

~~761~~ 761

F. W. BRUCH,
Complainant,

vs.

LANDS HEREIN DESCRIBED
ET AL.,
Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

NO. 761.

REQUEST FOR DECREE.

In this cause all parties defendant being in default, the evidence having been taken and the cause being ready for submission for Final Decree, and no defense having been interposed, the Complainant, by Norborne Stone, as his Solicitor of Record, files this his Written Request and Motion that the cause be submitted for Final Decree.

Dated this December 16, 1929.

Norborne Stone
Solicitor for Complainant.

The above Motion and Request is hereby granted, and it is ordered that the Complainant make out his Note of Testimony, and that upon the same being filed, all papers in the cause be delivered to the Judge for Final Decree.

Dated this 16 day of December, 1929.

T. W. Richardson
Register.

F. W. BRUCH,
Complainant

-VS-

THE LANDS HEREBIN DESCRIBED AND
WILLIAM FISHER, GENEVEIVE FISHER,
MARCILETTE KREBS, JOSEPH KREBS,
JOSEPH GRELOT, WILLIAM GRELOT,
AYPOLITE FISHER, WILLIAM FISHER,
MARY ELLEN DAVID, CHARLES LEBARON,
WILLIAM A. LeBARON, AS TRUSTEE,
WILLIAM A. LeBARON, TRUSTEE,
SARAH HAMMON, JOHN HAMMON, WILLIAM
C. RAYNOR, MARTEA H. RAYNOR,
HERMAN JOSEPH LEERS, AND SOUTHERN
COMMERCIAL COMPANY, A CORPORATION,
STANDARD FULLERS EARTH COMPANY, A
CORPORATION, C. C. RUPRECHT AS
RECEIVER OF AND FOR STANDARD FULLERS
EARTH COMPANY AND E. J. BAGNALL.
Respondents.

IN THE CIRCUIT COURT -
EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

NO. _____.

* Notice is hereby given to William Fisher, Geneveive Fisher, Marcilette Krebs, Joseph Krebs, Joseph Grelot, William Fisher, William Grelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company and C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, devisees, personal representatives, next of kin and successors of William Fisher, Geneveive Fisher, Marcilette Krebs, Joseph Krebs, Joseph Grelot, William Fisher, William Grelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron, William LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company, C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, to any and all persons, firms and corporations who claim any title to, interest in, lien or encumbrance on the land hereinafter described, that on the 24 day of June, 1928, F. W. Bruch filed in the Equity side of the Circuit Court of Baldwin County, Alabama, his Bill of Complaint against the following land in Baldwin County, Alabama, viz:-

Beginning at the mouth of Bayou Saline on the East bank of Tensas River; thence up said Bayou to its intersection with a line drawn due West from the Southwest corner of Government Section Thirty (30), and the Northwest corner of Government Section Thirty-one (31), Township Three (3) South of Range Two (2) East; thence due East

to the range line dividing Range One (1) East from Range Two (2) East; thence due East 20 chains to a stake; thence North 45 degrees East 28.30 chains to a stake; thence North 60 ch., to a stake; thence North 20° East 10 ch., across a deep ravine to a stake on Bluff; thence West to Tensaw River thence in a southerly course following the meanders of the river to the point of beginning and being a part of the William Fisher Grant or Claim Section Forty-two (42), and Joshua Kennedy Grant or Claim, Section Forty-four (44), Township Three (3) South of Range One (1) and Two (2) East.

That said Bill of Complaint was and is filed for the purpose of establishing the title of said Complainant to said lands and for the purpose of quieting his title thereto and clearing up all doubts and disputes concerning the same.

That the Complainant alleges in his Bill of Complaint that the legal title to said lands stands on the records of the Probate Court of Baldwin County, Alabama, in the name of complainant and that he claims title to said lands by and through the following deeds and instruments, viz:- United States Patent to William Fisher of date May 30th., 1837, of record in Deed Book 19 N.S. page 622 and conveying a part of said lands; Deed from Geneveive Fisher and William Fisher, her son to Samuel Haines, of date December 16th., 1822, of record in Deed Book "C", pages 25-7 and conveying a part of said lands; Deed from Samuel Haines to Geneveive Fisher and William Fisher, her son, of date March 19th., 1825, of record in Deed Book "B", pages 446-7 and conveying a part of said lands; Deed from Geneveive Fisher to John Fowler, of date March 30th., 1830, of record in Deed "C", pages 295-6 and conveying a part of said lands; Deed from Marcilette Krebs and Joseph Krebs, her husband, Joseph Grelot and William Grelot, her husband, Aypolite Fisher and William Fisher, her husband to John Fowler of date March 30th., 1830, of record in Deed Book "C", pages 293-4, conveying a part of said lands; Deed from John Fowler to Joshua Kennedy, of date March 9th., 1836, of record in Deed Book "D", pages 2-4 and conveying a part of said lands; United States Patent to Joshua Kennedy of date May 30th., 1837, of record in Deed Book 19 N.S. page 622 and conveying a part of said lands; Deed from W. R. Hallett, Executor under Will of Joshua Kennedy, deceased, and Susan Kennedy to Charles W. Dorrance and Jackson Stannard, of date June 16th., 1847, of record in Deed Book "E", pages 357-8 and conveying a part of said lands; Deed from C. W. Dorrance

and Mary A. Dorrance, his wife, to Jackson M. Stanard, of date October 6th., 1848, of record in Deed Book "E", pages 427-8 and conveying an undivided interest in part of said lands; Deed from W. R. Hallett, Executor of the Estate of Joshua Kennedy, deceased to Jackson M. Stanard, of date May 15th., 1849, of record in Deed Book "E", page 491 and conveying a part of said lands; Will of J. M. Stanard, deceased, admitted to probate and record, September 12th., 1853, of record in Book "A" of Wills, page 126, devising all of said property; Deed from Charles LeBaron, Executor of the Last Will and Testament of J. M. Stanard, deceased to William LeBaron, of date February 12th., 1867, of record in Deed Book "H" pages 679-80 and conveying all of said lands; Deed from Wm. A. LeBaron and Eliza J. LeBaron, his wife, to Charles L. LeBaron, of date February 28th., 1867, of record in Deed Book "I", page 713 and conveying all of said lands; Deed from David C. Stapleton, as Sheriff of Baldwin County, Alabama, to Mrs. Jane LeBaron, of date March 18th., 1890, of record in Deed Book "Q", page 504-6, and conveying a part of said lands; Deed from Mrs. Julia LeB. Queant to Alexander Queant, of date February 28th., 1891, of record in Deed Book "Q", page 494, conveying an undivided interest in all of said lands; Deed from Jane LeBaron and Thom M. LeBaron, her husband, A. Queant and Julia LeBaron Queant, her husband to Wm. C. Raynor, of date April 20th., 1891, of record in Deed Book "R", page 104 and conveying an undivided interest in all of said lands; Deed from William A. LeBaron, Trustee to Dr. W. C. Raynor, of date April 20th., 1891, of record in Deed Book "R", pages 103-4 and conveying said lands; Deed from William C. Raynor and Martha H. Raynor, his wife, to Charles G. Bronson, of date April 20th., 1891, of record in Deed Book "R", pages 136-7 and conveying an undivided interest in all of said lands; Deed from Charles G. Bronson to William C. Raynor, of date Jan. 31st., 1891, of record in Deed Book "X", pages 431-3 and conveying said lands; Mortgage from W. C. Raynor to Wm. A. LeBaron, Trustee, and Alex Queant, of date April 20th., 1891, of record in Deed Book "Q", pages 556-7 and conveying said lands; Transfer of last named Mortgage by Wm. A. LeBaron, Trustee, and A. Queant to Charles C. Bronson, of date Nov. ____., 1891 and of record in Deed Book "R", page 217; Mortgage from William C. Raynor and Martha H. Raynor, his wife, to Charles G. Bronson, of date Jan. 31st., 1898, of record in

