

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 D.S. Comstock, Clive M. Comstock,  
and Loxley Concrete and Construction Company,

of Coral Gables 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 Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by  
F.C. Turner and Company,

against said D.S. Comstock, Olive M. Comstock and Loxley  
Construction Company,

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 25rd  
December, 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

vs.

Solicitor for Complainant

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this .....

day of ..... 192 .....

Sheriff.

Executed this ..... day of

..... 192 .....

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By .....  
Deputy Sheriff.

**RECORDED**

*Dec 23/1926.*  
*Copy of Summons & Complaint*  
*Received Defts*  
*by Reg. Mail*  
*Dec 23/1926*  
*J.W. Williams*  
*Deputy*

F.C.Turner and Co.,

vs.

Dean S.Comstock et al.

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

I, T.W.Richerson, Register of said Court, do hereby certify that I

did, on the 23rd day of Dec 1927, send to

Dean S.Comstock Defendant

whose address was Coral Gables Fla,

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 31st day of December 1927

Witness my hand, this 31st day of December 1926

T.W.Richerson Register.

3

No. 598

CIRCUIT COURT OF  
BALDWIN COUNTY.  
IN EQUITY.

F.C. Turner and Co,

vs.

Dean S. Comstock et al

CERTIFICATE OF REGISTER AS TO NOTICE  
BY REGISTERED MAIL.

Filed in office on this 31st

day of December 1928

*W. R. Richmond*

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 Oliver H. Constock,

of Coral Gables, 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 Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by  
F. C. Turner & Company,

against said Oliver H. Constock,

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 31st day of  
May 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

*F. Thomas*

vs.

*Oliver M. Constock  
Coral Gables  
Fla.*

*A. H. Moore*

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 made  
& sent by registered  
mail to Oliver M. Constock  
Coral Gables  
Fla.*

RECORDED

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 D.S. Constock and Lowley  
Concrete and Construction Company,

of Coral Gables, Fla, ~~State~~ 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 Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

F.C. Turner and Company,

against said

D.S. Constock and Lowley Concrete and Construction Co,

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 21st day of

May 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

*F. C. Turner vs*

vs.

*H. S. Courlock v  
Lexley Concrete &  
Construction Co*

**RECORDED**

*H. D. Moore,*

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 Summons  
mailed to Courlock  
(and) and as manager  
Lexley Concrete & Construction Co,  
May 21/22. J. W. Williams  
Register*



Alabama.

The Southeast quarter of Section Thirty One, Township Four South, Range Four East, except 10 acres previously sold to Leon P. Comstock, containing one hundred and fifty acres, more or less, lying and being in Baldwin County,

Comstock was the owner of the following described real estate, to-wit:-

or goods by the said D. S. Comstock from your petitioner the said D. S.

That at the time of the said purchase of the bill of material

is still due and unpaid.

to the sum of Four Hundred Eighteen & 97/100 (\$418.97) Dollars, which

set out herein, said bill of goods and material purchased amounting

attached and marked Exhibit "A" and made a part hereof as though fully

a bill of material or goods, an itemized statement which is hereto

November 26, 1924, the said D. S. Comstock purchased from your petitioner

That on to-wit:- Between the date of October 22, 1924, and

SECOND:

County of Baldwin, State of Alabama, up until a short time ago.

D. S. Comstock, is over the age of twenty one years and resided in the

is a resident of Coral Gables / , in the State of Florida; that the said

Box 603,

That D. S. Comstock, who is also known as Deane S. Comstock,

Alabama, and its place of residence is Mobile, Mobile County, Alabama.

That it is a corporation doing business in the State of

FIRST:

as follows:-

respectfully represents and shows unto Your Honor and unto the Court

Your petitioner, E. O. Turner & Company, humbly complaining

BALDWIN COUNTY, ALABAMA, . . . . . IN EQUITY.

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

BALDWIN COUNTY.

STATE OF ALABAMA.

IN EQUITY.

