

SIM T. ANDREWS,

COMPLAINANT

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE
3 EAST, BALDWIN COUNTY, ALA-
BAMA, LEE GELDER, AND THE UN-
KNOWN HEIRS, DEVISEES, PER-
SONAL REPRESENTATIVES AND AS-
SIGNS OF LEE GELDER, AND ANY
AND ALL PERSONS, FIRMS, ASSOC
CIATIONS AND CORPORATIONS
CLAIMING ANY TITLE TO, INTER-
EST IN, CLAIM LIEN OR ENCUM-
BRANCE ON SAID LANDS OR ANY
PART THEREOF.

DEFENDANT.

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

This cause coming on to be heard is submitted for final decree upon behalf of the Complainant, upon the original bill of complaint and upon the service, pleading and proof as noted by the Register; and the same being considered by the Court, the Court is of the opinion, does find, ascertain and decree, that due and proper notice of the pendency of the said bill of complaint against the said lands and the named defendants, Lee Gelder and the unknown heirs, devisees, personal representatives, grantees and assigns of the said Lee Gelder, and any and all other persons, firms and corporations claiming any title to, interest in, claims or encumbrance upon the said lands or any part thereof, has been given in the manner required by law, and that the Complainant is entitled to the relief as prayed for in his bill of complaint.

IT IS THEREFORE FOUND, ASCERTAINED, ORDERED, ADJUDGED AND DECREED by the court that the said complainant, Sim T. Andrews, is over the age of twenty-one years and a resident of Baldwin County, Alabama; that at the time of the filing of the said bill of complaint and at the time of the submission of this cause for final decree, the complainant was and is in the actual and peaceable possession, claiming to own the same absolutely, and in fee simple of all that certain tract of land situated in the County

of Baldwin, State of Alabama, described as follows, to-wit:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East.

That the complainant obtained title to the said lands by deed from J. P. Prine and Katy Prine, his wife, deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N.S. page 197-8, who acquired the said lands from Randolph McGowan and wife by deed dated October 10, 1936 and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 60 N.S. page 396, who acquired said lands under a deed by the Land Commissioner of the State of Alabama, dated September 16, 1936, recorded 60 N.S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment by Lee Gelder, which said tax sale the said State of Alabama acquired on June 3, 1932, that the complainant and those whom he claims have been in actual possession of said lands continuously under color of title for more than ten years next preceeding the filing of complaint in this Court; that neither the said defendants nor any person, firm or corporation has had any possession of the said lands or any part thereof during the whole or any part of said period; that the complainant has for more than ten years annually assessed and paid taxes on said lands.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the said Sim T. Andrews at the time of the filing of the bill of complaint in this cause and at this time had and has the fee simple title to the above described lands, and to each and every part and parcel thereto, that neither of the said defendants, Lee Gelder, the unknown heirs, devisees, personal representatives, grantees or assigns of Lee Gelder, or any person, firm or corporation have any right, title to, interest in, claim or encumbrance upon the whole or any part of the said lands, and that the fee simple title to the said lands and each and every part and parcel thereof be and the same is hereby quited and established in and declares to be in the said Sim T. Andrews, as against the said defendants, Lee Gelder, the unknown heirs, devisees, personal re-

presentative, grantees or assigns of the said Lee Gelder and each of them, and against all other persons, firms, or corporations claiming any title to, interest in, lien or encumbrance upon the saidlands or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the title hereby quited and established in and declare to be in the said Sim T. Andrews, shall inure to the benefit of all persons deriving title to said lands or any part therein, from or through the said Sim T. Andrews, and the said title so quited and established in him shall be treated and considered as established in favor of the said Sim T. Andrews and all persons deriving title through him.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a certified copy of this decree be, by the Register of this Court, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in which County the saidland lies, within thirty days from the date of this decree, and that the cost thereof be taxed as a part of the cost in this proceeding.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Sim T. Andrews be and he is hereby taxes with the cost of this proceedings for which let execution issue.

Done at Monroeville, Ala this the 20th day of December, 1945.

F. W. Hare
Judge.

Final Decree

Filed

12-21-45

R.S. Luck

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT

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

Notice is hereby given to Lee Gelder, if living, and if dead, to his unknown heirs, devisees, personal representatives, grantees and assigns and to any and all persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

That Sim T. Andrews has filed his Bill of Complaint on the 12 day of September 1945, in this court on the equity side claiming to be in actual peaceable possession, owning and claiming to own that certain parcel or lot of land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County in his, Sim T. Andrews name: that he acquired title to the same from J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph

McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N. S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that Lee Gelder, if living, is over the age of twenty-one years and non-resident of the State of Alabama, and whose last known address was 2373 North Newland Avenue, Chicago, Illinois, a better address not being known, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns are over the age of twenty-one years and are non-residents of Alabama, their place of residence, and post-office addresses being unknown, that the said Lee Gelder, if living claims or is reputed to claim, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some part or parcel thereof.

Complainant further alleges that he and those through whom he claims have for more than ten years next preceding the filing of said bill of complaint, been in the actual adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereon and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained.

And an order having been made and entered that notice of the pendency of said suit be given publication once a week for four consecutive weeks, a newspaper published in Ray Minette, in Baldwin County, Alabama.

It is therefore ordered that the said Leo Colder, if living, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns and any and all other persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, appear and plead, answer or demur to the said bill of complaint within sixty days after the first publication of this notice, namely the 20 day of September, 1945, at which time the said cause shall stand at issue.

WITNESS my hand this the 15 day of September 1945.



Register,
Circuit Court, Baldwin County,
Alabama, In Equity.

