(810)

SAM PARKER COMPLAINANT

VS:

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY

BEATRICE PARKER RESPONDENT.

To the Honorable Francis W. Hare, Judge of said Court, titting in Equity.

Sam Parker brings this his bill of complaint against Beatrice Parker, and thereupon your orator pleads and says:

- and resides at Perdido, Baldwin County, Alabama and has been a bona fide resident of said County, in said State for more than three years next preceding the filing of this bill; that the respondent, Beatrice Parker, is over the age of twenty-one years and resides at Perdido, Baldwin County, Alabama, and that her post-office address is Perdido, Alabama.
- 2. That your orator and respondent intermarried at Pascagoula,

 Jackson County, Mississippi on or about the First day of April, 1923.
- That on or about the 15th. day of April, 1927, while your orator and respondent were living together as husband and wife in Baldwin County, Alabama the respondent voluntarily, and without just cause or good excuse abandoned the bed and board of your orator and has never returned to live with him as his wife since said abandonment.

Wherefore, the premises considered, your orator prays the Court as follows:

PRAYER FOR PROCESS AND RELIEF.

That the said Beatrice Parker be made a party respondent to this bill of complaint; that the usual process of this Honorable Court be forthwith issued to her commanding her to demur, plead to or answer this bill of complaint within the time and under the pains and penalties provided by law

and under the rules of this Honorable Court; that upon a final hearing of this cause a decree be rendered dissolving the bonds of matrimony now existing between your orator and respondent; that your orator be granted the right and privilege to again marry should he so desire; and such other further and different relief to which he may be entitled, the premises considered.

SOLICITOR FOR THE COMPLAINANT

POOT NOTE:

The respondent is required to answer each paragraph of the foregoing bill of complaint, numbered one (1), two (2) and three (3), but not under oath, answer under oath being hereby expressly waived.

SOLICITOR FOR THE COMPLAINANT.

Respondent lives at Perdido, Alabama.

Register

The State of Alabama, No. 509 Baldwin County

CIRCUIT COURT IN EQUITY

Sam Parker	Complainant
vs.	
Beatrice Parker	Defendant
This cause, coming on to be heard at this Term, was submitted upon the decree pro confesso and the testimony as noted by the Register; and upon considers Court is of opinion that the Complainant is entitled to the relief prayed for in said k IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the mony heretofore existing between the Complainant and Defendant be, and the same	ation thereof, the oill. e bonds of matri
solved, and the complainant is forever divorced from the Defendant, on account of	
Voluntary Abandonment.	•
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It is further ordered, that the said Sam Parker	
be, and he is hereby permitted to again contract marriage, upon the paymen Court in this cause.	t of the costs of
It is further ordered, that the said Sam Parker	
pay the costs herein taxed, for which execution may issue, and if such execution	is returned "no
property found," then execution for such costs may issue against the said	
Beatrice Parker	
It is further ordered, adjudged and decreed that the saidSam_Parke	r
hall not again marry except to said <u>Beatrice Parker</u>	
antil sixty days after this date, and that if an appeal is taken within sixty days.	he shall not
narry again except to saidBeatrice Parker	
during the said p	endency of appeal
Garring one some p	on or or or or
This 27th day of July 1929	
JUDGE OF THE CIRCUIT COURT OF F	MALDWIN COUNTY
1 F. W. Sto	a single source of the single
JUDGE OF THE CIRCUIT COURT OF F STATE OF ALABAMA BALDWIN COUNTY CIRCUIT COURT, IN EQUIT	
JUDGE OF THE CIRCUIT COURT OF F STATE OF ALABAMA CIRCUIT COURT, IN EQUIT BALDWIN COUNTY Register of said Circuity, Alabama, do hereby certify that the above is a full, true and correct correct correct.	Y cuit Court of said by of the decree
JUDGE OF THE CIRCUIT COURT OF F STATE OF ALABAMA BALDWIN COUNTY CIRCUIT COURT, IN EQUIT	Y cuit Court of said by of the decree
JUDGE OF THE CIRCUIT COURT OF F STATE OF ALABAMA CIRCUIT COURT, IN EQUIT BALDWIN COUNTY Register of said Circuity, Alabama, do hereby certify that the above is a full, true and correct correct correct.	Y cuit Court of said by of the decree
TATE OF ALABAMA CIRCUIT COURT, IN EQUIT I,	Y cuit Court of said by of the decree 9——,
TATE OF ALABAMA CIRCUIT COURT, IN EQUIT I,	Y cuit Court of said by of the decree
TATE OF ALABAMA CIRCUIT COURT, IN EQUIT I,, Register of said Circuity, Alabama, do hereby certify that the above is a full, true and correct corrected by said Court on the, day of	Y reuit Court of said by of the decree 9——, Complainant
TATE OF ALABAMA CIRCUIT COURT, IN EQUIT I,, Register of said Circuity, Alabama, do hereby certify that the above is a full, true and correct corrected by said Court on the day of	Y reuit Court of said by of the decree 9——, Complainant
TATE OF ALABAMA BALDWIN COUNTY I,	Y reuit Court of said by of the decree 9, Complainant