Mortgage Book No. 2, pages 80-3 and conveying said lands; Articles of Agreement between William G. Raynor and Otto W. Bengston, Charles J. Holmes and J. W. Newman, of date February 27th., 1899, of record in Deed Book "Z", pages 119-22 and covering said lands; Deed from William C. Raynor and Martha H. Raynor by Chas. K. Holt, Register and Master in Chancery, 13th District, Southwestern Chancery Division of Alabama to Charles G. Bronson, of date February 9th., 1901, of record in Deed Book 3 N.S. pages 419-20 and conveying said lands; Deed from Charles G. Bronson to N. M. Littlejohn and Miner G. Halverson, of date May 17th., 1901, of record in Deed Book 3 N.S. pages 690-1 and conveying said lands; Deed from W. C. Raynor and Martha H. Raynor, his wife, to George L. Alexander, Herman Pomrening, Charles Brussat, August Paulson and Joseph Lers, of date Sept. 27th., 1901, of record in Deed Book 4 N.S. pages 339-40 and covering said lands; Deed from N. M. Littlejohn and Jane S. Littlejohn, his wife, Minor G. Halverson and Jessie L. Halverson, his wife, to George L. Alexander, Herman Pomering, Charles Brussat, August Paulson and Joseph Lers, of date November 9th., 1901, of record in Deed Book 4 N.S. pages 471-3 and conveying said lands; Deed from George L. Alexander and Amalia Alexander, his wife, Herman Pomrening and Abbie Pomrening, his wife, Charles Brussat and Maude Brussat, his wife, August Paulson and Barbara Paulson, his wife, Joseph Lers and Mary Lers, his wife, to Southern Commercial Company, of date May 13th., 1902, of record in Deed Book 5 N.S. pages 564 and covering said lands; Deed from Southern Commercial Company to Standard Reduction Company, of date May 10th., 1907, of record in Deed Book 12 N.S. pages 346-7 and covering said lands; Certificate of change of name of Standard Reduction Company to Standard Fullers Earth Company, of date June 22nd., 1909, and of record in Corporation Record No. 1, pages 290-3; Deed from C. G. Ruprecht, as Receiver of and for Standard Fullers Earth Company, to E. J. Bagnall, of date Jan. 20th., 1911, of record in Deed Book 16 N.S. page 682 and covering said lands; Deed from E. J. Bagnall and Anna M. Bagnall, his wife, to The Fullers Earth Company, of date May 28th., 1915, of record in Deed Book 37 N.S. page 534 and covering said lands; Deed from The Fullers Earth Company to E. W. Bruch, of date August 4th., 1926, of record in Deed

Book 40 N.S. pages 418-19 and covering said lands; that in addition to the above instruments your Complainant's title is also derived from, under and through the following instruments of writing of record in Mobile County, Alabama, viz:- Will of Joshua Kennedy, Deceased, Probated December 22nd, 1838, of record in the Probate Court of Mobile, County, Alabama, in Will Book 2, page 27 and devising all of said lands to executor named therein; Last Will and Testament of Charles LeBaron, deceased, duly admitted to record and probate in the Probate Court of Mobile County, Alabama, of record in Book No. 5 of Wills, page 245 and devising a part of said lands; Deed from and between Ann LeBaron, M. Adeliza LeBaron, Joseph M. LeBaron, Florence LeBaron, Josephine Sands, Robert M. Sands, Mary E. Davis, by Thomas M. LeBaron, Attorney in Fact, Thomas M. LeBaron, Eliza LeBaron, Annie Stanard, Jane LeBaron, Julia M. LeBaron, Alexander LeBaron, Wm. A. LeBaron, Mary Keller, and Charles K. Keller, by Thomas M. LeBaron, Attorney in Fact, and Mary LeBaron to William LeBaron, to William LeBaron, as Trustee, of date October 31st., 1882, of record in Book 47 N.S. pages 174-6, of the Probate Records of Mobile County, Alabama, and conveying said lands; Power of Attorney from Thomas M. LeBaron, Jr., to Clara LeBaron, of date October 23d., 1882, of record in Misc. Book K, pages 568-9 in the office of the Judge of Probate of Mobile County, Alabama; Power of Attorney from Mary B. Keller and Charles Keller, her husband, to Thomas M. LeBaron, of date October 12th., 1882, of record in Misc. Book K, pages 565-6, in the office of the Judge of Probate of Mobile County, Alabama; Power of Attorney from Mary Ellen David to Thomas M. LeBaron, of date September 19th., 1882, of record in Misc. Book K, pages 566-7, in the office of the Probate Judge of Mobile County, Alabama.

And Complainant further alleges in his Bill of Complaint that he is in the quiet and peaceable possession of said lands, claiming to own the same absolutely and in fee simple; that he and those under whom he claims have paid taxes on said lands and held the same under color of title for more than 10 years next preceeding the filing of this Bill of Complaint and that during the said time no one else has paid any taxes on said lands or any part thereof.

Witness my hand this 2d day of June, 1928.

NORBORNE STONE
Solicitor for Complainant.

D. H. Riccison
As Register of the Circuit Court,
Equity Side, State of Alabama,
Baldwin County.

F. W. BRUCH,
Complainant

-vs-

THE LANDS HEREIN DESCRIBED AND WILLIAM FISHER, GENEVEIVE FISHER, MARCILETTE KREBS, JOSEPH KREBS, JOSEPH GRELOT, WILLIAM GRELOT, AYPOLITE FISHER, WILLIAM FISHER, MARY ELLEN DAVID, CHARLES LEBARON, WILLIAM A LEBARON, AS TRUSTEE, WILLIAM A. LEBARON, TRUSTEE, SARAH HAMMON, JOHN HAMMON, WILLIAM C. RAYNOR, MARTHA H. RAYNOR, HERMAN JOSEPH LERS, AND SOUTHERN COMMERCIAL COMPANY, A CORPORATION, STANDARD FULLERS EARTH COMPANY, A CORPORATION, C. C. RUPRECHT AS RECEIVER OF AND FOR STANDARD FULLERS EARTH COMPANY AND E. J. BAGNALL.