I, R. S. Duck, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the foregoing is a true and correct copy of the notice of the pendency of a bill of complaint in this Circuit Court of Baldwin County, Alabama, in equity wherein Sim T. Andrews is Complainant and the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, and Lee Gelder, if living, and if dead, his unknown heirs, devisees, personal representatives, grantees, and assigns and all other persons, firms, and corporations claiming any title to, interest in, claim, lien or encumbrance upon said lands in Baldwin County, Alabama are Defendants, as the same was drawn by me and caused to be published in the Baldwin Times, a newspaper, published in Baldwin County, Alabama, under and in pursuance of an order of this court made in said cause on the ____ day of _____, 1945.

WITNESS my hand this the ____ day of _____, 1945.

Register.

I, R. S. Duck, Register of the Circuit Court of Baldwin County, Alabama, in equity, do hereby certify that the foregoing is a true and correct copy of the notice of the pendency of a bill of complaint in the Circuit Court of Baldwin County, Alabama, in equity, wherein Sam T. Andrews is complainant and the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, and Lee Gelder, if living, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns and any and all other persons, firms or corporations claiming title to, interest in, claim, lien or encumbrance upon the said lands in Baldwin County, are Defendants, as the same was drawn and signed by me as Register of the Court and as caused to be published under an order of this court made and entered on _____ day of _____, 1945, and I do further certify that the same was published in the Baldwin Times, the newspaper designated therein in its issues of _____; _____, _____, and _____.

And I do further certify that the foregoing notice was filed by me for record in the office of the Judge of Probate of Baldwin County, Alabama, recorded by the said Judge of Probate in _____ page _____, on the _____ day of _____, 1945.

R. S. Duck
Register.

SIM T. ANDREWS,

COMPLAINANT;

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

This cause is submitted for final decree upon behalf of
Complainant on:

1. Bill of Complaint.
2. Order directing service.
3. Service by publication and proof of publication.
4. Recorded lispendense
5. Decree Pro Confesso.
6. Application for oral examination of witness, and notice thereof.
7. Order granting application for oral examination of witnesses.
8. Commission to take testimony.
9. Notice of time and place of taking testimony.
10. Depositions of Sim T. Andrews and Randolph McGowan.
11. Motion for final decree.

BEEBE & HALL

[Signature] for Complainant.

[Signature]
Register.

1-1
Miss T Andrews

by
R. S. Suck

Note of testimony

Filed Dec 19, 1945

R. S. Suck,
Registrar!

Dependence

BOOK 002 PAGE 14

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

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

DEFENDANT

Notice is hereby given to Lee Gelder, if living, and if dead, to his unknown heirs, devisees, personal representatives, grantees and assigns and to any and all persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

That Sim T. Andrews has filed his Bill of Complaint on the 15 day of September 1945, in this court on the equity side claiming to be in actual peaceable possession, owning and claiming to own that certain parcel or lot of land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County in his, Sim T. Andrews name; that he acquired title to the same from J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph

McCowan and Mary McCowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N. S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that Lee Gelder, if living, is over the age of twenty-one years and non-resident of the State of Alabama, and whose last known address was 2373 North Newland Avenue, Chicago, Illinois, a better address not being known, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns are over the age of twenty-one years and are non-residents of Alabama, their place of residence, and post-office addresses being unknown, that the said Lee Gelder, if living claims or is reputed to claim, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some part or parcel thereof.

Complainant further alleges that he and those through whom he claims have for more than ten years next preceding the filing of said bill of complaint, been in the actual adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereon and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained.

And an order having been made and entered that notice of the pendency of said suit be given publication once a week for four consecutive weeks, a newspaper published in Bay Minette, in Baldwin County, Alabama.

It is therefore ordered that the said Lee Galder, if living, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns and any and all other persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, appear and plead, answer or demur to the said bill of complaint within sixty days after the first publication of this notice, namely the 20th day of September, 1945, at which time the said cause shall stand at issue.

WITNESS my hand this the 15 day of September 1945.

STATE OF ALABAMA, BALDWIN COUNTY

Filed Sept 15, 1945 9 am
Recorded Lib. Gendbook 2 page 14-16
and I certify that the following Privilege Tax has been paid.
Deed Tax _____
Mortgage Tax _____

W. R. Stuart
Judge of Probate

By L. W.

[Signature]
Register,
Circuit Court, Baldwin County,
Alabama, In Equity.

[Handwritten notes on left margin]

[Handwritten notes on right margin]

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court

To Floise Rasberry

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 Sim T. Andrews and Pandolrh McGowan

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Sim T. Andrews is Complainant

Complainant and Lee Gelder, and the unknown heirs, devisees, personal representatives and assigns of Lee Gelder, and any and all persons, firms, associations and corporations claiming any title to, interest in, claim lien or encumbrance on the NE 1/4 of NW 1/4 of Section 18 Respondent Township 6 S., R 3 E., Baldwin Co., Ala. or some parcel or part thereof.

on oath, to be by you administered, upon them to take and certify the deposition S of the witness@s and return the same to our Court, with all convenient speed, under your hand.

Witness 22 day of November, 1942

R.S. Quate

Register

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Sam T. Andrews

Complainant

vs.
See Gilder

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF,

DEFENDANT

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

Whereas SIM T. ANDREWS has filed his bill of complaint on the 4 day of September, 1945, in this court on the Equity side claiming to be in actual peaceable possession, owning and claiming to own that certain parcel or lot of land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County in his, Sim T. Andrew's name; that he acquired title to the same from J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N.S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that Lee Gelder, if living, is over the age of twenty-one years and

and non-resident of the State of Alabama, and whose last known address was 2373 North Newland Avenue, Chicago, Illinois, a better address not being known, and if dead, his unknown heirs, devisees, personal representatives, grantees, and assigns are over the age of twenty-one years and are non-residents of Alabama, their places of residence, and post office addresses being unknown, that the said Lee Gelder, if living, claims or is reputed to claim and if dead his unknown heirs, devisees, personal representatives, grantees, and assigns, claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some part or parcel thereof.