IN THE CIRCUIT COURT,

or that the same be forever confessed.

within the time and under the pains and penalties as provided by law Court and that they be required to demur, plead to or answer the same this original bill of complaint by the usual process of this honorable Loxley Concrete and Construction Company be made parties respondent to

that the said D. S. Comstock and Olive M. Comstock, his wife, and the THE PREMISES CONSIDERED Your Petitioner respectfully prays

PRAYER FOR PROCESS.

real estate herein set out and described.

said D. S. Comstock reserved unto himself a secret equity in and to the deed was executed without consideration and wholly and utterly void and the to the said D. S. Comstock and wife, Olive M. Comstock, and that the said

consideration was paid by the said Loxley Concrete and Construction Company

hereto attached and marked Exhibit "A". That in fact and in truth no

indebted in the sum of \$418.97 as is fully shown by itemized statement

exclusive purpose of defrauding your petitioner to whom he was then

to the Loxley Concrete and Construction Company was made for the sole and

who is also known as Deane S. Comstock, and his wife, Olive M. Comstock,

and made a part hereof, made and executed by the said D. S. Comstock,

conveyance, a copy of which is hereto attached and marked Exhibit "B"

herein and your petitioner avers and states the truth to be that the

and marked Exhibit "B" and made a part hereof as though fully set out

valuable considerations, a copy of which said deed is hereto attached

upon a recited consideration of One & 00/100 (\$1.00) Dollars and other

Company, a deed purporting to convey the said real estate above described

Comstock, made and executed to the Loxley Concrete and Construction

material and that the said D. S. Comstock and his wife, Olive M.

property herein described at the time of the purchase of the said

That as stated herein, D. S. Comstock was the owner of the

THIRD:

PRAYER FOR RELIEF.

That on the final hearing of this cause that the said conveyance, copy of which is hereto attached as Exhibit "B", be declared fraudulent and void as to the debt of your petitioner and that it be ascertained by this honorable court by reference or otherwise the amount due and owing from the said D. S. Comstock to your petitioner and that the said Loxley Concrete and Construction Company be required by a proper decree of this honorable court to surrender the said conveyance to this court and that the said conveyance be cancelled, avoided, annulled and set aside and that the records of said conveyance be so marked by the Register of this honorable court and that the real estate hereinabove described be subjected and sold to the satisfaction of your petitioners indebtedness.

That if your petitioner is mistaken in the relief above prayed for that Your Honor will grant unto it such other, further and different and general relief as in justice and equity it may be entitled to receive under the allegations and proof it will ever pray etc., .

HENRY D. MOORER,  
Solicitor for Complainant.

FOOT NOTE:-

The respondents are required to answer each and every paragraph of the foregoing bill of complaint numbered one to three, both inclusive, but not under oath, answer under oath being hereby expressly waived.

HENRY D. MOORER,  
Solicitor for Complainant.

STATE OF ALABAMA, |

BALDWIN COUNTY. |

KNOW ALL MEN BY THESE PRESENTS, That we, Deane S. Comstock and Olive M. Comstock, his wife, grantors in consideration of the sum of One Dollar (\$1.00) and other good and valuable considerations to us in hand paid by the Loxley Concrete and Construction Company, a corporation, grantee, the receipt of which is hereby acknowledged do grant, bargain, sell and convey unto the said grantee its successors, and assigns all of the following described real property situated in the County of Baldwin, State of Alabama, to-wit:-

Southeast quarter of Section Thirty One, Township Four South of Range Four East, except 10 acres previously deeded to Leon P. Comstock containing one hundred and fifty acres, more or less,

the conveyance is subject to that certain mortgage to the Loxley State Bank for Eight Hundred Fifty & 00/100 (\$850.00) Dollars and to that certain mortgage to C. Nimo for Six Hundred Dollars (\$600.00) which said mortgages

the said corporation assumes and agrees to pay.

TO HAVE AND TO HOLD unto the said grantee its successors and assigns forever.

IN WITNESS WHEREOF we have hereunto set our hands and seals this 9th., day of January, 1925.

DEAN S. COMSTOCK, (Seal)

OLIVE M. COMSTOCK (Seal)

STATE OF ALABAMA, |

BALDWIN COUNTY. |

I, John G. Saxe, a Notary Public in and for said County in said State, hereby certify that Deane S. Comstock and Olive M. Comstock, his wife, whose names are signed to the foregoing conveyance and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance they executed the same voluntarily on the day the same bears date.

And I further certify that on the 9th., day of January, 1925, came before me the within named Olive M. Comstock, known to me to be the wife of the within named Deane S. Comstock who being examined separate and apart from the husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and

without fear, constraint or threats on the part of the husband.

In Witness Whereof I have hereunto set my hand and seal this  
9th., day of January, 1926.

John G. Saxe,  
Notary Public, Baldwin Co., Ala.,

Seal.

Filed: January 12th., 1925.  
Recorded: 35 N.S. Page 344.

COPY.