Respondents.

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

NO 761

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

Comes your Complainant, F. W. Bruch, and brings this his Bill of Complaint against the following described lands in the County of Baldwin, State of Alabama, viz:-

Beginning at the mouth of Bayou Saline on the east bank of Tensaw River; thence up said Bayou to its intersection with a line drawn ^{due West} from the Southwest corner of Government Section Thirty(30), and the Northwest corner of Government Section Thirty-one(31) Township Three(3) South of Range Two(2) East; thence due East to the Range line dividing Ranges One(1) East from Range Two(2) East; thence ^{due} East ~~20 chains to a stake~~; thence ^{due} N 45° E 20.30 ch to a stake; thence North 60 ch., to a stake; thence North 20° East 10 ch., across a deep ravine to a stake on Bluff; thence West to Tensaw River thence in a southerly course following the meanders of the river to the point of beginning and being a part of the William Fisher Grant or Claim, Section Forty-two (42), and Joshua Kennedy Grant or Claim, Section Forty-four (44), Township Three (3) South of Range One (1) and Two (2) East.

and against William Fisher, Geneveive Fisher, Marcilette Krebs, Joseph Krebs, Joseph Grelot, William Fisher, William Grelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron, William LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company, C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, devisees, personal representatives and next of kin and successors of said persons, firms or corporations and against any and all persons, firms or corporations claiming any

title to, interest in, lien or encumbrance on the above described lands or any part thereof and shows;

FIRST

That your Complainant is over the age of twenty-one years and claims in his own right and is in the actual, peaceable possession of the following described lands in Baldwin County, Alabama, viz:

Beginning at the mouth of Bayou Saline on the East bank of Tensaw River; thence up said Bayou to its intersection with a line drawn from the Southwest corner of Government Section Thirty (30), and the Northwest corner of Government Section Thirty-one (31), Township Three (3) South of Range Two (2) East, due East to the Range line dividing Range One (1) East from Range Two (2) East; thence East along said line 20 ch., to a stake, thence North 60 ch., to a stake; thence North 20° East 10 ch., across a deep ravine to a stake on Bluff; thence West to Tensaw River, thence in a southerly course following the meanders of the river to the point of beginning and being a part of the William Fisher Grant or Claim, Section Forty-two (42), and Joshua Kennedy Grant, or Claim, Section Forty-four (44), Township Three (3) South of Range One (1) and Two (2) East;

that your Complainant holds and has held color of title to the said lands for a period of 10 or more consecutive years next preceeding the filing of this Bill of Complaint and has paid taxes on said lands during the whole of said period; that your Complainant, together with those through whom he claims, have held color of title and paid taxes on the said lands during the whole of such period of time; that your Complainant and those through whom he claims title have paid taxes during the whole of said period of 10 years on all of said lands and no other person has paid taxes thereon during any part of said period; that your Complainant claims the title to said lands and all of said lands and every part thereof absolutely and in fee simple; that no suit is pending to test his title to, interest in or his right to the possession of said lands; that the title to all of said lands and every part thereof stands in the name of your complainant upon the records of the Probate Court of Baldwin County, Alabama, the county where the lands are situated; that no one has at any time within 10 years next preceeding the filing of this Bill of Complaint paid any taxes upon said lands or any interest therein nor is anyone known to Complainant to have had any possession of any part of said lands nor is anyone known to Complainant to claim said lands or any part thereof or any interest therein. The individuals

named herein as defendants, if living, are over the age of 21 years but your Complainant is informed and believes and upon such information and belief states that of the individuals named herein as defendants, William Fisher, Geneveive Fisher, Marcilette Krebs, Joseph Grelot, William Grelot, Aypolite Fisher, William Fisher, 100 Mary Ellen David, Charles LeBaron, William A. LeBaron, as Trustee and William A. LeBaron, Trustee, are dead; the names, residences and addresses of the heirs, devisees, personal representatives and next of kin of such defendants who are dead are unknown to your Complainant and could not and cannot be ascertained after diligent inquiry made by your Complainant but as to the other defendants named herein your Complainant does not know whether the individuals are dead nor whether the firms or corporations are still in existence, nor does your Complainant know and could not ascertain after diligent inquiry on his part made, the residences, and addresses of such other defendants; that if any of such other defendants are dead or do not continue to exist, your Complainant does not know and could not after diligent inquiry on his part made, ascertain the names, residences and addresses of their heirs, devisees, personal representatives, next of kin or successors; that as to all of such matters of which your Complainant does not know he has made diligent inquiry and exercised diligence to ascertain the facts, all as shown in Paragraph herein designated "THIRD".

-SECOND-

That Your Complainant's title to said land is derived from, under and through the following instruments of writing, all being duly recorded in the proper records in the Office of the Judge of Probate of Baldwin County, Alabama, the county where said lands are situated, viz:- United States Patent to William Fisher, of date May 30th, 1837, of record in Deed Book 19 N.S. page 622 and conveying a part of said lands; Deed from Genevieve Fisher and William Fisher, her son to Samuel Haines, of date December 16th, 1822, of record in Deed Book "C" pages 25-7 and conveying a part of said lands; Deed from Samuel Haines to Genevieve Fisher and William Fisher, her son, of date March 19th, 1825, of record in Deed Book "B" pages 446-7 and conveying a part of said lands; Deed from Genevieve Fisher to John Fowler, of date March 30th, 1830, of record in Deed

Book "C" pages 295-6 and conveying a part of said lands; Deed from Marcillette Krebs and Joseph Krebs, her husband, Joseph Grelot and William Grelot, her husband Aypolite Fisher and William Fisher, her husband to John Fowler of date March 30th, 1830, of record in Deed Book "C" pages 293-4, conveying a part of said lands; Deed from John Fowler to Joshua Kennedy, of date March 9th, 1836, of record in Deed Book "D" pages 2-4 and conveying a part of said lands; United States Patent to Joshua Kennedy of date May 30th, 1837, of record in Deed Book 19 N.S. page 622 and conveying a part of said lands; Deed from W. R. Hallett, Executor under Will of Joshua Kennedy, deceased and Susan Kennedy to Charles W. Dorrance and Jackson Stannard, of date June 16th, 1847, of record in Deed Book "E" pages 357-8 and conveying a part of said lands; Deed from C. W. Dorrance and Mary A. Dorrance, his wife to Jackson M. Stanard, of date October 6th, 1848, of record in Deed Book "E" pages 427-8 and conveying an undivided interest in part of said lands; Deed from W. R. Hallett, Executor of the Estate of Joshua Kennedy, deceased to Jackson M. Stanard, of date May 15th, 1849, of record in Deed Book "E" page 491 and conveying a part of said lands; Will of J. M. Stanard, deceased, admitted to probate and record, September 12th, 1853, of record in Book "A" of Wills, page 126, devising all of said property; Deed from Charles LeBaron, Executor of the Last Will and Testament of J. M. Stanard, deceased to William LeBaron, of date February 12th, 1867, of record in Deed Book "H" pages 679-80 and conveying all of said lands; Deed from Wm. A. LeBaron and Eliza J. LeBaron, his wife, to Charles L. LeBaron, of date February 28th., 1867, of record in Deed Book "I", page 713 and conveying all of said lands; Deed from David C. Stapleton, as Sheriff of Baldwin County, Alabama, to Mrs. Jane LeBaron, of date March 18th., 1890, of record in Deed Book "Q", pages 504-6 and conveying a part of said lands; Deed from Mrs. Julia LeB. Queant to Alexander Queant, of date February 28th., 1891, of record in Deed Book "Q", page 494, conveying an undivided interest in all of said lands; Deed from Jane LeBaron and Thom M. LeBaron, her husband, A. Queant and Julia LeBaron Queant, her husband to Wm. C. Raynor, of date April 20th., 1891, of record in Deed Book "R", page 104 and conveying an undivided interest in all of said lands; Deed from William A. LeBaron, Trustee to Dr. W. C.