Complainant further alleges that he and those through whom he claims have for more than ten years next preceding the filing of said bill of complaint been in the actual adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereon and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants are unknown and cannot be ascertained upon diligent inquiry was made and the names, ages and places of residence and addresses cannot be ascertained.

It is therefore ordered, judged and decreed that notice of the pendency of said suit be given by publication once a

week for four weeks consecutively in the Baldwin Times, a newspaper, published in Bay Minette, in Baldwin County, Alabama.

WITNESS my hand and seal this the 10 day of September 1945.

Register.

[Vertical handwritten scribble]

[Handwritten mark]

A

1404

JAMES H. FAULKNER
EDITOR AND PUBLISHER

The BALDWIN Times

ALABAMA'S BEST COUNTY'S- BEST NEWSPAPER

Legal Notices

NOTICE

SIM T. ANDREWS, Complainant, Vs. The Northeast Quarter of the Northwest Quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, Lee Gelder and the unknown heirs, devisees, personal representatives and assigns of Lee Gelder, and any and all persons, firms, associations and corporations claiming any title to, interest in, claim lien or encumbrance on said land or any part thereof — Defendant.

In the Circuit Court of Baldwin County, Alabama, In Equity.

Notice is hereby given to Lee Gelder, if living, and if dead, to his unknown heirs, devisees, personal representatives, grantees and assigns and to any and all persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

That Sim T. Andrews has filed his Bill of Complaint on the 15th day of September, 1945, in this court on the equity side, claiming to be in actual peaceable possession, owning and claiming to own that certain parcel or lot of land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County in his, Sim T. Andrews name; that he acquired title to the same from J. R. Prine and his wife, Kate Prine, by deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N. S., page 197-8, who acquired title thereto from Randolph McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book

60 N. S., page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that Lee Gelder, if living, is over the age of twenty-one years and non-resident of the State of Alabama, and whose last known address was 2373 North Newland Avenue, Chicago, Illinois, a better address not being known, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns are over the age of twenty-one years and are non-residents of Alabama, their place of residence and postoffice addresses being unknown, that the said Lee Gelder, if living, claims or is reputed to claim, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some part or parcel thereof.

Complainant further alleges that he and those through whom he claims have for more than ten years next preceeding the filing of said bill of complaint, been in the actual adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assesses or paid taxes on said lands or any part thereon and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants are unknown and cannot be ascertained upon diligent inquiry, and proof be-

ing made that diligent inquiry was made and the names, ages, and places of residence and postoffice addresses cannot be ascertained.

And an order having been made and entered that notice of the pendency of said suit be given publication once a week for four consecutive weeks, in The Baldwin Times, a newspaper published in Bay Minette, in Baldwin County, Alabama.

It is therefore ordered that the said Lee Gelder, if living, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns and any and all other persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, appear and plead, answer or demur to the said bill of complaint within sixty days after the first publication of this notice, namely the 20th day of September, 1945, at which time the said cause shall stand at issue.

Witness my hand this the 15th day of September, 1945.

R. S. DUCK, Register, Circuit Court, Baldwin County, Ala., In Equity

34-4ta

Ford Cook

Publisher.

paper for _____ consecutive weeks in the following issues:

- Sept 20*, 194*5* Vol. *56* No. *34*
- Sept. 27*, 194*5* Vol. *56* No. *35*
- Oct. 4*, 194*5* Vol. *56* No. *36*
- Oct. 11*, 194*5* Vol. *56* No. *37*

before the undersigned this _____ day of _____ 194_____.

_____ county.

Ford Cook

Publisher.

ON

orn, deposes and says
kly Newspaper pub-
e hereto attached of

28.07

1404

JAMES H. FAULKNER
EDITOR AND PUBLISHER

The **BALDWIN**
Times

ALABAMA'S BEST COUNTY'S- **BEST NEWSPAPER**
BAY MINETTE, ALABAMA

T ADS
"KNOCKS HERE"

We Have A Loan

We Have A Loan

TO PAY WHAT YOU
BUY WHAT YOU
REPAIR YOUR CAR
FINANCE AUTO-
PAY DOCTOR and
PAY TAXES
PAY INSURANCE
MEET EMERGEN
... You can use your
or Automobile as

THE BALDWIN

Member Federal De

PHONE 2281

come

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

Ford Cook, being duly sworn, deposes and says
that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper pub-
lished at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

notice

Pending

COST STATEMENT

846 WORDS @ 4 1/2 cents \$ 38.07

I hereby certify this is correct, due and unpaid (paid).

Ford Cook

Publisher.

Was published in said newspaper for _____ consecutive weeks in the following issues:

Date of 1st publication Sept. 20, 1945 Vol. 56 No. 34

Date of 2nd publication Sept. 27, 1945 Vol. 56 No. 35

Date of 3rd publication Oct. 4, 1945 Vol. 56 No. 36

Date of 4th publication Oct. 11, 1945 Vol. 56 No. 37

Subscribed and sworn before the undersigned this _____ day of _____ 1945.

Notary Public, Baldwin County.

Ford Cook

Publisher.

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF,

DEFENDANT

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

Whereas SIM T. ANDREWS has filed his bill of complaint on the 15 day of September, 1945, in this court on the Equity side claiming to be in actual peaceable possession, owning and claiming to own that certain parcel or lot of land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County in his, Sim T. Andrew's name; that he acquired title to the same from J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N.S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that Lee Gelder, if living, is over the age of twenty-one years and

and non-resident of the State of Alabama, and whose last known address was 2373 North Newland Avenue, Chicago, Illinois, a better address not being known, and if dead, his unknown heirs, devisees, personal representatives, grantees, and assigns are over the age of twenty-one years and are non-residents of Alabama, their places of residence, and post office addresses being unknown, that the said Lee Gelder, if living, claims or is reputed to claim and if dead his unknown heirs, devisees, personal representatives, grantees, and assigns, claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some part or parcel thereof.

