley, Sophronia Raley Thornton, Grover Rale Louisa Vancey Potter, Laura Hinote Cheatem, Gus Portervan, Lorena Valisori, Mary Moton, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell and Fred Beck are as set out in the said Bill of Complaint; that they are all non-residents of the State of Alabama and are allover the age of twenty-one years.

That the present address or place of residence of Jesse Hinote, Francis Codina, Johnnie Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missouri Bullman, Willie Mabry, Willie Hunter and Charles Villar are unknown to affiant and could not be learned after diligent inquiry made on part of affiant; that when these last named parties were last heard from they resided out of the State of Alabama and affiant is informed and believes and states upon such information and belief that they are non-residents of the State of Alabama; that all of these parties are over the age of twenty-one years.

That the present address and place of residence of those defendants shown in said Bill of Complaint to reside in Alabama is true and correct; that the more particular address of such resident defendants could not be ascertained by affiant, although he made diligent inquiry to that end; that all of such resident defendants are over the age of twenty one years.

That Bella Smith Porterman, Martin Villar Jr., (the son of Isabella Kee Villar and Martin Villar), Alice Hunter Mabry, Bella Hunter, Victoria Villar Hunter, Victorine Villar Beck, Missouri Carter, Artemus Villar (the son of Gus Villar) Gus Villar Phillipa Villar and Frank Kee (a son of William Kee, the patentee of lands described in said complaint) are all dead and having died intestate; that the names and places of residence or present whereabouts of the heirs at law, or next of kin of such deceased persons are unknown to affiant and could not and cannot be ascertained by him, although he has made diligent inquiry concerning same; that such unknown heirs at law and next of kin, affiant is informed and believes are non-residents of the State of Alabama and affiant states upon such information and belief, that they are non-residents of the State of Alabama; that such unknown heirs

at law and next of kin of said deceased persons are made unknown parties defendant in said cause and complainants sue them as unknown defendants because they are necessary parties.

That all of the parties defendant whose names are set forth in this affidavit and in the Bill of Complaint are over the age of twenty-one years; that as to the unknown parties defendant affiant is informed and believes and states upon such information and belief and after making diligent inquiry concerning such unknown defendants that they are over the age of twenty-one years.

That upon affiant making inquiry during the time , in the manner and of the parties as hereinafter shown, he was informed, as to all the matters and facts hereinabove set forth and further that the heirs at law and next of kin of Bella Smith Portovan, Victorine Villar Beck, and Phillipa Villar, when last heard of, were residents of the State of Mississippi; that the heirs at law and next of kin of Martin Villar Jr., Alice Hunter Mabry, Bella Hunter, Victoria Villar Hunter, Missouri Carter, Artemus Villar, Gus Villar and Frank Kee, above named, lived somewhere in the State of Florida when last hear d of.

That affiant has made diligent and constant inquiries extending over a period of more than two years concerning the heirs at law and next of kin of Virginia and William Yancey, John D. Raley, Frank Kee and Martin Villar and is informed and believes and states upon such information and belief that the persons, both known and unknown, named as defendants in the foregoing Bill of Complaint to which this affidavit is attached, are the heirs and all of the heirs at law and next of kin of said parties. That such inquiries as made by him and extending over such period of more than two years were made of parties residing at or near and in the neighborhood of the lands described in said complaint, ~~of the relatives of said parties and of the old citizens of Bal-~~ dwin County,Alabama; that your affiant has consulted and made inquiries of G. R. Suarez of Perdido Beach, Baldwin County, Alabama, who is related to some of the parties defendant, lives near and formerly owned lands adjoining the lands described in the Bill of Complaint; he has also consulted and made inquiries of Aubrey Suarez, Rufus Kee and Mrs. Rufus Kee, who are also related to some of the parties defendant named in this affidavit and who reside near the lands described in the Bill of Complaint. Your affiant has also made inquiries of and consulted Martin F. Villar, Miss Jane Yancey, Gus Yancey and a Mr. Phillips, all of whom are residents of Baldwin County, Alabama, and who are related to some of the parties defendant named in this affidavit. In addition to this affiant made additional inquires of Thomas L. Steele, a resident of the southern part of Baldwin County, Alabama and H. E. Hudson, who formerly owned the property described in this complaint. Affiant employed a Notary and secured his services in an effort to secure full information concerning the parties named in this affidavit, viz: Claude Peteet of Foley, Alabama, in Baldwin County,

Inquiries were made of Mrs.Elizabeth Shoemaker of the Foley Alabama, who is the surviving widow of Sam Danelly, who acted as attorney in fact for the ancestors of some of the parties defendant named in this affidavit. Your affiant had an abstract of title prepared covering said property and in addition to this had an attorney examine the records on file in the office of the Judge of Probate of Baldwin County,Alabama, in an effort to secure information concerning the parties named in the Bill of Complaint.

