

592

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

Your oratrix, Helen Graham, of the City and County of Mobile, State of Alabama, who is over the age of twenty-one years, respectfully exhibits this her Bill of Complaint against William Dubroca, who is over the age of twenty-one years, and is a non-resident of the State of Alabama, respectfully showing as follows, viz:

1. That your Oratrix is in the peaceable possession of the following land, viz:

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

and that she claims to own the same in her own right.

2. Your Oratrix further shows that her title to said land is denied or disputed by the Respondent, and that said Respondent claims or is reputed to claim some right, title or interest in or encumbrance upon said lands;

3. Your Oratrix further shows that no suit is pending to enforce or test the validity of such title, claim or encumbrance, and your Oratrix calls upon said Respondent to set forth and specify his title, claim, interest, or encumbrance upon said lands and to show how and by what instrument or instruments the same is derived and created.

Your Oratrix prays that upon the hearing of this cause your Honor will quiet the title of your Oratrix in and to the above described lands as against the said Respondent, and that Your Honor will further decree that the Respondent has no right, title or interest in or encumbrance upon said lands. Your Oratrix further prays that if she has not asked for the proper relief that Your Honor will grant to her such other, further and different

relief as to Your Honor may seem meet and proper.

Your Oratrix further prays that the said William Dubroca be made a party respondent to this Bill, and that Your Honor will direct the Register of this Honorable Court to give notice by publication to the said William Dubroca commanding him to appear before this Honorable Court and to stand to and abide such orders and decrees as to this Honorable Court may seem meet and proper in this cause.

And your Oratrix will ever pray, etc.

Tracy & Mitchell
Solicitors for Complainant

FOOT NOTE:

The Respondent is required to answer each and every allegation of the foregoing Bill of Complaint, but not under oath, oath to said answer being hereby expressly waived.

Tracy & Mitchell
Solicitors for Complainant.

HELEN GRAHAM,
Complainant,
-vs-
WILLIAM DUBROCA,
Respondent.

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

AFFIDAVIT

STATE OF ALABAMA,
COUNTY OF MOBILE.

Before me, R. C. Lambrecht, a Notary Public in and for said County in said State, personally appeared Helen Graham, who is known to me, who being by me first duly sworn deposes and says that she is the complainant in the foregoing cause; that the address of the said William Dubroca is unknown to affiant; that affiant has made diligent efforts to ascertain his address, that she has caused an abstract of the title to the property described in the Bill of Complaint in said cause to be made; that she has caused inquiries to be made of the mother of the said William Dubroca, but that she has been unable to get any information as to the present address of the said William Dubroca, and that affiant is informed and believes and upon such information and belief states that the said William Dubroca is a non-resident of the State of Alabama, and that he is over the age of twenty-one years.

Helen Graham

Subscribed and sworn to before me
on this 12th day of June, 1926.

R. C. Lambrecht
Notary Public, Mobile County, Alabama.

Filed June 14th 1926
T. W. Richardson
Register

RECORDED

Helen G. Graham

~~vs.~~

vs.

William D. Dubroca,

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

This the 17th day of

June, 1926

In this cause it being made to appear to the Register of this Court by the affidavit of

Helen G. Graham

that the Defendant William D. Dubroca,

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore ordered that publication be made in the Baldwin Times

, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

the said William D. Dubroca,

to answer or demur to the Bill of Complaint in this cause by the 17th day of

Aug. 1926

, or after thirty days therefrom a decree Pro Confesso may

be taken against him.

T. W. Reservoir Register.

Attorneys for Plaintiff.

JESSE F. HOGAN

WALTER MITCHELL, JR.

LAW OFFICES

HOGAN & MITCHELL

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

August 28, 1926.

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

Dear Mr. Richerson:

We are enclosing herewith a motion for a decree pro confesso in the case of Helen Graham v. William Dubroca. If everything is in due form we shall be glad for you to enter a decree pro confesso on proof of publication. We presume that proof of publication has been filed. If it has not, will you not please request the editor to file same and send us a bill for his services.