Raynor, of date April 20th., 1891, of record in Deed Book "R", page 103-4 and conveying said lands; Deed from William C. Raynor and Martha H. Raynor, his wife, to Charles G. Bronson, of date April 20th., 1891, of record in Deed Book "R", pages 136-7 and conveying an undivided interest in all of said lands; Deed from Charles G. Bronson to William C. Raynor, of date Jan. 31st., 1898, of record in Deed Book "X", pages 431-3 and conveying said lands; Mortgage from W. C. Raynor to Wm. A. LeBaron, Trustee, and Alex Queant, of date April 20th., 1891, of record in Deed Book "Q", pages 556-7 and conveying said lands; Transfer of last named Mortgage by Wm. A. LeBaron, Trustee, and A. Queant to Charles G. Bronson, of date Nov. _____, 1891 and of record in Deed Book "R", page 217; Mortgage from William C. Raynor and Martha H. Raynor, his wife, to Charles G. Bronson, of date Jan. 31st., 1898, of record in Mortgage Book No. 2, pages 80-3 and conveying said lands; Articles of Agreement between William C. Raynor and Otto W. Bengston, Charles J. Holmes and J. W. Newman, of date February 27th., 1899, of record in Deed Book "Z", pages 119-22 and covering said lands; Deed from William C. Raynor and Martha H. Raynor by Chas. K. Holt, Register and Master in Chancery, 13th District, Southwestern Chancery Division of Alabama to Charles G. Bronson, of date February 9th., 1901, of record in Deed Book 3 N.S. pages 419-20 and conveying said lands; Deed from Charles G. Bronson to N. M. Littlejohn and Miner G. Halverson, of date May 17th., 1901, of record in Deed Book 3 N.S. pages 690-1 and conveying said lands; Deed from W. C. Raynor and Martha H. Raynor, his wife, to George L. Alexander, Herman Pomrening, Charles Brussat, August Paulson and Joseph Lers, of date Sept. 22nd., 1901, of record in Deed Book 4 N.S. pages 339-40 and covering said lands; Deed from N. M. Littlejohn and Jane S. Littlejohn, his wife, Miner G. Halverson and Jessie L. Halverson, his wife, to George L. Alexander, Herman Pomering, Charles Brussat, August Paulson and Joseph Lers, of date November 9th., 1901, of record in Deed Book 4 N.S. pages 471-3 and conveying said lands; Deed from George L. Alexander and Amalia Alexander, his wife, Herman Pomrening and Abbie Pomrening, his wife, Charles Brussat and Maude Brussat, his wife, August Paulson and Barbara Paulson, his wife, Joseph Lers and Mary Lers, his

wife, to Southern Commercial Company, of date May 13th., 1902, of record in Deed Book 5 N.S. page 564 and covering said lands; Deed from Southern Commercial Company to Standard Reduction Company, of date May 10th., 1907, of record in Deed Book 12 NS. page 246-7 and covering said lands; Certificate of change of name of Standard Reduction Company to Standard Fullers Earth Company, of date June 22nd. 1909 and of record in Corporation Record No. 1, pages 290-3; Deed from C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company, to E. J. Bagnall, of date Jan. 20th., 1911, of record in Deed Book 16 N.S. page 682 and covering said lands; Deed from E. J. Bagnall and Anna M. Bagnall, his wife, to The Fullers Earth Company, of date May 28th., 1915, of record in Deed Book 37 N.S. page 534 and covering said lands; Deed from The Fullers Earth Company, to F. W. Bruch, of date August 4th., 1926, of record in Deed Book 40 N.S. pages 418-19 and covering said lands; that in addition to the above instruments your Complainant's title is also derived from, under and through the following instruments of writing of record in Mobile County, Alabama, viz: Will of Joshua Kennedy, Deceased, Probated December 22nd., 1838, of record in the Probate Court of Mobile, County, Alabama, in Will Book 2, page 27 and devising all of said lands to executor named therein; Last Will and Testament of Charles LeBaron, deceased, duly admitted to record and probate in the Probate Court of Mobile County, Alabama, of record in Book No. 5 of Wills, page 245 and devising a part of said lands; Deed from and between Ann LeBaron, M. Adeliza LeBaron, Joseph M. LeBaron, Florence LeBaron, Josephine Sands, Robert M. Sands, Mary E. Davis, by Thomas M. LeBaron, Attorney in Fact, Thomas M. LeBaron, Eliza LeBaron, Annie Stanard, Jane LeBaron, Julia M. LeBaron, Alexander LeBaron, Wm. A. LeBaron, Mary Keller, and Charles K. Keller, by Thomas M. LeBaron, Attorney in Fact, Thomas M. LeBaron Jr., by Clara LeBaron, Attorney in Fact, and Mary LeBaron to William LeBaron, to William LeBaron, as Trustee, of date October 31st., 1882, of record in Book 47 N.S. pages 174-6, of the Probate Records of Mobile County, Alabama, and conveying said lands; Power of Attorney from Thomas M. LeBaron, Jr., to Clara LeBaron, of date October 23d., 1882, of record in Misc. Book K, pages 568-9 in the office of the Judge

Your Complainant brings this Bill of Complaint against the lands hereinabove described and against any and all persons, firms or corporations hereinabove mentioned and referred to and against all other persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof and against the heirs, devisees, personal representatives, next of kin and successors of any and all of them for the purpose of establishing Complainant's title to and interest in said lands and clearing up all doubts and disputes concerning same.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, Your Complainant prays that the lands hereinabove described, the defendants herein named and the unknown heirs, devisees, personal representatives, next of kin and successors of each of the defendants hereinabove mentioned and all persons, firms, or corporations claiming any title to, interest in, lien or encumbrance on said land or any part thereof be made parties defendant to this Bill of Complaint and be brought into this court by publication or other usual or proper process and be required to appear plead, answer or demur to this Bill of Complaint within the time prescribed 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 filed in the Probate Court of Baldwin County, Alabama; that such other notices of pendency of this Bill of Complaint be given as may be required by law or the rules of this Honorable Court.