That from time to time affiant has consulted and made inquiries of and had letters written to various other parties, relatives of some of the defendants named in the Bill of Complaint concerning the parties named in such Bill of Complaint.

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 23rd day of March, 1926.

Frank Barchard Sr

Claude Peteet

Notary Public, Baldwin County, Alabama.

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Fred Beck. Pascagoula Miss)

of Pascagoula, Miss, ~~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

Henry G. Herbert et al.

against said

Fred Beck et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry G. Herbert et al.

vs.

Fred Beck et al.

Stone and Stone.

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.

Copy of Bill &
Copy of Summons
Registered Sept
Nov 29 1926
J M McGowin
Register

8587 SUMMONS—Original.

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 Mrs. Silas Powell,
(Pascagoula, Miss)

of Pascagoula, Miss ~~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 Henry G. Hombert, et al.

against said Mrs. Silas Powell, et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this said Defendant shall in no wise omit, under penalty, etc. And we further command that you ret this writ with your endorsement thereon, to our said Court immediately upon the execution ther

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th, d March, 1926.

T. W. Richerson R

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

8587 SUMMONS—Original.

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 Mrs. Silas Powell,
(Pascagoula, Miss)

of Pascagoula, Miss ~~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 Henry G. Hombert, et al.

against said Mrs. Silas Powell, et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this said Defendant shall in no wise omit, under penalty, etc. And we further command that you make this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson
Clerk.

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

8587 SUMMONS—Original.

MOORE PTG CO BAY MINETTE

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 Mrs. Silas Powell,
(Pascagoula, Miss)

of Pascagoula, Miss ~~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

Henry G. Hombert, et al.

against said Mrs. Silas Powell, et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry G. Herbert et al.

vs.

Mrs. Silas Powell et al.

Stone & Stone.
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.

Copy of process
of Summons Mailed
Def Mrs Silas Powell
P.O. Address
Robertsdale
Ala

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Fritz Beck, (Scranton, Miss)

of Scranton, Miss ~~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

Henry G. Herbert et al.

against said

Fritz Beck, et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry C. Herbert et al.

vs.

Fritz Beck, et al.

Stone & Stone,
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.

Copy of Bill v
Copy of Summons
Registered Dft
Aug 29 1922 2 C
J. D. Callaway
Registrar

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Mike Fletcher,
(Scranton, Miss)

of Scranton, Miss ~~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

Henry C. Herbert et al.

against said

Mike Fletcher et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry G. Herbert et al.

vs.

Mike Fletcher et al.

Stone & Stone.
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.

Copy of Regal & Copy of Summons Received & Defts Rec'd 29 Oct 1926 J. O. Kellum Sheriff

MOORE PTG CO BAY MINETTE

8587 SUMMONS—Original.

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 Conde Fletcher
(Scranton, Miss)

of Scranton, Miss ~~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 Henry C. Herbert et al.

against said Conde Fletcher,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry G. Herbert et al.

vs.

Conde Fletcher, et al.

Stone & Stone.
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.

Copy of Bill
Copy of Summons
Registered Oct
Rec 32 Oct 19 2 Co
J. M. Higginbotham
Reg Co

8587 SUMMONS---Original. MOORE PTG CO BAY MINETTE

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 Virginia Fletcher

S Cranton Hiss

of Scranton Miss. ~~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

Henry C. Herbert, et al.

against said Virginia Fletcher,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

8587 SUMMONS—Original.

MOORE PTG CO BAY MINETTE

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 Victoria Fletcher Crebs,
(Scranton, Miss)

of Scranton, Miss, 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

against said Vitoria Fletcher Crebs,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

8587 SUMMONS—Original.

MOORE PTG CO BAY MINETTE

The State of Alabama,
Baldwin County.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mary Fletcher Porteman, (Scranton, Miss)

of Scranton, Miss. ~~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

Henry G. Herbert, et. al.

against said Mary Fletcher Porteman, et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Russell Bullman,
(Scranton, Miss.)

of Scranton, Miss ~~& 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

Henry G. Herbert, et al.

against said

Russell Bullman, et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

The State of Alabama,
Baldwin County.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mary Moton,
W. Belmont St. (Near St. Johns Cemetery) Pensacola, Fla.

of Pensacola, ~~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

Henry G. Herbert et al.

against said Mary Moton,

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 26th day of March, 1926

T. W. Richerson Register.

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

8587 SUMMONS—Original.

MOORE PTG CO BAY MINETTE

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 Lorena Valisori, Pensacola Fla.

of Pensacola, Fla. 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 Henry C. Herbert et al.

against said Lorena Valisori

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 26th day of March, 1926.

