

W. R. STUART

PROBATE JUDGE

No. **1773**

Bay Minette, Ala.,

aug 13

, 194**5**

Received of

R S Duck

No.		Deed Tax		Mortgage Tax		Recording Fees		Total	
		\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
	<i>J F La Hou</i>								
	<i>vs</i>								
	<i>Certain lands</i>					<i>1 25</i>		<i>1 25</i>	

FOR RECORD

TOTAL \$

W R Stuart

Judge of Probate.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. (1388)

CIRCUIT COURT BALDWIN COUNTY

August

TERM, 194⁵

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon The Magnolia Springs Land Company

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

~~The Magnolia Springs Land Company et als.~~ Respondents

by L. F. Laflam

Complainant
Plaintiff

Witness my hand this 13th day of August 194⁵

R. Luck

Register

(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 Complainant 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, 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 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 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 afore-said 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 A. Christian
Forest A. Christian, Foley, Alabama
Solicitor for Complainant

THE STATE OF ALABAMA,)
BALDWIN COUNTY.

Before me, Wm. Schmitt, 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 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, 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.

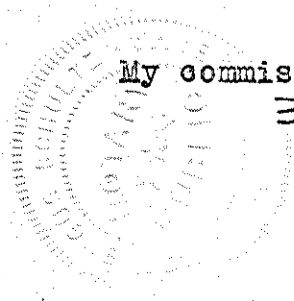
Forest A. Christian
Forest A. Christian

Sworn to and subscribed before me, a Notary Public, whose seal is hereto affixed by me, this the 10th day of August, 1945.

Wm. Schmitt
Notary Public

My commission expires:

3-29-49



THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

L. F. LeFLAM,)
Complainant)

vs.)

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. LeFlam 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.

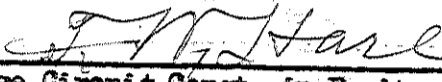
IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED that the Complainant, is the owner in fee simple of the lands described in this Decree and that no other person, firm or corporation has any title to, interest in or lien or encumbrance upon said land or any part thereof and especially is this so as to the 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 null 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 ORDERED, ADJUDGED AND DECREED that a certified copy of this Decree be recorded in the Office of the Judge of Probate 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 Monticello, Alabama, this 14th day of November, 1945.


Judge Circuit Court, in Equity.

L. F. LaFLAM

VS.

CERTAIN LANDS, WALTER D. GIBSON, ET AL

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____

~~Summons, Order designating Newspaper, Notice to Non-resident Defendants, Lis Pendens Notice, Affidavit of Publication, Motion for ~~REXMA~~ Decree Pro Confesso on Publication, Motion for Decree Pro Confesso on Personal Service, Decree Pro Confesso on Personal Service, Testimony of L. F. LaFlam and Mildred L. LaFlam~~

and in behalf of Defendant upon _____

James H. Choate

R. J. Seal Register.

No. 1388

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

L. F. LaFLAM

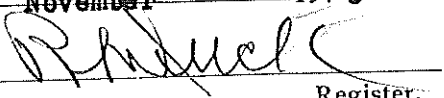
VS.

CERTAIN LANDS, WALTER D. GIBSON ET AL

NOTE OF TESTIMONY

Filed in Open Court this 14

day of November 1945



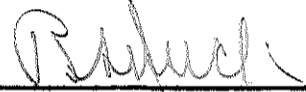
Register:

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 13 day of September, 1945.



Register

L. F. LaFLAM,)	IN THE CIRCUIT COURT OF
Complainant)	
vs.)	BALDWIN COUNTY, ALABAMA
CERTAIN LANDS, WALTER D. GIBSON)	IN EQUITY
ET AL,)	
Defendants)	

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. 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.

THIRD

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 Anna 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, 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 Complainant 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, 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 writ 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 A. Christian
Forest A. Christian, Foley, Alabama
Solicitor for Complainant

THE STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, Gen Schultz, 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 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 verily believe, and so states, that the same are true.