State of Alabama  
Mobile County

Personally appeared Mr. F. C. Turner known to me to be F. C. Turner doing business as F. C. Turner & Co., being first duly sworn according to law deposes and says that the attached account against D. S. Comstock for \$418.97 is true, correct and just, all proper credits having been allowed, and payment therefor has not been received.

*F. C. Turner*  
*F. C. Turner*

Subscribed and sworn to before me this 20th day of February 1926.

*J. H. Baker*  
Notary Public.

folio \_\_\_\_\_

MONTHLY STATEMENT

Mobile, Ala., Feb 20 1926

M. S. Constock

Silverhill, Ala.

TO **F. C. TURNER & CO., DR.**

**Sash, Doors, Blinds, Screens, Cabinet Mantels**

**GRATES, TILE AND BEAVER BOARD**

Payable in Mobile Free of Expense to Us.

1924		To Statement Rendered				
Oct	22	To Bill Rendered	13	50		
Nov	26		745	65		
	26			12	30	
						771 45
1924		<i>or</i>				
Spt	29	cash	65	65		
Oct	7	"	100	00		
Nov	8	"	13	50		
	17	"	172	71		
1925	17	com	17	94		
Apr	1	"	18	41		
						388 21
						383 24
		Ent to 3/1/26				35 73
						418 97

WE ASSUME NO LIABILITY FOR LOSS OR DAMAGE TO GOODS AFTER SHIPMENT

MOBILE, ALA., *Nov 26* 192*4*

M *S. S. Comstock*

*Silverhill Ala*

BOUGHT OF **F. C. TURNER & CO.**  
MANUFACTURERS OF  
**DOORS, SASH, BLINDS, MOULDINGS, ETC.**  
DEALERS IN  
WALL BOARD, GLASS, PUTTY, CABINET MANTELS, GRATES  
TILING AND ROOFING

COR. ST. ANTHONY AND WATER STREETS

BOTH PHONES

*Extra*

	2 Doors 3' x 7' - 1 3/8" 5 x 2L	860	
	1 T Astragal 1 3/4" x 7'	75	
	2 Hood Brackets	650	
	2 D Astragals 1 3/8" x 7'	100	
		<u>1685</u>	
	<i>cr</i>		
	1 door cancelled on original order	455	
		<u>1230</u>	





MOBILE, ALA., *Mo* - *26th* 192*7*

M *S. J. Comstock*

*Silverhill Ala*

BOUGHT OF **F. C. TURNER & CO.**  
 MANUFACTURERS OF  
**DOORS, SASH, BLINDS, MOULDINGS, ETC.**

DEALERS IN  
 BESTWALL WALL BOARD, GLASS, PUTTY, CABINET MANTELS,

BOTH PHONES *Elsonor School*

COR. ST. ANTHONY AND WATER STS.

- 1- Door frame  $6 \times 7 \times 1\frac{3}{4}$  - 2° trans
  - 1- " "  $3 \times 7 \times 1\frac{3}{4}$
  - 3 Quintette Wd frms  $3^5 \times 7^8 \frac{1}{8} \times 1\frac{3}{8}$  D.H.
  - 2 Double " "  $3^5 \times 7^8 \frac{1}{8} \times 1\frac{3}{8}$  "
  - 1- " " "  $2^4 \frac{1}{2} \times 7^8 \frac{1}{8} \times 1\frac{3}{8}$  "
  - 1- Single " "  $2^4 \frac{1}{2} \times 7^8 \frac{1}{8} \times 1\frac{3}{8}$  "
  - 2- " " "  $2^1 \times 4^6 \times 1\frac{3}{8}$  "
  - 4 Pivot sash "  $3^0 \times 2^5 \times 1\frac{3}{8}$
  - 4 Inside door frames  $3^0 \times 7^0 \times 1\frac{3}{8}$
  - 3 " " "  $2^6 \times 7^0 \times 1\frac{3}{8}$
  - 1. based opening  $3^0 \times 7^0$
  - 6. " "  $2^6 \times 7^0$
  - 3 Bookcases complete fronts & door only
  - 1- Ar Entrance doors  $6^0 \times 7^0 \times 1\frac{3}{4}$  - 12 lts
  - 1- Transome  $6^0 \times 2^0 \times 1\frac{3}{4}$  - 16 lts
  - 19 Windows  $3^5 \times 7^8 \frac{1}{8} \times 18$  lts
  - 3 "  $2^4 \frac{1}{2} \times 7^8 \times 1\frac{3}{8}$  - 12 lts 6 R.
  - 2 "  $2^1 \times 4^6 \times 1\frac{3}{8}$  - 8 " "
  - 4 Doors  $3^0 \times 7^0 \times 1\frac{3}{8}$  5 x Pl
  - 3 "  $2^6 \times 7^0 \times 1\frac{3}{8}$  - 5 "
  - 2 Hood Brackets for back door
  - 24 lts weights & cord
  - 130 Lft chalk rail
  - 190 " Blackboard trim
  - 900 " Three member base
  - 900 " Picture med g
  - 900 " 2 1/4" Crown med g
  - 800 " 4" Chair rail
  - 1000 " 7/8 quarter round
  - 4- Pivot sash  $3^0 \times 2^5 \times 1\frac{3}{8}$
  - 7. Round Louvers 2° diam
- all above delivered to  
 Silverhill all for the  
 sum of