T. W. Richerson Register.

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

8587 SUMMONS---Original. MOORE PTG CO BAY MINETTE

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 Gus Portevan, Scranton, Miss.

of Scranton Miss ~~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

Henry G. Herbert et al.

against said Gus Porterven et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th day of March, 192 8.

T. W. Richerson Register.

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

8537 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Laura Hinote Cheatham

San Antonio Texas,

of San Antonio, Tex ~~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

Henry G. Herbert et al

against said

Laura Hinote et al.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th day of March, 1925.

T. W. Richerson Register.

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

8587 SUMMONS—Original.

MOORE PTG CO BAY MINETTE

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 George Raley,
1125. E.Howard Ave, Biloxi, Miss.

of Biloxi, Miss, ~~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 Henry G.Herbert et al.

against said George Raley.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T W Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Sophronie Daley Thornton,
248. 3rd St. Biloxi, Miss.

of Biloxi Miss ~~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

Henry G. Herbert, et al.

against said Sophronie Daley Thornton.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th day of March, 192 6.

T. W. Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 William Raley,
New Orleans La,

of New Orleans La, ~~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

Henry C. Herbert et al.

against said William Raley.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th day of March, 192 6.

T. W. Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Ida Raley Mc Caleb,
1429 E.Beach St,Biloxi,Miss.

of Biloxi,Miss ~~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

Henry G.Herbert,et al.

against said Ida Raley Mc Caleb.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

192 6.

T. W. Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Louise Yancey Potter,
College Park, Atlanta, Ga.

of Atlanta Ga, 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

Henry G. Herbert et al.

against said Louise Yancey Potter,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 25th day of March, 1925.

T. W. Richerson Register.

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

8537 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Louise Yancey Potter,
College Park, Atlanta, Ga.

of Atlanta, Ga. 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

Henry G. Herbert et al.

against said Louise Yancey Potter,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

8587 SUMMONS—Original. MOORE PTG CO BAY MINETTE

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 Ella Crane, Stockton, Jennie Yancey, Daphne, William Yancey, Daphne, Lydia Yancey Phillips, Daphne, Frank Yancey, Spanish Fort, Artemus Villar alias Artemus Bullard, (Marlow) Martin F. Villar, Elberta,

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 Henry C. Herbert, Tina F. Herbert and Frank Berchard, Sr.,

against said Ella Crane, Jennie Yancey, William Yancey Lydia Yancey Phillips, Frank Yancey, Artemus Villar alias Artemus Bullard, (Marlow.) Martin F. Villar.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

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

T. W. Richerson Register.

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

Original

4

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Henry C. Herbert et al.

vs.

Ella Crone (Stockton,
Jennie Yancey (Darbie)
William Yancey (Daphne)
Lydia Yancey Phillips (Daphne)
Frank Yancey (Spanish Fort)
Artemus Villar alias Artemus Bullard (Marlow)
Martin F. Villar, Alias

STORM & STORM.

Solicitor for Complainant

Recorded in Vol.....

4

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

Executed April 5th 1926 by delivering a copy of the within Summons to Jennie Yancey, William Yancey, and Lydia Yancey Phillips and on this 7th 1926 Frank Yancey and on Martin F. Villar and on this 9th 1926 Artemus Villar alias Artemus Bullard by delivering a copy to Mrs Ella Crone Stockton April 15th 1926 personally and on Artemus Villar alias Artemus Bullard.

W. R. Stuart
Sheriff of
Baldwin Co.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority, personally appeared Norborne Stone, who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath:-

That his name is Norborne Stone; that he is a member of the firm of Stone & Stone, who are the solicitors for complainants in the matter of Henry G. Herbert et al, complainants versus Missouri Bullman, et al, defendants, now pending in the Circuit Court Equity Side, State of Alabama, Baldwin County; that as such he is the agent and attorney for complainants and is fully and duly authorized to make this affidavit; that he makes this affidavit on a ccount of his being acquainted with the facts herein alleged.

