Register.

THE STATE OF ALABAMA, BALDWIN COUNTY.	CIRCUIT COURT,		Term, 19 27	
Bacon Mc Millan, Veneer C	50,		Complainant	
Against the land described in Mary Wing, Bettie Wing, Bettie Gussie Deason and the unknown int. In this cause it appears to the Register.	Complaint and Fox, Tom Wing, I heirs devisees	CorneliousBr Levi Deason, V s &c <b>ax</b> the l	ryars, Andrew Villie Desson Land describe of publication here-	Brya d in
tofore made in this cause, was published for four co	nsecutive weeks, commend	ing on the 17	7th day of	
Febuar <b>y</b> , 19 <sup>27</sup> , in	the BaldwinTi	imes,		
newspaper published in Bay Minette Ala	Alabama, that a co	py of said order was	posted at the Court	
House door in Balûwin	County, on the	17th	day of	
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Febuary 19 <sup>27</sup> , & &				
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And it now further appearing to the Register				
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And it now further appearing to the Register Cornelious Bryars, Andrew Brya Levi Deason, Willie Deason, Guss	ars, Mary Wing, I	Bettie Fox, To	om Wing,	isee
And it now further appearing to the Register Cornelious Bryars, Andrew Brya	ars, Mary Wing, I	Bettie Fox, To	om Wing,	isee
And it now further appearing to the Register Cornelious Bryars, Andrew Brya Levi Deason, Willie Deason, Guss	ars, Mary Wing, laie Deason, and omplaint.	Bettie Fox, To	neirs and dev	isee
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No. 654.	Page	(° () ( <del> </del>
THE STATE Baldwin	OF ALABAN County.	AA,
CIRCUIT COU	RT, IN EQU	ITY
Bacon Vene	er Co.	
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Cornelious		t al.
DECREE PRO PUBLIC	CONFESSO ATION.	ON
ssued May 16		19_27
J. m. Ri	Regi	ster.
Recorded inPag		Record
<del></del>	Regi	ster.

BACON-MCMILLAN VENEER COMPANY, \* a corporation,

Complainant, :

vs

CORNELIUS BRYARS, et al, Defendants .

: IN THE CIRCUIT COURT OF BALDWIN : COUNTY, IN EQUITY, ALABAMA, NO. 654

Comes defendants Willie Deason, Levi Deason and Gussie Blackmon nee Deason and answering the bill of complaint say that they admit the allegations of said bill of complaint and they agree that complainant may take their testimony and submit the cause for final decree. These defendants waive further forms and notices.

Dated this \_\_\_\_\_ day of nuy , 1927

Lo B, Derson (SEAL)
William O Deadon (SEAL)

I A Blackmon (SEAL)

3

Filed Dre 8th 1927 The Receiver

RECORDED

BACON-McMILLAN VENEER COMPANY, a corporation,

COMPLAINANT,

VS

SOUTHEAST QUARTER OF SOUTHEAST QUARTER, SECTION 29, NORTHEAST QUARTER & NORTHEAST DIVISION OF SOUTHWEST QUARTER OF SECTION 32 and SUBDIVISION "C" of SECTION 19, TOWNSHIP 2 NORTH, RANGE 2 EAST and

CORNELIUS BRYARS, et al, DEFENDANTS, IN THE CIRCUIT COURT OF BAIDWIN COUNTY, ALABAMA, IN EQUITY.

No. 654

# FINAL DECREE.

This cause being at issue and coming on to be heard and being submitted on the pleadings and evidence as noted in the note of evidence and the allegations of the bill of complaint being sustained by legal and competent evidence to the satisfaction of the Court and it appearing to the Court that publication has been made and lis pendens notice filed in all things as required by the statutes of Alabama in this proceeding and that complainant is entitled to relief prayed for:

It is therefore ordered, adjudged and decreed that the complainant have judgment as prayed for in its bill of complaint against the land described in the bill of complaint and the defendants and each of them; that all claims of the defendants, Cornelius Bryars, Andrew Bryars, Mary Wing, Betty Fox, Tom Wing, Levy Deason, Willie Deason and Gussie Deason, and if dead all claims of their heirs, personal representatives, next of kin and devisees and each of them in and to the lands described in the bill of complaint and all claims of all persons, firms or comporations, other than the complainant, claiming the said land or any part thereof or any interest thereon or lien or incumbrance thereon, are hereby ordered, adjudged and decreed to be invalid and groundless and complainant is hereby declared, adjudged and decreed to be the true and lawful owner, absolutely and in fee simple of the said land, particularly describedes:

The Southeast quarter of southeast quarter section 29, northeast quarter of northeast quarter and northeast division of southwest quarter of section 32 and Subdivision "C" of section 19, township 2 north, Range 2 east,

in Baldwin County, Alabama, and that the title to the said land, both

in law and in equity, is hereby adjudged and decreed to be vested in the complainant, the Bacon-McMillan Veneer Company, a corporation. It is further ordered, adjudged and decreed by the Court that complainant's title to the said land is hereby quieted against all claims or demands of any and all persons, firms and corporations, claiming title to, interest in or lien or incumbrance on the said land.

It is further ordered, adjudged and decreed that the Register of this Court shall within thirty days from the rendition of this Decree, prepare and file a certified copy of this decree in the office of the Judge of Probate of Baldwin County, Alabama for record and tax the expense thereof as part of the expense of this cause and it is further directed that the Judge of Probate shall record such copy in the same book and manner in which deeds are recorded and index the same in the name of Edward Lancaster, Edward Lancaster, Jr., and W. H. Lancaster and Cornelius Bryars, Andrew Bryars, Mary Wing, Betty Fox, Tom Wing, Levi Deason, Willie Deason and Gussie Deason, as grantors on the direct index and the Bacon-McMillan Veneer Company on the reverse index.

