

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity.)

Marshall E. Trawick

Complainant.

VS.

Robert Archer

Respondent.

I T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Marshall E. Trawick,

witness named in the Requirement for Oral Examination, on the 12 day of January

1929, at the office of Register,

Bay Minette

in Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said witness

doth depose and say as follows:

Marshall E. Trawick, the witness for the complainant, being duly sworn deposes and says as follows - That he is the grantee in the deed from the State of Alabama, executed by W.B. Allgood, State Auditor, under date of April 12, 1920, admitted to record in Probate Judge's office for Baldwin County, Alabama, October 16, 1923, in Deed Book 34 page 70 which conveyed to him the S 1/2 of SE 1/4 of SW 1/4 of Section 20, Township 3S, Range 3E in Baldwin County, Alabama. That he has been in the peaceable possession of the said land, claiming to own the same in his own right, since some time in the year 1923. That no suit is pending to test the validity of his title or the title of the respondent herein to said land. That the said respondent Robert Archer is reputed to claim some right, title or interest in or encumbrance upon the said land. That the place of residence of the said Robert Archer is to the said complainant unknown and that it is his belief that the said Robert Archer is over the age of twenty one years; that the said complainant Marshall E. Trawick is a resident of Baldwin County, Alabama and is over the age of twenty one years. That the said complainant, Marshall E. Trawick, has the legal title to and owns the said land.

Marshall E. Trawick

ORIGINAL

No 1171

THE STATE OF ALABAMA

REVENUE DEPARTMENT

Know All Men by These Presents:

That Whereas, on 12 day of April, A. D. 1920, the Probate Court of Baldwin County rendered a decree for the sale of lands hereinafter described and conveyed, for the payment of State and County taxes then due from Robert Archer the owner of said lands, and for the payment of the fees, costs, and expenses of and under said decree, and the sale had in execution thereof.

And Whereas, thereafter, to-wit, on the 1 day of June, 1920, under and in pursuance of said decree, said lands were regularly offered for sale by the Tax Collector of Baldwin County for said taxes, fees, costs, and expenses, and no person having bid a sufficient sum for said lands to pay the same, said lands were bid in for the State for the sum of said taxes, fees, costs, and expenses.

And Whereas, the time allowed by law for the redemption of said lands has elapsed since said sale, and the same not having been redeemed, the title thereto under said sale is still in the State.

And Whereas, said lands having been entered upon the books of this Department, and the Auditor and Treasurer of this State, with the approval of the Governor, have fixed the price of said land, and ascertained that the sum of Thirty & no/100 Dollars is sufficient to cover and satisfy all claims of the State and County against said lands for or on account of taxes, interest, fees, and costs, and officers' fees which were due upon or have accrued against said lands, as provided for in Chapter 45, Article 13, of the Code of Alabama of 1907.

And Whereas, application has been made to the Auditor of the State by Marshall E. Trawick to purchase said lands, and said sum of Thirty & no/100 Dollars therefor has been paid into the State Treasury.

Now therefore, I, W. B. Allgood, as Auditor of the State of Alabama, by virtue of and in accordance with the provisions of said Chapter 45, Article 13, of the Code of Alabama of 1907, with the approval of the Governor of Alabama, and in consideration of the premises above set out, have this day granted, bargained, sold, and conveyed, and by these presents do grant, bargain, sell, and convey unto the said

Marshall E. Trawick, without warranty or covenant of any kind on the part of the State, express or implied, all right and title of the State of Alabama in and to said lands, described as follows:

S 1/2 of SE 1/4 of SW 1/4, Section 20, Township 3 S, Range 3 E,

lying and being situate in said County and State, to have and to hold the same, the said right and title of the State in the lands aforesaid, unto Marshall E. Trawick and his heirs and assigns, forever.

In testimony whereof I have hereunto set my hand and seal this the 4 day of September, 1923

W. B. Allgood, State Auditor.

THE STATE OF ALABAMA, MONTGOMERY COUNTY.

I, David C. Fox, a Notary Public in and for said County, in said State, hereby certify that W. B. Allgood, whose name is signed to the foregoing conveyance as State Auditor, and who is known to me, acknowledged before me on this day that, being informed of the contents of this conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand this the 4 day of September, 1923

David C. Fox, Notary Public.

The State of Alabama,

Baldwin COUNTY

State of Alabama
TO

Marshall E. Francis

DEED

THE STATE OF ALABAMA.

OFFICE OF JUDGE OF PROBATE.

I hereby certify that the within Deed was filed
in this office for record on the *16th* day of
Oct., 19*23*, at
1:15 o'clock *P*. M., and duly recorded
in Book *34* of Deeds, page *70*
and examined.