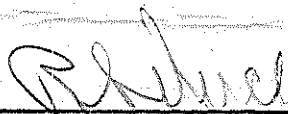
Complainant further alleges that he and those through whom he claims have for more than ten years next preceeding the filing of said bill of complaint been in the actual adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereon and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants are unknown and cannot be ascertained upon diligent inquiry was made and the names, ages and places of residence and addresses cannot be ascertained.

It is therefore ordered, judged and decreed that notice of the pendency of said suit be given by publication once a

week for four weeks consecutively in the Baldwin Times, a newspaper, published in Bay Minette, in Baldwin County, Alabama.

WITNESS my hand and seal this the 15 day of September 1945.



Register.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, } No. ~~1403~~ ¹⁴⁰⁴ CIRCUIT COURT BALDWIN COUNTY
BALDWIN COUNTY } Sept. TERM, 194 5

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon Lee Gelder

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

Lee Gelder Respondent

by Sim T. Andrews

Complainant

Witness my hand this 15th day of Sept. 194 5

R. D. [Signature] Clerk.

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT

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

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

Comes your Complainant, SIM T. ANDREWS and presents this,
his bill of complaint against the following described lands in
Baldwin County, Alabama, to-wit:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

and against Lee Gelder, a non-resident of the State of Alabama,
and whose last known address was 2373 North Newland Avenue,
Chicago, Illinois, a better address not being known, and if he
be dead, then against his heirs, devisees, personal represen-
tatives, grantees and assigns, separately and severally, and
against any and all other persons, firms, associations or
corporations claiming any title to, interest in, claim lien
or encumbrances upon the said lands or any part or parcel
thereof and respectfully represents and shows unto your Honor
and this Honorable Court as follows:

1.

That your Complainant is over the age of twenty-one years
and a resident of Baldwin County, Alabama; that Complainant has
made diligent search to ascertain the ages, place of residence
of the said Lee Gelder; that he has inquired of numerous per-
sons at Fairhope and Silverhill, the vicinity in which such

land is situated and of persons at Bay Minette, including all of the officers, and has searched the Probate and tax records and from such search and inquiry has ascertained and alleges; that Lee Gelder, if living, is over the age of twenty-one years and a non-resident of the State of Alabama, his heirs, devisees, personal representatives, grantees, and assigns are over the age of twenty-one years and are non-residents of the State of Alabama;

2.

That your Complainant is the owner in fee simple and in the actual possession of said lands in Baldwin County, Alabama, described as follows, to-wit:

Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

and that he and those through whom he claims have been in the continuous adverse possession of the said lands for more than ten years next preceeding the filing of this complaint and that he and those through whom he claims title to the said lands have for ten years next preceeding the filing of this bill of complaint annually assessed and paid the taxes on the said lands and that during such period of time no other person, has assessed the said lands for taxes or paid taxes thereon, and that no other person for such period has had, or attempted to exercise, any possession over the said land or claimed any right to possession thereof or any title to or interest in, claim, lien or encumbrance thereon or to any part or parcel of the same.

3.

That no suit is pending to test Complainant's title to, interest in, lien, claims or encumbrances on, or rights of possession of said land.

4.

That the Complainant obtained title to the said lands by purchase from one, J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the

Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N. S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that the title to the said lands as claimed by this Complainant stands upon the record of Baldwin County, Alabama, in his name; that there appears upon the record a deed to Lee Gelder, conveying the said lands from the River Park Fruit Company dated December 21, 1905, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 10 N. S. page 350; but that the said Lee Gelder nor any person holding under him have claimed any interest in the said land for more than ten years next preceding the filing of this Bill of Complaints and that during the whole of such time, Complainant, and those through whom he claims, has claimed the said lands and have been in the actual adverse possession of the same as against him and against any person holding under him and against any and all persons and against the world; and that this Complainant and those through whom he claims have been in the actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of said lands for more than ten years next preceding this date and that he and those through whom he claims have continuously occupied and used the said lands in person, by tenant or through agent for the whole of such ten year period; that the said Lee Gelder, by virtue of the afore said deed to Lee Gelder, claims or is reputed to claim some title to, or interest in, claim, lien or encumbrance upon the said lands or

some portion or parcel thereof;

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said Lee Gelder, and the unknown heirs, devisees, personal representatives, grantees, and assigns of Lee Gelder, and then if he should be dead, and all other persons, firms or corporations claiming any title to or interest in, claim, lien or encumbrance upon the said lands, to-wit: Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, or any part, or parcel thereof, to be made parties defendant to this Bill of Complaint and by appropriate process require them and each of them separately and severally to plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays, that upon a final hearing of this cause, this Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of encumbrances, to the said land and to each part the parcel thereof, is vested in your Complainant, Sim T. Andrews, as against Lee Gelder, if he be living, and, if he be dead, as against his heirs, unknown, devisees, personal representatives, grantees, and assigns, and against any and all other persons, firms or corporations claiming any title to, interest in, or claim, lien or incumbrance upon the said lands or any part thereof, and that any and all doubts and disputes concerning the same be cleared up, and your Complainant prays for such other, further, different or general relief as in equity and good conscience shall seem meet and proper.

BEEBE & HALL

By _____
Solicitors for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

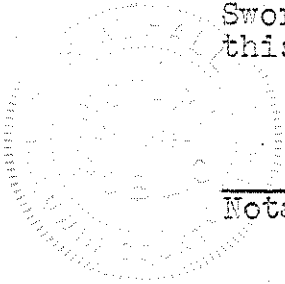
Before me, the undersigned authority in and for said County and State, personally appeared W. C. Beebe, who is known to me, and who, having been by me first duly sworn, deposes and says that he is Solicitor for the Complainant in the above styled cause, and that the facts stated in the foregoing Bill of Complaint, from all information obtainable, are true, and from such information obtained he verily believes, and so states, the same to be true.