It is further ordered, adjudged and decreed that the title herein established in complainant shall enure to the benefit of all persons who derive title to the said lands from or through the complainant.

It is further ordered, adjudged and decreed that the complainant be taxed with the costs in and about this case, for the collection of which let execution issue.

Dated this  $q^{-1}$  day of December, 1927.

John D. Leigh.

BACON-MCMILLAN A CORPORATION.	VENEER COMPANY,	Ø	
	COMPLAINANT.	Ø	IN THE CIRCUIT COURT OF
VS.		0	BALDWIN COUNTY, ALABAMA.
THE LAND HEREIN ET AL.	DESCRIBED,	Ó	IN EQUITY.
	RESPONDENTS.	<b>Q</b>	NUMBER 61X

It is ordered that publication of this notice be made in the Baldwin Times, a newspaper having general circulation and published in Baldwin County, Alabama.

Dated, this th. day of February, 1927.

Womellan Geren John D. Leigh Judge Ealerdien for Consequences

NO. 604

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

BACON-MCMILIAN VENEER COMPANY, A CORPORATION, COMPLAINANT.

VS.

CORNELIUS BRYARS, ET AL, RESPONDENTS.

DESIGNATION OF THE BALDWIN TIMES AS NEWSPAPER FOR PUB-LICATION OF THE LEGAL NOTICE.

The State of Alabama,  Baldwin County.	Gircuit Court o	f Baldwin County,	, In Equity.	
To any Sheriff of the State of			4-25	•
WE COMMAND YOU, T	hat you summon	Levi Deason,	Willie Deas	on,
and Gussie Deason,	(.][obile Ala,	)		• • • •
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of Mobile			-	
of Baldwin County, exercising C	hancery jurisdiction,	within thirty days a	fter the service o	f Sum-
mons, and there to answer, plea				
Bacon -Mc Millan				•
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against said Levi Deas				
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and further to do and perform	what said Judge shall	order and direct in	that behalf. And	this the
said Defendant shall in no wise this writ with your endorsemen	omit, under penalty, e it thereon, to our said (	ourtimmediately u	pon the execution	therecf.
WITNESS, T. W. Richer				
Febuary 192	una.			
		TWORK	ever	Register.
N. B.—Any party defendant is	entitled to a copy of t	he bill upon applicat	tion to the Regist	er.

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PUBLISHED EVERY THURSDAY

# THE BALDWIN TIMES

#### PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE ADVERTISING RATES GIVEN ON APPLICATION

R.B. VAIL

BAY MINETTE, ALA.

# ALFIDAVIT OF PUBLICATION STATE OF ALABAMA, BALDWIN COUNTY. being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette,, Baldwin County, Alabama; that the notice hereto attached of mcmillan Vencer 6 no Was published in said Newspaper for \_\_\_\_\_ consecutive weeks in the following

Bay Minette, Ala., Lea 30 1927

Ifan J. M. Recherous

IN ACCOUNT WITH

# G. W. Humphries

JUDGE OF PROBATE, BALDWIN COUNTY

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

Your Orator, the Bacon-McMillan Veneer Company, a corporation, brings this bill of complaint against that certain land in Baldwin County, Alabama, described as Southeast quarter of Southeast quarter of Southeast quarter of Northeast quarter and Northeast Division of Southwest quarter of Section Thirty-two, and Subdivision "C", of Section, Nineteen, all in Township Two North, Range Two East, and against the unknown heirs, devisees, personal representatives and next of kin of William H. Lancaster, Cornelius Bryars, Andrew Bryars, Edward Lancaster, Jr., and against

Cornelius Bryars,
Andrew Bryars,
Mary Wing,
Bettie Fox,
Tom Wing,
Levi Deason,
Willie Deason,
Gussie Deason,

and against the unknown heirs, devisees, personal representatives and next of kin of the said

Cornelius Bryars,
Andrew Bryard,
Mary Wing,
Bettie Fox,
Tom Wing,
\* Levi Deason,
\* Willie Deason, and
\* Gussie Deason,

if they, or any of them, are dead, and against any and all persons, firms or corporations claiming any title to, interest in, lien or incumbrance upon the said land or any part thereof, and your Orator respectfully shows:

# FIRST.

Your Orator is a corporation organized under the laws of the State of Alabama, and having its principal place of business at Stockton, in Baldwin County, Alabama, and claims to own in its own right and is in actual peaceable possession of the land in Baldwin County, Alabama, described as:

Southeast quarter of Southeast quarter of Section

Twenty-nine, Northeast quarter of Northeast quarter and North-east division of the Southwest quarter of Section Thirty-two, and Subdivision "C" of Section Nineteen, all in Township Two North, Range Two East,

and claims title to said land absolutely and in fee simple. Its said title was derived as stated in second paragraph hereof, and no suit is pending to test its title to, interest in, or right to possession of said lands, and your Orator and those through whom it claims has held color of title to, claimed and paid taxes on the said land during the entire period of ten or more consecutive years next preceding the filing of this bill of complaint, and no other person, firm or corporation has paid any taxes thereon or had any possession of said land or any part thereof, and no other person is known to your Orator to have claimed said land or any part thereof during any part of said period. The individuals herein named as defendants, if living, are over the age of twenty-one years, and your Orator is informed and believes, and upon such information and belief states that the individuals, William H. Lancaster and Edward Lancaster, Jr., hereinabove first named, are dead, and their heirs, devisees, personal representatives and next of kin are over the age of twentypone years, and are