Very truly yours,

HOGAN & MITCHELL,

By *Jesse F. Hogan*

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

SITTING IN EQUITY

Your oratrix, Helen Graham, of the City and County of Mobile, State of Alabama, who is over the age of twenty-one years, respectfully exhibits this her Bill of Complaint against William Dubroca, who is over the age of twenty-one years, and is a non-resident of the State of Alabama, respectfully showing as follows, viz:

1. That your Oratrix is in the peaceable possession of the following land, viz:

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

and that she claims to own the same in her own right.

2. Your Oratrix further shows that her title to said land is denied or disputed by the Respondent, and that said Respondent claims or is reputed to claim some right, title or interest in or encumbrance upon said lands;

3. Your Oratrix further shows that no suit is pending to enforce or test the validity of such title, claim or encumbrance, and your Oratrix calls upon said Respondent to set forth and specify his title, claim, interest, or encumbrance upon said lands and to show how and by what instrument or instruments the same is derived and created.

Your Oratrix prays that upon the hearing of this cause your Honor will quiet the title of your Oratrix in and to the above described lands as against the said Respondent, and that Your Honor will further decree that the Respondent has no right, title or interest in or encumbrance upon said lands. Your Respondent further prays that if she has not asked for the proper relief that Your Honor will grant to her such other, further and different

relief as to Your Honor may seem meet and proper.

Your Oratrix further prays that the said William Dubroca be made a party respondent to this Bill, and that Your Honor will direct the Register of this Honorable Court to give notice by publication to the said William Dubroca commanding him to appear before this Honorable Court and to stand to and abide such orders and decrees as to this Honorable Court may seem meet and proper in this cause.

And your Oratrix will ever pray, etc.

Solicitors for Complainant

FOOT NOTE:

The Respondent is required to answer each and every allegation of the foregoing Bill of Complaint, but not under oath, oath to said answer being hereby expressly waived.

Solicitors for Complainant.

HELEN GRAHAM,

Complainant,

-vs-

WILLIAM DUBROCA,

Respondent.

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

AFFIDAVIT

STATE OF ALABAMA,

COUNTY OF MOBILE.

Before me, _____, a Notary

Public in and for said County in said State, personally appeared Helen Graham, who is known to me, who being by me first duly sworn deposes and says that she is the complainant in the foregoing cause; that the address of the said William Dubroca is unknown to affiant; that affiant has made diligent efforts to ascertain his address, that she has caused an abstract of the title to the property described in the Bill of Complaint in said cause to be made; that she has caused inquiries to be made of the mother of the said William Dubroca, but that she has been unable to get any information as to the present address of the said William Dubroca, and that affiant is informed and believes and upon such information and belief states that the said William Dubroca is a non-resident of the State of Alabama, and that he is over the age of twenty-one years.

Subscribed and sworn to before me

on this _____ day of June, 1926.

Notary Public, Mobile County, Alabama.

HELEN GRAHAM,

Complainant,

vs.

WILLIAM DUBROCA,

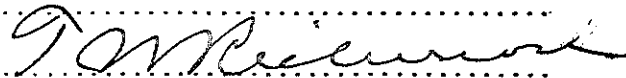
Respondent

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.
NO. 592

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, and
decree pro confesso

and in behalf of Defendant upon



Register.

No. 592

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Helen Graham,

Complainant,

vs

William Dubroca,

Respondent

NOTE OF TESTIMONY

Filed in Open Court this

13th

day of

Sept

1926

T. W. Keenan

Register

MOORE PIGCO

REGISTERED

3473-550
rec'd 9/24/26

HELEN GRAHAM,

Complainant,

-vs-

That certain land in Baldwin County, Alabama, described as follows:

Lots 19 and 20 in a plat of lots surveyed by Gavin B. Yuille, Jr., on lands formerly belonging to Cyrus Sibley, Esq., in Township 5 South, Range 2 East, which plat is recorded in Deed Book E, page 388, of the Probate Records of Baldwin County, Alabama, and any and all persons other than those hereinafter named or described, claiming any right, title or interest therein, and against the unknown heirs and devisees of Maximillian Dubroca, and against Mary Brue, Corinna Brue, Wilmer Brue, Maximillian Brue, Georgia C. Brue, Vannie McCartle, Leo Brue, Adelaide Chastang, Maude Chastang, Ben Brue, Clewis Brue, Ollie Brue, Clotilde Brue, Lavarta Brue, Cleve Brue, Pauline Brue, Odile B. Thompson, Marcelita Dubroca, Octavia Neely, Ida Belle Mandeville, Gertrude Mandeville, Irene Dubroca, Vera Dubroca, Felicia Dubroca, Odile Dubroca, Eloise Guizon, Anna Kelly Webster, Joseph Kelly, Jack Kelly, Catherine Dubroca, the heirs and devisees of the said Maximillian Dubroca;

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY,
NO. 553.