PRAYER FOR RELIEF.

Complainant prays that if any of the defendants or any other person, firm or corporation claim said land or any part thereof, or any interest therein, or lien or encumbrance thereon, he, they or it may be required to set forth and specify such claim, title interest, lien or encumbrance, and set forth how, and by what instrument the same was derived or created. Complainant further prays that upon the final hearing of this cause, it will be ordered, adjudged and decreed that Complainant at the time of the filing of this Bill of Complaint had the legal title to the above described lands and that none of the defendants or any other person, have or

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own the same or any part thereof, or have any right, title or interest therein or thereto, or any lien or encumbrance thereon and Complainant prays for such otheer, further, different and general relief as in equity and good conscience he may be entitled to receive in the premises. And Complainant will ever pray, etc.

W. D. A.

STATE OF ALABAMA,

BALDWIN COUNTY,

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

That his name is Norborne Stone and that he is the Solicitor of record for Complainant in the foregoing cause and as such is fully empowered, instructed and authorized to make this affidavit for and as the agent, attorney and solicitor for F. W. Bruch, the Complainant; that he is fully acquainted with all matters and facts set forth in the foregoing Bill of Complaint and that the same are true.

Norborne Stone

Sworn to and subscribed before
me this 2^d day of June, 1928.

J. M. McCallister
Notary Public, Baldwin County,
State of Alabama.

F. W. BRUCH,
Complainant,

vs.

LANDS HEREIN DESCRIBED
ET AL.,
Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

NO. 761.

CERTIFICATE BY REGISTER AS TO ISSUANCE,
RECORDING AND PUBLICATION OF NOTICE OF
PENDENCY OF BILL OF COMPLAINT.

I, T. W. Richerson, Register of the Circuit Court, Equity Side, State of Alabama, Baldwin County, do hereby certify that in the above styled cause Notice of Pendency of Bill of Complaint was by me on June 2, 1928, duly drawn and signed, and was by me published once a week for four consecutive weeks in The Baldwin Times, a newspaper having general circulation and published in the County where the lands covered by this suit lie, and being the paper prescribed by the Court by an Order made in this cause on June 2, 1928, said Notice being published in the issues of June 7th, June 14th, June 21st and June 28th, 1928.

I further certify that a copy of the said Notice, certified by me as such Register as being correct, was by me filed for record on June 6, 1928, in the office of the Judge of Probate of Baldwin County, Alabama, the County where said lands lie, said Notice being recorded in Lis Pendens Book No. 1, pages 73-4-5.

I further certify that said Notice showed by what title Complainant claims the lands described in Bill of Complaint and his interest therein, and in whose name the title to said lands and the interest therein sought to be established stands on the records of the Probate Court of Baldwin County, Alabama, the County where the lands lie, and who, if any one, is known to have paid taxes upon said property or to have been in possession of said lands, or of any part thereof, within ten years next prior to the filing of the Bill of Complaint.

IN WITNESS WHEREOF, I hereunto set my hand as Register and affix the Seal of the Circuit Court of Baldwin County, Alabama, this July 3rd, 1928.


As Register.

F. W. BRUCH,
Complainant,

vs.

LANDS HEREIN DESCRIBED
ET AL.,
Respondents.

) IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.
NO. 761.

NOTE OF TESTIMONY.

Complainant being called offers the following testimony and prays that the same be noted on the Note of Testimony in this cause:

1. The Original Bill of Complaint as filed in this cause June 2, 1928.
2. Order of the Judge of this Court, of date June 2, 1928, prescribing newspaper in which publication of Notice of Pendency of Bill of Complaint in this cause be published.
3. Original Notice of Pendency of Bill of Complaint in this cause as drawn and signed by the Register of this Court on June 2, 1928.
4. Proof of Publication of the Notice of the Pendency of the Bill of Complaint in The Baldwin Times, as filed in this cause on *July 2nd* 1928.
5. Copy of the Notice of the Pendency of the Bill of Complaint, certified by the Register as being correct, and recorded as a Lis Pendens in the Office of the Judge of Probate of Baldwin County, Alabama, in Lis Pendens Record Number 1, pages 73-4-5, with certificate of the Judge of Probate thereon.
6. Certificate by Register as to the issuance, recording and publication of the Notice of Pendency of Bill of Complaint.
7. Interrogatories propounded by Complainant to F. W. Bruch, complainant, and a witness for complainant, on October 7, 1929.
8. Commission issued by the Register to Carlton J. Hurt, 994 Union Trust Building, Cleveland, Ohio, for taking of testimony of F. W. Bruch, complainant and a witness for complainant, on interrogatories.

9. Deposition of F. W. Bruch, complainant and a witness for complainant, as taken before Carlton J. Hurt, Commissioner, on October 14, 1929.

10. Certified copy of United States Patent to Joshua Kennedy, of date May 30, 1837, of record in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 19 N.S., page 622, and covering Section Forty-four (44) in Township Three (3) South of Range One (1) and Two (2) East, in the District of Lands subject to sale at St. Stephens, in the State of Alabama.

11. Certified copy of United States Patent to William Fisher, of date May 30, 1837, of record in the Office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 19 N.S., page 622, and covering Section Forty-two (42) in Township Three (3) South of Range One (1) and Two (2) East, in the District of Lands subject to sale at St. Stephens, in the State of Alabama.

12. Certified copy of Deed from E. J. Bagnall, et ux., to The Fullers Earth Company, of date May 28, 1915, of record in the Office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 37 N.S., page 534, and covering the lands described in Bill of Complaint.

13. Certified copy of Deed from The Fullers Earth Company, Inc., to F. W. Bruch, of date August 4, 1926, of record in the Office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 40 N.S., pages 418-19, and covering the lands described in the Bill of Complaint.

14. Certified copy of Tax Records of Baldwin County, Alabama, covering Assessments of and Taxes on all of the lands described in Bill of Complaint for the years 1918-1927 inclusive, and certified to by G. W. Humphries, Judge of Probate of Baldwin County, Alabama, on October 22, 1928.

15. Request for Decree in Vacation as made by Solicitor for Complainant on December 16, 1929, and Order of Register granting same as made on December 16, 1929, said Request and Order being filed on December 16, 1929.

I hereby certify that the foregoing Note of Testimony is correct.

Dated this December 16, 1929.


Register.

F. W. BRUCH,
Complainant,

vs.

IN THE CIRCUIT COURT,
EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

NO. 761.