> William Lancaster, Jim Richerson, Martha Arnett, Susie Lancaster, Alice Richerson Tom Richerson Chester Richerson Mintie Richerson Logan Richerson Florence Richerson Bennie Richerson, William Lancaster, Morgan Lancaster, John Lancaster, May A. Lancaster, Alice Lancaster McDonald, Maccie Lancaster Taylor Buck Taylor, Percy Taylor, Tidd Taylor Claudia Taylor Tillie Taylor, Hilary Taylor, Hilary Taylor, Jr., Tillie Pressley, Mary Wing, Bettie Fox, Tom Wing, √Levi Deason, Willie Beason, and Gussie Deason,

all of whom live in Baldwin County, Alabama, except the six last named. The said Cornelius Bryars and Andrew Bryars, if living, are over the age of twenty-one years, and are nonresidents of the State of Alabama, and if the said Cornelius Bryars and Andrew Bryars are dead, their heirs, devisees, personal representatives and next of kin are over the age of twenty-one years, and are non-residents of the State of Alabama. The said Cornelius Bryars and Andrew Bryars, more than fifty years ago, left Alabama, and your Orator is informed and believes, and upon such information and belief states, went to, and took up their permanent residence at Shreveport, in the State of Louisiana, and have been non-residents ever since, and your Orator does not know the names and present residence of their heirs, devisees, personal representatives and next of kin. It has used due diligence to ascertain the names of such unknown heirs, devisees, personal representatives and next of kin by inquiring of persons living in the locality of the land hereinabove described, and inquiring of relatives of the said Cornelius Bryars and Andrew Bryars, who still live in Baldwin County, Alabama, and cannot ascertain such residence further than the said Cornelius Bryars and Andrew Bryars went to Shreveport, Louisiana many years ago and have not been heard from, since. The saud Mary Wing, Bettle Fox and Tom Wing are non residents of the State of Alabama, and are over the age of twenty-one years, when last heard from, they were residents of some place in the State of Connecticut, having gone to that State to live, but none of the family has heard from them in many years, and their place of residence is unknown. If dead, their heirs, devisees, personal representatives and next of kin are over the age of twenty-one years, and are non-residents of the State of Alabama. The said Levi Deason, Willie Deason and Gussie Deason are over the age of twenty-one years, and when last heard from they were living in Mobile, Mobile County, Alabama, and your Orator believes they are located in said county at the present time. Your Orators cannot ascertain the names and residences of any of defendants further than is hereinabove stated, although it has used due diligence by inquiring of everyone who could be supposed to have personal knowledge of the facts. Orator does not know whether the individuals, Cornelius Bryars, Andrew Bryars, Mary Wing, Bettie Fox and Tom Wing are living or not.

## SECOND.

Orator further shows that its record title to the said land is shown by the instruments of writing describing said land and duly recorded on the records of Baldwin County, Alabama, as follows, viz:

Deed from W.H.Gasque, Probate Judge, to M.M.McMillan and T.M.McMillan, dated March 2nd., 1874, recorded in Deed Book "K", page 34; deed from Andrew Lancaster to M.M.McMillan and T.M.McMillan, dated September 26th., 1874, and recorded in Deed Book "K", page 163-4; deed from heirs of M.M.McMillan to T.M.McMillan, dated August 25rd., 1890, recorded in Deed Book 21, page 270; deed from T.M.McMillan to Mobile Timber Company, dated July 22nd., 1909, recorded in Deed Book 15, N.S., page 185; deed from Mobile Timber Company to J.C. Turner, dated October 18th., 1917, recorded in Deed Book 27, N.S., page 88; deed from Mobile Timber Company to Orator, dated January 1923, and filed for record in the Probate Court of Baldwin County, Alabama. Orator further shows that in his will probated in Baldwin County, Alabama, Edward Lancaster devised to Cornelius Bryars and Andrew Bryars a one-half interest in the Southeast quarter of the Southeast quarter of Section Twenty-nine, Township Two North, Range Two East, which is the only part of the land hereinabove described the said Andrew Bryars and Cornelius Bryars were ever interested in; that the said Andrew Bryars and Cornelius Bryars undertook to convey the said land, but described the same as:

"All that farm or piece of land situate in Baldwin County, being part of Southeast quarter of Southeast quarter, Section Twentynine, Township Two North, Range Two East",

and Orator shows that the last named deed undertakes to describe the only part of said lands hereinabove described in which the said Cornelius Bryars and Andrew Bryars appear to have ever had a claim, but they are named as parties defendant because they acquired a half interest in the land described in Section Twenty-nine, by Will from William H. Lancaster, and in their conveyance to R.H.Bryars under whom your Orator claims, the description is void for indefiniteness. The land stands upon the records of the Probate Court of Baldwin County, where the land is situated, in the name of your Orator. Your Orator further shows its chain of title to said land from T.M.McMillan and M.M.McMillan hereinabove referred to is perfect by deeds from said grantees duly recorded on the records of Baldwin County, Alabama. The chain of title of defendants was by patents to William H. Lancaster and Edward Lancaster, Jr., from the United States Government, dating back about seventy-five years ago.