745 65

WE ASSUME NO LIABILITY FOR LOSS OR DAMAGE TO GOODS AFTER SHIPMENT

MOBILE, ALA., Apr 1st 1925

M S. S. Comstock

Silverhill Ala

BOUGHT OF **F. C. TURNER & CO.**

MANUFACTURERS OF

**DOORS. SASH, BLINDS, MOULDINGS, ETC.**

DEALERS IN

**WALL BOARD, GLASS, PUTTY, CABINET MANTELS, GRATES**

**TILING AND ROOFING**

BOTH PHONES

COR. ST. ANTHONY AND WATER STREETS

		3 nights bill	11/22/22		13	37
		"	"	11/26/22	2	67
		"	"	11/27/22	2	37
					18	41

CREDIT BILL

PAID

MOBILE, ALA., *Nov 17th* 1924

M. *S. J. Comstock*

*Silverhill Ala*

BOUGHT OF **F. C. TURNER & CO.**

MANUFACTURERS OF

**DOORS, SASH, BLINDS, MOULDINGS, ETC.**

DEALERS IN

**WALL BOARD, GLASS, PUTTY, CABINET MANTELS, GRATES**

**TILING AND ROOFING**

BOTH PHONES

COR. ST. ANTHONY AND WATER STREETS

		<i>Drights bill 7/26/24</i>	<i>16.95</i>		
		<i>" " 10/22/24</i>	<i>3.0</i>		
		<i>" " 11/11/24</i>	<i>10.69</i>		
			<i>17.94</i>		
		<b>CREDIT BILL</b>			

CREDIT BILL

CREDIT BILL

CREDIT BILL

CLAUDE PETRETT,  
Complainant.

vs

SUNNY SOUTH DEVELOPMENT COMPANY,  
Incorporated, a corporation,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN CHANCERY.

Number 439.

This cause is submitted for final decree upon original  
bill and decree pro confesso.

This July 2, 1928.

*J. W. Peterson*  
Register.

note of Testimony

Filed July 30 1928  
D. W. McMillan  
Register

RECORDED

INDEXED

COMMUNICATIONS  
SECTION

RECEIVED  
JUL 31 1928

The State of Alabama, }  
BALDWIN COUNTY.

No. 439 CIRCUIT COURT IN EQUITY.

Claude Peteet Complainant

vs.

Sunny South Development Company a Corporation, Defendant

Motion is hereby made for a Decree Pro Confesso against Sunny South Development Company, a Corporation, Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant.....ha... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23rd day of June 1928

*Bebe Hall*  
Solicitor.

The State of Alabama, }  
Baldwin County.

No. 439

CIRCUIT COURT, IN EQUITY

Claude Petéet

Complainant

vs.

Sunny South Development Company,

Defendant

In this cause it appears to the Register

that a Summons requiring the Defendant Sunny South Development Company a Corporation

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon John Stelk, President of Sunny South Development Company,

was served upon him by the Sheriff of Baldwin County, Alabama, on the 25th day of April 1924

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Beebe & Hall,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Sunny South Development Company a Corporation,

Defendant... aforesaid.

This 25th day of June 1924

*J.W. Peterson*

Register.



No. 439 Page

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.

Claude Peteet

Vs.

Sunny South Development Co.

DECREE PRO CONFESSO ON  
PERSONAL SERVICE.

Issued June 25th, 1928

*J. W. Williams*

Register.

RECORDED

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

Comes Claude Peteet, and humbly complaining against  
the Sunny South Development Company, Inc., respectfully shows

as follows:-

FIRST: That your Complainant is over the age of  
twenty-one years, and a resident of Baldwin County, Alabama;  
that the defendant, Sunny South Development Company, Inc.,  
is a Corporation organized under the laws of the State of  
Alabama with its principal office at Oak, in Baldwin County,

SECOND: That your Complainant is the owner of and  
is in the actual possession of the following described lands  
situated in Baldwin County, Alabama, to-wit:-

The N $\frac{1}{2}$  of the SW $\frac{1}{2}$  of Section 9, Township 8 South of  
Range 4 East.

