Dee	d Tax	Mortg	age Tax	Record	ling Fees	To	tal
\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
						-41	1
						-,	-
				-/-	2-5		10
		02.5					
					Taking I		
		Deed Tax \$ Cts.					Deed Tax Mortgage Tax

BALD	WIN COUNT	(A	)		gust		TERM,	194—
TO ANY SHER	IFF OF TH	E STAT	E OF ALA	BAMA:		. *		
Von are he	rehy commus	ided to s	umpion The	Magnolia	S prings	≟and	Company	7
		Section of Experimental Section 1			Service Control of Service Assessment			e atanti e e e
		Tay .						
H. Asset			٠					
o appear and ple	ad, answer or	demur, v	within thirty	days from the	service here	of, to the	e Complaint	filed in
he Circuit Court	of Baldwin C	County, St	ate of Alaba	ma, at Bay Mir				
he Circuit Court	of Baldwin C	county, St	ate of Alaba	ma, at Bay Mir			e Complaint	
to appear and ple the Circuit Court The Magnoli	of Baldwin C	county, St	ate of Alaba	ma, at Bay Mir		st		ident

No	Page			Defend	ant lives at	
THE STATE OF BALDWIN COU	ALABAMA NTY					
CIRCUIT C	1. 1			RECEIV	ED IN OFFICE	194
	Plaintiffs		I	have exect	ited this summ	Sheriff ons
vs.			ieaving	a copy wi		194
1	Defendants			<u> </u>		
SUMMONS AND C	OMPLAINT					
					· · · · · · · · · · · · · · · · · · ·	
Filed	194	-				
	Clerk			<b>a</b>		
	well process					
	To the second se					
			- -			
	Plaintiff's Attorney					Sheriff
				(5) (3)		eputy Sheriff
De	fendant's Attorney				D	eputy Sherin
Moore Printing Co., Bay Minette, Ala	1.				** *	\\

Certain Lands, walter D.

Clibson, Et al.

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

#### BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

Comes your Complainant, L. F. LaFlam, and brings this his Bill of Complaint against the following described real property situated in Baldwin County, Alabama, to wit:

Lot Thirteen (13) in Block Seventeen (17) in Foley, Alabama.....

Complainant further brings his Bill of Complaint against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon, the above described land or any part thereof and especially brings this Bill of Complaint against Walter D. Gibson and his wife, and the Magnolia Springs Land Company, a corporation, incorporated under the Laws of the State of Alabama, doing business in Foley, Alabama, if they be living and if dead against their heirs, devisees and grantees, and Complainant respectfully shows unto your Honor as follows:

#### FIRST

That he is in the actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

#### SECOND

That no suit is pending to test Complainant's title to, interest in or right to possession of said land.

#### THIRD

Complainant further shows that he claims the entire fee simple title in and to said land, having acquired the samein the following manner:

- (1) That John B. Foley and Anna E. Foley, his wife, by a warranty deed dated June 20, 1905, and filed for record in the Office of the Judge of Frobate on June 24, 1905, in Deed Book N. S., Pages 104 and 105, conveyed this land to the Magnolia Springs Land Company.
- (2) That on or about the year 1924, Walter D. Gibson began to assess the said lot of land in his name until about the year 1938, and that the said Magnolia Springs Land Company has not filed an assessment against the said lot since the said Walter D. Gibson began assessing it.
- (3) That on or about June 17, 1940, the tax collector sold the said land for taxes to the State of Alabama.
- (4) That on or about July 15, 1943, G. W. Robertson, Judge of Probate, executed a tax deed to your Complainant, L. F. LaFlam.

- (5) That the property described above has been assessed in the name of Walter D. Gibson since prior to the year 1935, and that the said Walter D. Gibson paid these taxes, at least, since the year 1934, through about the year 1939, and that since the year 1939, your Complainant has paid the taxes on this land and that no other person has paid the taxes thereon during any part of said period.
- (6) That prior to the year 1935, and from that year to the year 1939, Walter D. Gibson was in continuous, actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use, and from the year 1939, to the present time your Complainant has been and is in continuous, actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

#### FOURTH

Complainant further shows unto your Honor that all of the Defendants are over the age of 21 years and are non-residents of the State of Alabama, and that their place of residence and post office address is unknown to your Complainant, except the said Magnolia Springs Land Company, whose post office address is Foley, Alabama; if any of the above named Defendants be dead, the names and addresses of their heirs and devisees or grantees, if any, are unknown to your Complainant; Complainant further shows unto your Honor that he has used diligence in trying to ascertain the residences or post office addresses of these several Defendants and has been unable to do so, except the aforesaid Magnolia Springs Land Company; that in this investigation and inquiry Complainant has had a complete abstract of title to said land as to the ownership of the same, the possession of the same and the whereabouts of any and all persons who are, or may be interested in the same or who claim any interest therein.

#### FIFTH

Complainant further shows unto your Honor that he and those through whom he claims have paid taxes for a period of ten consecutive years on the lands and that no other person has paid taxes thereon during any part of said period.

That no one is known to your Complainant to claim said land or any part thereof or any interest therein, except your Complainand and the Defendants to this proceeding as hereinabove named, and Complainant calls upon the several persons hereinabove named as Defendants, or anyone else interested, to set forth or specify his or her or its claim, ittle, interest in or encumbrance upon said land, and how and by what instrument or otherwise the same is derived or created.

#### PRAYER FOR PROCESS

To the end, therefore, that equity may be had in the premises, Complainant prays that your Honor will cause the usual writ of process to issue to the following named Defendants, viz: Walter D. Gibson and his wife, and the Magnolia Springs Land Company, if they be living and if dead the unknown heirs and devisees of them and each of them, and to any and all other persons, firms or corporations claiming any interest in, right, or title to said land, in the usual form and according to the practice of this Honorable Court, requiring them to plead, answer or demur to the same within the time required by law and the practice of this Honorable Court, and that your Honor will also cause notice to be published of the proceedings instituted by the filling of this Bill of Complaint, as required by the laws of

the State of Alabama, authorizing the quieting of title of proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint, to the aforesaid Defendants by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint, and requiring them to phead answer or demur to the same within the time as required by law.

#### PRAYER FOR RELIEF

Your Complainant further prays that on a hearing of this cause that your Honor will establish Complainant's right to title to said land and will decree that the Complainant is the owner in fee simple of the land herein described and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said land or any part thereof, and especially Walter D. Gibson and his wife, and the Magnolia Springs Land Company, if living and if dead the unknown heirs and devisees of them and each of them, have no right, title, interest in, or lien or encumbrance upon said land that in said Decree your Honor will cause a certified copy of the Decree to be filed in the Probate Court of Baldwin County, Alabama, and to be recorded therein, and that in said Decree your Honor will direct in whose name it shall be indexed in the Direct and Indirect Indexes of the Records thereof in said Probate Court of Baldwin County, Alabama, and Complainant further prays for such other, further, different and general relief as in equity may seem just and meet, and Complainant will ever pray.

Forest A. Christian, Foley, Alabama Solicitor for Complainant

THE STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, Lug chulk, a Notary Public in and for said State and County, personally appeared Forest A. Christian, who upon oath deposes and says:

That he is the agent of, and the attorney for, the Complainant in the above styled cause and is therefore duly authorized to make this oath; that in the belief of the affiant all of the Defendants named in the foregoing Bill of Complaint are over the age of 21 years and non-residents of the State of Alabama, their place of residence being unknown to your affiant, except the Magnolia Springs Land Company, whose post office address if Foley, Alabama; that he has made a diligent inquiry to ascertain the same and has been unable to do so; that if any of the above named Defendants are dead, the names of their heirs, devisees or grantees are unknown and affiant has made diligent inquiry to ascertain the same and that their residence as he believes is not in this State; that all the other matters and facts stated in the foregoing Bill of Complaint upon information and belief, and verily believe, and so states, that the same are true.

Forest A. Christian

Sworn to and subscribed before me, a Notary Public, whose seal is hereto affixed by me, this the the day of August, 1945.

My commission expires:

3-29-49

Notary Public

THE STATE OF ALABAMA, | BALDWIN COUNTY.

L. F. LAFIAN,

Complainant

**V8.** 

CERTAIN LANDS, WALTER D. GIBSON, ET AL.

Defendants

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY.