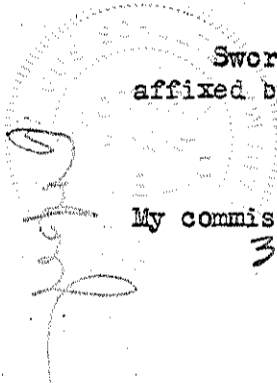
Forest A. Christian
Forest A. Christian

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

My commission expires:

3-25-49

Gen Schultz
Notary Public



1388

12-1945

1388

Copy

My commission expires:

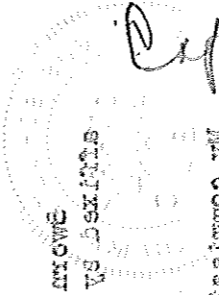
2-22-42

Witness my hand and the seal of my office, this 19th day of August, 1942.

Notary Public, whose office is hereto

Robert A. Christian

Robert A. Christian



Notary Public

1942-8-19

states, that the same are true. I believe, and so Bill of Complaint upon information and belief, and verily believe, and so in this State; that all the other matters and facts stated in the foregoing in this State; that all the other matters and facts stated in the foregoing in their names, surnames or Christian names and residence as he believes in not to go on; that if any of the above named Defendants are dead, the names of that he has made a diligent inquiry to ascertain the same and has been unable to ascertain their true names, whose post office address is Holy, Arizona; of Arizona, their place of residence being unknown to your affiant, except the Bill of Complaint are over the name of St. Louis and non-residents of the State in the belief of the affiant all of the Defendants named in the foregoing above stated cause and is therefore duly authorized to make this oath; that that he is the agent of, and the attorney for, the Complaint in the

and says:

and County, personally observed Robert A. Christian, who upon oath deposes before me, *Robert A. Christian*, a Notary Public in and for said State

BERDMAN COUNTY.

THE STATE OF ARIZONA.

Policitor for Complaint

Robert A. Christian, Holy, Arizona

Robert A. Christian

will ever deny. and General Relief as in said Bill and meet, and Complaint County, Arizona, and Complaint further deny for any other, further, differ- and indirect indexes of the Records thereof in said Probate Court of Berdman Decree Your Honor will direct in whose name it shall be entered in the Direct Court of Berdman County, Arizona, and to be recorded therein, and that in said Your Honor will cause a certified copy of the Decree to be filed in the Probate Office, interest in, or lien or encumbrance upon said land that in said Decree

L. F. LaFLAM,
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 13 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 disputes concerning the same;

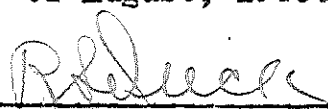
That title to said land stands in the name of the Complainant on the records in the office of the Judge of Probate in Baldwin County, Alabama;

That Complainant claims title to said land by virtue of a tax deed executed by G. W. Robertson, Judge of Probate, on July 15, 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 13 day of August, 1945.

Forest A. Christian
Solicitor


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

L. F. LaFLAM,
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 13 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 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, 1943.

Complainant further alleges in his Bill of Complaint that he is 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 13 day of August, 1945.

Forest A. Christian
Solicitor

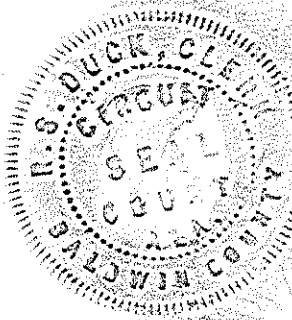

R. S. Duck
as Register of the Circuit Court of
Baldwin County, Alabama.

BOOK 002 PAGE 12
STATE OF ALABAMA.

BALDWIN COUNTY

I, R. S. DUCK, Register of the Circuit Court of Baldwin 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 Times, a Newspaper published at Bay Minette, Alabama, in the cause of L.F. LAFLAM VS. CERTAIN LANDS, WALTER D. GIBSON ET ALS. Respondents, and Filed in the Office of the Probate Judge of Baldwin County, Alabama, the County in which said lands lie, in accordance with the provisions of the Statutes of the State of Alabama.

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



STATE OF ALABAMA, BALDWIN COUNTY

Filed August 13, 1945 - 8:30 AM

Recorded *As Paid* book 21 page 11-12
and I certify that the following Privilege Tax has been paid.

Dead Tax _____

Mortgage Tax _____

W.R. Stewart

Judge of Probate

By *RSW*

R. S. Duck
Register, Circuit Court
Baldwin, County, Alabama.

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court

To Alica A. Christian

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

as witnesses in behalf of L. F. LaFlam in a cause pending in our Circuit Court in Baldwin County, of said State, wherein L. F. LaFlam

Complainant
and Certain Lands, Walter D. Gibson, et al

Respondent
on oath, to be by you administered, upon L. F. LaFlam and Mildred L. LaFlam
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 8 day of November, 1945



Register

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 1388

THE STATE OF ALABAMA
Baldwin County
CIRCUIT COURT

L. F. LaFIAM
Complainant

VS.