THE FOLLOWING DESCRIBED LANDS IN THE COUNTY OF BALDWIN, STATE OF ALABAMA, VIZ.:-- BEGINNING AT THE MOUTH OF BAYOU SALINE ON THE EAST BANK OF TENSAS RIVER; THENCE UP SAID BAYOU TO ITS INTERSECTION WITH A LINE DRAWN DUE WEST FROM THE SOUTHWEST CORNER OF GOVERNMENT SECTION THIRTY (30) AND THE NORTHWEST CORNER OF GOVERNMENT SECTION THIRTY-ONE (31), TOWNSHIP THREE (3) SOUTH OF RANGE TWO (2) EAST; THENCE DUE EAST TO THE RANGE LINE DIVIDING RANGE ONE (1) EAST FROM RANGE TWO (2) EAST; THENCE DUE EAST 20 CHAINS TO A STAKE; THENCE NORTH 45 DEGREES EAST 28.30 CHAINS TO A STAKE; THENCE NORTH 60 CHAINS TO A STAKE; THENCE NORTH 20 DEGREES EAST 10 CHAINS ACROSS A DEEP RAVINE TO A STAKE ON BLUFF; THENCE WEST TO TENSAS RIVER; THENCE IN A SOUTHERLY COURSE FOLLOWING THE MEANDERS OF THE RIVER TO THE POINT OF BEGINNING AND BEING A PART OF THE WILLIAM FISHER GRANT OR CLAIM, SECTION FORTY-TWO (42), AND JOSHUA KENNEDY GRANT OR CLAIM, SECTION FORTY-FOUR (44), TOWNSHIP THREE (3) SOUTH OF RANGES ONE (1) AND TWO (2) EAST; WILLIAM FISHER, GENEVEIVE FISHER, MARCILLE KREBS, JOSEPH KREBS, JOSEPH GRELOT, WILLIAM FISHER, WILLIAM GRELOT, AYPOLITE FISHER, MARY ELLEN DAVID, CHARLES LeBARON, WILLIAM LeBARON AS TRUSTEE, WILLIAM LeBARON, TRUSTEE, SARAH HAMMON, JOHN HAMMON, WILLIAM C. RAYNOR, MARTHA H. RAYNOR, HERMAN JOSEPH LEERS, SOUTHERN COMMERCIAL COMPANY, A CORPORATION, STANDARD FULLERS EARTH COMPANY, C. C. RUPRECHT, AS RECEIVER OF AND FOR STANDARD FULLERS EARTH COMPANY AND E. J. BAGNALL, AND UNKNOWN HEIRS, DEVISEES, PERSONAL REPRESENTATIVES AND NEXT OF KIN AND SUCCESSORS OF SAID PERSONS, FIRMS OR CORPORATIONS AND ANY AND ALL PERSONS, FIRMS OR CORPORATIONS CLAIMING ANY TITLE TO, INTEREST IN, LIEN OR ENCUMBRANCE ON THE ABOVE DESCRIBED LANDS OR ANY PART THEREOF.

Respondents.

FINAL DECREE.

This cause coming on to be heard is submitted for Final Decree on the original Bill of Complaint as filed in this cause on June 2, 1928, the Order of the Judge of this Court of date June 2, 1928, prescribing the paper in which the Notice of the Pendency of Bill of Complaint be published, Original Notice of Pendency of Bill of Complaint as drawn and signed by the Register of this Court on June 2, 1928, Proof of Publication of Notice of Pendency of Bill of Complaint in The Baldwin Times, certified copy of Notice of Pendency of Bill of Complaint as certified by the Register and recorded as a Lis Pendens in the office of the Judge of Probate of Baldwin County, Alabama, in Lis Pendens Record No. 1, pages 73-4-5, with Certificate of the Judge of Probate thereon, Certificate of Register as to Issuance, Publication and Recording of Notice of Pendency of Bill of Complaint, Evidence offered by Complainant in said cause as shown by the Note of Testimony, Request for Decree in Vacation as filed in this cause on December 16, 1929, and Note of Testimony as filed in this cause on December 16, 1929, and thereupon the Court ascertains and decrees that this cause is at issue and proceeds to the consideration thereof.

Upon consideration of said cause it is made to appear and the Court hereby ascertains that the Complainant was at the time of the filing of the Bill of Complaint over the age of twenty-one (21) years, and was at the time of the filing of the Bill of Complaint and is at this time in the actual peaceable possession of, claiming to own in his own right the following described lands in Baldwin County, Alabama, viz.:-

Beginning at the mouth of Bayou Saline on the East bank of Tensas River; thence up said Bayou to its intersection with a line drawn due West from the Southwest corner of Government Section Thirty (30) and the Northwest corner of Government Section Thirty-one (31), Township Three (3) South of Range Two (2) East; thence due East to the range line dividing Range One (1) East from Range Two (2) East; thence due East 20 chains to a stake; thence North 45 degrees East 28.30 chains to a stake; thence North 60 chains to a stake; thence North 20 degrees East 10 chains across a deep ravine to a stake on Bluff; thence West to Tensas River; thence in a Southerly course following the meanders of the River to the Point of beginning and being a part of the William Fisher Grant or Claim, Section Forty-two (42), and Joshua Kennedy Grant or Claim, Section Forty-four (44), Township Three (3) South of Ranges One (1) and Two (2) East;

claiming title thereto absolutely and in fee simple, his title being derived from the persons and sources as set out in paragraph of the Original Bill of Complaint designated "SECOND"; that at the

time of the filing of said Bill of Complaint and at this time no suit was or is pending to contest Complainant's title to, interest in or right to the possession of said lands, and that the Complainant and those through whom he claims title, as stated in said Bill of Complaint, have held color of title to, claim and have been in the actual adverse possession of all of the said lands above described during the whole period of ten (10) or more consecutive years next preceding the filing of the Bill of Complaint and without interruption; that no other person, firm or corporation, other than the Complainant and those through whom he claims, have paid any taxes thereon or been in the possession of said lands, or any part thereof, at any time during said period; that Complainant has exercised and up to and at the time of the filing of the Original Bill of Complaint in this cause had exercised diligence to ascertain the facts with regard to the matters and things referred to and covered by said Original Bill of Complaint, and which were not known to Complainant.

It is further made to appear to the satisfaction of and it is hereby ascertained by the Court that the title to the property described in the Bill of Complaint has been by the Complainant duly proven to be in him, and that the Complainant is entitled to the relief prayed for in said Bill.

IT IS NOW, THEREFORE, HEREBY CONSIDERED, ORDERED, ADJUDGED AND DECREED BY THE COURT:

That the Complainant have and he hereby is given judgment as prayed for in his Bill of Complaint.

That the Complainant, F. W. Bruch, is the true and lawful owner in fee simple of the following described property in Baldwin County, Alabama, being the property included in and covered by the Bill of Complaint in this cause, viz.:-

Beginning at the mouth of Bayou Saline on the East bank of Tensas River; thence up said Bayou to its intersection with a line drawn due West from the Southwest corner of Government Section Thirty (30) and the Northwest corner of Government Section Thirty-one (31), Township Three (3) South of Range Two (2) East; thence due East to the range line dividing Range One (1) East from Range Two (2) East; thence due East 20 chains to a stake; thence North 45 degrees East 28.30 chains to a stake; thence North 60 chains to a stake; thence North 20 degrees East 10 chains across a deep ravine to a stake on Bluff; thence West to Tensas River; thence in a Southerly course following the meanders of the River to the point of beginning and being a part of the William Fisher Grant or Claim, Section Forty-two (42), and Joshua Kennedy Grant or Claim, Section Forty-four (44), Township Three (3) South of Ranges One (1) and Two (2) East.