#### FINAL DECREE

This cause coming on to be heard is submitted for Final Decree upon the Bill of Complaint, the Affidavit attached hereto, the Notice of Publication, the Order Designating Newspaper, the Affidavit of Publication, Decree Pro Confesso on Publication and Decree Pro Confesso on Personal Service and Lis Pendens Notice filed in the Office of the Judge of Probate in Baldwin County, Alabama, against said Defendants, and the testimony as noted. And it appearing to the Court that L. F. LaFlam is in the actual, peaceable, adverse possession of the following described real estate, situated in Baldwin County, Alabama, to wit:

Lot Thirteen (13), Block Seventeen (17) in Foley, Alabama.....

being the same land as heretofore described in the caption of this Decree and against which this proceeding is brought, claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

And it appearing to the Court that no suit is pending to test Complainant's title to, interest in or right to possession of said land.

And it appearing to the Court that all parties interested in said land, together with the Defendants, whose names are set forth in the Bill of Complaint, have had due notice of these proceedings by publication for the length of time as prescribed by law and the rules of this Court, or by personal service, and the Court understanding the same is of the opinion that Complainant is entitled to the relief prayed for in his Bill of Complaint.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED that the Complainant, is the owner in fee simple of the lands described in this Decree and that no other person, firm or corporation has any title to, interest in or lien or encumbrance upon said land or any part thereof and especially is this so as to the Defendants whose names are set forth in the caption of this Decree.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any claim, title to, or interest in or encumbrance upon the aforesaid land or any part thereof that Walter D. Gibson and his wife, if they be living and if dead, the unknown heirs and devisees of them and each of them hold or claim to hold are a cloud upon the title of the Complainant in this cause as to the aforesaid land, and that their said title to, interest in, lien or encumbrance upon said land or any part thereof are hereby decreed to be mull and void and as such are removed as a cloud upon the title of the Complainant and that such title to, interest in, lien or encumbrance upon said land or any part thereof held by the aforesaid Defendants or any of them, are hereby removed and held for naught as being void and of no force and effect, and such Defendants have no interest in, title to, lien or encumbrance upon said land or any part thereof.

IT IS FURTHER CROERED, ADJUDGED AND DECREED that a certified copy of this Decree be recorded in the Office of the Judge of Project of Baldwin County, Alabama, and that said Decree shall be indexed on the Direct Indexes in the name of Walter D. Gibson, and that it shall be indexed in the Indirect Indexes on the records of Baldwin County, Alabama, in the name of L. F. LaFlam, and that the Register of this Court shall within thirty days from the rendition of this Decree file said certified copy of this Decree in the Office of the Judge of Probate for record and tax the expense thereof as a part of the cost of this proceeding, and that the Probate Judge shall record such a copy in the same book and manner in which deeds are recorded and index the same as said Decree orders and directs.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that L. F. LaFlam be and he is taxed with the cost of this proceeding for which execution may issue.

Dated at Monne engle, Alabama, this 14 day of November,

Judge Circuit Court, in Equity.

	THE STATE OF ALABAMA,
	BALDWIN COUNTY
L. F. LAFLAN	
VS.	IN EQUITY
CERTAIN LANDS, WALTER D. GIBSON, ET AL	CIRCUIT COURT OF BALDWIN COUNTY
- TATION APPROACH OF THE	Notice to Non-resident Defendants, Lision, Motion for FFAXMA Decree Pro Confesso Confesso on Personal Service, Decree Pro No. of L. F. LeFlam and Mildred L. LeFlam
- TATION APPROACH OF THE	ion, Motion for REMAIN Decree Pro Confesso Confesso on Personal Service, Decree Pro ny of L. F. LeFlam and Mildred L. LeFlam
Pendens Notice, Affidavit of Fublication on Publication, Motion for Decree Pro- Confesso on Personal Service, Testimo	TTT
- TATION APPROACH OF THE	TTT
Pendens Notice, Affidavit of Fublication on Publication, Motion for Decree Pro- Confesso on Personal Service, Testimo	TTT

Foresfollow Al An

### The State of Alabama, BALDWIN COUNTY

#### IN EQUITY.

CIRCUIT COURT OF BALDWIN COUNTY

L. F. Laflam

VS.

CERTAIN LANDS, WALTER D. GIBSON ET AL

NOTE OF TESTIMONY

00

Register.

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon the Magnolia Springs Land Company, a corporation, incorporated under the Laws of the State of Alabama, doing business in Foley, Alabama, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead or demur without oath to a Bill of Complaint, lately exhibited by L. F. LaFlam, against the said Magnolia Springs Land Company, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Defendants shall in no wise omit, under penalty of the law. And we further command that you return this writ with your execution thereof.

WITNESS, R. S. Duck, Register of said Court, this the day of September, 1945.

Register

L. F. Laflan,

Complainant

IN THE CIRCUIT COURT OF

Vs.

BALDWIN COUNTY, ALABAMA

CERTAIN LANDS, WALTER D. GIBSON

ET AL,

Defendants

#### BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BAIDWIN COUNTY, ALABAMA, IN EQUITY.

Comes your Complainant, L. F. LaFlam, and brings this his Bill of Complaint against the following described real property, situated in Baldwin County, Alabama, towwit:

Lot Thirteen (13) in Block Seventeen (17) in Foley, Alabama.....

Complainant further brings his Bill of Complaint against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon, the above described land or any part thereof and especially brings this Bill of Complaint against Walter D. Givson and his wife, and the Magnolia Springs Land Company, a corporation, incorporated under the Laws of the State of Alabama, doing business in Foley, Alabama, if they be living and if dead against their heirs, devisees and grantees, and Complainant respectfully shows unto your Honor as follows:

#### FIRST

That he is in the actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

#### SECOND

That no suit is pending to test Complainant's title to, interest in or right to possession of said land.

#### THI RD

Complainant further shows that he claims the entire fee simple title in and to said land, having acquired the same in the following manner:

- (1) That John B. Foley and Ama E. Foley, his wife, by a warranty deed dated June 20, 1905, and filed for record in the Office of the Judge of Probate on June 24, 1905, in Deed Book N. S., Pages 104 and 105, conveyed this land to the Magnolia Springs Land Company.
- (2) That on or about the year 1924, Walter D. Gibson began to assess the said lot of land in his name until about the year 1938, and that the said Magnolia Springs Land Company has not filed an assessment against the said lot since the said Walter D. Gibson began assessing it.
- (3) That on or about June 17, 1940, the tax collector sold the said land for taxes to the State of Alabama.
- (4) That on or about July 15, 1943, G. W. Robertson, Judge of Probate, executed a tax deed to your Complainant, L. F. Laflam.
- (5) That the property described above has been assessed in the name of Walter D. Givson since prior to the year 1935, and that the said Walter D. Gibson paid these taxes, at least, since the year 1934, through about the year 1939, and that since the year 1939, your Complainant has paid the taxes on this land and that no other person has paid the taxes thereon during any part of said period.

(6) That prior to the year 1935, and from that year to the year 1939, Walter D. Gibson was in continuous, actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use, and from the year 1939, toothe present time your Complainant has been and in in continuous, actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to tuse.

#### FOURTH

Complainant further shows unto your Honor that all of the Defendants are over the age of 21 years and are non-residents of the State of Alabama, and that their place of residence and post office address is unknown to your Complainant, except the said Magnolia Springs Land Company, whose post office address is Foley, Alabama; if any of the above named Defendants be dead, the names and addresses of their heirs and devisees or grantees, if any, are unknown to your Complainant, Complainant further shows unto your Honor that he has used diligence in trying to ascertain the residences or post office addresses of these several Defendants and has been unable to do so, except the aforesaid Magnolia Springs Land Company; that in this investigation and inquiry Complainant has had a complete abstract of title to said land as to the ownership of the same, the possession of the same and the whereabouts of any and all persons who are, or may be interested in the same or who claim any interest therein.

#### FIFTH

Complainant further shows unto your Honor that he and those through whom he claims have paid taxes for a period of ten consecutive years on the lands and that no other person has paid taxes thereon during any part of said period.

That no one is known to your Complainant to claim said land or any part; thereof or any interest therein, except your Complainant and the Defendants to this proceeding as hereinably enamed, and Complainant calls upon the several persons hereinable named as Defendants, or anyone else interested, to set forth or specify his or her or its claim, title, interest in or encumbrance upon said land, and how and by what instrument or otherwise the same is derived or created.

#### PRAYER FOR PROCESS

To the end, therefore, that equity may be had in the premises, Complainant prays that your Honor will cause the usual write of process to issue to the following Defendants, viz: Walter D. Gibson and his wife, and the Magnolia Springs Land Company, if they be living and if dead the unknown heirs and devisees of them and each of them, and to any and all other persons, firms or corporations claiming any interest in, right, or title to said land, in the usual form and according to the practice of this Honorable Court, requiring them to plead, answer or demur to the same within the time required by law and the practice of this Honorable Court, and that your Honor will also cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint, as required by the laws of the State of Alabama, authorizing the quieting of title of proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint, to the aforesaid Defendants by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint, and requiring them to plead, answer or demur to the same within the time as required by law.