Orator brings this bill of complaint against the land hereinabove described, and any and all persons, hereinabove named, mentioned or referred to, except the heirs of Edward Lancaster, Jr., and William H. Lancaster not specifically mentioned as parties defendant, and against any and all persons, firms and corporations claiming the said land or any part thereof, or any interest therein, or any lien or incumbrance thereon, and against the heirs, devisees, personal representatives and next of kin of any and all of them for the purpose of establishing Orator's title to and interest in the said land, and clearing up all doubts and disputes concerning same.

# PRAYER FOR PROCESS:

The premises considered, Orator prays that the land hereinabove described, the defendants herein named, and the unknown heirs, devisees, personal representatives and next of kin of each of them, and all persons, firms or corporations claiming any title to or interest in or lien or incumbrance on said land, or any part thereof, be made parties defendant to this bill of complaint, and brought into this court by proper process, and be required to plead, answer or demur to this bill of complaint within the time required by law and under the rules of this Honorable Court, and that notice of the pendency of this bill of complaint be published and a certified copy thereof be filed in the Probate Court of Baldwin County, Alabama, and that such other notice of the pendency of this bill of complaint be given as may be required by law or the rules of this Honorable Court.

## PRAYER FOR RELIEF:

Orator prays that if any of the defendants or any person, firm or corporation claim said land or any part thereof, or any interest therein, or lien or incumbrance thereon, he or they be required to set forth and specify such claim, title, interest, lien, or incumbrance, and to set forth and specify how and by what instrument the same is derived or created. Orator further prays that upon a final hearing of this cause, it will be ordered,

adjudged and decreed that Orator, at the time of filing this bill of complaint, and at the time such decree was rendered, has the legal title to the above described land, and that none of the defendants or any other person, firm, or corporation have or own the same or any part thereof, or have any right or title therein or thereto, or any lien or incumbrance thereon.

Orator further prays for such other, further, different and general relief as in equity and good conscience it may be entitled to receive in the premises, and Orator will ever pray, etc.

Clegne One Forcer Solicitors For Complainant.

FOOT NOTE: The respondents are required to answer each and every allegation and paragraph of the foregoing bill of complaint, but not under oath, answer under oath being hereby expressly waived.

Complete Pour Solicitors For Complainant.

STATE OF ALABAMA, COUNTY OF MOBILE.

Before me, Lelia C. Harris, a Notary Public in and for said State and County, personally appeared B.F. McMillan, Jr., who is known to me, and who being sworn, says on oath that he is a member of the firm McMillan & Grove, attorneys for complainant in the foregoing cause; and that the facts hereinabove stated in the foregoing bill of complaint are true.

Sworn to and subscribed before me, this 77th. day of

fleresty 927

Notary Public, Mobile County, Alabama.

B. J. Wemillaco

EXHIBIT "A".

October 28, 1926.

Bay Minette Turpentine Company,

Bay Minette, Alabama.

#### Gentlemen:-

We write to say that in consideration of the sum of \$800.00 of which you have paid \$100.00 in cash and have given us your note for \$700.00 due June 15, 1927, at 8% interest, we hereby lease to you the right to work for turpentine purposes the growing ;pine timber on the lands hereinafter stated, to-wit:-

On the lands we own in Section thirty-six, Township two south, range three east and in sections twelve, thirteen and twenty-four in township three south, range three east and in sections seven and eight in township two south, range four east.

As to the foregoing lands this lease runs to December 31, 1927, and you are privileged to back box the timber and cut new faces.

The following lands we lease to you for a period of three years to December 31, 1929, to-wit:-

The lands we own in Section Seven, Fownship.
Three South, Range Three East and in Section Nineteen, Township
Two South, Range Three East,

In the event you fail to pay the note above mentioned within ten days after it is due we are privileged to cancel the lease immediately and all your rights in said section and the timber thereon shall immediately cease and determine.

Yours very truly,
SIGNED Bay Minette Land Company
by Hampton D. Ewing,
Prest.

EXHIBIT "A".

ប្រូវដើ

to receive under the allegations and proof they will ever pray, etc.,

HENRY D. MOORER, Attorney for Complainants.

FOOT NOTE:-

The respondent, Bay Minette Land Company, is required to answer each and every paragraph of this original bill of complaint, numbered from FIRST to SECOND, both inclusive, but not under oath, answer under oath is hereby expressly waived.

HENRY D. MOORER, Attorney for Complainant.

C a 3

in Section Seven, Township Three South, Range Three East, when it was the intention and purpose of said lease to describe Section Seven, Township Three South, Range Four East; that there was a mistake made in describing the said lands on the part of the said Bay Minette Land Company.

That your petitioners have made or caused to be made a request to correct the said description to the said Bay Minette Land Company and that the said Bay Minette Land Company has failed and refuses to do so.

#### PRAYER FOR PROCESS.

THE PREMISES CONSIDERED Your petitioners respectfully pray that the said Bay Minette Land Company be made party respondent to this original bill of complaint by the usual process of this honorable court; that they be required to demur, plead to or answer the same within the time and under the pains and penalties as required by law or that the same be forever confessed.

#### PRAYER FOR RELIEF.

Your petitioners pray that on the final hearing of this cause the said Bay Minette Land Company, a corporation, be required to amend the said lease or to execute another lease leasing to your petitioners according to the terms and conditions of the original lease, a copy of which is attached to this original bill and marked as Exhibit "A", the lands owned by the Bay Minette Land Company, a corporation, in Section Seven, Township Three South, Range Four East, Baldwin County, Alabama; that this Honorable Court will enter an appropriate order and decree for the purpose of cancelling from the present lease the lands owned by the Bay Minette Land Company, a corporation, in Section Seven, Township Three South, Range Three East, Baldwin County, Alabama.