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	
Beatrice Parker	• • •
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Baldwin	
Baldwin of	ourt
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of S	
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibite	
Same, Parker	
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••••• ••••••••••••••••••••••••••••••••	

against said Beatrice Parker	

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	• • • • • • • • • • • • • • • • • • • •
and further to do and perform what said Judge shall order and direct in that behalf. And this said Defendant shall in no wise omit, under penalty, etc. And we further command that you rethis writ with your endorsement thereon, to our said Court immediately upon the execution the WITNESS, T. W. Richerson, Register of said Circuit Court, this24 the	s the turn reof
April 192 9 M. Relum, Reg	isteı

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

Solicitor,

The State of A	· · · · · · · · · · · · · · · · · · ·	\ No8£	9 CIRCU	JIT COURT I	N EQUITY.
Dait Will God	Sam Parker			Con	pplainant
		vs.			
	Beatrice P	arker		D	efendant
Motion is hereby made f	ica Deni			·	
in the above stated cause,					
summons upon said Defer	danti;and that	said summons	s was duly se	erved according	g to law, and
that said Defendantha. to this date.	failed to demur	, plead to or a	nswer the Bi	ll of Complaint	in this cause
This 20th	day of	July		19_2 <u>9</u>	

Frank G.Horn

	e ot B	aldwin (i Alai County.	oama, j	No.: 80)9	. CIRCI	JIT COUR	T, IN EQUITY
			;- ;-	Sam Pai	rker				<u>.</u>
			دد د د شهره مد.		* *** ***				Complainant
•	***	•			vs.				
				Beatrice	Parker		· - ·		Defendant
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that a	Summo	ns requirir	g the Defe	ndant I	Beatrice	Parke	r		
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 -	13th	day	of	May		1929		-	

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	And th	e said Defe	endant	having failed	l to demur,	plead to or	r answer t	he said B	ill of Complaint
to this	date, it	t is now, th	ierefore, on	motion of	Hon.F.	L.Horn,	Atty_	rot-Cor	plaint
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	THE STATE OF ALABAMA,
	BALDWIN COUNTY
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Bictrice Hans	IN EQUITY,
	CIRCUIT COURT OF BALDWIN COUNTY.
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This cause is submitted in behalf of	Complainant upon the original Bill of Complaint,
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	and the termination
Dam Barker	gwInt and H
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. Magana.	• • • • • • • • • • • • • • • • • • • •
and in behalf of Defendant upon	
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	Baldwin County.		No	•••••	•••••••••	Term, 192
	Sam		Par	Bur		, Complainant
			vs.			•
,	Death	ice	-Par	ker		, Defendant

To, J. W. Richerso, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by James Solicitors of record, now files with the Register of this Court

this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Tranky Horne Solicitor for Complainant.

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No. 809	Page
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THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY, CUIT COURTOF BALDWIN COUNTY.