#### PRAYER FOR RELIEF

Your Complainant further prays that on a hearing of this cause that your Honor will establish Complainant's right to title to said land and will decree that the Complainant is the owner in fee simple of the land herein described and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said land or any part thereof, and especially Walter D. Gibson and his wife, and the Magnolia Springs Land Company, if living and if dead the unknown heirs and devisees of them and each of them, have no right,

title, interest in, or lien or encumbrance upon said land that in said Decree your Honor will cause a certified copy of the Decree to be filed in the Probate Court of Baldwin County, Alabama, and to be recorded therein, and that in said Decree your Honor will direct in whose name it shall be indexed in the Direct and Indirect Indexes of the Records thereof in said Probate Court of Baldwin County, Alabama, and Complainant further prays for such other, further, different and general relief as in equity may seem just and meet, and Complainant will ever pray.

Forest M. Christian, Foley, Alabama Solicitor for Complainant

THE STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, Jan January, a Notary Public in and for said State and County, personally appeared Ferest A. Christian, who upon oath deposes and says:

That he is the agent of, and the attorney for, the Complainant in the above styled cause and is therefore duly authorized to make this oath; that in the belief of the affiant all of the Defendants named in the foregoing Bill of Complaint are over the age of 21 years and non-residents of the State of Alabama, their place of residence being unknown to your affiant, except the Magnolia Springs Land Company, whose post office address is Foley, Alabama; that he has made a diligent inquiry to ascertain the same and has been unable to do so; that if any of the above named Defendants are dead, the names of their heirs, advisees or grantees are unknown and affiant has made diligent inquiry to ascertain the same and that their residence as he believes is not in this State; that all the other matters and facts stated in the foregoing Bill of Complaint upon information and belief, and varily believe; and so states, that the same are true.

Forest A. Christian

Sworn to and subscribed before me, a Notary Public, whose seal is hereto affixed by me, this the \_\_\_\_day of August, 1345.

My commission expires:

3-25-49

Notary Public

Pector seroed County, Alabama, County, and Seneral Serenes Dray. ins emsdelå tyinnol nivols soon i toerib iliw rond rot to sorebul to runt trant transfer some sameds H 201101 canae a certified copy ಸ್ತು ಅದ್ವಾಸ್ತ್ರಿ whose TOUCHE 9 Hell Hell to exect ಅದ್ದ ೦ಭ **0** dent mees 4.7 4.4 recorded miwbise to treeses ... asidwin sed ilsde t assid though the total offer and trents the treeses the tre the meru Formal Go on blee mi tent of the control 5.88 Decree

No 1 To 1 To N M. Christian, Foley, Al O

CODMIN.

Conner's \*\* 80 VO 04040B Bureaus olidry Yratio w ಸ್ವರ್ಣ ಸ್ವರ್ಣ ಸಂದರ್ಣ ರಾಣ್ಯ 는 () () 0404S

ESSELVES CRICES AND CONTROL TO THE CONTROL OF THE C 640ರ್ or mon bus arsey is to egs ent revo ers trisiqued to Ilia section of the interior of the section of the tent instrement of the section of the tent to section of the tent the the 건 () ęų O o bolyta Polist ant tetate trielomod d O rt-J OJ 081180 O H Are more out the drawn fine of the drawn from the d 1330 는 건 () Suc as ... solt at box Ils traills e Us olt ram t nouse SEE OFFER ę Ç on cheronal Ņ an edden Treat danit ದೆಬ್ಬಾ eD.c tor verrotts beattoning 10日日日の日本 a transmer a SUG sad traithe bra f fedas concliser a took To admediaer-non nt benen ere geeg postol and mi botate brangaveeled withat Not treome traiths rook o same all as a ser a se 108 K 6 भ सक्रमाध्या प्रमाणका भ tregilib obem es tor el sevelled e parcogenot ent mi क प्रमुख (i) Remen ent a object and state , म्योप ह O H 000

10 to bediros dus 920 Nod o Hot a # 0 E

できるなのなのなっ

日のの中の日

Complainant

vs.

CERTAIN LANDS, WALTER D.

GIBSON, ET AL,

Defendants

#### NOTICE TO NON-RESIDENT DEFENDANTS

It having been made to appear in the above styled cause from the Affidavit of Forest A. Christian, the Solicitor of Record for the Complainant in said cause, that the Defendants, Walter D. Gibson and his wife, are non-residents of the State of Alabama, their residences or Post Office address being unknown to Complainant.

NOTICE IS HEREBY GIVEN TO Walter D. Gibson and his wife, if they be living and if dead the unknown heirs and devisees of them and each of them, and to any and all persons, firms or corporations claiming any interest in, title to, lien or encumbrance upon the land herein described; that on the 10 day of August, 1945, L. F. LaFlam, filed in the Equity Side of the Circuit Court of Baldwin County, Alabama his Bill of Complaint against the following described land in Baldwin County, Alabama, viz:

Lot Thirteen (13) in Block Seventeen (17) in Foley, Alabama.....

and against the Defendants hereinabove named and any and all other persons, firms, or corporations claiming any interest in, lien or encumbrance upon the above described land, and you are hereby notified to appear and plead, answer or demur within thirty days from the completion of publication, the 22 day of October, 1945, or a decree pro confesso will be rendered against you;

That said Bill of Complaint was and is filed for the purpose of establishing the title of said Complaint to said land for the purpose of quieting its title thereto and clearing up all doubts and desputes concerning the same;

That title to said land stands in the name of the Complainant on the records in the office of the 'udge of Probate in Baldwin County, Alabama;

That Complainant claims title to said land by virtue of a tax deed executed by G. W. Robertson, Judge of Probate, on July 15, 1943.

Complainant further alleges in his Bill of Complaint that he in in the quiet and peaceable possession of said land claiming to own the same absolutely and in fee simple and that he and those under whom he claims, have been in possession of said land for more than 10 years next preceding the filing of the Bill of Complaint, and they have paid the taxes on said land for the last 10 years, prior to the filing of said bill of Complaint and no other person, firm or corporation has paid any taxes on said land during said 10 year period.

Witness my hand this the  $\frac{\sqrt{3}}{2}$  day of August, 1945.

Forest A. Christian Solicitor

R. S. Duck as Register of the Circuit Court of Baldwin County, Alabama.

#### NOTICE TO NON-RESIDENT DEFENDANTS

L. F. LaFLAM, Complainant

CERTAIN LANDS, WALTER D. GIBSON, ET. AL., Defendants

L. F. LaFLAM. Complainant

600K 002 PAGE 11

vs.

q i griogi.

CARTAIN LANDS, WALTER D. GIBSON, ET AL, Defendants

#### MOTICE TO NON-RESIDENT DEFENDANTS

It having been made to appear in the above styled cause from the Affidavit of Forest A. Christian, the Solicitor of Record for the Complainant in said cause, that the Defendants, Welter D. Gibson and his wife, are non-residents of the State of Alabama, their residences or Post Office address being unknown to Complainant.

NOTICE IS HEARBY GIVEN TO walter D. Gibson and his wife, if they be living and if dead the unknown heirs and devisees of them and each of them and to any and all persons, firms or corporations claiming any interest in, title to, lien or encumbrance upon the land herein described; that on the 13 day of August, 1945, L. F. darlams filed in the Equity Side of the Circuit Court of Baldwin County, Alabama his Bill of Complaint against the following described land in Baldwin County, Alabama, viz:

Lot Thirteen (13) in Block Seventeen (17)

and against the Desendants hereinabove named and any and all other persons. Tirms, or corporations claiming any interest in, lien or encumbrance upon the above described land, and you are hereby not-lifted to appear and plead, answer or demur within thirty days from the completion of publication, the day of October, 1945, or a decree pro confesso will be rendered against you;

That said Bill of Complaint was and is filed for the purpose of establishing the title of said Complaint to said land for the purpose of quieting its title thereto and clearing up all doubts and desputes concerning the same;

That title to said land stands in the name of the Complainant on the records in the office of the Judge of Probate in Baldwin County, Alabama;

That Complainant claims title to said land by virtue of a tax deed executed by G. W. Robertson, Judge of Probate, on July 15.

Complainant further alleges in his Bill of Complaint that he in in the quiet and peaceable possession of said land claiming to own the same absolutely and in fee simple and that he and those under whom he claims, have been in possession of said land for more than 10 years next preceding the filing of the Bill of Complaint, and they have paid the taxes on said land for the last 10 years. prior to the filing of said Bill of Complaint and no other person, firm or corporation has paid any taxes on said land during said 10 year period.

