

*(Handwritten initials)*

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Ex Parte

~~\_\_\_\_\_~~ Eva Lee Wilson,

*No. 646*

THIS CAUSE coming on to be heard at this Term was submitted upon the Petition filed by said

..... Eva Lee Wilson, .....

and the affidavits filed therewith; and, upon consideration thereof, the Court is of the opinion that the Petitioner is entitled to the relief prayed for in her said Petition;

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the said

..... Eva Lee Wilson, .....

be and she is hereby granted permission to again contract marriage.

It is further ordered, that the said petitioner Eva Lee Wilson, ..... pay the costs herein taxed, for which execution may issue.

This the 14<sup>th</sup> day of February 1927

(Signed)

*John A. Leigh*

Judge of the 21st Judicial Circuit of Alabama.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

I, T. W. RICHERSON, Register of the Circuit Court, in and for said State and County, do hereby certify that the above is a true and correct copy of the Decree allowing the within named Petitioner to again contract marriage, rendered on the ..... day of ..... 192... in the cause; all of which appears of record in this Court.

Witness my hand and seal of office, this the ..... day of ..... 192...

.....  
Register of the Circuit Court in Equity for Baldwin County, Ala.

No. 646

COPY.

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

EX PARTE

Eva Lee Wilson,

DECREE.

Filed in office this, the 14

day of Feb, 1927

J. W. Williamson  
Register.

M P T O B A Y M I N E T T E

State of Alabama )  
Baldwin County )

Circuit Court Baldwin County, Alabama  
In Equity.

To Honorable John D. Leigh , Judge of the Judicial Circuit of Alabama:  
Lee Lee

Your petitioner Eva<sup>Lee</sup> Jordan, formerly Mrs. Eva<sup>Lee</sup> Wilson, respectfully represents unto your Honor that in the case of Wiley R Wilson vs Eva Lee Wilson in the Circuit Court of Baldwin County, Alabama, on the 19th day of September, 1925 (in term time at said time) your Honor rendered a decree - dissolving the bonds of matrimony then existing between the said Wiley R . Wilson and the said Eva Lee Wilson, your petitioner herein, as shown by the certified copy of said decree attached hereto and made a part of this petition

Your petitioner further shows unto your Honor that the decree rendered by your Honor aforesaid does not grant your petitioner the right to marry again and your petitioner is advised and therefore states it is necessary for her to secure an order from your Honor giving her permission to again enter into the matrimonial relationship.

Your petitioner further shows she is a suitable person to enter into the marital relation or estate and has been for more than twelve months before and pryor to the filing of this petition in this cause a bona fide citizen of Mobile County, Alabama. and that she is of good character and in proof of all which, your petitioner attaches to this petition the affidavits of two reputable citizens of Mobile County, Alabama.

The premises considered, your petitioner humbly and earnestly complaining, prays your Honor to make an order permitting her to marry again and upon such terms and conditions as your Honor may seem meet and proper.

*J. Jenkins*

Solicitor for Peitioner.

Filed Jan 5/1927  
T. W. Neilson  
Register.

RECORDED

State of Alabama. )  
Mobile County .))

Before me personally appeared W W Bayless who being by me first duly sworn, does depose and say: I have known Eva Jordan, formerly Mrs Eva Wilson, for past two years; she has during that time been living in Mobile and is a bona fide resident and citizen of Mobile County, Alabama .

Said Eva Jordan, formerly Mrs. Eva Wilson, is a person of good character in the community where she resides and is a fit person to again enter into the marriage relation or state .

W W Bayless

Subscribed and sworn to before me this 29 day of December 1926

Louise P. McRoy

Notary Public Mobile County, Alabama.

Filed Jan 5/1927  
T. W. Reelmon  
Register.

RECORDED

State of Alabama. )  
Mobile County .))

Before me personally appeared Lee E. McRay who being by me first duly sworn, does depose and say: I have known Eva Jordan, formerly Mrs. Eva Wilson, for past two years; she has during that time been living in Mobile and is a bona fide resident and citizen of Mobile County, Alabama.

Said Eva Jordan, formerly Mrs. Eva Wilson, is a person of good character in the community where she resides and is a fit person to again enter into the marriage relation or state.

Lee E. McRay

Subscribed and sworn to before me this 29<sup>th</sup> day of December 1926

Louise P. McRay

Notary Public Mobile County, Alabama.