CERTAIN LANDS, WALTER D. GIBSON ET AL

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Alice A. Christian

WITNESSES:

L. F. LaFlam and Mildred L.

LaFlam

[Faint, illegible text and markings, possibly bleed-through or ghosting from the reverse side of the page.]

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. 1388 _____, Term, 19____

L. F. LaFLAM

Complainant

Vs.

CERTAIN LANDS,

WALTER D. GIBSON, ET AL

Defendant S

Motion is hereby made for a Decree Pro Confesso against Lot Thirteen (13), Block Seventeen

(17) Foley, Alabama, and Walter D. Gibson, and his wife Defendant S

in the annexed stated cause. on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 10th day of November 1945

746 Code

[Handwritten Signature]

Solicitor.

No. 1388

Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

L. F. LaFLAM

Complainant _____

Vs.


CERTAIN LANDS, WALTER D. GIBSON

ET AL

Defendant **8**

Motion for Decree Pro Confesso
on Publication

Filed November 14 1945



Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

No. _____ Circuit Court, In Equity.

L. P. LaFLAM

Complainant

Vs.

CERTAIN LANDS, WALTER D. GIBSON, ET AL

Defendant S

Motion is hereby made for a Decree Pro Confesso against the Magnolia Springs Land Company,

a Corporation, incorporated under the Laws of the State of Alabama, Defendant 1
doing business in Foley, Alabama

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 _____ has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 10th day of November 1945



Solicitor.

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

L. F. LaFLAM

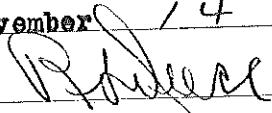
Vs.

~~CERTAIN LANDS, WALTER D. GIBSON~~

~~ET AL~~

Motion for Decree Pro Confesso on
Personal Service

Filed November 14 19 45



Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

The State of Alabama,
Baldwin County.

No. 1388 CIRCUIT COURT IN EQUITY.

L. F. LaFLAM

Complainant

vs.

CERTAIN LANDS, WALTER D. GIBSON, ET AL

Defendant

In this cause it appears to the Register, R. S. Duck that a summons requiring the Defendant the Magnolia Springs Land Company, a corporation, incorporated under the Laws of the State of Alabama, doing business in Foley, Alabama

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 The said Magnolia Springs Land Company was served upon it by the Sheriff of Baldwin County, Alabama, on the 1st day of September 1945.

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 Forest A. Christian, Solicitor for the Complainant... 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 Magnolia Springs Land Company

Defendant aforesaid.

This 14 day of November 1945

R. S. Duck

Register.

No. 1388

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

L. F. LAFLAM

vs.

CERTAIN LANDS, WALTER D. GIBSON

ET AL.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE**

Issued **NOVEMBER** 14th 1945

R. H. [Signature]
Register.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. 1368, Term, 1945

L. F. LaFLAM Complainant

Vs.

CERTAIN LANDS, WALTER D. GIBSON, ET AL Defendant

In this cause it appears to the Register R. S. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 29th day of August, 1945, in the Baldwin Times a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 29th day of August 1945 and recorded as a Lis Pendens notice as provided by Title 7, Section 1120

And it now further appearing to the Register R. S. Duck, that the said

Lot Thirteen (13), Block Seventeen (17), Foley, Alabama, and Walter D. Gibson and his wife, if they be living, and if dead, their unknown heirs & devisees of them and each of them

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register R. S. Duck

that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said above named Respondents.

This 14 day of November 1945

R. S. Duck Register.

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

L. F. LaFLAM

Vs.

CERTAIN LANDS, WALTER D. GIBSON

ET. AL.

Decree Pro Confesso of Publication

Issued NOVEMBER 11 1945

R. J. [Signature]

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

No. _____

CIRCUIT COURT BALDWIN COUNTY

_____ TERM, 194_____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon THE MAGNOLIA SPRINGS LAND COMPANY

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against CERTAIN LANDS,

WALTER D. GIBSON, ET. AL., Defendant^s

by L. F. LaFLAM

Plaintiff

Witness my hand this 13 day of AUGUST 1945

R. H. HICK

Clerk.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed _____ 194 _____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this _____ 194 _____

by leaving a copy with

Sheriff

Deputy Sheriff

(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 Complainant 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, 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 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 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 A. Christian
Forest A. Christian, Foley, Alabama
Solicitor for Complainant

THE STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, Ben Schuetz, 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 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, 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
Forest A. Christian

Sworn to and subscribed before me, a Notary Public, whose seal is hereto affixed by me, this the 11th day of August, 1945.