Witness my hand this the / 3 day of August, 1945.

Forest A. Christian Solicitor

R. S. Duak

as Register of the Circuit Court of Baldwin County, Alabama.

5, 1

沖遺

4

æ

為其為 100 £ 2 253

# -4

0 0 0 0 4015 4404 444 450 TOTAL 5447 4569 45 ⇔ #<sub>25</sub> €3 252 ASA 200  $\mathbb{C}_{p}$ 100 w I 25.0 Toology to the control of the contro **在一种一种** (4) intuit. A And 20 00 <u>ابد</u> ج

NON-RESIDENT DEFENDANTS 3434 L. P. Darlam, NATH VS. H 44 - 5 4 CARTAIN DANDS, GIBSON, AT.AL. CHAPTON CONTRACTOR CON 5.3 4 4 0 0 or p. Gluson and his wife, to the compose of the co · E o 

14 (日本) Q.J \$ ... 

000 a c 4 4 Complainant **3** (1) 8 h 100 WALTER D? ALTER -per and ants 200 3 5 6 专与 4 13 3 F B 7 13 70 504 44000 **参** P B 10° 600

6 A 6 0.00 8 B 333 143 # 每 量 5-4 나를 등 취임 经营 经通 40 14 046 å₹ \$ CARGEOUS SECTIONS OF THE PROPERTY OF THE PROPE 409 0.0 880 温姆姆 S. 科格 獨 00 0 неВ 2.2 計道線 o do 49 44 46 (3) Hara Hara San 23 000 (G 92 008 44 W O

**4** 0 4 3 13 th **4** 看數域 - 0 4 - 0 4 4 7 7 133 9 9 9 T 9.9 إيدو 00 , <u>\$</u> .4 4400 23 O ta 34 1 12 Vs (1) G nia (4) T. 6 33 Sant. 0 14 0 0 10 (d) 10 (d) (a) (b) TO WE SEE 5-A 3 4 2 the state 

... (4) -14 E4 69 15.53 0.8 - (J -- (J) 43 (S) () · 1 46 75 하나를 생활 ♣ 24 1"2 . W 90 C 0 (3) 2/2/2 e3. ∵γ'₹ 20 3 22 23 7 B 40 \* O -1 0

TYOU BY 40 4 3-12 A Corporation of a state of a sta (4) (4) 5 <del>-</del>1 14. <u>1</u> ALSTONOO TO INTO OTALIA S SINT SINT SO NOTES OF T SINE TO NOTES SINTE TO INTE SIN TO SULLI TO OTALIA SINTENOO TO SO OT OUT TRIBUTED TO SO OT OUT TRIBUTED TO Anthible to be seen to W 35 143 133 200 4.2

1 (J) 3 · 43 20.00

a s Comment of # E 93 12 C 0 \$ . <del>† 5</del> 73 CA (1) See 1 30 0 0 7 0 12 300 v 2 .....

0

0.00

BCOK 002 PAGE STATE OF ALABAMA.

BALDWIN COUNTY

I, R. S. DUCK, Register of the Circuit Court of aldwin County, I, R. S. DUCK, Register of the Circuit Court of aldwin County, Alabama, hereby certify that the above is a full, true and correct and complete copy of the notice given by publication in the Baldwin of L.F. LAFLAM VS. CERTAIN LANDS, WALTER D. GIBSON ET ALS. Respondents, and Filed in the Office of the Probate Judge of accordance with the provixions of the Statutes of the State of Alabama.

IN WITNESS HEREOF, I have hereunto set my hand and seal of office on this the 13th day of August 1945.

WCE C 2 been paid. Deed Tax

STATE OF ALABAMA, BALDWIN COUNTY Filed august 13, 1945 - 8:30 Am Recorded Dend book 2 page 1/-/2 and I certify that the following Privilege Tax has Mortgage Tax Indee of Probate

Register, Circiut Court Baldwin, County, Alabama.

## THE STATE OF ALABAMA, BALDWIN COUNTY

#### Circuit Court

To Alica A. Christian	t ook				****		
	5.5 5.4 4.4 4.4		•			  	200 100 100 100 100 100 100 100 100 100
**************************************							
463							See
KNOW YE: That we, ha	aving full faith in	your pru	dence and c	ompeten	cy, hav	e appo	inted y
ommissioner, and by these prese	10.0				•		
	20 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		1.1		- <b>-</b>		
fore you and examine L. F.	. Larlam and M	ildred_	Pe nar Ian			· · · · · · · · · · · · · · · · · · ·	
							· · · · · · · · · · · · · · · · · · ·
	,	•					
	·						
s witnesses in behalf of	F. LaFlam	2.	i		in a cau	se pend	ling in (
s witnesses in benair of					12 4 04-		^
reuit Court in Baldwin County,	of said State, wh	erein	L. F. I	eFlam			
	· · · · · · · · · · · · · · · · · · ·						* -
						,	
						Comp	lainant-
		~ e+ c	7				
nd Certain Lands, Wa	lter D. Gibso	<u> </u>					
nd <u>Gertain Lands, Wa</u>	lter D. Gibso	119. 20. 2	\ <u></u>				
nd <b>Gertain Lands, Wa</b>	iter D. Gibso	119 00 2	\				
nd <u>Certain Lands, Wa</u>	iter D. Gibso						
nd <u>Certain Lands, Wa</u>	iter D. Gibso		-			Re	sponde
nd <u>Certain Lands, Wa</u>	iter D. Gibso			. ,		Re	sponde
							sponde
n oath, to be by you administer	ed, upon La Fa	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
on oath, to be by you administer o take and certify the deposition <b>g</b>	ed, upon La Fa	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
on oath, to be by you administer o take and certify the deposition <b>g</b>	ed, upon La Fa	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
on oath, to be by you administer o take and certify the deposition a peed, under your hand.	ed, upon L. F.  s of the witness	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
on oath, to be by you administer o take and certify the deposition a peed, under your hand.	ed, upon La Fa	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
on oath, to be by you administer o take and certify the deposition a peed, under your hand.	ed, upon L. F.  s of the witness	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
on oath, to be by you administer o take and certify the deposition a peed, under your hand.	ed, upon L. F.  s of the witness	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	
n oath, to be by you administer to take and certify the deposition peed, under your hand.	ed, upon L. F.  s of the witness  y of Novemb	LaFlan	and Mild	red L.	LeFla	m <u>.</u>	conven

No. 1388	
HE STATE OF ALABAM Baldwin County	<b>A</b>
CIRCUIT COURT	
<u> </u>	
	20-40 (0000000) (10-100000000)
No. of the second secon	w the section of the
	All the committee of th
	the state of the s
Complainant VS.	
CERTAIN LANDS, WALTER D. GIBS	son et al
	gen engal se de de
Defendant	L_B
COMMISSION TO TAKE DEPOSIT	ION
	- And Carlot
COMMISSIONER:	The state of the s
Alica A. Christian	esceptional desired
	or supplied the same
WITNESSES:	anna e de la companya
L. F. LaFlam and Mildred	<b>L</b> .
Loftsm	

\$18 - 13

144

and the second of the second o

.

·		the state of the s	
THE STATE OF ALABAM	//A, ) C	RCUIT COURT,	IN EQUITY
BALDWIN COUNTY	No. 1388	3	, Term, 19
	NO.		, 101111, 10
	e Tu		
L. F. ISFIAN			Complainant
	Vs.		
CERTAIN LANDS,			
WALTER D. GIBSON, ET AL		년: 1명()	Defendant_
Motion is hereby made for a Decree Pro			`
(17) Foley, Alabama, and Walter	D. Gibson, and	his wife	Defendant
in the annexed stated cause, on the grou	and that more than	thirty days have elapsed	d since the perfection
of publication was made under the order	of this Court; and	d it having been shown	by due proof to the
Court that said Defendant is a non-resid	lent of the State of	Alabama, and has failed	l to answer, plead or
demur to the Bill in this cause, to the de	ate hereof.		
This 10th day	of. November	er 19 <b>45</b>	

746 Code

HalfMhVH/Hy Solicitor.

No. 1385	Page
	of Alabama,
CIRCUIT COU	RT, IN EQUITY
	Balandara Samadara da Sama
L. F. Lofiam	:
	Complainant
٧	s.
CERTAIN LANDS	WALTER D. GIBSO
er al	
	Defendant 8
	ee Pro Confesso olication
iled November	14 1945
Rh	suel-
	Register.
Recorded in	Recor

Moore Printing Co., Bay Minette, Ala.

Register.