That Mellie Norris, Jesse Horton, Agnes Hollifield and Mittie Ellis, who are named as parties defendant in the amended Bill of Complaint are non-residents of the State of Alabama, Mittie Ellis residing at 8335 Apricot Street, New Orleans, Louisiana, and the others above named residing at 1221 West Belmont Street, Pensacola, Florida; that all of them are over the age of twenty-one years and that service by publication is necessary in order to make them party respondent in said cause.

Norborne Stone

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed this 19 day of April, 1926.

Charles R. Stone

Notary Public, Baldwin County, Alabama.

5

Herbert, et al
vs
~~Bedford~~
Bullman et al

Additional
Affidavit of [illegible]
[illegible]

RECORDED
Filed 11/8/86
T. W. Rueckin
[illegible]

HENRY G. HERBERT, ET AL, Complainants,	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-	STATE OF ALABAMA.
MISSOURI BULLMAN, ET AL, Defendants.	BALDWIN COUNTY.
	CAUSE NO. 580.

Come the complainants by Norborne Stone as their Solicitor of record, and move the court to strike the demurrer of William Raley, Ida Raley McCaleb, George Raley, Sophronia Raley Thornton, Grover Raley, Fred D. Raley, Anna Raley Harrison, Ella Raley Banks, Nora Raley Walker, David Raley, Leon C. Raley and Ethel Raley Allen, heretofore filed in this cause on July 12th., 1926 and for grounds of this motion shows:

1. That said demurrer was filed after the expiration of the time allowed by law for such parties to appear and plead, answer or demur.

2. That said demurrer was filed after the time allowed by law and without any leave had or obtained from this court for the filing of the same.

3. That no proper showing was made by said partiesin connection with the filing of said demurrer which was filed after the said parties were in default.

WHEREFORE, complainants move the court to strike said demurrer.

Norborne Stone

As Solicitor for complainants

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority, personally appeared Norborne Stone who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath:-

That he is the solicitor of record for complainants in the above styled cause and that he is the same person whose name is signed to the foregoing motion as such; that he is acquainted with the facts and matters set forth in said motion and that the same are true and correct.

Norborne Stone

Sworn to and subscribed befor me
this 30th. day of September, 1926

T. W. Bullman

As Clerk of the Circuit Court, Baldwin County, Alabama.

21

Notice of Strike
Chinaman

Entered Aug 20
1926

T. W. Robinson
Registrar

RECORDED

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority, personally appeared H. M. Hall, who is known to me and who, after being by me first duly and legally sworn, doth depose and say under oath:

That his name is H. M. Hall and he is a duly licensed attorney at law and practicing in the Circuit Court Equity side, State of Alabama, Baldwin County and was such an attorney and so practicing on September 13th., 1926.

That he was in attendance upon the special session of the Circuit Court Equity Side, Baldwin County, Alabama, and was present at court before the hour of 1:30 P. M., on said day; that 1:30 P. M. was the regular hour for convening said court on said day; that he was present before and at the regular hour for convening said court and was in constant attendance upon the same until its recess on the evening of said day.

That he knows Norborne Stone who is also a practicing attorney in said court and that the said Norborne Stone was also in attendance upon said court on said day and was present therein before the hour of 1:30 P. M.

That affiant and the said Norborne Stone appeared in said court to-gether and were to-gether therein until its recess as above stated.

H. M. Hall

Sworn to and subscribed before me this 30th. day of September, 1926.

T. W. Richerson
As Clerk of the Circuit Court, Baldwin County, Alabama.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority, personally appeared Norborne Stone, who is known to me and who, after being by me ~~first duly and legally sworn, doth depose and say under oath:-~~

That his name is Norborne Stone and he is a duly licensed attorney at law and practicing in the Circuit Court Equity Side State of Alabama Baldwin County; that he was a member of the firm of Stone & Stone, a partnership composed of Frank S. Stone and Norborne Stone who were the solicitors of record in Cause No. 580 in the Circuit Court Equity Side State of Alabama, Baldwin County wherein Henry G. Herbert et al were complainants and Misscuri Bullman, et al, were defendants, and that such firm was such solicitors of record until its dissolution on to-wit: July 14th., 1926, by reason of the death of the said Frank S. Stone; that he, since said July 14th., 1926, has been and now is Solicitor of record for the complainants in said cause.