Ben Schuetz
Notary Public

My commission expires:



3-29-49

for the past 18 years. The title to said land stands on the records in the office of the Judge of Probate in Baldwin County, Alabama, in the name of L. F. LaFlam. 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.

Alicia A. Christian,
Commissioner

Mildred L. LaFlam
Mildred L. LaFlam

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

L. F. La Flam

Complainant

VS.

Certain Lands, Walter D. Gibson, et al

Respondent

Alica A. Christian

I,

as ~~Registered~~ Commissioner

have called and caused to come before me L. F. LaFlam and Mildred L. LaFlam

witness ~~es~~ named in the Requirement for Oral Examination, on the 8th day of November
194 5, at the office of Forest A. Christian

in Foley, Alabama, and having first sworn said Witness ~~es~~ to speak the
truth, the whole truth, and nothing but the truth, the said L. F. LaFlam and Mildred L.
LaFlam doth depose and say as follows:

TESTIMONY OF L. F. LaFLAM

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 (13), 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 names 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.


L. F. LaFlam

TESTIMONY OF MILDRED L. LaFLAM

My name is Mildred L. LaFlam, I am the wife of L. F. LaFlam, 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 (13), 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. LaFlam 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

ORAL EXAMINATION.

I, Alice A. Christian, as ~~Registered~~ Commissioner hereby certify that the foregoing deposition ~~on~~ Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and Forest A. Christian at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said 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.

Alice A. Christian

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NO. <u>1388</u>	PAGE
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY.	
<u>L. F. JAFFAR</u>	Complainant
vs.	
<u>CERTAIN LANDS, WALTER D. GIBSON</u>	Respondent
<u>ER AL</u>	
Oral Deposition	
Filed <u>NOVEMBER 14</u> , 194 <u>5</u>	Recorded in
<u>Richard</u> , Register.	Record
Vol. _____	Page _____
, Register.	

W. R. STUART
PROBATE JUDGE

No. **3214** Bay Minette, Ala., **11-16**, 19**45**

Received of **R & Duck**

No.	Deed Tax		Mortgage Tax		Recording Fees		Total	
	\$	Cts.	\$	Cts.	\$	Cts.	\$	Cts.
L F La Flam, Camp								
Certain ^{1/3} Lands					1215		1215	

FOR RECORD

TOTAL \$
W R Stuart
 300
 Judge of Probate.

The State of Alabama, {
BALDWIN COUNTY

CIRCUIT COURT. (Equity)

November 14th Term, 1945

L.F. Laflem
No. 1388 vs.
Certain lands et als.