	<b> </b>	_			
THE STATE (	OF ALABAM • county	IA,		Circuit Court	, In Equity.
in the state of th		, '			, , , , ,
	Leplan			2	
				Com	iplainant
		Vs.			
CERTAIN LAND	S, WALTER D. GI	BSON. ET AL	• •		
	and the copyright control of		g. 4	D	efendant <b>S</b>
Motion is hereby made	e for a Decree Pro C	Sonfocco against	*** **** ***	en de les est	e volumente se
And the fact of the second					M. Oundary,
a Corporation, in	corporated unde	r the Laws of	the State o	f Alabama,	efendant 🎩
doing business in					
in the above stated cor	ise, on the ground t	hat more than thin	ty days have el	apsed since servic	e of summons
upon said Defendant_					
Defendant—ha &	failed to demur, ple	ead to or answer th	he Bill of Comp	aint in this cause	to this date.
This	l <b>0th</b> day of-	November	19	45	
		,			·
		Ann.	II Million	41 Au	—Solicitor.
					Somemor.

0. 1388	/ Page
The Sta	ate of Alabama, DWIN COUNTY
CIRCUIT (	COURT, IN EQUITY
	7
L. F. Laf	FLAM
	Vs.
CERTAIN :	LANDS; WALTER D. GIBSON
Motion for P	Decree Pro Confesso on ersonal Service
Filed Novemb	Zhile or
	Register.
Recorded in	Record
Vol.	_Page
	Register

Moore Printing Co., Bay Minette, Ala.

The State of Alabama	l, { No. 13	38 CIRCUIT	COURT IN EQUITY.
Baldwin County.		Weight and the second of the s	1776 1876
L. F. Lapian		11 11	Complainant
	۷s.		· ·
CERTAIN LANDS, WALTER D. GIBSO	n, et al		Defendant.
In this cause it appears to the	Register, R.	e, ef	
that a summons requiring the Defendant		• "	ompany, a corpor-
ation, incorporated under the L	. Agr		**************************************
Foley, Alabama			
		•	
/ ••••••••••••••••••••••••••••••••••••		*******	**********
	*****	* # * * * * * * * * * * * * * * * * * *	
	*******	• • • • • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • • • • • • • •
			• • • • • • • • • • • • • • • • • • • •
	, 2 1 to 725 / 7		and the second of the second o
to appear and demur, plead to or answer			
after the service of said Summons upon	The said Ma	gnolia Springs	Land Company
was served uponitby the She	riff ofBal	dwin	ounty, Alabama, on the
latday ofSeptember		19. <b>45</b> .	magan s amount s a massach a company and some a company and some a company and some a company and some a company
			•
And the said Defendant having fail	ed to demur, ple	ad to or answer th	e said Bill of Complaint
to this date, it is now, therefore, on mot	ion of <b>Forest_A</b>	. Christian, So	licitor for the
Complainant			• • • • • • • • • • • • • • • • • • • •
ordered and decreed that the said Bill of	Complaint in th	is cause be and it l	hereby is in all things
taken as confessed against the said Mag			
	•		
	e in any many many many many many many many	Same of the second company of the second	
	****		ব্য
***************************************	A A A A A A A A A A A A A A A A A A A		••••••••••••••••••••••••••••••••••••••
	• • • • • • • • • • • • • • • • • • • •		*************
*******************			
•••••	· · · · · · · · · · · · · · · · · · ·		•••••
***************************************		Alleys	
			Defendant : aforesaid.
Thisday of	November		45
	(	KNULLEK	Register.

	В	te of	ounty	7.		
CIR	CUIT	COUR	Γ, 1N	EQ	UI	13) 13
	A COLUMN TO A STATE OF THE STAT		*			11.5
	L. F. 1	aflam	N.		v v	
		vs.				100
	TAIN L	AW , EDIN	laer	D. (	) LBS	O
DI		PRO C			10.	Ŋ
		MBER		ALL		1.1 -2.1

Moore Printing Company, Bay Minette, Ala.

THE STATE OF A		CIRCUIT CO	OURT, IN EQUITY
BALDWIN CO	UNTY	No. 1388	, Term, 19
L. F. L	ePLAM		Complainant
		Vs.	
-	<u>.</u>		Defendant
In this cause it appea	rs to the Register	R. S. Duck	that the order of publication
			commencing on the 29th
day of August	, 19 <b>45</b> , in the	Baldwin Times	a newspaper published
in Bay Minette	, Alabama, tha	at a copy of said order was	s posted at the Court House door
in Baldwin (	County, on th	ne day of	August 1945
and recorded as a Lis	Pendens notice	as provided by Titl	e 7, Section 1120
		,	
		_	
Lot Thirteen (13).	Block Seventeer hey be living, a	1 (17), Foley, Alabe	that the said man, and Wallter D. Gibson unknown heirs & devisees
			, ,
a continue		And the second of the second o	The state of the s
		***	
. 11			Complaint in this cause, it is
now, therefore, on motion o	f Complainant, o	rdered and decreed by the	Register R. S. Duck
that	the Bill of Complain	t in this cause be, and it l	hereby is in all things taken as
confessed against the said-	above named Re	spondents.	
This 124	day of <b>No</b>	vember R	9.45 Register.

No. 1388	Page	
The State of A		
CIRCUIT COURT,	IN	EQUITY
L. F. LOFLAM		
Vs.		
CERTAIN LANDS, WA	lær	D. BGIBSON
Decree Pro Confesso	of	Publication
Issued NOVEMBER 17	2 D (	19 <b>45</b>
771		Register.
Recorded in		Record
Yol, Page		
		Register.
Moore Printing Co., Bay 1	Minette	Ala.

Z

ini ini

	E STAT	DWIN CO			)						TERM	I, 194 <u>–</u>
CO A	ANY SHE	RIFF OF	THE	STATI	E OF	ALABA	AMA:	-				,
		hereby co					*	JAGNOL	IA SPR	INGS	LAND (	COMP
	You are	ilcreby co								•		
						27	**************************************			Tue Control		etertulia kan Tuga
way to have been		and the second second second second	y and the disease of the second	re i jagizaner i i see, v							/	1.7
о ар	pear and p	olead, ans	wer or d	lemur, v	vithin	thirty d	ays from	n the serv	rice hereo	f, to the	Compla	int file
o ap	Circuit Cou	rt of Bald	lwin Coi	unty, St	ate of	Alabam	a, at Ba	y Minett	e, against	CERT	CAIN L	ANDS
he C	Circuit Cou	ort of Bald	lwin Cou	unty, St	ate of	Alabam	a, at Ba	y Minett	e, against	CERT	CAIN L	ANDS
he C	Circuit Cou	ort of Bald	lwin Cou	unty, St	ate of	Alabam	a, at Ba	y Minett	e, against	CERT	CAIN L	ANDS endant
the C	Circuit Cou	ort of Bald	lwin Cou	ET.	ate of	Alabam	a, at Ba	y Minett	e, against	CERT	CAIN L	ANDS endant

No Page				Def	endant	lives	ıt	· 1, · ·
THE STATE OF ALABAMA BALDWIN COUNTY			4					
CIRCUIT COURT				REC	EIVED	IN OFFIC	E	A. C.
}			<del>,</del>					. 194
			I	have ex	cecuted	this su	Λ.	_ Sheriff }
Plaintiffs vs.	-	this _		·				_ 194
		by lea	wing	a copy	with	5		
Defendants							•	
SUMMONS AND COMPLAINT		**************************************	*					
Filed194								7
Çler <b>k</b>				: :	:			
							. (	The state of the s
								The part of the pa
	10 m							
			<u>:</u>	- :		7		
					**************************************			•
Plaintiff's Attorney								Sheriff
Defendant's Attorney				43			. Depu	ty Sheriff
Moore Printing Co., Bay Minette, Ala.								

Complainant IN THE CIRCUIT COURT OF

VS. BALDWIN COUNTY, ALABAMA

CERTAIN LANDS, WALTER D. IN EQUITY.

GIBSON, ET AL.

#### BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, SUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

Comes your Complainant, L. F. LaFlam, and brings this his Bill of Complaint against the following described real property situated in Baldwin County, Alabama, to wit:

Lot Thirteen (13) in Block Seventeen (17) in Foley, Alabama......

Complainant further brings his Bill of Complaint against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon, the above described land or any part thereof and especially brings this Bill of Complaint against Walter D. Gibson and his wife, and the Magnolia Springs Land Company, a corporation, incorporated under the Laws of the State of Alabama, doing business in Foley, Alabama, if they be living and if dead against their beirs, devisees and grantees, and Complainant respectfully shows unto your Homor as follows:

#### FIRST

That he is in the actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

#### SECOND

That no suit is pending to test Complainant's title to, interest in or right to possession of said land.