1st  
acc

Petition

Filed Jan 5 1924  
T. W. Stearns  
Register

RECORDED



George C. Meyer,

Complainant,

-vs.-

H. J. Champion and Herbert J. Champion, individually and as partners doing business as H. J. Champion & Son,

Respondents.

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

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

Your orator, George C. Meyer, humbly complaining shows unto your Honor as follows, to-wit:-

FIRST.

That complainant is a resident citizen of Mobile County, Alabama, residing at Mobile in said County, and is over the age of twenty-one years.

SECOND.

That the respondents, H. J. Champion and Herbert J. Champion are residents of Baldwin County, Alabama, residing at or near Bon Secour in said County, and are each over the age of twenty-one years and are partners doing business as H. J. Champion & Son.

THIRD.

That complainant is the lawful owner of all those certain lands in Baldwin County, Alabama, together with all timber thereon, described as follows:

Fractional part of Northwest quarter of Southwest quarter (31 acres); the Northeast quarter of Southwest quarter (20 acres) and Northwest quarter of Southeast quarter (29 acres); the South half of Northeast quarter and South half of Northwest quarter; and Northwest quarter of Northwest quarter, all being in Section Seventeen, Township Nine South, Range Four East, containing in all, approximately 280 acres, more or less;

that said complainant is in possession thereof.

FOURTH.

That the respondents, one or both of them, either individually or as partners doing business as H. J. Champion & Son, are trespassing upon said lands or a part thereof by cutting and removing the

pine timber therefrom and have expressed their purpose of continuing to cut the timber from said land until all timber is cut and removed therefrom. Complainant alleges that upon being informed that respondents were cutting said timber, he went to the respondent H. J. Champion and warned him not to cut the timber and informed him that he had no right to so cut and that the said respondent H. J. Champion replied that he intended to continue cutting until all of said timber was removed; and complainant avers that the cutting of said timber and the removal thereof is without his permission and contrary to his wishes; and complainant further avers that the timber, as the same is now growing upon said lands, constitutes one of the chief items of value entering into the present value of said property as will more fully and completely appear from the subsequent averments of this bill, and that if said timber is cut or removed complainant will thereby suffer irreparable injury.

FIFTH.

Complainant further avers that there are in this particular tract of land approximately 280 acres and that there is a great amount of young timber growing thereon and that it is very necessary in order to sustain the present value of said property that this timber which is now on the land be permitted to remain there and that if the respondent, as he expressed his purpose to do, continues to cut and remove said timber from said land, it will result in a multiplicity of suits to cover the damages for each trespass so committed.

SIXTH.

Complainant further avers that the above lands are the property of this complainant and that he has invested heavily in lands lying contiguous thereto and in this immediate vicinity for colonization and development purposes, and that it is the wish of this complainant to retain said lands and the timber now growing thereon in its present condition for the purpose of beautifying said land and making the same more salable and to increase the value thereof. That the complainant, owing a large area contiguous to the lands in question, contemplates the sale of said property for recreation purposes and for the purpose of establishing hotels and winter resorts, golf courses and other places of amusement and recreation thereon, and

that to denude the land of its timber would make the same unsightly and unsuited for the purpose to which the complainant desires to adapt the same.

PRAYER FOR RELIEF.

Therefore, the premises considered and in order that said property may be preserved and that justice and equity may be done, complainant prays that your Honor will grant to him the following relief, to-wit:

1. The complainant prays that this Honorable Court will grant its temporary writ of injunction issued in his name and behalf against the respondents, H. J. Champion and Herbert J. Champion, individually and as partners doing business as H. J. Champion & Son, enjoining them and each of them, individually and as partners aforesaid, from in any manner interfering with the lands and timber described in this bill of complaint and from cutting or removing therefrom any timber of any kind whatsoever or from mutilating or destroying the young and growing timber and from defacing said property in any manner and from trespassing upon or in any manner interfering with the lands and timber described in this bill and with the ownership and possession of said complainant thereof.

2. That on the final hearing of this matter said temporary injunction will be made final and that the respondents will be forever enjoined from further trespassing in any manner upon said land.

PRAYER FOR PROCESS.

Complainant further prays that the proper process issued from this Court to the said H. J. Champion and Herbert J. Champion, individually and as partners doing business as H. J. Champion & Son, and that they and each of them be made parties respondent to this bill of complaint and be properly brought before this Honorable Court in order that complainant may have the relief herein prayed for.