That he was in attendance upon the special session of the Circuit Court Equity side, Baldwin County, Alabama on September 13th., 1926 and was present in court before the hour of 1:30 P. M. on said day; that 1:30 P. M. was the regular hour for convening said Court on said day and that he was present before and at the regular hour for convening said court and was in constant attendance upon the same until its recess in the evening of said date.

That in the above styled cause pending in said court one Asa B. Fuller, through his solicitor F. E. St. John, obtained the following order at the special session of said court on September 13th., 1926, viz: "September 13th., 1926. Asa B. Fuller allowed to come in and be allowed to file answer and be made party respondent. Answer of Asa B. Fuller filed."; that affiant as the solicitor of record for complainants had no notice nor did he waive notice of the motion on which said order was obtained and that the same was obtained on motion made and heard in open court on said date and when none of the complainants nor affiant as their solicitor of record was present in court and at a time prior to the regular hour for convening said court.

That affiant as such solicitor of record for complainants has at no time consented or agreed to the granting of such order or waived notice of same but has always and does now resist and object to the same.

Norborne Stone

Sworn to and subscribed before me this 30th. day of September, 1926.

T. W. Bellinger

As Clerk of the Circuit Court, Baldwin County, Alabama.

FRANK BARCHARD, Sr.,
Complainant.

-VS-

ANGELO SELIRIO, et al.,
Defendants,

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

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

Comes the complainant, FRANK BARCHARD, Sr., and exhibits this as his complaint against Rufus A. Kee, Josie Kee, George R. Kee, Gus Portovan, Lorena Valisori, Mellie Norris, Jesse Morton, Agnes Hollifield, Mittie Ellis, RUSSELL BULLMAN, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Francis Codina, Johnnie Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Josie Willar, Willie Mabry, Willie Hunter, Charles Villar, the unknown heirs at law and next of kin of Bella Smith Portovan, who is dead and who died intestate, the unknown heirs at law and next of kin of Martin Villar, Jr., who is dead and who died intestate, the unknown heirs at law and next of kin of Alice Hunter Mabry, who is dead and who died intestate, of Bella Hunter, who is dead and who died intestate, of Victoria Villar Hunter, who is dead and who died intestate, of Missiouri Carter, who is dead and who died intestate, of Artemus Villar, who is dead, and who died intestate, of Gus Villar, who is dead and who died intestate, of Victorine Villar Beck, who is dead and who died intestate, of Phillipa Villar, who is dead and who died intestate, of Frank Kee (a son of William Kee), who is dead and who died intestate, of Artemus Villar, alias Artemus Billard, Martin F. Villar, Bella Villar, the unknown heirs at law or next of kin of Carmaline Perrenot, who is dead and who died intestate, and against Crona Suarez, Mrs. Mae Lewis, Mrs. Carrie Crona, Mrs. Ethel McGill, Mrs. Belle Collins, Mrs. Ola Stapleton, Rex Dolive, Marone Dolive, Miss Gladys Dolive, Mrs. Florence Sibley, Mrs. Hattie Belle, Mrs. Lillie Wells, Mrs. Minnie Walters, Mrs. Lillie Wells, _____, Mrs. Ruby Varnado Mary Ordway,

M. L. Dolive, Guy P. Dolive, Howard H. Dolive, Medrick Dolive, Mrs. Minnie Walters, Mrs. Elodia Van Iderstine, Mr. W. P. Hall, Mrs. Cecile Hall, Mrs. Inez Bill, Miss Belle Sibley, W. A. Sibley, Mrs. Juliette Jones, W. H. Sibley, Helena E. Sibley, H. A. Sibley, N. L. Sibley, M. R. Sibley, H. M. Low, Mrs. Susie Dick, Miss May Dolive, and Harry L. Dolive, and shows unto Your Honor and unto this Honorable Court, as follows:-

1. That your complainant is over the age of twenty one years and that the subject matter of this cause is real property located in Baldwin County, Alabama.