W. C. Beebe

Sworn to and subscribed before me on
this the 15 day of September 1945.

W. C. Beebe

Notary Public, Baldwin County, Alabama.



SIM T. ANDREWS,

COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

The attorneys for the Complainant in the above styled cause hereby give notice to the above named persons, firms or corporations that the deposition of Sim T. Andrews and Randolph McGowan, witnesses for the Complainant, will be taken before Eloise Rasberry, Commissioner, heretofore named by this Honorable Court on the 15th day of December, 1945 at the office of Beebe & Hall, in the town of Bay Minette, Alabama on the 15th day of December, 1945.

Witness this 15th day of December, 1945.

BEEBE & HALL

By: *J. C. Beebe*

Attorneys for Complainant.

I, R. S. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a true and correct copy of notice given to the Defendants of Plaintiff's application and motion for oral examination of Sim T. Andrews and Benjamin McGowan, witnesses for Complainant, as the same was entered on the Order Book of the Register and that said notice was entered on the Order Book of the Register on the 23rd day of November, 1945.

Witness my hand and seal of office this 23rd day of November, 1945.

R. S. Duck
Clerk of the Circuit Court
Baldwin County, Ala.

(SEAL)

*Jim T. Andrews
P. S. Duck*

(SEAL)

1942

Witness my hand and seal of this office this 3rd day of November, 1942, on the 3rd day of November, 1942, that said notice was entered in the Order Book of the Western District of Alabama at the same was entered in the Order Book of the Western District of Alabama and Jim T. Andrews and P. S. Duck, witnesses for defendant, Plaintiff's application and motion for oral examination of time and correct copy of notice given to the Defendant of County, Alabama, do hereby certify that the foregoing is a

I, P. S. Duck, Clerk of the Circuit Court of Baldwin

Notice of time and place of taking oral depositions of Carl Lamant's witnesses

Filed Dec 1, 1942

P. S. Duck

Register

For file

W. C. [unclear]
Baldwin County, Ala.
Clerk of the Circuit Court

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

SIM T. ANDREWS

Complainant

VS.

LEE GELDER, AND OTHERS

Respondent

I, Floise Rasberry

as Register and Commissioner

have called and caused to come before me Sim T. Andrews and Randolph McGowan

witnesses named in the Requirement for Oral Examination, on the 15 day of December 1945, at the office of BEEBE & HALL in Bay Minette, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said witnesses

doth depose and say as follows:

My name is Sim T. Andrews. I am the Complainant in that certain cause pending in the Circuit Court of Baldwin County, Alabama, in Equity, number 1404, wherein Lee Gelder and others are Defendants, involving the title to the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East. I am over the age of 21 years and a resident of Baldwin County, Alabama. I am in the actual possession of such lands and have been in continuous possession thereof since I purchased the same on August 10, 1941. Lee Gelder is a non-resident of the State of Alabama. His last known address was 2372 N. Newland Ave., Chicago, Illinois. If he is dead, his heirs, devisees, personal representatives, grantees and assigns are non-residents of Alabama, over the age of 21 years, but their post-office address is unknown to this Complainant and I have made diligent search and inquiry to ascertain the same, having examined tax and probate records at the probate office of Baldwin County, Alabama and having inquired of numerous persons living in and who have lived in the neighborhood in which such lands are situated. I purchased the lands from J. R. Prine and Katy Prine, August 10, 1941. My deed is recorded in the office of the Judge of Probate of Baldwin County, Alabama, Deed Book 77 NS, page 197-8. When I bought the lands from J. R. Prine he was in the actual possession of the same, claiming to own the same and had been in continuous possession of the same, claiming to own the same, since October 10, 1936. He acquired the same from Randolph McGowan, who at the time of transfer of title was in possession of the same, having been in continuous possession of the same since September 16, 1936, claiming to own the same. J. R. Prine's deed is recorded in said office at 60 NS, page 396. Randolph McGowan's deed from the State Land Commissioner of Alabama is recorded at 60 NS, page 390. The State acquired the said lands at a Tax sale June 3, 1932; ~~that~~ I and those through whom I claim the said lands have been in actual possession of the said lands for more than 10 years next preceeding the filing of this suit, namely September 15, 1945; ~~that~~ during the whole of the said time no person other than I and those through whom I claim as aforesaid have had any possession of the said lands or any part thereof or claim any right, title or interest in, lien or encumbrance upon the said land or any part thereof; ~~that~~ I and those through whom I claim as aforesaid have annually assessed the said lands for taxes and paid the taxes thereon for 10 years next preceeding the filing of said suit. Lee Gelder has not had any possession of the said lands for the last 10 years or claimed any right, title or interest in, lien or encumbrance upon the said lands or any part thereof; ~~that~~ no person other than I and those through whom I claim as aforesaid have assessed the said lands for taxes or paid any taxes thereon for more than 10 years next preceeding September, 15, 1945.

Sim T. Andrews

My name is Randolph McGowan. I am over the age of 21 years. I know the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East. I purchased the said lands from the State of Alabama September 16, 1936 and immediately went into possession of them claiming to own them. I was in possession when I sold to J. R. Prine October 10, 1936. J. R. Prine immediately went into possession of the lands, claiming to own them and remained in continuous possession until August 10, 1941 when he sold said lands to Sim T. Andrews, who immediately went into possession of them and remained in continuous possession to this day. No person other than Sim T. Andrews and those through whom he claims as aforesaid have assessed said lands for more than 10 years next preceeding September 15, 1945. He and those through he claims as aforesaid have assessed said lands each year and paid taxes on them. Lee Gelder and no other person for more than 10 years has assessed said lands or paid any taxes thereon.