FINAL DECREE

This cause being at issue, and coming on to be heard, and being submitted on the pleadings and evidence, as noted in the note of evidence, and the averments of the Bill of Complaint being sustained by legal and competent evidence to the satisfaction of the court, and it appearing to the court that the complainant is entitled to relief prayed for;

It is now therefore, hereby ordered, adjudged and decreed that the complainant have the decree as prayed for in her Bill of Complaint herein, against the land described in said Bill of Complaint as hereinafter set out, and against the defendants and each of them, and that all claims of the defendants, viz: Any and all persons, other than ~~the complainant and~~ those hereinafter named or described, claiming any right, title or interest therein, and ~~against~~ the unknown heirs and devisees of Maximillian Dubroca, and ~~against~~ Mary Brue, Corinna Brue, Wilmer Brue, Maximillian Brue, Georgia C. Brue, Vannie McCartle, Leo Brue, Adelaide Chastang, Maud Chastang, Ben Brue, Clewis Brue, Ollie Brue, Clotilde Brue,



Lavarta Brue, Cleve Brue, Pauline Brue, Odile B. Thompson, Marcellita Dubroca, Octavia Neely, Ida Belle Mandeville, Gertrude Mandeville, Irene Dubroca, Vera Dubroca, Felicia Dubroca, ~~William Dubroca~~, Odile Dubroca, Eloise Guizon, Anna Kelly Webster, Joseph Kelly, Jack Kelly and Catherine Dubroca, who are believed to be all the heirs and devisees of the said Maximillian Dubroca, and each of them, in or to said lands or any part thereof, are hereby adjudged and decreed to be invalid and void, and the Complainant is hereby declared and adjudged to be the true and lawful owner of said lots which are more particularly described as follows, viz: That certain tract or parcel of land in Baldwin County, Alabama, more particularly described as follows, viz:

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

and that the title to said lands, both in law and in equity is hereby adjudged and decreed to be in the complainant, the said Helen Graham; and it is further adjudged and decreed by the court that the said complainant's title to said lands is hereby quieted against all claims or demands of any and all persons claiming any title to, interest in, lien or incumbrance upon said lands.

It is further ordered and decreed that the Register of this Court shall within thirty days from the rendition of this decree, prepare and file a certified copy thereof in the office of the Judge of Probate of Baldwin County, Alabama, for record, and tax the expense thereof as a part of the costs of this cause; and it is further directed that the Judge of the Probate Court shall record such copy and index the same in the same manner in which deeds are recorded and indexed.

It is further ordered, adjudged and decreed that the title herein established in the complainant shall inure to the benefit of all persons who derive title to said lands, or any part thereof, or any interest therein from or through complainant.

It is further ordered, adjudged and decreed that the complainant pay the costs of this cause, for which execution may issue.

Done at Bay Minette, Baldwin County, Alabama, this 26th day of September, 1926.

John D. Leigh

Judge

Fiscal Decease

Filed Sept 28, 1924
T. W. Richardson
Register

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
No. 592. August 30th, 1926 ~~22 1922~~

Helen Graham

Complainant.....

vs. William Dubroca,

Defendant.....

In this cause it appears to the Register..... that the order of publication here-
tofore made in this cause, was published for four consecutive weeks, commencing on the 17th
June, 1926, in the Baldwin Times,
a newspaper published in Bay Minette Alabama, that a copy of said order was posted at the Court
House door in Baldwin County, on the 17th
June, 1926 ~~and 22~~

And it now further appearing to the Register....., that the said
William Dubroca

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, there-
fore, on motion of Complainant....., 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.....

William Dubroca,

This 30th, day of August, 1926.

Register.

2

No. 592 Page _____

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY

Helen G. [unclear]

vs.