That if your petitioners be mistaken in the relief prayed for that Your Honor will grant unto them such other further, different and general relief as they in justice and equity may be entitled

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT,

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

0 e

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

Your petitioners, E. G. McMillan and W. S. McMillan, doing business under the firm name and style of the BAY MINETTE TURPENTINE COMPANY, humbly complaining respectfully represents and shows unto Your Henor as follows:-

#### FIRST:

That they are over the age of twenty one years and are bona fide resident citizens of Baldwin County, Alabama, residing at Bay Minette, in said County and State.

That the BAY MINETTE LAND COMPANY, is a corporation whose principal place of business is Bay Minette, Baldwin County, Alabama;

SECOND:

That on to-wit:- October 28th., 1926, the

Bay Minette Land Company executed a lease with the right to work for

turpentine purposes the growing pine timber on the lands hereinafter

described, a copy of said lease is hereto attached and marked Exhibit "A",

and made a part of this petition as though fully set out herein, said

lands being described as follows, to-wit:-

Lands owned by the Bay Minette Land Company in Section Thirty Six, Township Two South, Range Three East, and in Sections Twelve, Thirteen and Twenty Four in Township Three South, Range Three East and in Sections Seven and Eight in Township Two South, Range Four East;

Lands owned by the Bay Minette Land Company in Section Seven, Township Three South, Range Three East and in Section Nineteen, Township Two South, Range Three East, said lands being in Baldwin County, Alabama,

That the said lease incorrectly describes a portion of the said property in that it describes the lands we own

Largest Weekly Circulation in South Alabama

Bay Minette, Ala. 2/1/27

THE BALDWIN TIMES

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

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THE BALDWIN TIMES

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PROMPT SERVICE. LOWEST PRICES.

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PUBLISHED EVERY THURSDAY

# THE BALDWIN TIMES

#### PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE ADVERTISING RATES GIVEN ON APPLICATION

R. B. VAIL EDITOR AND PROPRIETOR .

BAY MINETTE, ALA.

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	Date of second publication		
	Date of third publication	no ich an	
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GLADYS MCGILL HALL, Complainant,

-vs-

LUTHER HALL. Defendant.

IN THE CIRCUIT COURT-EQUITY SIDE. STATE OF ALABAMA. BALDWIN COUNTY.

TO THE HON. THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY AND THE HON. JOHN D. LEIGH, JUDGE, THEREOF; SITTING IN EQUITY:

Comes your complainant, Gladys McGill Hall and exhibits this, her bill of complaint for divorce against Luther Hall on the grounds of abandonment and shows unto your Honor and unto this Court as follows:-

- (1). That your complainant is 19 years of age and the defendant is over 21 years of age; that your complainant is a bona fode resident of Baldwin County, Alabama, residing at Perdido Station and has been such a resident for more than three years next immediately preceding the filing of this Bill of Complaint; that the address or whereabouts of defendant is unknown to complainant and cannot and could not be ascertained although she has made diligent inquiries to that end.
- (2). That your complainant and the defendant were married on heretofore to-wit: July 3rd., 1923, at Pascagoulà, Mississippi, and lived to-gether as man and wife until to-wit: July 24th., 1923 when defendant voluntarily deserted and abandoned your complainant without just cause or legal excuse; that such abandonment took place at Perdido Station, Baldwin County, Alabama, more than two years before the filing of this suit and has continued without interruption.

### PRAYER FOR PROCESS & RELIEF:

THE PREMISES CONSIDERED, your complainant prays that all necessary orders and subpoenas be issued in this cause to make the said Luther Hall party defendant hereto; that upon a final hearing hereof that it be decreed that the bonds of matrimony heretofore existing between the complainant and the defendant be forever dissolved and that your complainant be again permitted to contract the marriage relation should she so desire and as in duty bound, she will ever pray, etc. etc.,

NORBORNE STONE, SOLICITOR FOR COMPLAINANT.

FOOT NOTE:

The defendant is required to answer each and every paragraph of the foregoing Bill of Complaint from 1 to 2 both inclusive, but answer under oath is hereby expressly waived.

NORBORNE STONE, SOLICITOR FOR COMPLAINANT.

GEADYS MCGILL HALL, Complainant,

-vs-

LUTHER HALL, Defendant. IN THE CIRCUIT COURT-EQUITY SIDE. STATE OF ALABAMA. BALDWIN COUNTY.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority in and for said state and county, personally appeared Gladys McGull Hall who is known to me and who, after being by me first duly and legally sworn, doth depose and say under oath:

That he name is Gladys McGill Hall and she is the complainant in the above styled cause now pending in the Circuit Court, Equity Side, Baldwin County, Alabama and wherein Luther Hall is the defendant; that Luther Hall is over the age of twenty one years, that his whereabouts are unknown and cannot be ascertained by affiant although she has made diligent inquiry to that end; that service by publication is necessary against the said Luther Hall in said cause.

Gladye Male Hall

Sworn to and subscribed before me, a Notary Tublic who se seal is hereto affixed this January 10th...

Notary Publica Baldwin County, Alabama.

State of Alabama Baldwin County

In The Circuit Court,

Baldwin County.

In Equity.

Your Orator, J.T. Bell, respectfully represents and shows unto Your Hone

That he is a bona fide resident citizen of Baldwin County, Alabama, who resides at Uriah or near Uriah in saidd county and has resided in said Baldwin County, Alabama, for more than three years next preceeding the filing of this Bill; that he cover the age of twenty one years.