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NOTE OF TESTIMONY

Filed in Open Court this 23

day of July 1929

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The State of Alabama, Baldwin County

Circuit Court In Equity

Sam Parker

RECORDED

VS.

Beatrice Parker

Decree Pro Confesso On Personal Service.

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The State of Alabama, Baldwin County,

CIRCUIT COURT, IN EQUITY

Sam Parker RECORDED

vs.

Beatrice Parker

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE

July 20th, 19 29

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Register

Recorded in Record

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Meore Printing Company, Bay Minette, Ala.



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THE STATE OF ALABAMA, BALDWIN COUNTY

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No. 809

THE STATE OF ALABAMA, Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Sam Parker

RECORDED

VS

Beatrice Parker

DECREE OF DIVORCE

Filed in office this 29un

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Register.

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The State of Alabama, Baldwin County, Alabama (In Equity.)

Sam Parker		Complainant.	
	vs.		
Beatrice Park	er	Respondent.	
т Ф. W. 3	Richerson		
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	_	cer, J. W. Frost, and	
H. S. Rogers			
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		n, on the 25 thay of July	
192.9, at the office of	T. W. Richerson,	, Clerk Circuit Court	
in Bay Minette	_,Alabama, and having fi	irst sworn said witness 55 to speak the	
truth, the whole truth, and nothing	g but the truth, the said.	Witnesses!	• •
	_doth depose and say as	follows:	
follows: My name is Sabove styled cause. If I am over the age of to County for the last fo the respondent in this at Pascagoula. Jackson is fover the age of twe April, while my wife a she did abandon me vol	am Parker. I am live at Perdido wenty-one years, rty-four years. case, whose nam dounty, Mississ nty-one years. untarily and with	the Complainant in the Baldwin County, Alabama. and have resided in Baldwin I married Beatrice King e now is Beatrice Parker, ippi, April 1st. 1923. She On or about the I5th day of iving at Perdido, Alabama, hout just cause or good ex- th me as my wife since said	
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		A Dordido Aleman T kno	
·		eat Perdido, Alabama. I kno this case. I know that on	
	***	inant was living at Perdido,	
· · · · · · · · · · · · · · · · · · ·		to her brother-in-law's house	
.and.has.never.lived.v	vith.him.since	I. know that he was a good	

. prowlder, and that he took care of her well.
11:715c/26/
Restimony of H. S. Rogers:
I know the respondent is about 24 or 25 years of age, and
that the Complainant is about 43 or 44 years old. I know that the
Respondent left the Complainant about April 15th, 1927 wolun
tarily, and that she had no just cause or good excuse to do same.
I. was a merchant, and I furnished groceries and other merchandise
to Sam Parker and to his wife, and I know that she always had
all the necessaries of life, and that he paid for and furnished
herssameI.know.that.she.has.never.returned.to.live.with.him
.since said abandonment.
H.D. Rogers

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(

I, T. W. Richerson, as Register and Commissioner hereby certify
that the foregoing depositionon Oral Examination was taken down in writing by me in the words
of the witness Sand read over to them and they signed the same in the presense of myself and F. J. Horn Que for Angles and
at the time and place herein mentioned; that I have personal knowledge of personal identity of said
witnessesor had proof made before me of the identity of said witness_es; that I am not of
counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof
I enclose the said Oral Examination in an envelope to the Register of said Court.
Given under my hand and seal, this25th_day ofJuly1929
TMPccurron (L. S.)

vs. Complainant Beatrice Parker Respondent. Oral Deposition Filed July 25, 1929. Recorded in Recorded in Recorded in Recorded in Recorded in Recorded in Recorded in Recorded i	Sam Parker	THE STATE OF ALABAMA BALDWIN COUNTY: IN CIRCUIT COURT, IN EQUITY
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ERNEST HANKS, Complainant,

VS

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs and devisees of Alfred Sewell if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Defendants.