2. That Gus Portovan, who resides at Scranton, Mississippi, Lorena Valisori, who resides at Pensacola, Florida, Mary Morton, who resides on West Belmont Street, near St. Johns Cemetery, Pensacola, Florida, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, and Fritz Beck, who resides in Scranton, Mississippi, Mrs. Silas Powell, and Fred Beck, who resides in Pascagoula, Mississippi, Mrs. Lillie Wells, Richton, Mississippi, Mrs. Ruby Vornado, Naxapater, Mississippi, Guy P. Dolive, Howison, Mississippi, Miss May Dolive, 308 Carter Bldg., Houston, Texas, Howard H. Dolive whose address and last place of residence is unknown, Mrs. Ola Stapleton, Tampa, Florida, W. A. Sibley, Bond, Mississippi, Mrs. Juilette Jones, Route #1, Northdale, Baton Rouge, Louisiana, W. A. Sibley, Shreveport, Louisiana, M. R. Sibley1702 19th., Str., Gulfport, Mississippi, Mary Ordway of (Pensacola, Fla., are all non-residents of the state of Alabama.

That the present addresses or places of residence of Francis Codina, Johnnie Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Josie Villar, Bella Villar, Missiouri, Bullman, Willie Mabry, Willie Hunter and Charles Villar are unknown but when last heard from they resided out of the State of Alabama, and complainant is informed and believes and alleges upon such information and belief that they are non-residents of the State of Alabama.

That the more particular addresses and places of residences of the defendants above named in this paragraph are unknown to complainant and could not and cannot be ascertained, although diligent inquiry has been

made by complainant to that end.

That of the parties defendant the following are residents of the State of Alabama, Artemus Villar, alias Artemus Billard, who resides at Marlow, Alabama, Martin F. Villar, who resides at Elberta, Alabama, Rufus A. Kee, Josie Kee, who are residents of this county; Rex Dolive, Marone Dolive, Miss Gladys Dolive, Loxley, Alabama; Mrs. Florence Sibley, 1225 Selma Str., Mobile, Alabama; Mrs. Hattie Belle, 150 Marine Str., Mobile, Alabama; Mrs. Minnie Walters, Bromley, Alabama; Mederick Dolive, Bay Minette, Alabama; Mrs. Susie Dick, 959 Spring Hill Ave., Mobile, Ala., Harry L. Dolive, Bromley, Alabama; Mrs. Elodia Van Iderstine, Daphne, Alabama, Mr. W. P. Hall, Daphne, Alabama; Mrs. Cecile Hall, Loxley, Alabama; Mrs. Inez Bill, Loxley, Alabama, Miss Belle Sibley, Bay Minette, Alabama, Miss Helena E. Sibley, Bay Minette, Alabama, H. M. Sibley, Bay Minette, Alabama, H. A. Sibley, Bay Minette, Alabama, N. L. Sibley, Bromley, Alabama, that Bella Smith Portovan, Martin Villar, Jr., (the son of Isabella Kee Villar and Martin Villar), Alice HunterMabry, Bella Hunter, Victoria Hunter, Victorine Villar Beck, Missiouri Carter, Artemus Villar (the son of Gus Viller) Gus Villar, Phillipa Villar, Frank Kee (a son of William Kee) and Carmaline Perrenot are all dead and died intestate, but the names or places of residence or whereabouts of the heirs at law or next of kin or such deceased persons are unknown to complainants and could not and cannot be ascertained although they have made diligent inquiry to that end; such unknown heirs at law and next of kin, complainants are informed and believe are non-residents of the State of Alabama, and complainant alleges upon such information and believe them to be non-residents of the State of Alabama; such unknown heirs at law and next of kin of such deceased persons are made unknown parties defendant to this cause and complainant sues them as unknown defendants because they are necessary parties.

That all of the parties defendant, whose names are set forth herein are over the age of twenty one years, that as to the unknown parties defendant complainants, onmaking diligent inquiry, were informed and they believe and allege upon such information and belief that all of such

unknown parties defendant are over the age of twenty one years.

3. That the complainant ownes and is in peaceable possession and has been in peaceable possession for more than ten years and still is in peaceable possession of the following described lands, claiming to own the same, namely:-

> Starting at the SW corner of Sec. 37, Township 8 S., R. 5 E., Baldwin County, Alabama, run East 2497 ft., thence N. 24° 30' West 798 ft., to the place of beginning, thence N. 65° 30' East, 924 ft., thence S. 24° 30' East 690 ft., thence N. 65° 30' East 500 ft., thence S. 24° 30' East 300 ft., to Perdido Bay, thence N. 85° East along the meanders of Perdido Bay, 566 ft., thence N. 51° 30' East along the meanders of Perdido Bay, 700 ft., thence N. 69° 40' East, along the meanders of Perdido Bay, 675 ft., thence N. 34° West, 5 chs., 67 lks., thence N. 71° 30' West 8 chs., thence due W. 3 chs., 75 lks., thence N. 3245 ft., to Bay LaLaunch, thence S. 32° West along the meanders of the Bay LaLaunch, 500 ft., thence S. 62° West along the meanders of Bay LaLaunch, 462 ft., thence S. 20° 30' West along the meanders of Bay Lalaunch, 457 ft., thence S. 44° West along the meanders of Bay Lalaunch, 860 ft., thence S. 71½° West along the meanders of Bay LaLaunch, 500 ft., thence S. 30° West along the meanders of Bay Lalaunch, 570 ft., thence S. 995 ft., thence Southwest 660 ft., to the point of beginning, containing 175 acres, more or less, situated, lying and being in Section 37, Township 8 South, Range 5 East, Baldwin County, Alabama,