#### Second

That Mary E Bell is a resident citizen of Escambia County, Alabama, residing at Wallace, Alabama in said county; that she has been abona fide resident of Escambia County, Alabama, for more than three years next preceding the filing of the bill in this cause; that she is over the age of twenty one years.

#### Third.

That your Orator and the said Mary E Bell were lawfullyxinmarried

and lived together as husband and wife until January 1st,1924

at which time the said Mary E Bell voluntarily abandoned your said 
Orator without just cause and without fault on his part. Said act was

committed in County, Alabama. Your said rator having

moved to Baldwin County, where he had employment and the said Mary E

Bell refused and failed to go with him to Baldwin County and did then and

there abandon your orator on towit, January 1st, 1924.

The premises Considered, your Orator respectfully prays that the said Mary E Bell be made a party respondent to this bill of complaint by the usual process of this Honorable court; that such orders, decrees and publications be made as necessary to perfect service on the said Mary E Bell and that she be required to demur, plead to or answer the same within the time and under the penalties as provided by law or that the same be forever confessed.

**-** ®€

· 1

Prayer for Relief.

That upon the final hearing of this cause Your Honor will grant unto Your Orator an absolute divorce from the said Mary E Bell.

That if your Orator is mistaken in the relief prayed for then your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray etc

& Gentins

Solicitor for Complainant.

FootNote:

Defendant is required to answer every allegation contained in the foregoing bill, paragraph one to three inclusive, but not under oath.

Answer under oath is hereby expressly waived.

Solicitor for Complainant.

JABell Complainent Mary & Beel Respondant

Filed Jan 2 1927 Die Riemann Pages

J. T. BEIL,
Complainant.

IN THE CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA.

MARY E. BELL,
DEFENDANT.

Comes the defendant, Mary E. Bell, and files this her plea to the jurisdiction of the Court in this cause, appearing specially for this purpose only and without waiving any of her other rights and remedies in the premises, and thereupon she says:

- l. The defendant is a resident of Escambia County, Alabama, and was residing in said county and state at the time the bill of complaint was filed in this cause. The complainant and the defendant intermarried in October, 1904, and lived together until some time in early part of May, 1925, at which time, while living together in Escambia County, Alabama, the complainant voluntarily and without just cause or excuse abandoned the defendant, and has never returned nor offered to return to live with her. The complainant has never since the time of said abandonment offered to provide or furnish the defendant a home elsewhere.
- 2. The defendant further says that this Court has no jurisdiction to hear and determine the issues presented in and by the her bill of complaint exhibited against/in this cause, on the contrary she avers that the Circuit Court of Escambia County, Alabama, equity side, has the exclusive jurisdiction as to these proceedings, both as to the subject matter and the person of the defendant.

Wherefore, the defendant prays that this Court shall not further consider the matters presented in and by said bill of that complaint, and/these proceedings be hence dismissed.

HYBART, HARE & RANKIN, Solicitors for Defendant. THE STATE OF ALABAMA)
ESCAMBIA COUNTY.

Before me, C. F. Rankin, Register of the Circuit Court in and for said County in said State, personally appeared H. C. Rankin, known to me to be solicitor for the defendant in the foregoing cause now pending in the Circuit Court of Baldwin County, Alabama, wherein J. T. Bell is complainant, and Mary E. Bell is defendant, and who, being by me first duly and legally sworn, deposes and says on cath, that he is one of the solicitors for the defendant in said cause, that he is informed and believes, and upon such information and belief states, that the facts and statement contained in the foregoing plea, are true and correct and therein set forth.

NoRanken

Subscribed and sworn to before me, this 19th day of March, 1927.

Register of Circuit Court, Escambia County, Alabama.

J. T. Bell Complainant Mary E Bell Defendant Gircuit Court Baldrein County Stabanna In Equity SPECIAL PLEA Filed Mends 21/927 I N. Receumn Register

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Frayer for Relief.

That upon the final hearing of this cause Your Monor will grant unto Your Orator an absolute divorce from the said Mary & Bell.

That if your Orator is mistaken in the relief proyed for then your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray etc

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Solicitor for Complainant.

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State of Alabama Baldwin County

Baldwin County.
In Equity.

To The Honorable John D Leigh, Judge of The Circuit Court, Baldwin County Alabama . . . . . . . . . . . . . . . In Equity.

Your Orntor, J.T. Bell, respectfully represents and shows unto Your Hono as follows:-

That he is a bona fide resident citimen of Baldwin County, Alabama, who resides at Uriah or near Uriah in said county and has resided in said Baldwin County, Alabama, for more than three years next preceeding the filing of this Bill; that he over the age of twenty one years.

# Second

That Mary E Bell is a resident citizen of Escembia County, Alabama, residing at Fallace, Alabama in said county; that she has been bone fide resident of Escambia County, Alabama, for more than three years next proceeding the filing of the bill in this cause; that she is over the age of twenty one years.

#### Third.

That your Crator and the said Mary E Bell were lawfullyrinmerried to Combine along all the said Mary E Bell voluntarily abandoned your said—

Orator without just cause and without fault on his part. Said act was committed in Baldwin. County, Alabama. Your said Crator having moved to Baldwin County, where he had employment and the said Mary E Bell refused and failed to go with him to Baldwin County and did then and there abandon your orator on towit, January 1st, 1926.

The premises Considered, your Orator respectfully prays that the said Mary E Bell be made a party respondent to this bill of complaint by the usual process of this Honorable court; that such orders, decrees and publications be made as necessary to perfect service on the said Mary E Bell and that she be required to demur, plead to or answer the same within the time and under the penalties as provided by law or that the same be forever confessed.