#### THIRD

Complainant further shows that he claims the entire fee simple title in and to said land, having acquired the samein the following manner:

- (1) That John B. Foley and Anna A. Foley, his wife, by a warranty deed dated June 20, 1905, and filed for record in the Office of the Judge of Probate on June 24, 1905, in Deed Book N. S., Pages 104 and 105, conveyed this land to the Magnolia Springs Land Company.
  - (2) That on or about the year 1924, Walter D. Gibson began to assess the said lot of land in his name until about the year 1938, and that the said Magnolia Springs Land Company has not filed an assessment against the said lot since the said Walter D. Gibson began assessing it.
  - (3) That on or about June 17, 1940, the tax collector sold the said land for taxes to the State of Alabama.
  - (4) That on or about July 15, 1943, G. W. Robertson, Judge of Probate, executed a tax deed to your Complainant, L. F. LaFlam.

- (5) That the property described above has been assessed in the name of Walter D. Gibson since prior to the year 1935, and that the said Walter D. Gibson paid these taxes, at least, since the year 1934, through about the year 1939, and that since the year 1939, your Complainant has paid the taxes on this land and that no other person has paid the taxes thereon during any part of said period.
- (6) That prior to the year 1935, and from that year to the year 1939, Walter D. Gibson was in continuous, actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use, and from the year 1939, to the present time your Complainant has been and is in continuous, actual, peaceable, adverse possession of the above described land claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use.

#### FOURTH

Complainant further shows unto your Honor that all of the Defendants are over the age of 21 years and are non-residents of the State of Alabama, and that their place of residence and post office address is unknown to your Complainant, except the said Magnolia Springs Land Company, whose post office address is Poley. Alabama; if any of the above named Defendants be dead, the names and addresses of their heirs and devisees or grantees, if any, are unknown to your Complainant; Complainant further shows unto your Honor that he has used diligence in trying to ascertain the residences or post office addresses of these several Defendants and has been unable to do so, except the aforesaid Magnolia Springs Land Company; that in this investigation and inquiry Complainant has had a complete abstract of title to said land as to the ownership of the same, the possession of the same and the whereabouts of any and all persons who are, or may be interested in the same or who claim any interest therein.

#### FIFTH

Complainant further shows unto your Honor that he and those through whom he claims have paid taxes for a period of ten consecutive years on the lands and that no other person has paid taxes thereon during any part of said period.

That no one is known to your Complainant to claim said land or any part thereof or any interest therein, except your Complainant and the Perendants to this proceeding as hereinabove named, and Complainant calls upon the several persons hereinabove named as Defendants, or anyone else interested, to set forth or specify his or her or its claim, ittle, interest in or encumbrance upon said land, and how and by what instrument or otherwise the same is derived or created.

#### PRAYER FOR PROCESS

To the end, therefore, that equity may be had in the premises, Complainant prays that your Honor will cause the usual writ of precess to issue to the following named Defendants, viz: Walter D. Gibson and his wife, and the Magnolia Springs Land Company, if they be living and if dead the unknown heirs and devises of them and each of them, and to any and all other persons, firms or corporations claiming any interest in, right, or title to said land, in the usual form and according to the practice of this Honorable Court, requiring them to plead, answer or demur to the same within the time required by law and the practice of this Honorable Court, and that your Honor will also cause notice to be published of the proceedings instituted by the filling of this Bill of Complaint, as required by the laws of

the State of Alabama, authorizing the quieting of title of proceedings in rem; that your Honor will also order that notice be given of the filing of this Bill of Complaint, to the aforesaid Defendants by publication in some newspaper published in Baldwin County, Alabama, making them parties to this Bill of Complaint, and requiring them to plead answer or demur to the same within the time as required by law.

#### PRAYER FOR RELIEF

Your Complainant further prays that on a hearing of this cause that your Honor will establish Complainant's right to title to said land and will decree that the Complainant is the owner in fee simple of the land herein described and that no other person, firm or corporation has any title to, interest in, or lien or encumbrance upon said land or any part thereof, and especially Welter D. Gibson and his wife, and the Magnolia Springs Land Company, if living and if dead the unknown heirs and devisees of them and each of them, have no right, title, interest in, or lien or encumbrance upon said land that in said Decree your Honor will cause a certified copy of the Decree to be filed in the Probate Court of Baldwin County, Ilabama, and to be recorded therein, and that in said Decree your Honor will direct in whose name it shall be indexed in the Direct and Indirect Indexes of the seconds thereof in said Probate Court of Baldwin County, Alabama, and Complainant further prays for such other. Further, different and general relief as in equity may seem just and meet, and Complainant will ever pray.

Forest A. Christian, Folay, Alabama Solicitor for Complement

THE STATE OF ALABAMA.

BAIDWIN COUNTY.

Before me. Lu Llutto, a Notary Public in and for said State and County, personally appeared Forest A. Christian, who upon oath deposes and says:

That he is the agent of, and the attorney for, the Complainant in the above styled cause and is therefore duly authorized to make this oath; that in the belief of the affiant all of the Defendants named in the foregoing Bill of Complaint are over the age of 21 years and non-residents of the State of Alabama, their place of residence being unknown to your affiant, except the Magnolia Springs Land Company, whose post office address if Folsy, Alabama; that he has made a diligent inquiry to ascertain the same and has been unable to do so; that if any of the above named Defendants are dead, the names of their heirs, devisees or grantees are unknown and affiant has made diligent inquiry to ascertain the same and that their residence as he believes is not in this State; that all the other matters and facts stated in the foregoing Bill of Complaint upon information and belief, and verily believe, and so states, that the same are true.

Forest A. Ohristian

Sworn to and subscribed before me, a Notary Public, whose seal is hereto affixed by me, this the IHL gay of August, 1945.

My commission expires:

3-19-49

Notary Publice

operation of the contract of t BILL OF COMPLAINT D. T. Tallan. Š Complainant

000000

ACTOR OF THE

÷ 4 €

**静** 

276

man talquen

THE STATE OF THE S

TO THE CONTRACT OF THE CONTRAC

Ó

# \*\*

\*\*\*\*\*\*\*\*\*\*\*\*

THE PARTY OF SELECTION OF SELEC

TO A COMPANY OF THE PARTY OF TH

TO SOCIAL

12000

S. Carallelle

**%** 

**3** 

の対象

137

4a 13 41

9

(\$ 12 43

WALTER D. Defendants

0227 はて意味をなる 

総額特

100 July 100 管団を奉 CERTAIN LANDS, VOIBSON, ET. AL. 9000T 9

9 The terms of the control of the cont A Section of the sect **企** 2 6 43 (i) 

ě. 100 rend a no sel 

6 抽樓 # 6 à 建设 040 

500 300 

for the past 18 years. The title to said land stands on the records in the ffice of the Judge of Probate in Ealdwin County, Alabama, in the name of L. F. DaFlam. All of the Defendants named in the said Bill of Complaint are over the age of 21 years and are non-residents of the State of Alabama, their places of residence being unknown to me. Mr. L. F. LaFlam and I have used due diligence in trying to ascertain the residences and post office addresses of the several Defendants and were unable to do so. We have had a complete abstract of title to said real estate made from the records in the Office of the Judge of Probate of Baldwin County, Alabama, and have made inquiries in the neighborhood of said real estate as to the ownership of same and the addresses of any persons, firms or corporations who might claim any interest in same and have obtained no such information.

alien a. Christian, Mildred L. La Mildred L. LaFle

L. F. LaFlam and Mildred L.

THE STATE OF ALA	> · · · · ·	Circuit Cou	rt of Baldwin C (In Equity)	ounty, Alabama
<u>I.</u> ,	F. La Flam		Complain	nant
Certain Lends, Alica A. Ch			Respo	ondent
as Register Commissioner have called and caused to come		F. LaFlam an	d Wildred L.	[aFlow
No.	and the second s	Contraction of the Contraction o	Committee Commit	
	Spanist.	No.		
at the office of	irement for Oral Forest A. Chri	stian		San Paga Cara

#### PESTIMONY OF L. F. LAFLAM

- doth depose and say as follows:

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

My name is L. F. LaFlam. I am over 21 years of age and have been a resident of Foley, Alabama, for the past 20 years. I am the Complainant in the above styled cause. I have known this land for 20 years and I am the person who filed the Bill of Complaint against lands in Baldwin County, Alabama, described as Lot Thirteen (15), Block Seventeen (17), Foley, Alabama, and the defendants named therein. I was in actual, peaceable and adverse possession of said land, claiming to own the land in fee simple and using it in every way that it is susceptible to use at the time of filing the Bill of Complaint and at the present time. There was no suit pending at the time of the filing of the Bill of Complaint. I have used due diligence in trying to learn the names and addresses of any person, firm, or corporation, claiming to own said land, or any part thereof, and whether or not any of them are dead. I, and those under whom I claim, have been in the actual, peaceable and adverse possession of said land during that period of time stated in the Bill of Complaint. I have had a complete abstract of title made to said lands and have diligently made inquiry in the neighborhood of said real estate as to the mames and addresses of any person, firm or corporation, who might claim to own the same or any part thereof, but have found no claimant. The said land stands on the records in the Probate Office of Baldwin County, Alabama, in the name of L. F. LaFlam. Also, I have paid the paving assessments to the town of Foley, on the lands in question.