4. That each of the defendants above named claims or is reputed to claim some right, title or interest in or encumbrance upon the said lands and your complainant hereby calls upon each of above named defendants to set forth and specify his or her title or claim, interest or encumbrance upon the said lands or any part thereof and how and by what instrument the same is derived and created.

5. That no suits are pending to enforce or test the validity of such claim, title or encumbrance asserted or reputed to be asserted by the defendants or any of them or by any oneelse, there being no pending litigations involving in any way the title to said lands.

THEREFORE, THE PREMISES CONSIDERED, your complainant respectfully prays that the above named parties against whom this suit is brought be made parties defendant to this Bill of Complaint and all brought into court by publications, or through such other orders, decrees or

processes as may be appropriate in the premises.

That upon a final hearing of this cause it be rendered, adjudged and decreed that the above named parties against whom this cause is brought, and each of them, have no right, title or interest or hold any lien or encumbrances upon the lands hereinabove described, or any part thereof and that as against the said parties and each of them, your complainant has a good and perfect title to all of said lands and that their said title to said lands be forever quited as against the above named defendants, and each of them. Should complainants be mistaken in the relief herein sought, then that such other, further and differenet relief be granted complainant as may be equitable in the premises, and as in duty bound they will ever pray, etc.,

HENRY D. MOORER,
Attorney for Complainant.

FOOT NOTE:-

The defendants and each of them are required to answer each paragraph of the foregoing bill of complaint, from one to five, both inclusive, but answer under oath is hereby expressly waived.

HENRY D. MOORER,
Attorney for Complainant.

STATE OF ALABAMA, }
BALDWIN COUNTY. }

Before me, Gladys Bush, a Notary Public in and for said County and State, personally appeared FRANK BARCHARD, Sr., who being by me first duly and legally sworn doth depose and say:-

That he is the complainant in the cause of FRANK BARCHARD, SR., vs ANGELO SELIRIO, et al., defendants, to which this affidavit is attached, and that the allegations and statements contained in said bill are true and correct.

Frank Barchard Sr.

Subscribed and Sworn to before me
this 21st day of July, 1926.

Gladys Bush
Notary Public,
Baldwin County, Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, Gladys Bush, a Notary Public in and for said County and State, personally appeared FRANK BARCHARD, Sr., who is known to me and who after being by me first duly and legally sworn according to law doth depose and say:-

That his name is Frank Barchard, Sr., that he is over the age of twenty one years and a bona fide resident citizen of Baldwin County, Alabama.

That he has read the bill of complaint in the said cause to which this affidavit is attached and is fully informed as to and knows the contents thereof; that all of the matters and facts therein alleged are true and correct as therein written.

That the pl ceo f residence of Gus Portovan, Lorena Valisori, Russell Bullman, Mary Fletcher Porterman, Victoria Fletcher Crebs, Virginia Fletcher, Conde Fletcher, Mike Fletcher, Fritz Beck, Mrs. Silas Powell, Fred Beck, Mrs. Lillie Wells, Mrs. Ruby Varnado, Guy P. Dolive, Miss May Dolive, Howard H. Dolive, Mrs. Ola Stapleton, W. A. Sibley, Mrs. Juilette Jones, W. A. Sibley, M. R. Sibley, Mary Ordway, are as set out in the said bill of complaint; that they are all non-residents of the State of Alabama, and all over the age of twenty one years.

That the present address or place of residence of Francis Cordina, Johnnie Fletcher, Mrs. Bill Ankerson, Elizabeth Selirio, Angelo Selirio, Jessie Villar, Stella Villar, Missiouri Bullman, Willie Mabry, Willie Hunter, Chas. Villar, Howard H. Dolive, Mary Ordway and Mrs. Ola Stapleton, are unknown to affiant and could not be ascertained after diligent inquiry on the part of the affiant but when these parties were last heard of they resided out of the State of Alabama, and affiant is informed and believes and states upon such information and belief that they are non-residents of the State of Alabama, and that they are all over

the age of twenty one years.