That the absolute fee simple title to said lands, and

to every part thereof, is in the Complainant, F. W. Bruch, free and clear of any claim or claims of William Fisher, Genevieve Fisher, Marcilette Krebs, Joseph Krebs, Joseph Grelot, William Fisher, Grelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron, William LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company, C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, devisees, personal representatives and next of kin and successors of said persons, firms or corporations, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the above described lands or any part thereof.

That the Complainant have and hereby is given judgment against said lands and against William Fisher, Genevieve Fisher, Marcilette Krebs, Joseph Krebs, Joseph Grelot, William Grelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron, William LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company, C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, devisees, personal representatives and next of kin and successors of said persons, firms or corporations, and against any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance on the above described lands or any part thereof, and that the claims or liens of all said or such persons, firms or corporations claiming any title to, interest in or lien or encumbrance on said lands, or any part thereof, are hereby adjudged and decreed to be invalid, groundless and of no effect, Complainant's title thereto being hereby quieted against all such persons, firms or corporations.

That a certified copy of this Decree be by the Register within thirty (30) days from the rendition hereof filed in the office of the Judge of Probate of Baldwin County, Alabama, and the expenses thereof be taxed as a part of the costs of this cause.

That the Judge of Probate of Baldwin County, Alabama, shall record such certified copy of this Decree in the same book and manner in which deeds are recorded, and shall index the same in the names of William Fisher, Genevieve Fisher, Marcilette Krebs, Joseph Krebs, Joseph Grelot, William Grelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron, William LeBaron, as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company, C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company, and E. J. Bagnall, in the direct index, and shall index the same in the name of F. W. Bruch in the indirect index of the record thereof.

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That the title hereby decreed to be in the Complainant shall inure to the benefit of all persons who derive title to said lands, or any interest therein, from or through the Complainant, F. W. Bruch.

That the Complainant be taxed with all costs of this cause, for which let execution issue.

Done, this 16th day of December, 1929.

F. W. Hare

Judge of the Twenty-first Judicial
Circuit of the State of Alabama.

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F. W. BRUCH,
Complainant

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THE LANDS HEREIN DESCRIBED AND
WILLIAM FISHER, GENEVEIVE FISHER,
MARCELETTE KREBS, JOSEPH KREBS,
JOSEPH CRELOT, WILLIAM CRELOT,
AYPOLITE FISHER, WILLIAM FISHER,
MARY ELLEN DAVID, CHARLES LEBARON,
WILLIAM A. LEBARON, AS TRUSTEE,
WILLIAM A. LEBARON, TRUSTEE,
SARAH HAMMON, JOHN HAMMON, WILLIAM
C. RAYNOR, MARTHA H. RAYNOR,
HERMAN JOSEPH LEERS, AND SOUTHERN
COMMERCIAL COMPANY, A CORPORATION,
STANDARD FULLERS EARTH COMPANY, A
CORPORATION, C. C. RUPRECHT AS
RECEIVER OF AND FOR STANDARD FULLERS
EARTH COMPANY AND E. J. BAGNALL.
Respondents.

IN THE CIRCUIT COURT -
EQUITY SIDE.

STATE OF ALABAMA.
BALDWIN COUNTY.

NO. _____

Notice is hereby given to William Fisher, Geneveive Fisher, Marcilette Krebs, Joseph Krebs, Joseph Crelot, William Fisher, William Crelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company and C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, devisees, personal representatives, next of kin and successors of William Fisher, Geneveive Fisher, Marcilette Krebs, Joseph Krebs, Joseph Crelot, William Fisher, William Crelot, Aypolite Fisher, Mary Ellen David, Charles LeBaron, William LeBaron as Trustee, William LeBaron, Trustee, Sarah Hammon, John Hammon, William C. Raynor, Martha H. Raynor, Herman Joseph Leers, Southern Commercial Company, a corporation, Standard Fullers Earth Company, C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company and E. J. Bagnall, and unknown heirs, to any and all persons, firms and corporations who claim any title to, interest in, lien or encumbrance on the land hereinafter described, that on the 2d day of June, 1928, F. W. Bruch filed in the Equity side of the Circuit Court of Baldwin County, Alabama, his Bill of Complaint against the following land in Baldwin County, Alabama, viz:-

Beginning at the mouth of Bayou Saline on the East bank of Texas River; thence up said Bayou to its intersection with a line drawn due West from the Southwest corner of Government Section Thirty (30), and the Northwest corner of Government Section Thirty-one (31), Township Three (3) South of Range Two (2) East; thence due East

to the range line dividing Range One (1) East from Range Two (2) East; thence due East 20 chains to a stake; thence North 45 degrees East 28.50 chains to a stake; thence North 60 ch., to a stake; thence North 30° East 10 ch., across a deep ravine to a stake on Bluff; thence West to Tensas River thence in a southerly course following the meanders of the river to the point of beginning and being a part of the William Fisher Grant or Claim Section Forty-two (42), and Joshua Kennedy Grant or Claim, Section Forty-four (44), Township Three (3) South of Range One (1) and Two (2) East.

That said Bill of Complaint was and is filed for the purpose of establishing the title to said Complainant to said lands and for the purpose of quieting his title thereto and clearing up all doubts and disputes concerning the same.

That the Complainant alleges in his Bill of Complaint that the legal title to said lands stands on the records of the Probate Court of Baldwin County, Alabama, in the name of complainant and that he claims title to said lands by and through the following deeds and instruments, viz:- United States Patent to William Fisher of date May 30th., 1837, of record in Deed Book 19 N.S. page 622 and conveying a part of said lands; Deed from Genevieve Fisher and William Fisher, her son to Samuel Haines, of date December 16th., 1822, of record in Deed Book "C", pages 25-7 and conveying a part of said lands; Deed from Samuel Haines to Genevieve Fisher and William Fisher, her son, of date March 19th., 1825, of record in Deed Book "B", pages 446-7 and conveying a part of said lands; Deed from Genevieve Fisher to John Fowler, of date March 30th., 1830, of record in Deed "C", pages 295-6 and conveying a part of said lands; Deed from Marcillette Krebs and Joseph Krebs, her husband, Joseph Crelot and William Crelot, her husband, Agolite Fisher and William Fisher, her husband to John Fowler of date March 30th., 1830, of record in Deed Book "C", pages 295-4, conveying a part of said lands; Deed from John Fowler to Joshua Kennedy, of date March 9th., 1835, of record in Deed Book "D", pages 2-4 and conveying a part of said lands; United States Patent to Joshua Kennedy of date May 30th., 1837, of record in Deed Book 19 N.S. page 622 and conveying a part of said lands; Deed from W. R. Hallett, Executor under Will of Joshua Kennedy, deceased, and Susan Kennedy to Charles W. Dorrance and Jackson Stannard, of date June 16th., 1847, of record in Deed Book "E", page 357-8 and conveying a part of said lands; Deed from C. W. Dorrance