And complainant prays for such other, further and different relief as in equity he may be entitled to and as to your Honor will seem meet, and your orator will ever pray, etc.

  
Solicitors for Complainant.

FOOT NOTE:

The respondents and each of them, both individually and as partners

aforesaid, are required to answer each and every paragraph of the foregoing bill of complaint numbered from FIRST to SIXTH, inclusive, but not under oath, oath thereto being hereby waived.

Alexander McCleary & Good Good & Jones  
Solicitors for Complainant.

State of Alabama,

Mobile County.

Before me, F. A. Brown, a Notary Public in and for said State and County, personally appeared George C. Meyer, who being duly sworn deposes and says that he is the complainant named in the foregoing bill of complaint; that he has read said bill of complaint and has knowledge of the facts therein stated; and that all and singular the same are true.

George C Meyer

Subscribed and sworn to before me

this 7th day of January, 1927.

F. A. Brown  
Notary Public, Mobile County, Alabama.

George C. Meyer,  
Complainant,

Vs.

H. J. Champion and Herbert J.  
Champion, individually and as  
partners doing business as  
H. J. Champion & Son,  
Respondents.

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

TO THE HONORABLE CLAUDE A. GRAYSON, JUDGE OF THE CIRCUIT COURT OF  
MOBILE COUNTY, ALABAMA, IN EQUITY:

Comes the Complainant in the above styled cause and presents to your Honor its bill of complaint against the above named Respondents, praying for a writ of temporary injunction and other relief against the said Respondents as is more particularly set forth in said bill of complaint. And your Complainant represents and shows that according to his information and belief the Honorable John D. Leigh, the Judge of the Circuit Court of Baldwin County, Alabama, the county in which the land described in said bill of complaint is situated, and in which said suit will presently be filed, is at Brewton, Alabama, and that the delay which would be occasioned by presenting this bill of complaint to the said Judge John D. Leigh would tend to deprive the Complainant of his rights in that many of the trees now on the property of Complainant would be cut before the relief could be obtained.

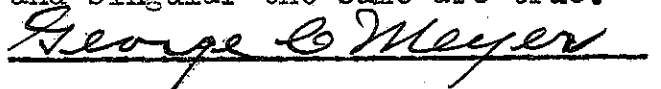
WHEREUPON the said Complainant prays that your Honor will issue an order directing the issuance of the temporary writ of injunction as prayed for in said bill of complaint upon the complainant entering into bond in such sum as your Honor may fix.

  
Solicitors for Complainant.

STATE OF ALABAMA,

MOBILE COUNTY.

Before me, O. H. Swinson, a Notary Public in and for said State and County, personally appeared George C. Meyer, who being duly sworn deposes and says that he has read the foregoing application for temporary writ of injunction, and that he has knowledge of the facts therein stated, and that all and singular the same are true.



Sworn to and subscribed before me  
this 7th day of January, 1927.

  
Notary Public, Mobile County, Alabama.

The foregoing application for temporary writ of injunction having been this day presented to me, it is ordered, adjudged and decreed that the said temporary writ of injunction as prayed for in said bill of complaint do forthwith issue upon the Complainant giving bond, payable to the Respondent with good and sufficient surety to be approved by the Register of the Circuit Court of the County of Baldwin, in the sum of  $(\$2000 \frac{00}{XX} \text{ } \overset{\text{two thousand dollars}}{\text{,}})$  conditioned as required by law, and that said Register do forthwith issue, upon the filing of this bill of complaint and this order and said bond and evidence of its approval, said temporary writ of injunction directed to the Respondents, H. J. Champion and Herbert Champion, individually and as partners doing business as H. J. Champion & Son, commanding, enjoining and prohibiting them and each of them from interfering in any manner with the lands and timber described in said bill of complaint, and further commanding, enjoining and prohibiting them and each of them from cutting and removing from said lands any timber of any kind whatsoever, or mutilating or destroying the timber growing thereon, and from trespassing upon, or in any manner interfering with the said lands and timber thereon, or the ownership and possession of the complainant thereof.

It is further ordered that the application of the Complainant for said temporary writ of injunction and this order be attached to said bill of complaint and filed therewith.

Done at Mobile, Alabama, this the 7th day of January, 1927.

Claude A. Grayson  
Judge of the Circuit Court of Mobile  
County, Alabama,  
Sitting in Equity.

*Tidwell v H. H. Hill Lumber Co. et al 198 Ala 236*