#### TESTIMONY OF WILDHED L. LAFLAW

My name is Mildred L. LaFlam, I am the wife of L. F. LaFiam, the Complainant in this cause. I am over 21 years of age and have lived in Foley, Alabama, for about 18 years. I have known the land described as Lot Thirteen (15), Block Seventeen (17), Foley, Alabama, during this time. The said L. F. LaFlam was at the time of filing his Bill of Complaint in said cause, and still is, in actual, peaceable and adverse possession of said land, above described, claiming to own the same in his own right in fee simple and using the same in every way that it is susceptible to use; there was no suit pending to test the title of said L. F. LaFlam, his interest or right to possession of said land. The said L. F. LeFlam and those under whom he claims, have been in actual, peaceable and adverse possession of said land, paying taxes on the same for more than 10 years, next preceding the filing of the Bill of Complaint in said cause. The said L. F. LaFlam acquired the title to said lands as set out in the Bill of Complaint. There was no other person, firm or corporation in the actual possession of said land or any part thereof at the time of filing the said Bill of Complaint, not at this time. I am personally acquainted with the lands involved in this suit, having lived within a few blocks of said land

grant contrasponentials production gradient to the companies of the companies of the contrast	The state of the s
ORAL EXAMINATION.	ABAN MA BATTA TERRAT DI CONTRAMENTO NO CONTRAMENTO E CONTRAMENTO E CONTRAMENTO DE CONTRAMENTO DE CONTRAMENTO D NO PROTECO DE CONTRAMENTO
I, Alica A. Christian	as Registrated Commissioner hereby certify
· Tangang to the complete of the comprehensive of	tion was taken down by me in writing in the words_
	and they signed the same in the presence of
myself and Forest A. Christian	
	I have personal knowledge of personal identity of
said witness or had proom made before me	of the identity of said witness; that I am not of
The first transfer of the second seco	cause, or any manner interested in the result thereof
I enclose the said Oral Examination in an	envelope to the Register of said Court.
Given under my hand and seal, this 8th	day of November 1945
	alica a Christians
	Total Transport Train Control Kindella
ANTINEM COMMENTS THE CALL OF BORGES SEE A	
worse so oblivees. The sold boat treat	R (\$1) At Argania (Again) (Again) (Again) (Again) (Again) (Again) The ann arm agains arm gain again (Bagan) (Bagan)
ton derresten, som ingen diete er ere derme se elektrisch, lipe medig Beschitten geichern Gemein, siebens, im bie meit e	
worse so oblivees. The sold boat treat	R (\$1) At Argania (Again) (Again) (Again) (Again) (Again) (Again) The ann arm agains arm gain again (Bagan) (Bagan)
This will be seen it agreemed the some such a company of the seen agreement to be	
Telleri genele transcrive and descrive and a second and a	
Topover process, sale to be and the process of the	
Televisia complete to the rest been to the rest of the	
Televisia complete to the rest been to the rest of the	

	most a Kardyk i 13 i i i j	નીકુ લોક્ષે અન્યક્રમ સ્ટીક્ક ટ્રીડિક જ		- O haran dan Amah - Sasaran - Sa
	aa garaan a			Apple sampe prob
		A 2018 * 11 La 2018 To 2012		
		A DAY - DY THEY A	lagailt el 😝	
450 41 20 . 0 - 111 .04 .				
opone balyby observed		• • • • • • • • • • • • • • • • • • •	$\square$	
monante o gordia ega		A E	RC	H H
	⊃`` <b>E</b>			> \( \cdot \)
R			F.	A T
		<b> </b>	F C	ATE ATE
corded	$\subseteq$ $\bigcirc$	N. S.	10	FATE O
		Ç	OURT	- m  -
	> \ 0		<b>=</b> +	منزا خار 🔾 📗
Pa I	N N		Z	ı g t lΩ
ge		Ree	• • • • •	N AB
The second secon	، <b>أس</b> ا	Complaina	EQU	
		omplain gh D. G gh D. G	ď	MA
			I	
giste	5	nant		a comprehense production in
gister		BS nt		
1 52 1				31

na parameter antima de la compania d La compania de la co

Andrew Million Control of the Contro

	n	ed Tax	M		p	P	T	otal
No.	\$	Cts.	Mortg	age Tax Cts.	\$	Cts.	\$	Cts
2 Txa feally, com								
Certain Fanke				- Carridge	/	25	- 1	2k
			,		Y			
	<u>,                                    </u>							
			***************************************	un .		L \$		

#### The State of Alabama, BALDWIN COUNTY

#### CIRCUIT COURT. (Equity)

November 14th Term, 194 5

No. 1388

Certain ands et als.

ADDICATED IS THES		OUNT	F COSTS SHERIFFS FEES:	AM	TNUC
REGISTER'S FEES		1	Summoning on Bill, Each Defendant		
Fees in Circuit Court— Docketing Cause, One fee only of	00 I	. 00	Executing Writ of Injunction, or Ne Execut. 1.50	1	50
Issuing Summons on Bill, each	11	50	Executing Subpoenas for Witnesses, each		
Issuing Copies Thereof, each	11	40	Executing Writs of Possession, each		
Entering Return of Same, each		15	Executing Writs of Possession each	Towns of Stage volking	Alellah terrambak tanganya
Orders of Publication to Non-Residents, each1,	- 11 ***	. 00	Taking and Approving Bonds, each		7.77 34.1
Filing Bill or Other Paper, each	10	60	Impaneling Jury		Fe.
Copies of Same, Per 100 Words	15		Collecting Execution for Costs Only, each1.50		
Entering Appearances, each	.25*	25	Sheriff's Commissions		
Issuing Writs of Injunction, Ne Exeat, each 1.	.50				
Issuing Copies Thereof, each	.50				
Entering Return of Same, each	15	100	Total Sheriff's Fees	1	50
Decrees Pro Confesso, each	2	100	Jour Salvana Salvana	****	
Order Appointing Guardian Ad Litem, each1	.00#				
Issuing Commissions to Take Testimony, each	.50	50			N.
Taking Testimony, Per Day	.50	1	SUMMARY OF FEES, COSTS, AND JUDGMENT		
Taking Testimony, Per 100 words	.20		Fees in Circuit Court—	l	6 00
Receiving and Filing Depositions, each pkg.,	.10	10	Register's Fees		; 00
Indersing Depositions Published, each pkg.,	10		Ex-Register's Fees	•	L: 50
All Entries on Commission Docket, Each Cause	50		Sheriff's Fees		
Entering Order Submitting Cases for Decree, each	50	1	Ex-Sheriff's Fees		
Other Orders of Court. each	.25		Witness Fees	_	
Noting Testimony on Hearing of Cause, each	.50	50	Commissioner's Fees	1	00
Entering Decrees, of 500 Words of Less, each	.75	75	Guardian Ad Litem		
Per 100 words over 500	.15	75	Publisher's Fees Baldwin imes	2	0 47
Taking Accounts, etc., on Ref., per Day3.	.00#		Solicitor's Fees		<b>!</b>
Taking Testimony on Reference Relating to	15		Court Reporter's Fees, Per Day or fraction thereof .5.00	;	5 00
•	[]		Trial Tax3.00		
Reference and Reports, each	11		Recdn.Les pen and Decree		İ
Per 100 Words over 500	11		77	:	\$ 50
Issuing Suppoenas for Witnesses, each	li i		inm Probate Ct.		
Issuing Witness Certificates, each	11		Fees and Costs in Inferior Court:		
All Entries on Subpoena Docket, each Cause	H		Clerk of Inferior Court Fees		
Taking and Approving Bonds, each1	11		Sheriff's Fees		
Making Complete Record, per 100 Words		20	Witness Fees		
Hearing, etc Regarding Appointment of Re-		20			
celver or Trustee	.00		Total Fees and Costs in Inferior Court	7.00	<b>1000</b>
Settlements with Receiver or Trustee, each3	.00		Total Fees and Costs in Interior Court		.47
Examining Vouchers in Settlements, each	.10				- T
Examining Answers on Exceptions, each Answer	.00				
Removal Disabilities on Non-Age			Total Fees and Costs		
Commissions on Sales	il i		Judgment		
Making Deeds to Property Sold, each	2.00				
Receiving and Paying Out Money Other Than That Arising from Sales					
Cortificates or Affidavits, with Seal, each.			Total Fees, Costs, and Judgment		
Certificates or Affidavits without Seal, each			And the second s	, wie zenschier	"The San Company
Issuing Scire Facias or other Notice, each					
Other Orders of Register, except Cont., each			Decree Dated 11-k6-45		1
Entering Certificates of Supreme Court, each					
Transcript for Supreme Court, per 100 words, each.	11				
Additional Copies, per 100 words	l1			And the second	
Appeal Bond, each	11				
Certificate of Appeal, each	11				
Notice of Appeal, each	11				
Report to State Board of Health, each case	- 11				
Certificate of Judgment, each	- 11	1			
Issuing Executions, each	11				
Entering Returns Thereof, each	. H	1			
Copy Decree	11	1 00			
**************************************		_	-		
	1	6   00	11	11	1