Randolph McGowan

ORAL EXAMINATION.

I, Eloise Rasberry, as Register and 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 W. C. Beebe 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 15th day of December, 1945.

Eloise Rasberry (L.S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed 12-19, 1945.

R.S. Muck Register.

Recorded in

Record

Vol. _____

Page _____

, Register.

10

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

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

DEFENDANT

Notice is hereby given to Lee Gelder, if living, and if dead, to his unknown heirs, devisees, personal representatives, grantees and assigns and to any and all persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of the Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

That Sim T. Andrews has filed his Bill of Complaint on the 15 day of September 1945, in this court on the equity side claiming to be in actual peaceable possession, owning and claiming to own that certain parcel or lot of land, lying and being situated in the County of Baldwin, State of Alabama, described as follows:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

Complainant alleges in his bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County in his, Sim T. Andrews name; that he acquired title to the same from J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph

McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N. S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that Lee Gelder, if living, is over the age of twenty-one years and non-resident of the State of Alabama, and whose last known address was 2373 North Newland Avenue, Chicago, Illinois, a better address not being known, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns are over the age of twenty-one years and are non-residents of Alabama, their place of residence, and post-office addresses being unknown, that the said Lee Gelder, if living claims or is reputed to claim, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns claim or are reputed to claim some title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some part or parcel thereof.

Complainant further alleges that he and those through whom he claims have for more than ten years next preceding the filing of said bill of complaint, been in the actual adverse possession of the said lands and have annually assessed and paid the taxes thereon and that during such period no other person has been in possession of said lands or any part thereof or assessed or paid taxes on said lands or any part thereon and that the bill of complaint is filed for the purpose of establishing his title to and interest in said lands and clearing up doubts and disputes concerning the same.

And it appearing from said bill of complaint, the same being duly verified that the names, ages and places of residence and post office addresses of the said defendants are unknown and cannot be ascertained upon diligent inquiry, and proof being made that diligent inquiry was made and the names, ages and places of residence and post office addresses cannot be ascertained.

And an order having been made and entered that notice of the pendency of said suit be given publication once a week for four consecutive weeks, a newspaper published in Bay Minette, in Baldwin County, Alabama.

It is therefore ordered that the said Lee Gelder, if living, and if dead, his unknown heirs, devisees, personal representatives, grantees and assigns and any and all other persons, firms and corporations claiming any title to, interest in, claim, lien or encumbrance upon the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, appear and plead, answer or demur to the said bill of complaint within sixty days after the first publication of this notice, namely the 20 day of September, 1945, at which time the said cause shall stand at issue.

WITNESS my hand this the 15 day of September 1945.

R. S. Luck
Register,
Circuit Court, Baldwin County,
Alabama, In Equity.

Filed
12-19-45-
R.S. Luck
Reg.

PROF. ...

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11/10/04

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

1404
No. 1404

CIRCUIT COURT BALDWIN COUNTY

Sept. TERM, 194 5

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon Lee Gelder

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

Lee Gelder

Respondent
Defendant

by

Sim T. Andrews

Complainant
Plaintiff

Witness my hand this 15th day of Sept. 194 5

[Signature] 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

*attach procedure
and file to
Lee Gelder
2373 North Newland Ave
Chicago*

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT

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

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

Comes your Complainant, SIM T. ANDREWS and presents this,
his bill of complaint against the following described lands in
Baldwin County, Alabama, to-wit:

Northeast quarter of Northwest quarter of
Section 18, Township 6 South, Range 3 East,
Baldwin County, Alabama.

and against Lee Gelder, a non-resident of the State of Alabama,
and whose last known address was 2373 North Newland Avenue,
Chicago, Illinois, a better address not being known, and if he
be dead, then against his heirs, devisees, personal represen-
tatives, grantees and assigns, separately and severally, and
against any and all other persons, firms, associations or
corporations claiming any title to, interest in, claim lien
or encumbrances upon the said lands or any part or parcel
thereof and respectfully represents and shows unto your Honor
and this Honorable Court as follows:

1.

That your Complainant is over the age of twenty-one years
and a resident of Baldwin County, Alabama; that Complainant has
made diligent search to ascertain the ages, place of residence
of the said Lee Gelder; that he has inquired of numerous per-
sons at Fairhope and Silverhill, the vicinity in which such

land is situated and of persons at Bay Minette, including all of the officers, and has searched the Probate and tax records and from such search and inquiry has ascertained and alleges; that Lee Gelder, if living, is over the age of twenty-one years and a non-resident of the State of Alabama, his heirs, devisees, personal representatives, grantees, and assigns are over the age of twenty-one years and are non-residents of the State of Alabama;

2.

That your Complainant is the owner in fee simple and in the actual possession of said lands in Baldwin County, Alabama, described as follows, to-wit:

Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama.

and that he and those through whom he claims have been in the continuous adverse possession of the said lands for more than ten years next preceeding the filing of this complaint and that he and those through whom he claims title to the said lands have for ten years next preceeding the filing of this bill of complaint annually assessed and paid the taxes on the said lands and that during such period of time no other person, has assessed the said lands for taxes or paid taxes thereon, and that no other person for such period has had, or attempted to exercise, any possession over the said land or claimed any right to possession thereof or any title to or interest in, claim, lien or encumbrance thereon or to any part or parcel of the same.

3.

That no suit is pending to test Complainant's title to, interest in, lien, claims or encumbrances on, or rights of possession of said land.

4.