G. Lambert
Judge of Probate
My W. H. Rankin

BROWN PRINTING CO., MONTGOMERY.

Filed Jan 12/1929
P. W. Williams
Register

THE STATE OF ALABAMA
RECORDS DEPARTMENT

RECORDS DEPARTMENT
ALABAMA
INDEXED
FILED
JAN 12 1929
P. W. WILLIAMS
REGISTER

ORAL EXAMINATION.

I, T. W. Richerson, as Register and Commissioner hereby certify that the foregoing deposition... on Oral Examination was taken down in writing by me in the words of the witness... and read over to them and they signed the same in the presence of myself... and Hon. T. W. Gilmer, Atty. for Complainant... at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness... or had proof made before me of the identity of said witness...; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 12 day of Januar, 1929.
T. W. Richerson (L. S.)

NO. _____ PAGE _____

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

Marshall E. Trawick

vs. Complainant

Robert Archer,

Respondent.

Oral Deposition

Filed Jan 12th, 1929

T. W. Richerson, Register.

Recorded in

Record

Vol. _____ Page _____

Register

Marshall E. Traywick,
Complainant -

Vs

In the Circuit Court for
Baldwin County, Alabama.
IN EQUITY -

Robert Archer,
Respondent -

To the Honorable John D. Feigh,
Judge of the Twenty First Judicial Circuit.

Your orator, Marshall E. Traywick, who is a resident of Baldwin County, Alabama, and over twenty one years of age, respectfully shows unto your Honor-

1. That he has the legal title to and owns the following tract of land under a conveyance by the State of Alabama executed by the State Auditor under date of September 4, 1923, situated in Baldwin County, Alabama, and described as follows -
S2 of SE4 of SW4, Section 20, Township 3 S, Range 3 E.
2. That he is now and has been for more than three years just passed in peaceable possession of the said lands claiming to own the same in his own right.
3. That no suit is pending to test the validity of his said title or of the title of the respondent Robert Archer.
4. That the said respondent Robert Archer claims, or is reputed to claim some right, title, or interest in or encumbrance upon the said lands.
5. That the said Robert Archer's place of residence is to your orator unknown and that to the best of your orator's information and belief the said Robert Archer is over the age of twenty one years.

Your orator prays that the said Robert Archer, respondent, shall be required to set forth and specify his title, claim, interest, or encumbrance, in, to, or upon the said lands and how and by what instrument the same is derived and created and that he may be required to answer, according to the best of his information, knowledge and belief, each and every one of the above statements, as though specifically interrogated as to each, but answer under oath is hereby waived.

Your orator prays that your Honor direct the Register of this Court to make out and superintend the proper order of publication to the said Robert Archer that he may be made party respondent to ~~this~~ this bill and commanded to personally appear before your Honor in this Court within thirty days after the period prescribed in said order of publication, and then and there to answer all and singular the premises herein and to abide such order and decree as to your Honor seems meet.

Your orator prays that, upon the final hearing of this cause, your Honor may decree that the said respondent Robert Archer has no right, title, interest, claim, lien or encumbrance upon the said land and that by such decree your Honor will quiet the title of your orator ~~against~~ in and to said lands, and will grant to your orator such other and further relief in the premises as the nature of his case may require and as to your Honor seems meet. And your orator will ever pray.


Solicitor for Complainant.

FOOTNOTE-

Answers by respondent are required to allegations numbered 1 to 5, inclusive.

The State of Alabama, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. Term, 192.....

Marshall & Trawick

Complainants

vs.

Robert Archer

Defendants

Motion is hereby made for a Decree Pro Confesso against

Robert Archer

Defendant

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

This *9th* day of *January* 192*9*

John W. Givens

746 Code.

Solicitor.

2

No. 777 ¹/₂ Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Marshall Trawick

RECORDED

Complainants.

Vs.

Robert Archer,

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed Jan 7th, 1929

T. W. Richardson
Register.

Recorded in Record,

Vol. Page.....

Register.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
No. 777 1/2 Vacation Term, 1929

Marshall Trawick, Complainant..

vs. Robert Archer, Defendant..

In this cause it appears to the Register that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 1st day of Nov, 1928, in the Baldwin

a newspaper published in Bay Minette Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 1st day of November 1929, and

And it now further appearing to the Register, that the said Robert Archer,

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

that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Robert Archer,

This 7th day of January 1929.

[Signature] Register.

No. 777 $\frac{1}{2}$

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Marshall Trawick

RECORDED

vs.

Robert Archer.

DECREE PRO CONFESSO
OF PUBLICATION

Issued Jan 7th, 1929

G. W. Riccio

Register.

Recorded in Record

Vol. Page

Register.