The State of Alabama,  Baldwin County.  Circuit Court of Baldwin County, In Equity.
To any Sheriff of the State of Alabama-GREETING:
WE COMMAND YOU, That you summon Loxley Concrete and Construction
Company, a Corporation,
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of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
***************************************
Loxley State Bank a Corporation,
***************************************
against said Governor of One
Loxley Concrete and Construction Company a Corporation,
<del></del>
and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return
this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.
WITNESS, T. W. Richerson, Register of said Circuit Court, this 26th day of
Towns order
Macure Register.
N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

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SERVE ON	THE STATE OF ALABAMA, BALDWIN COUNTY.
Circuit Court of Baldwin County In Equity.	Received in office this 26th
No.	day of January 192 7
SUMMONS	
Loxley State Bank a	Sheriff.
Corporation	Executed this 28th day of
	January 1927
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vs.	Loyley Constile + Constructions Co
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Solicitor for Complainant	
Recorded in VolPage	

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LOXLEY STATE BANK, A Corporation, Complainant,

-VS-

LOXLEY CONCRETE & CONSTRUCTION COMPANY, a corporation,

Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE. STATE OF ALABAMA.

BAIDWIN COUNTY.

TO THE HON. THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your complainant and exhibits this its Bill of Complaint against the Loxley Concrete and Construction Company, a corporation and shows unto your Honor and unto this Court as follows:-

- (1). That both complainant and respondent are domestic corporations of Alabama with their principal offices or
  places of business in Baldwin County, Alabama, at Loxley; that
  Leon Comstock is the agent of and for the respondent and resides
  at Loxley, Alabama.
- complainant under and by virtue of two promissory notes executed by respondent and payable to the order of complainant, the first note being for Eight hundred dollars (\$800.00) dated July 3rd., 1926 and payable October 20th., 1926 and the second note being for Five Hundred Dollars (\$500.00) dated July 19th., 1926 and payable on demand. That there is now due and owing under said notes the sum of Thirteen Hundred Dollars (\$1300.00) as the principal and in addition thereto interest at 8% from their respective due dates to-gether with reasonable attorneys fees for collection thereof, all of which respondent agreed to pay in and by and as a part of said notes.
- (3). That for the purpose of collecting amounts due it by the respondent under said instrument, your complainant has

instituted and there is now pending in the Circuit Court Law Side of Baldwin County, Alabama, a suit against the respondent on said notes.

- (4). That the respondent is the owner of Lot No. 7 in Block No. 14 of Mahler's Park Addition to Loxley, Baldwin County, Alabama but by reason of respondents failure or refusal to secure and place of record evidence of such ownership your complainant cannot know whether such title of respondent in and to said property is legal or equitable and by reason of respondent failing or refusing to place his evidence of title of record the kind, nature and extent of such ownership is concealed and hidden so that your complainant is now and will be unable to subject it to the payment of the above debts and by reason of the insufficiency of visible assets of respondent subject to the payment of its debts under legal execution the claim of complainant will remain unsatisfied and unpaid if respondent's title and ownership be not established and made subject to legal process.
- (5). That your complainant is now without remedy at law to subject said property of respondent to the satisfaction of said debts.

## PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED: complainant prays that all necessary orders, summons and notices be issued and caused to be served as are necessary to make the Loxley Concrete and Construction Company, a corporation, party defendant in this cause, requiring the debtor, the above named respondent, to answer on oath and disclose all property real or personal in which it may have or may claim an interest, legal or equitable, all monies, effects or choses in action in which it may have or claim an interest, legal or equitable; where such property, real or personal, is situated or may be found; who has, or may claim possession thereof;

in whose possession are the monies, effects or choses in action in which it has or may claim an interest, legal or equitable, and where such monies, effects, or choses in action may be found and the kind, nature and extent of its title, interest, ownership or claim in, to or on the above described Lot No. 7 in Block 14 of Mahler's Park Addition to Loxley, Baldwin County, Alabama.

That your Honor will make or cause to be made all such orders or decrees as may be necessary and proper to reach and subject all property of the respondent, real and personal, or any interest in property real or personal subject to the payment of debts, or any money, effects or choses in action or any interest therein, of the respondent subject to the payment of debts, whether such property, monies, effects or choses in action be within or without the State and, if necessary for that purpose, appoint a Receiver with authority to demand, sue for and recover or otherwise to reduce to possession such property, monies, effects or choses in action and, if necessary, require the debtor to make to such Receiver all conveyances, assignments or transfers which may be necessary and proper to enable him to receive, or to sue for and recover such property.

And if your complainant be mistaken in the relief herein prayed for then that your Honor grant unto it such other, further or different relief to which it may be in equity and good conscience entitled. And, as in duty bound, your complainant will ever pray, etc.