That the Complainant obtained title to the said lands by purchase from one, J. R. Prine and his wife, Kate Prine by deed dated August 10, 1941, and recorded in the office of the

Judge of Probate, Baldwin County, in Deed Book 77 N. S. page 197-8, who acquired title thereto from Randolph McGowan and Mary McGowan by deed dated October 10, 1936, and recorded in the office of the Judge of Probate, Baldwin County, Alabama, in Deed Book 60 N. S. page 396, who acquired title thereto under a deed by the State Land Commissioner of Alabama, dated September 16, 1936, recorded 60 N. S. page 397, which deed was executed under a sale of the said lands for taxes June 3, 1932, under an assessment which said tax sale the said State of Alabama acquired on June 3, 1932; that the title to the said lands as claimed by this Complainant stands upon the record of Baldwin County, Alabama, in his name; that there appears upon the record a deed to Lee Gelder, conveying the said lands from the River Park Fruit Company dated December 21, 1905, and recorded in the office of the Judge of Probate, Baldwin County, in Deed Book 10 N. S. page 350; but that the said Lee Gelder nor any person holding under him have claimed any interest in the said land for more than ten years next preceeding the filing of this Bill of Complaints and that during the whole of such time, Complainant, and those through whom he claims, has claimed the said lands and have been in the actual adverse possession of the same as against him and against any person holding under him and against any and all persons and against the world; and that this Complainant and those through whom he claims have been in the actual, peaceable, notorious, exclusive, continuous, hostile, adverse possession of said lands for more than ten years next preceeding this date and that he and those through whom he claims have continuously occupied and used the said lands in person, by tenant or through agent for the whole of such ten year period; that the said Lee Gelder, by virtue of the afore said deed to Lee Gelder, claims or is reputed to claim some title to, or interest in, claim, lien or encumbrance upon the said lands or

some portion or parcel thereof;

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said Lee Gelder, and the unknown heirs, devisees, personal representatives, grantees, and assigns of Lee Gelder, and then if he should be dead, and all other persons, firms or corporations claiming any title to or interest in, claim, lien or encumbrance upon the said lands, to-wit: Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, or any part, or parcel thereof, to be made parties defendant to this Bill of Complaint and by appropriate process require them and each of them separately and severally to plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court.

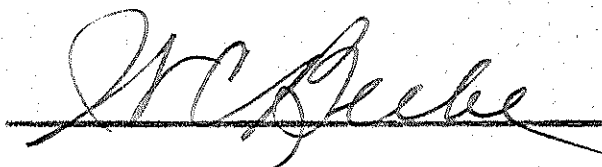
Your Complainant further prays, that upon a final hearing of this cause, this Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of encumbrances, to the said land and to each part the parcel thereof, is vested in your Complainant, Sim T. Andrews, as against Lee Gelder, if he be living, and, if he be dead, as against his heirs, unknown, devisees, personal representatives, grantees, and assigns, and against any and all other persons, firms or corporations claiming any title to, interest in, or claim, lien or incumbrance upon the said lands or any part thereof, and that any and all doubts and disputes concerning the same be cleared up, and your Complainant prays for such other, further, different or general relief as in equity and good conscience shall seem meet and proper.

BEEBE & HALL

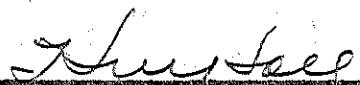
By _____
Solicitors for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority in and for said County and State, personally appeared W. C. Beebe, who is known to me, and who, having been by me first duly sworn, deposes and says that he is Solicitor for the Complainant in the above styled cause, and that the facts stated in the foregoing Bill of Complaint, from all information obtainable, are true, and from such information obtained he verily believes, and so states, the same to be true.



Sworn to and subscribed before me on
this the 15 day of September 1945.



Notary Public, Baldwin County, Alabama.

SIM T. ANDREWS,
COMPLAINANT,
VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

To Lee Gelder, and the unknown heirs, devisees, personal representatives and assigns of Lee Gelder, and any and all persons, firms, associations and corporations claiming any title to, interest in, claim lien or encumbrance on the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some parcel or part thereof.

Notice is hereby given that the Complainant in the above styled cause has this day made application for the oral examination of Sim T. Andrews and Randolph McGowan, witnesses for the Complainant in the above styled cause and has suggested Eloise Rasberry as a suitable person to act as Commissioner in the taking of the deposition of said witnesses.

Witness this 10th day of November, 1945.

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

Beebe & Hall
By H. Beebe
Attorneys for Complainant.

I, R. S. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a true and correct copy of the motion and application of the Plaintiff for oral examination of ~~Sim T. Andrews and Randolph McGowan~~, witnesses for Complainant and that notice of said motion was given to the Defendants by entry on the Order Book of the Register, said entry having been made on the 19th day of November, 1945.

Witness my hand and seal of office this the 19th day of ~~November~~ 1945.

R.S. Duck
R.S. Duck
Clerk of the Circuit Court
Baldwin County, Ala.

Sim T. Andrews

11/19/45

Order Book of the Register

401 file

15 ✓
Jim Andrews

To
R. S. Duck

1042

Witness my hand and seal of said court this 15th day of November 1945.
Complaint and that nothing is to be done in the premises until examination of the witnesses and Randolph H. Hagerman, my witness

Notice of application
for oral examination
of Complainant's witness

Belgian County
Clerk of the Court

1042

Filed Nov 15, 1945

R. S. Duck
Register

For file

correct copy of the motion and application of the district for
Alabamas, go heretofore settling first the foregoing in a true and
I, R. S. Duck, Clerk of the Circuit Court of Baldwin County,

SIM T. ANDREWS,

COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3,
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

Complainant having on November 15, 1945, filed his motion and request for oral examination of Sim T. Andrews and Randolph, witnesses for Complainant and due and proper notice thereof having been given as required by law on the Order Book of this Court and Eloise Rasberry of the town of Bay Minette being a suitable person to act a Commissioner to take the deposition of said witnesses.

It is therefore ordered, adjudged and decreed that the said motion for the oral examination of Sim T. Andrews and Randolph McGowan, witnesses for Complainant, be and is hereby granted.