I certi	fy that the within is	s a true and correc	t Bill of Co	sts in the w	rithin styled	l cause.			
	e garage en	mangang sa amagamag sa an ag an a taon ngan agait sa at sa at sa				in a d	na an lea Esperies in l	en e	6 5 3
	en de la companya de	and the second s		ATTEST:-		· //			<del></del>
					Register	r Circuit Co	ourt, Bal	dwin Count	y, Ala.
	S. C.							erene (1) erene el	.5Z
Receiv	red payment this	day of_		· · · · · · · · · · · · · · · · · · ·	1	94	a silin seria. Pe	i i turtei e ii. Ole e e e e e e e e e e e e e e e e e e	
					er er en	and the same of th			
ng ngananan Biyataya seba	TT to do en trace en patrola trace. Trace	er en	ing in in it. Name in it.	ATTEST:-				an area and a	Markey Jaw
					Registe	r Circuit Co	ourt, Bal	ldwin Count	y, Ala.
	o Elektrika kula (P <sup>1</sup> ekolo) Productiva kula (Productiva)	ed in suma gine disibili. Sisees sidhe in sidasis	and the second of the second o					and some of	
Moore		Fee 1							No.
<u>-</u>		Book						3	
inting (			ĘQ				0	he :	
Jo., B							CIRCUIT	State of Alal	
ву М					vs.		Ľ∥	nte DWI	
linette	D		CC				· 1		
e, <u>XI</u>	Plaintiff's Defendaut's	Page	TSC				COURT	of Alabama,	
	ntiff						Ğ.	NI	Page
	11 1 07 1	Term,	BILL	Defe	Tel.		T	baı	
and the same of th	Attorney	, 19		Defendant	Plaintiff			na,	
	ney.			1	ff		-		
				: 1					
							an en	was a second second second	
A Common Programme Common Comm	E de la policie de la companya de la		en gan en	2				To The second second second	(Additional Control of Control
:						* * * * * * * * * * * * * * * * * * * *			
					in the second of			totalis paties Karalis pasies	
		e e su en			genter and a second			ense virus e	
	¥	und red start et samme.						ericulturence George	New York
		energi (f. 1505). Hermania	la de la composición br>La composición de la					e e la propia de	water of
: :			est e weert				era er . 	e i deserva di gale. Li la Colorado a per esti	
	Total	Selection of the select	gen in her Mil						
						i di ilayan da sa		and the second s	
:		erekanika di manana di kacamatan da kacamatan da kacamatan da kacamatan da kacamatan da kacamatan da kacamatan Kacamatan da kacamatan da kacama	en de presenta		•			ri Karanterra	
			e partir to					en de la companya de	and Services
		# m = 4 × × × × × × × × × × × × × × × × × ×				alleman leas			er e progentio
un assembla as economis		a kanda da baran baran da bar Baran da baran da ba			or experience to the control of the commence	man Hemmel selven keren er tre tredenken er e	orania della come della		
					1.1			d Maliki belombe manasak apak	100
	The state of the s	ar seria ko				direk udigata di	imme ingk	ken is eden	Selection of the
								o un o establisto (se un recatto se socialist	
					e jan				
					e destaca. La destaca			on the conjugate of the	
								er en de sage de la compa	4
:								a satisficative en materials terminals	
								respondente de la compania de la co La compania de la co	
. 1.					i de kezen Maria			amini ya keedeka hiiliya Kali dooba ay ya waxaas	
:									
			: :		1		1000	evening of Elegants	

MES BEST BEST COUNTY'S-

#### BAY MINETTE, ALABAMA

Walter D. Gibson and his wife, if they be living and, if dead, the unknown heirs and devisees of them and each of them, and to any and all persons, firms or corporations claiming any interest in title to, lien or encumbrance upon the land herein described; that on the 13th day of August, 1945, on the 13th day of August, 1945, L. F. LaFlam, filed in the Equity Side of the Circuit Cuort of Baldwin County, Alabama, his Bill of Complaint against the following described land in Baldwin County, Alabama, viz:

ALABAMA'S

Lot Thirteen, (13) in Block Seventeen (17) in Foley, Alabama . . . .

and against the Defendants hereinabove named and any and all other persons, firms, or corporations claiming any interest in, lien or encumbrance upon the above described land, and you are hereby notified to appear and plead, answer or demur within thirty days from the completion of publication the 22nd day of October, 1945, or a decree pro confesso will be rendered against you;

That said Bill of Complaint was and is filed for the purpose of establishing the title of said Com-

plaint to sad land for the pur- day of August, 1945.
pose of quieting its title thereto and clearing up all doubts and disputes concerning the same;

That title to said land stands in the name of the Complainant on the records in the office of the Judge of Probate in Baldwin County, Alabama;

That Complainant claims title to said land by virtue of a tax deed executed by G. W. Robertson, Judge of Probate, on July 15,

Complainant further alleges in his Bill of Complaint that he is in the quiet and peaceable possession of said lands claiming to own the same absolutely and in fee simple and that and those under whom he claims, have been in possession of said land for more than 10 years next preceding the filing of the Bill of Complaint, and they have paid the taxes on said land for the last 10 years, prior to the filing of said Bill of Complaint and no other person, firm or corporation has paid any taxes on said land during said 10 year per-

Witness my hand this the 13th

R. S. DUCK, Register. of the Circuit Court of Baldwin County, Alabama

FOREST A. CHRISTIAN, Solicitor. 29-4tc

, being duly sworn, THE BALDWIN TIMES, a Weekly County, Alabama; that the notice h

OST STATEMENT

cents.

rrect, due and unpaid (paid)

- tosk loop
Was published in said newspaper forconsecutive weeks in the
Date of 1st publication aug, 16, 1945 Vo
Date of 2nd publication aug. 23, 1945 Vo
Date of 3rd publication aug. 30, 1945 Vo.
Date of 4th publication Sept. 6, 1945 Vol
Subscribed and sworn before the undersigned thisday of
Notary Public, Baldwin County.
_ tord Co

NOTICE TO NON-RESIDENTS L. F. LaFLAM, Complainant, VS.

CERTAIN LANDS, WALTER D. GIBSON, et al, Defendants.

It having been made to appear in the above styled cause from the Affidavit of Forest A. Christian, the Solicitor of Record for the Complainant in said cause, that the Defendants Walter D. Gibson and his wife, are non-residents of the State of Alabama, their residences or Post Office address being unknown to Complainant.

NOTICE IS HEREBY GIVEN to

# ALABAMA'S BEST COUNTY'S MINES H. FAULKNER EDITOR AND PUBLISHER BEST NEWSPAPER

Publisher.

3	AY MINETTE, ALABAMA
wday of August, 1945.  th  R. S. DUCK, Register.  of the Circuit Court of  th  Baldwin County, Alabama  th  ar FOREST A. CHRISTIAN,  29-4tc	AFFIDAVIT OF PUBLICATION
pc Solicitor. tit th c 1	STATE OF ALABAMA, BALDWIN COUNTY.  , being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of
	Notice to Mon- Residents
	COST STATEMENT  455 WORDS @ 45 cents \$ 20.42
	I hereby certify this is correct, due and unpaid (paid).  Food Rook Publisher.
	Was published in said newspaper for 4 consecutive weeks in the following issues:  Date of 1st publication Aug. 16, 1945 Vol. 56 No. 29  Date of 2nd publication Aug. 23, 1945 Vol. 56 No. 30
	Date of 3rd publication Aug. 30, 1945 Vol. 56 No. 3/ Date of 4th publication Sept. 6, 1945 Vol. 56 No. 32
	Notary Public, Baldwin County.  And Cook