That the present address and place of residence of these defendants shown in said bill of complaint to reside in Alabama are true and correct; that the more particular address of such defendants could not be ascertained by affiant although he made diligent inquiry to that end. That all of said residents are over the age of twenty one years.

That Bella Smith Portervan, Martin Villar, Jr., (the son of Isabella Kee Villar and Martin Villar) Alice Hunter,Mabry, Bella Hunter, ~~Victoria Hunter~~, Victoria Villar Hunter, Victorine Villar Beck, Missiouri Carter, Artemus Villar(the son of Gus Villar) , Gus Villar, Phillipa Villar, Frank Kee (son of W illiam Kee) Carmaline Perrenot are all dead and died intestate; that the names and place of residence of the present whereabouts of the heirs at law or next of kin of such deceased persons are unknown to affiant and could not and cannot be ascertained by him although he has made diligent inquiry concerning same; that such unknown heirs at law and next of kin, affiant is informed and believes that they are non-residents of the State of Alabama and affiant states upon such information and belief that they are non-residents of the state of Alabama; that such unknown heirs at law and next of kin of said deceased persons are made unknown parties defendant in said cause and complainant sues them herein as unknown defendants.

That all the parties defendant whose names are set forth in this affidavit and in the bill of complaint are over the age of twenty one years; that as to the unknown parties defendant, affiant is informed and believes and states upon such information and belief and after making diligent inquiry concerning such unknown defendants that they are over the age of twenty one years.

That upon affiant making inquiry during the time, in the manner and of the parties as herein shown,he was informed, as to all matters and facts herein set forth and further that the heirs at law and next of kin of Bella Smith Portovan, Victorine Villar Beck, and Phillipa Villar, when last heard of were residents of the State of Mississippi, that the heirs at law and next of kin of Martin Villar, Jr., Alice Hunter Mabry, Bella Hunter, Victoria Villar Hunter, Missiouri Carter, Artemus Villar, Gus Villar and Frank Kee,

above named, lived somewhere in the State of Florida, when last heard of and the more particular and specific address of the said parties is unknown to affiant, and that he has made diligent inquiry as to them.

That affiant has made diligent and constant inquiry extending over a period of more than two years concerning the heirs at law and next of kin of all parties named as defendnats in this bill of complaint and is informed and believes and states upon such information and belief that the persons, both known and unknown, named as defendants in the foregoing bill of complaint to which this affidant is attached are the heirs and all of the heirs at law and next of kin of said parties. That such inquiries as made by him and extending over a period of more than two years were made of parties residing at or near and in the neighborhood of the land described in said complaint, of the relatives of the parties and of the oldest citizens of Baldwin County, Alabama; that your affiant has consulted and made inquiries of G. R. Suarez, Perdido Beach, Baldwin County, Alabama, who is related to some of the parties defendant living near and formerly owned lands adjoining the lands described in the bill of complaint; he has also consulted and made inquiries of Aubrey Suarez, Rufus Kee and Mrs. Rufus Kee, who are also related to some of the parties defendant named in this affidavit and who reside near the land described in the bill of complaint. Your affiant has also made inquiries and consulted Martin F. Villar, Miss Jane Yancey, Gus Yancey and a Mr. Phillips and Miss Helena Sibley, all of whom are residents of Baldwin County, Alabama and who are related to some of the parties defendant named in this affidamit. In addition to this affiant made additional inquiries of Thos. L. Steele, a resident of the southern part of Baldwin County, Alabama.

Inquiries were made of Mrs. Elizabeth Shoemaker of Foley, Alabama, who is the surviving widow of Danelly, who acted as attorney in fact for the ancestors of some of the parties defendant named in this affidavit. Your affiant had an abstract of title prepared covering said property and in addition to this had an attorney examine rhe records on file in the office of the Judge of Probate, Baldwin County, Alabama, in an effort to secure

information concerning the parties named in the bill of complaint.

That from time to time affiant has made inquiries and consulted various parties and had letters written to various other parties, relatives of some of the defendants named in the bill of complaint concerning the parties and property named in this bill of complaint.

Frank Barchard Sr

Subscribed and sworn to before me
this 21st day of July, 1926.

Gladys Bush.
Notary Public,
Baldwin County, Alabama.