And that Eloise Rasberry be and she is hereby appointed as Commissioner to take the deposition of said witnesses.

Witness my hand this 23rd day of November, 1945.

R.S. Duck
Register.

1-1
Jim T. Andrews,

by

Lee Seader

Order granting Motion
for oral examination
of Complainants
Witnesses

Filed Nov. 25, 1945

R. S. Lucka

Register

7

SIM T. ANDREWS,
COMPLAINANT,
VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

The attorneys for the Complainant in the above styled cause hereby give notice to the above named persons, firms or corporations that the deposition of Sim T. Andrews and Randolph McGowan, witnesses for the Complainant, will be taken before Eloise Raspberry, Commissioner, heretofore named by this Honorable Court on the 15th day of December, 1945 at the office of Beebe & Hall, in the town of Bay Minette, Alabama on the 15th day of December, 1945.

Witness this 5th day of December, 1945.

BEEBE & HALL,

By: W. C. Beebe

Attorneys for Complainant.

1-2
John T. Andrews

vs
Lee Gilder

Notice of amended
place of taking oral
depositions of complainant
and witnesses

Filed Dec 5, 1915

R.S. each.

Register
your order book
9

SIM T. ANDREWS,
COMPLAINANT,

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

Comes the Complainant in the above styled cause, more than
thirty days having lapsed since service by publication in the
aforesaid cause on Lee Gelder, Defendant and he not having
plead, answered or demurred within the time required by law.

Motion is hereby made for a Decree Pro Confesso against the said
Lee Gelder this the 5th day of November, 1945.

BEEBE & HALL

By: *W. C. Beebe*

Sine Andrews
vs
Lee Geeser, et al

Motion for decree
Pro Confessio

Filed Nov 5, 1948
R.S. Luck
Register

SIM T. ANDREWS,
COMPLAINANT,
VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

Comes the Complainant in the above styled cause and requests
the oral examination of Sim T. Andrews and Randolph McGowan, as
witnesses for the Complainant who resides in Baldwin County,
State of Alabama and suggests Eloise Rasberry of the town of
Bay Minette as a suitable person to act as Commissioner to take
the deposition of the said witnesses.

Witnesses our hands this 15th day of ~~November~~, 1945.

BEEBE & HALL,

By: W C Beebe

Attorneys for Complainant.

John T. Andrews

to
Lu. Golden

Request for oral
examination of
Complainants Wilkins
et al.

Filed March 11, 1945

F.S. Luck

Register

In order book
Wilmington

SIM T. ANDREWS

COMPLAINANT

VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

Comes the Complainant in the above styled cause, said cause
being at issue and ready for submission, and moves that said cause
be set down for final decree.

This the 18th day of December, 1945.

BEERE & HALL,

By: *W. C. Beere*
Solicitors for the Complainant.

John T. Andrews

Ex 2
Lee Green

Motion for final
decree

Filed Dec 18, 1945

R.S. such
Register

11

SIM T. ANDREWS,
COMPLAINANT
VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS, FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

In this cause it appearing to the court, by certificate of the Clerk (or, Register) that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 20th day of September, 1945, in the Baldwin Times, a newspaper published in Baldwin County, Alabama; that a copy of said order was posted at the court house door in said County, on the 20 day of September, 1945 and that another copy of the Complaint, summons and notice were sent by registered mail to the Defendant, Lee Gelder, set out in the Complaint, properly stamped and addressed at his place of residence, and it is now further appearing to the court that the said Defendant has, to the date hereof, failed to plead, answer, or demur to the bill of complaint in this cause; It is therefore, on motion of complainant, ordered and decreed by the court, that the said bill of complaint be, and it hereby is, in all things, taken as confessed against the said defendants.

This the 7 day of November, 1945.

R.S. Luck
Clerk of Circuit Court of Baldwin
County, Alabama.

1-11
Miss Andrews

to
Lieutenant

Deane Proctor
Jessop

Filed Mar 7, 1948

P. S. Luck

Register

b

SIM T. ANDREWS,
COMPLAINANT,
VS.

THE NORTHEAST QUARTER OF THE
NORTHWEST QUARTER OF SECTION
18, TOWNSHIP 6 SOUTH, RANGE 3
EAST, BALDWIN COUNTY, ALABAMA,
LEE GELDER, AND THE UNKNOWN
HEIRS, DEVISEES, PERSONAL RE-
PRESENTATIVES AND ASSIGNS OF
LEE GELDER, AND ANY AND ALL
PERSONS; FIRMS, ASSOCIATIONS
AND CORPORATIONS CLAIMING
ANY TITLE TO, INTEREST IN,
CLAIM LIEN OR ENCUMBRANCE
ON SAID LANDS OR ANY PART
THEREOF.

DEFENDANT.

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

To Lee Gelder, and the unknown heirs, devisees, personal representatives and assigns of Lee Gelder, and any and all persons, firms, associations and corporations claiming any title to, interest in, claim lien or encumbrance on the Northeast quarter of Northwest quarter of Section 18, Township 6 South, Range 3 East, Baldwin County, Alabama, or some parcel or part thereof.

Notice is hereby given that the Complainant in the above styled cause has this day made application for the oral examination of Sim T. Andrews and Randolph McGowan, witnesses for the Complainant in the above styled cause and has suggested Eloise Rasberry as a suitable person to act as Commissioner in the taking of the deposition of said witnesses.

Witness this 15th day of November, 1945.

A.S. Luck
Clerk Circuit Court,
Baldwin County, Alabama.

W. B. Hall
W. B. Debe
Attorneys for Complainant.

Jim Andrews
Lee Gilder

Notice of application
for oral examination
of Complainants' Net-
works

1400

Filed NOV 15, 1945

R.S. Luck

Register

For over Book