BILL OF COSTS

REGISTER'S FEES	AMOUNT	SHERIFF'S FEES:	AMOUNT
Fees in Circuit Court—		Summoning on Bill, Each Defendant.....1	1 50
Docketing Cause, One fee only of.....1.00	1 00	Executing Writ of Injunction, or Ne Exeat, each..1.50	
Issuing Summons on Bill, each......50*	50	Executing Subpoenas for Witnesses, each......65	
Issuing Copies Thereof, each......40	40	Executing Writs of Possession, each......5.00	
Entering Return of Same, each......15	15	Executing Scire Facias or Notice, each......1.50	
Orders of Publication to Non-Residents, each....1.00*	1 00	Taking and Approving Bonds, each......1.00	
Filing Bill or Other Paper, each......10	60	Impaneling Jury......75	
Copies of Same, Per 100 Words......15		Collecting Execution for Costs Only, each......1.50	
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	2 00		
Decrees Pro Confesso, each......1.00*		Total Sheriff's Fees	1 50
Order Appointing Guardian Ad Litem, each.....1.00*	50		
Issuing Commissions to Take Testimony, each....50			
Taking Testimony, Per Day......1.50			
Taking Testimony, Per 100 words......20	10		
Receiving and Filing Depositions, each pkg.,.....10			
Indorsing Depositions Published, each pkg.,.....10			
All Entries on Commission Docket, Each Cause....50			
Entering Order Submitting Cases for Decree, each..50			
Other Orders of Court, each......25			
Noting Testimony on Hearing of Cause, each.....50	50		
Entering Decrees, of 500 Words or Less, each.....75	75		
Per 100 words over 500......15	75		
Taking Accounts, etc., on Ref., per Day.....3.00*			
Taking Testimony on Reference Relating to Trustee, etc., per 100 words......15			
Reference and Reports, each......2.00*			
Reports of 500 Words or Less......2.50			
Per 100 Words over 500......15			
Issuing Subpoenas for Witnesses, each......25			
Issuing Witness Certificates, each......25			
All Entries on Subpoena Docket, each Cause.....50			
Taking and Approving Bonds, each......1.00			
Making Complete Record, per 100 Words......15	7 20		
Hearing, etc., Regarding Appointment of Re- ceiver or Trustee......3.00			
Settlements with Receiver or Trustee, each.....3.00			
Examining Vouchers in Settlements, each......10			
Examining Answers on Exceptions, each Answer..3.00			
Removal Disabilities on Non-Age.....			
Commissions on Sales.....			
Making Deeds to Property Sold, each......2.00			
Receiving and Paying Out Money Other Than That Arising from Sales			
Certificates or Affidavits, with Seal, each......50			
Certificates or Affidavits without Seal, each.....25			
Issuing Scire Facias or other Notice, each......50			
Other Orders of Register, except Cont., each.....50			
Entering Certificates of Supreme Court, each.....50			
Transcript for Supreme Court, per 100 words, each..15			
Additional Copies, per 100 words......05			
Appeal Bond, each......1.00			
Certificate of Appeal, each......50			
Notice of Appeal, each......50			
Report to State Board of Health, each case......50			
Certificate of Judgment, each......25			
Issuing Executions, each......75			
Entering Returns Thereof, each......15			
Copy Decree.....	1 00		
Total Register's Fees	16 00		
		SUMMARY OF FEES, COSTS, AND JUDGMENT	
		Fees in Circuit Court—	
		Register's Fees	16 00
		Ex-Register's Fees	1 50
		Sheriff's Fees	
		Ex-Sheriff's Fees	
		Witness Fees	
		Commissioner's Fees	10 00
		Guardian Ad Litem	
		Publisher's Fees <u>Baldwin Times</u>	20 47
		Solicitor's Fees	
		Court Reporter's Fees, Per Day or fraction thereof .5.00	3 00
		Trial Tax	3 00
		<u>Recdn. Les pen and Decree</u>	
		<u>inn Probate Ct.</u>	2 50
		Fees and Costs in Inferior Court:	
		Clerk of Inferior Court Fees	
		Sheriff's Fees	
		Witness Fees	
		
		Total Fees and Costs in Inferior Court	20 00 55.47
		Total Fees and Costs	
		Judgment	
		
		Total Fees, Costs, and Judgment	
		Decree Dated 11-16-45	

I certify that the within is a true and correct Bill of Costs in the within styled cause.

ATTEST:

Register Circuit Court, Baldwin County, Ala.

Received payment this _____ day of _____ 194_____

ATTEST:

Register Circuit Court, Baldwin County, Ala.

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT

vs. Plaintiff -----

Defendant -----

EQUITY COST BILL

Term, 19_____

Fee Book _____, Page _____

Plaintiff's Attorney.

Defendant's Attorney.

Moore Printing Co., Bay Minette, Ala.

1388

JAMES H
EDITOR A

The BALDWIN Times

ALABAMA'S BEST COUNTY'S- BEST N
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, 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 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 said land for the purpose 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, 1943.

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 period.

Witness my hand this the 13th

day of August, 1945.

R. S. DUCK, Register.
of the Circuit Court of
Baldwin County, Alabama
FOREST A. CHRISTIAN,
Solicitor. 29-4tc

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

Non-Resident

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

COST STATEMENT

45 cents \$ 20

correct, due and unpaid (paid).

Ford Cook

Was published in said newspaper for 4 consecutive weeks in the

Date of 1st publication Aug. 16, 1945 Vol.

Date of 2nd publication Aug. 23, 1945 Vol.

Date of 3rd publication Aug. 30, 1945 Vol.

Date of 4th publication Sept. 6, 1945 Vol.

Subscribed and sworn before the undersigned this _____ day of _____

Notary Public, Baldwin County.

Ford Co