Moore Printing Company, Bay Minette, Ala.

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Marshall E. Trawick

~~vs.~~

vs.

Robert Archer,

The State of Alabama,
Baldwin County.

Circuit Court, in Equity.

This the 1st day of

November, 1928

In this cause it being made to appear to the Clerk of this Court by the affidavit of
Marshall E. Trawick,

that the Defendant Robert Archer

is a non-resident of the State of Alabama and his place of residence is to
affiant unknown.

and further, that, in the belief of said Affiant... the Defendant is over the age of 21
years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper publish-
ed in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring
the said Robert Archer.

to answer or demur to the Bill of Complaint in this cause by the 1st
December 1928, or after thirty days therefrom a decree Pro Confesso may be
taken against the said Robert Archer.

Thos. W. Gilmer
Atty for Complainant.

T. W. Richerson,
Register.

BAY MINETTE, ALA. 12/1/38

M. T. W. Richardson Clk

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

W. Gilmer Atty

To Notice of M. E. Frawick vs R. Archer

Run 4/8-15-22 - 169 words 4 1/2

761

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.

NOTICE TO NON-RESIDENT

The State of Alabama, Baldwin County.

Circuit Court, in Equity.

This the 1st day of November, 1928.
Marshall E. Trawick, vs., Robert Archer.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Marshall E. Trawick, that the Defendant, Robert Archer, is a non-resident of the State of Alabama and his place of residence is to affiant unknown, and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, there, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Robert Archer, to answer or demur to the Bill of Complaint in this

ALFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail

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 _____

Marshall E. Trawick

vs

Robert Archer

for drunkenness.

ice up to his name and was arrested

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<i>November 1 - 1928</i>	Vol. <i>39</i>	No. <i>40</i>
Date of second publication	<i>November 8 - 1928</i>	Vol. <i>39</i>	No. <i>41</i>
Date of third publication	<i>November 15 - 1928</i>	Vol. <i>39</i>	No. <i>42</i>
Date of fourth publication	<i>November 22 - 1928</i>	Vol. <i>39</i>	No. <i>43</i>

Subscribed and sworn to before the undersigned this *22^d* day of *December* 192*8*

W. B. Pearson
Clerk Circuit Court

R. B. Vail
Publisher.

State of Alabama,
Baldwin County.

This day personally appeared before me Gladys Bush, a notary public in and for said County in said State, Marshall E. Trawick, who being by me personally sworn deposes and says as follows .

That he the said Marshall E. Trawick is the complainant in the Chancery suit of Marshall E. Trawick vs Robert Archer and that in his opinion and belief the said respondent Robert Archer is over the age of twenty one years but that the place of the said ^{residence of} Robert Archer is to the said respondent unknown.

Marshall E. Trawick

Subscribed and sworn to before
me this 26th day of October, 1928.

Gladys Bush.

Notary Public for Baldwin County, Alabama.

2

Grand Oct 26/92
J. W. McNamee
Register

Marshall E. Irawick

^{vs}
Robert Archer -

Circuit Court for
Baldwin County,
Alabama.

In Equity -

The complainant files with the
Register his request to take
the oral examination of
Marshall E. Irawick, complainant,
to be filed in said cause -

Howe Palmer
Solicitor for complainant

Marshall E. Drowick
Complainant

vs

Robert Archer
Respondent

In Equity

Request to take
oral examination
of complainant

Filed Jun 5/1929

T. W. Rice
Clerk

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

Comes your Complainant, NANCY LEVINS, and humbly complaining
against ISAAH LEVINS, the Respondent, respectfully shows unto your Honor and
this Honorable Court, as follows:

FIRST:

That both your Complainant and the Respondent are bona fide
residents of Baldwin County, Alabama, and have been formore than three years
nest preceding the filing of the bill of complaint in this in this cause; that
both are over the age of twenty-one years.

SECOND:

That your Complainant and the Respondent are wife and husband,
having intermarried at Bay Minette, Baldwin County, Alabama, in October, 1925;
that they lived together as man and wife until in, to-wit, June, 1928.

THIRD:

That the Respondent is a man of brutal temperment and often
cursed, abused and threatened your Complainant, and that on to-wit, June _____,
1928, the Respondent cursed, abused and threatened to strike your Complainant
and thereby do her serious bodily harm; that the conduct of the Respondent was
such as to cause your Complainant to have reasonable apprehension of violence
to her person attended with danger to her life and health.

Wherefore the premises considered your Complainant prays that
your Honor will by proper process make the said Isaaiah Levins a party defendant
to this bill of complaint, requiring him to plead, answer or demur to the same
within the time and under the penalites prescribed by law and the practice of
this Honorable Court.