THIRD: That the defendant, Sunny South Development  
Company, Inc. claims or is reputed to claim some right, title  
or interest claim or demand in, or lien or encumbrance upon  
the said lands. That there is no suit pending to test the  
validity of the right, title, interest, claim or demand of  
the Sunny South Development Company, Inc., or of your Complainant  
in and to said lands.

FOURTH: Complainant calls upon the said Sunny South  
Development Company, Inc. to set forth and specify what right,  
title, interest, claim or demand in, lien or encumbrance upon  
the said lands, and to set forth and specify how and by what  
instrument or instruments the same is derived or created.

Wherefore, Complainant prays this Honorable Court  
to take jurisdiction of the cause made by this Bill of Complaint;  
that by appropriate process the said Sunny South Development, Inc.  
be made proper defendant hereto and be required to plead, answer  
or demur within the time and under the penalties prescribed by  
law and the practice of his Honorable Court.

Complainant further prays that upon the final hearing of this cause, your Honor will make and enter a decree that the said defendant, the Sunny South Development Company, Inc. has no right, title or interest, claim or demand, in lien or encumbrance upon the aforesaid lands, or any part thereof; that the title of Complainant be forever quieted against the said defendant; that complainant have and receive such other and different relief as in the premises shall be meet.

Richard Beebe & Hall

Solicitors for Complainant

Defendant is required to answer each paragraph of the foregoing bill numbered 1 to 4 inclusive, but not under oath. Oath is hereby waived.

Richard Beebe & Hall

Solicitors for Complainant

1st Original Bill

...of the ...  
...the ...  
...the ...  
...the ...

...of the ...  
...the ...  
...the ...  
...the ...

Claude Petet  
or  
Sunny South Developments

Filed Apr 28/92 by  
P. W. Williams  
Agent

Alexander

RECORDED

...of the ...

...

...

*John W. Robinson Receipt*

Bay Minette, Ala.,

*Aug 15*

192

*8*

IN ACCOUNT WITH

**G. W. Humphries**

**JUDGE OF PROBATE, BALDWIN COUNTY**

Please Return Bill With Remittance

Deed Tax and Mortgage Tax

Rec. Fee

Total

*To*

*John W. Robinson  
Deed Rec. Mort. from Claude P. Peltier to the County Bank Building Co*

*65*

*Paid 9/15/28  
G. W. Humphries  
by S. K. ...*

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 Sunny South Development Company,  
Inc., a Corporation,

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

Claude Peteet,

against said

Sunny South Development Co a Corporation,

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 23rd day of April,

1924

*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

*Clarence Pettit*

*Shirley South Development Co.*  
vs.  
*John Stalk President of  
Army South Development  
Co.*

RECORDED

*J. Hall*  
Solicitor for Complainant.

in Vol. Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

Received in office this *4/23*

day of *April* 192 *4*

*W. R. Stunt*  
Sheriff.

Executed this *25<sup>th</sup>* day of

*April* 192 *4*

by leaving a copy of the within summons with  
*John Stalk President of  
Army South Development  
Co.* Defendant.

*W. R. Stunt*  
Sheriff.

By \_\_\_\_\_  
Deputy Sheriff.

CLAUDE PETREET,  
Complainant.

vs

SUNNY SOUTH DEVELOPMENT COMPANY,  
Incorporated, a corporation,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN CHANCERY.

Number 439.

This cause coming on to be heard on original bill and decree pro confesso as noted by the Register, and the same being considered, the court is of the opinion that the Complainant is entitled to the relief prayed for in his bill of complaint.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Defendant, Sunny South Development Company, Incorporated, a corporation, has no right, title or interest, claim or demand in, lien or encumbrance upon the whole or any part of the North half of the Southwest quarter of Section nine, Township eight South, Range four East, Baldwin County, Alabama; that the title to the said land be and the same is hereby quieted in the said Claude Peteet as against the Sunny South Development Company, Incorporated, a corporation .

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant pay the cost in this cause for which let execution issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a copy of this decree be, by the Register of this court, filed for record in the office of the Judge of Probate of Baldwin County, Alabama, within thirty days from this date.

Done at Brewton, Alabama, this the 31<sup>st</sup> day of July, 1928.

*John D. Leigh*  
Judge.