William Dubroch

DECREE PRO CONFESSO ON
PUBLICATION.

Issued Aug 30th 1924

J. W. [unclear]
Register.

Recorded in RECORDED Record

Vol. _____ Page _____

Register.

Largest Weekly Circulation in South Alabama

Bay Minette, Ala.,

July 6.

M Hogan & Mitchell -
City Bank Bldg Mobile Ala.

THE BALDWIN TIMES

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

Legal notice - Helen Graham vs William Dubroca

158 words - 4 times

\$7.11

Allen Graham

vs.

William Dubose

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
on pleadings & decree of course.

and in behalf of Defendant upon

J. W. [Signature]

Register.

No. 692

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Allen Graham

VS

William Dubroc

NOTE OF TESTIMONY

Filed in Open Court this 14

day of Sept 1926

D. M. Beeman

Register

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

John Hilburn, being duly sworn, deposes and says that he is
the ~~PUBLISHER~~ Foreman of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Notice to Non-Resident

Helen Graham vs William

Dubroca

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

issues:

Date of first publication	<u>June 17 - 1926</u>	Vol. <u>37</u>	No. <u>20</u>
Date of second publication	<u>June 24</u>	Vol. _____	No. <u>21</u>
Date of third publication	<u>July 1 -</u>	Vol. _____	No. <u>22</u>
Date of fourth publication	<u>July 8 -</u>	Vol. _____	No. <u>23</u>

Subscribed and sworn to before the undersigned this 10th day of

July 1926

T. W. Richerson
Clerk Circuit Court.

John Hilburn

Publisher
Foreman

NOTICE TO NON-RESIDENT
State of Alabama, Baldwin County,
Circuit Court, in Equity, This the
7th day of June, 1926.
Helen Graham vs. William Du-
broca
In this cause it being made to ap-
pear to the Register of this Court by
the affidavit of Helen Graham, that
the Defendant William Dubroca,
is a non-resident of the State of Ala-
bama, and further, that, in the be-
lief of said Affiant the Defendant is
over the age of 21 years; it is, there-
fore ordered that publication be made
in the Baldwin Times, a paper pub-
lished in the Bay Minette, Baldwin
County, Alabama, once a week for
four consecutive weeks, requiring him
the said William Dubroca, to answer
or demur to the Bill of Complaint in
this cause by the 17th day of 1926,
or after thirty days therefrom a de-
crece Pro Confesso may be taken
against him.
T. W. RICHEYSON, Register
Hogan & Mitchell, Attys. for Plaintiff
20-4t.

AMERICAN CABLE COMPANY
THE BAYDWIN LINES

REGISTERED IN THE PORT OF THE GOLDEN SANDS

REGISTERED IN THE PORT OF THE GOLDEN SANDS

STATE OF MASSACHUSETTS

BAY STATE ALA.

NOTICE TO REGISTER

STATE OF MASSACHUSETTS

Filed July 10th 1926.
T. W. Richardson
Register.

Robert Graham
- OS -
William DeBross

Use provided in this jurisdiction for

Date of first publication	Date of second publication	Date of third publication	Date of fourth publication
1926	1927	1927	1927

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HELEN GRAHAM,

Complainant,

-vs-

WILLIAM DUBROCA,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY

NO. 592.

FINAL DECREE

This cause coming on to be heard, was submitted for decree on the pleadings and decree pro confesso, as noted, and upon consideration thereof, the court is of the opinion that the complainant is entitled to relief.


It is therefore ordered, adjudged and decreed that the respondent has no right, title or interest in or incumbrance upon the following described lands, or any part thereof, viz:

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

It is further ordered that the Register of this court shall within thirty days from the rendition of this decree, file a certified copy of this decree in the office of the Probate Judge of Baldwin County, Alabama, for record therein, and that the costs thereof be taxed in the costs of this cause.

It is further ordered that the complainant pay the costs of this cause, for which execution may issue.

In Term Time the 25th day of September, 1926.


Judge of the Circuit Court of
Baldwin County, Alabama.

Helen Graham
- vs -
William Dubrow.

Final Decree

Filed Sept 28th/1924
J. W. Rice
Register

RECORDED

RECORDED

~~115~~
615-8162