Your Complainant further prays that upon the final hearing
of this cause your Honor will grant to her an absolute decree of divorce forever
barring the bonds of matrimony existing between her and the Respondent and that
your Honor will grant unto her such other, further or different relief as she
may be in equity and good conscience entitled to receive, and as in duty bound

she will ever pray, etc.

Beebe & Hall
Solicitors for Complainant.

FOOT NOTE:

The Respondent, Isaiah Levins, is required to answer each and every paragraph of the foregoing bill of complaint, numbered first to third, both inclusive, but not under oath. Oath being hereby expressly waived.

Beebe & Hall
Solicitors for Complainant.

Copy

Nancy Lewis
is

Isabel Lewis

Filed Oct 24, 1928

T. W. Pritchard
Register

Defendant is with
Mrs Lena Denton
Pritchard, Ala

The State of Alabama, } Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ~~Isaiah Levins~~

Isaiah Levins

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 Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Nancy Levins

against said Isaiah Levins

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 21st day of November 1928

T. W. Richerson Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Copy

SERVE ON

Circuit Court of Baldwin County
In Equity.

No. 778.

SUMMONS

Nancy Devins

[Handwritten Signature]

vs.

Isaiah Devins

Bobbie & Hall.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Isaiah Devins
not found
Defendant.

Ed Byrne
Sheriff.

By *St. Lodge*
Deputy Sheriff.

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ~~Isaiah Levins~~

Isaiah Levins

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 Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Nancy Levins

against said Isaiah Levins

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 21st day of November 1928.

T. W. Richerson Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Original

SERVE ON

Circuit Court of Baldwin County
In Equity.

No. 778.

SUMMONS

Nancy Levins

D-8-27

vs.

Isaiah Levins

*works at Paper Mills
near Pritchard*

*Raymond Denton of
Pritchard can tell about him*

Beebe & Hall.

Solicitor for Complainant

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

*Isaiah Levins
my friend*

De.

Pat Bignall

Sheriff.

By

J. E. Dodge

Deputy Sheriff.

Recorded in Vol. Page.

The State of Alabama, } Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Isaiah Levins

At residence of Mrs. Lena Danton,

Pritchard, Ala.

of Mobile 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 Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Nancy Levins

Isaiah Levins

against said

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 24th day of

October 1928.

T. W. Richerson Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

2 Original
48

SERVE ON.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County
In Equity.

Received in office this 27th
day of October 1928

No.

Pat Pyne
D. V. Gibson, Clerk Sheriff.

SUMMONS

Executed this day of
..... 1928

Nancy Levins

by leaving a copy of the within Summons with

Defendant,

vs.

Sheriff.

N. X. Isaiah Levins.

By Deputy Sheriff.

At residence of Mrs. Lena
Denton, Pritchard, Alabama.

Received Oct 27, 1928,
and Isaiah Levins
"not found in
my county"

Beabe & Hall.
Solicitor for Complainant

Pat Pyne, Sheriff
H. Dodge, D. V.

Recorded in Vol. Page.

10-27-28

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

Comes your Complainant, NANCY LEVINS, and humbly complaining against ISALIAH LEVINS, the Respondent, respectfully shows unto your Honor and this Honorable Court, as follows:

FIRST:

That both your Complainant and the Respondent are bona fide residents of Baldwin County, Alabama, and have been for more than three years next preceding the filing of the bill of complaint in this in this cause; that both are over the age of twenty-one years.

SECOND:

~~That your Complainant and the Respondent are wife and husband,~~
having intermarried at Bay Minette, Baldwin County, Alabama, in October, 1925; that they lived together as man and wife until in, to-wit, June, 1926.

THIRD:

That the Respondent is a man of brutal temperment and often cursed, abused and threatened your Complainant, and that on to-wit, June _____, 1926, the Respondent cursed, abused and threatened to strike your Complainant and thereby do her serious bodily harm; that the conduct of the Respondent was such as to cause your Complainant to have reasonable apprehension of violence to her person attended with danger to her life and health.

Wherefore the premises considered your Complainant prays that your Honor will by proper process make the said Isaiah Levins a party defendant to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalites prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon the final hearing of this cause your Honor will grant to her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Respondent and that your Honor will grant unto her such other, further or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound

she will ever pray, etc.

Beebe & Hall
Solicitors for Complainant.

FOOT NOTE:

The Respondent, Isaiah Levins, is required to answer each and every paragraph of the foregoing bill of complaint, numbered first to third, both inclusive, but not under oath. Oath being hereby expressly waived.

Beebe & Hall
Solicitors for Complainant.

1st Original

Nancy Lewis

vs

Isiah Lewis

RECORDED

Filed Oct 24, 1978

T. W. Peterson

Register