and Mary A. Dorrance, his wife, to Jackson M. Stanard, of date October 6th., 1843, of record in Deed Book "E", pages 427-8 and conveying an undivided interest in part of said lands; Deed from W. R. Hallett, Executor of the Estate of Joshua Kennedy, deceased to Jackson M. Stanard, of date May 15th., 1849, of record in Deed Book "E", page 491 and conveying a part of said lands; Will of J. M. Stanard, deceased, admitted to probate and record, September 18th., 1855, of record in Book "A" of Wills, page 126, devising all of said property; Deed from Charles LeBaron, Executor of the Last Will and Testament of J. M. Stanard, deceased to William LeBaron, of date February 13th., 1857, of record in Deed Book "H" pages 679-80 and conveying all of said lands; Deed from Wm. A. LeBaron and Eliza J. LeBaron, his wife, to Charles L. LeBaron, of date February 20th., 1867, of record in Deed Book "I", page 713 and conveying all of said lands; Deed from David C. Stapleton, as Sheriff of Baldwin County, Alabama, to Mrs. Jane LeBaron, of date March 10th., 1870, of record in Deed Book "Q", page 504-5, and conveying a part of said lands; Deed from Mrs. Julia LeB. Queant to Alexander Queant, of date February 20th., 1891, of record in Deed Book "Q", page 494, conveying an undivided interest in all of said lands; Deed from Jane LeBaron and Thom M. LeBaron, her husband, A. Queant and Julia LeBaron Queant, her husband to Wm. C. Raynor, of date April 20th., 1891, of record in Deed Book "R", page 104 and conveying an undivided interest in all of said lands; Deed from William A. LeBaron, Trustee to Dr. W. C. Raynor, of date April 20th., 1891, of record in Deed Book "R", pages 103-4 and conveying said lands; Deed from William C. Raynor and Martha H. Raynor, his wife, to Charles C. Bronson, of date April 20th., 1891, of record in Deed Book "R", pages 136-7 and conveying an undivided interest in all of said lands; Deed from Charles C. Bronson to William C. Raynor, of date Jan. 31st., 1891, of record in Deed Book "X", pages 431-3 and conveying said lands; Mortgage from W. C. Raynor to Wm. A. LeBaron, Trustee, and Alex Queant, of date April 20th., 1891, of record in Deed Book "Q", pages 556-7 and conveying said lands; Transfer of last named Mortgage by Wm. A. LeBaron, Trustee, and A. Queant to Charles C. Bronson, of date Nov. _____, 1891 and of record in Deed Book "R", page 217; Mortgage from William C. Raynor and Martha H. Raynor, his wife, to Charles C. Bronson, of date Jan. 31st., 1899, of record in

Mortgage Book No. 2, pages 80-3 and conveying said lands; Articles of Agreement between William C. Raynor and Otto W. Bengston, Charles J. Holmes and J. W. Newman, of date February 27th., 1899, of record in Deed Book "Z", pages 110-22 and covering said lands; Deed from William C. Raynor and Martha H. Raynor by Chas. K. Malt, Register and Master in Chancery, 15th District, Southwestern Chancery Division of Alabama to Charles G. Bronson, of date February 9th., 1901, of record in Deed Book 3 N.S. pages 419-20 and conveying said lands; Deed from Charles G. Bronson to N. M. Littlejohn and Minor C. Halverson, of date May 17th., 1901, of record in Deed Book 3 N.S. pages 221 and conveying said lands; Deed from W. C. Raynor and Martha H. Raynor, his wife, to George L. Alexander, Herman Pomrening, Charles Brussat, August Paulson and Joseph Lers, of date Sept. 27th., 1901, of record in Deed Book 4 N.S. pages 339-40 and covering said lands; Deed from N. M. Littlejohn and Jane S. Littlejohn, his wife, Minor C. Halverson and Jessie L. Halverson, his wife, to George L. Alexander, Herman Pomrening, Charles Brussat, August Paulson and Joseph Lers, of date November 9th., 1901, of record in Deed Book 4 N.S. pages 471-3 and conveying said lands; Deed from George L. Alexander and Analia Alexander, his wife, Herman Pomrening and Abbie Pomrening, his wife, Charles Brussat and Maude Brussat, his wife, August Paulson and Barbara Paulson, his wife, Joseph Lers and Mary Lers, his wife, to Southern Commercial Company, of date May 15th., 1902, of record in Deed Book 5 N.S. pages 554 and covering said lands; Deed from Southern Commercial Company to Standard Reduction Company, of date May 10th., 1907, of record in Deed Book 18 N.S. pages 545-7 and covering said lands; Certificate of change of name of Standard Reduction Company to Standard Fullers Earth Company, of date June 22nd., 1909, and of record in Corporation Record No. 1, pages 290-3; Deed from C. C. Ruprecht, as Receiver of and for Standard Fullers Earth Company, to E. J. Bagnall, of date Jan. 20th.,

Book 40 N.S. pages 419-19 and covering said lands; that in addition to the above instruments your Complainant's title is also derived from, under and through the following instruments of writing of record in Mobile County, Alabama, viz:- Will of Joshua Kennedy, Deceased, Probated December 22nd, 1836, of record in the Probate Court of Mobile, County, Alabama, in Will Book 2, page 27 and devising all of said lands to executor named therein; Last Will and Testament of Charles LeBaron, deceased, duly admitted to record and probate in the Probate Court of Mobile County, Alabama, of record in Book No. 5 of Wills, page 245 and devising a part of said lands; Deed from and between Ann LeBaron, M. Adeline LeBaron, Joseph M. LeBaron, Florence LeBaron, Josephine Sands, Robert M. Sands, Mary E. Davis, by Thomas M. LeBaron, Attorney in Fact, Thomas M. LeBaron, Eliza LeBaron, Annie Stanard, Jane LeBaron, Julia M. LeBaron, Alexander LeBaron, Wm. A. LeBaron, Mary Keller, and Charles K. Keller, by Thomas M. LeBaron, Attorney in Fact, and Mary LeBaron to William LeBaron, to William LeBaron, as Trustee, of date October 31st., 1832, of record in Book 47 N.S. pages 174-5, of the Probate Records of Mobile County, Alabama, and conveying said lands; Power of Attorney from Thomas M. LeBaron, Jr., to Clara LeBaron, of date October 23d., 1832, of record in Misc. Book K, pages 568-9 in the office of the Judge of Probate of Mobile County, Alabama; Power of Attorney from Mary B. Keller and Charles Keller, her husband, to Thomas M. LeBaron, of date October 12th., 1832, of record in Misc. Book K, pages 565-6, in the office of the Judge of Probate of Mobile County, Alabama; Power of Attorney from Mary Ellen David to Thomas M. LeBaron, of date September 19th., 1832, of record in Misc. Book K, pages 566-7, in the office of the Probate Judge of Mobile County, Alabama.

and Complainant further alleges in his Bill of Complaint that he is in the quiet and peaceable possession of said lands, claiming to own the same absolutely and in fee simple; that he and those