Intermetions Talentes for Complainment

The	State of Alabama, (C) Baldwin County.	ircuit Court of Baldwin County, In Equity.
To an	any Sheriff of the State of Alaban	18—GREETING:
	WE COMMAND YOU, That yo	ou summon <u>Dora Lee Anderson</u>
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of Ba	aldwin County, exercising Chancer	nty, to be and appear before the Judge of the Circuit Court y jurisdiction, within thirty days after the service of Sum- mur, without oath, to a Bill of Complaint lately exhibited by
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and said	d further to do and perform what said	aid Judge shall order and direct in that behalf. And this the under penalty, etc. And we further command that you return eon, to our said Court immediately upon the execution therecf.
		egister of said Circuit Court, this26 day of
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SERVE ON	THE STATE OF ALABA  BALDWIN COUNTY
Circuit Court of Baldwin County In Equity.	
	Received in office this
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Dora Lee Anderson	
	By
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Mabry & Crovatt.  Solicitor for Complainant	
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o any Sheriff of the State of Alabama—GREETING	<b>3.</b>
WE COMMAND YOU, That you summon	Dora Lee Anderson
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against said Dora Lee Anderson	· · · · · · · · · · · · · · · · · · ·
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a souther to do and perform what said Judge shall	l order and direct in that behalf. And this the
a Description of wise omit, under penalty,	etc. And we further command that you return
this writ with your endorsement thereon, to our said	Court immediately upon the execution thereci.
WITNESS, T. W. Richerson, Register of said	Circuit Court, this26day of
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## THE STATE OF ALABAMA, BALDWIN COUNTY.

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JOHN HENRY ANDERSON: Complainant,

-V3-

DORA LEE ANDERSON. Vofendant. IN THE CIRCUIT COUNT-EQUITY SIDE STATE OF ALABAMA. BALDNIE COUNTY.

TO THE HON. THE CIRCUIT COURT OF BALDWIN COUNTY, ALAZ BAMA, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, SITT-ING IN EQUITY:-

Vomes your Complainant, John Henry Anderson and exhibits this his Bill of Complaint for divorce against Dora Lee Anderson and shows:-

- (1). That both complainant and defendant are over 21; that your complainant is a bonn fide resident of Baldwin County, Alabama and has been such bonn fide resident foremore than three years next immediately proceding the filing of this complaint; that the whereabouts of the defendant is unknown and could not and council to ascertained by complainant although he has made diligent inquiry to that end.
- (2). That your complainant and defendant were married on heretofore to-wit: December 17th., 1921 and lived to-gether as man and wife until on to-wit: during the month of September, 1926, when on account of the matters hereinafter complained of, they separated.
- (3). That the defendant during the month of September,

  1926, and prior thereto committed adultery with one Jeff Heard.

  PRAYER FOR PROCESS AND MEDIEF:

necessary orders and notices and summons be issued to make the above named Dora Lee Anderson party defendant to this cause, requiring her to appear and plead, answer or demur, within the time and under the pains and penalties prescribed by law and the rules of this court.

## (page two)

That upon a final hearing of this cause your Honor will render, adjudge and decree that the bonds of matrimony here-tofore existing between your complainant and the defendant be forever dissolved and that your complainant be again permitted to contract the merriage relation should he so desire and, as in duty, bound, your complainant will over pray, etc.

MABRY AND GROVATT. Solicitors for complainant.

FORT MOTTER .

The defendant Dora Lee Anderson is required to ansser each and every paragraph of the foregoing bill of complaint from first to third both inclusive, but not under oath as oath is hereby expressly waived.

> MABRY & CROVATT, Solicitors for Complainant,

JOHN HENRY ANDERSON, Complainant,

-vs-

DORA LEE ANDERSON, Defendant.

IN THE CIRCUIT COURT-EQUITY SIDE STATE OF ALABAMA.

BALDWIN COUNTY.

TO THE HOW. THE CIRCUIT COURT OF BALDWIN COUNTY, ALA2 BAMA, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your Complainant, John Henry Anderson and exhibits this his Bill of Complaint for divorce against Dora Lee Anderson and shows:-

- (1). That both complainant and defendant are over 21; that your complainant is a bona fide resident of Baldwin County, Alabama and has been such bona fide resident for more than three years next immediately preceding the filing of this complaint; that the whereabouts of the defendant is unknown and could not and cannot be ascertained by complainant although he has made diligent inquiry to that end.
- (2). That your complainant and defendant were married on heretofore to-wit: December 17th., 1921 and lived to-gether as man and wife until on to-wit: during the month of September, 1926, when on account of the matters hereinafter complained of, they separated.
- (3). That the defendant during the month of September, 1926, and prior thereto committed adultery with one Jeff Heard.

  PRAYER FUR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your complainant prays that necessary orders and notices and summons be issued to make the above named Dora Lee Anderson party defendant to this cause, requiring her to appear and plead, answer or demur, within the time and under the pains and penalties prescribed by law and the rules of this court.

(page two)

That upon a final hearing of this cause your Honor will render, adjudge and decree that the bonds of matrimony here-tofore existing between your complainant and the defendant be forever dissolved and that your complainant be again permitted to contract the marriage relation should he so desire and, as in duty, bound, your complainant will ever pray, etc.

MABRY AND CROVATT, Solicitors for complainant.

FOOT NOTE:-

The defendant Dora Lee Anderson is required to ansser each and every paragraph of the foregoing bill of complaint from first to third both inclusive, but not under oath as oath is hereby expressly waived.

MABRY & CROVATT, Solicitors for Complainant. County of Baldwin.

State of Alabama
County of Baldwin
John Henry Ander
Vs. John Henry Anderson Dora Lee Anderson.

Bill for Divorce. In Circuit Court. In Equity.

Personally appeared before me, the undersigned, who being first duly sworn deposes and says on oath that he is the complainant named in the foregoing bill for divocer and that the facts stated in said bill are true. and that the place of residence of the defendante is unknown. John hanny onde

Sworn to and subscribed before this January 4, 1927.

Chas, Lencin notary Inblie m Newry Audum 549

ora Lee audum 144all)

Friedfan 26/927, Til Reienson Negaror

**BECORD**