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

This cause coming on to be heard is submitted for final decree on the original bill of complaint filed May 14, 1929, and the affidavit thereto attached; on the order of the Judge of this Court, dated May 15., 1929, ordering notice of the pendency of such bill of complaint published in the Baldwin Times a newspaper published at Bay Minette, in Baldwin County, Alabama; notice of such bill of complaint as drawn and filed by the Register of this Court May 27, 1929; notice of the pendency of the bill of complaint as published, together with the affidavit of the Publisher of the Baldwin Times making proof of such publication; original notice of pendency of the bill of complaint served on Leneila Glass, Defendant, together with the Sheriff's return thereon; Certificate of the Register of this Court as to publication of notice of the pendency of the said bill

of compaint, and as to the mailing of notice of the pendency of the bill of complaint to Allee Kirksey, Defendant, at Sweetwater, Texas, by registered mail, marked for delivery to addressee only, and of the fact that such notice was unclaimed; notice of the pendency of such suit as filed for record in the office of the Judge of Probate, May 22, 1929, and certificate of the Probate Judge that the same was recorded May 28, 1929, in Book of Lis Pendens #1, pages 88-9; application for oral examination of C. Irwin and Walker Taylor, witnesses for the Complainant, filed September 17, 1929; notice of application of oral exemination of C. Irwin and Walker Taylor, witnesses for Complainant, served by entry on the Register's Order Book September 17, 1929; order of the Register granting motion for oral examination of witnesses C. Irwin and Walker Taylor for Complainant, dated September 23, 1929; notice of time and place of taking testimony of C. Irwin and Walker Taylor, witnesses for Complainant, served by entry on the Order Book October 1st., 1929; deposition of C. Irwin, witness for Complainant; certified copy of deed from United States to State of Alabama, dated July 11, 1870, recorded Deed Book 5NS, pages 222, et sequa; patent from United States to Henry Taylor, dated November 15, 1854; deed from Alabama Insane Hospitals to Ernest Hanks, dated May 23, 1928; deed from State of Alabama to Ernest Hanks, dated April 29, 1929; certified copy of deed from J. D. Payne and Olle V. Payne, his wife, to O. R. Jones, dated November 28, 1891; deed from 0. R. Jones to Ernest Hanks, dated July 20, 1921; deed from 0. R. Jones to F. Tynes, dated May 6, 1921; deed from F. Tynes to Ernest Hanks, dated July 20, 1921; all as noted by the Register, and the same being considered, the Court is of the opinion that the Complainant is entitled to the relief prayed for in his bill of complaint.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Complainant Ernest Hanks is over the age of twenty-one years and a resident of Georgiana, in the State of Alabama; that he is the owner in fee simple of, and in the actual peaceable possession of the following described lands situated in BaldwinCounty, State of Alabama, to-wit:

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East.

That there is no suit pending to test the title to, interest in or his right to possession of such lands, and that his title to the said land stands upon the record of the Probate Court of Baldwin County, Alabama, in his name; that his title to the said land was obtained by the following deeds: Patent from United States to State of Alabama, dated July 11, 1897, recorded in Deed Book 5NS, pages 222, et sequa, conveying the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to place of beginning, all in Section twenty-four, Township two South, Range three East; deed from State of Alabama to the said Ernest Hanks dated April 29, 1929, conveying the said lands; deed from Alabama Insane Hospitals tated May 25, 1928, conveying the said lands, and patent from United States to Henry Taylor, dated November 15, 1854, conveying the Southwest quarter of the Southwest quarter of said Section twenty-four; deed from J. D. Payne and Olle V. Payne, his

wife, to 0. R. Jones, dated November 28, 1891, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Record Book "R", page 236-7; deed from O. R. Jones to Ernest Hanks, dated July 20, 1921, recorded in said Probate Office in Deed Book 31NS, page 131, conveying that part of the said above described land lying in the North half of the Southwest quarter of said Section; deed from O. R. Jones to F. Tynes, dated May 6, 1921, recorded in said office in Deed Book 30NS, page 611, conveying the South half of the Southwest quarter of said Section twenty-four; deed from F. Tynes to said Ernest Hanks dated July 20, 1921, recorded 31NS, page 130, conveying the said South half of the Southwest quarter of said Section twentyfour, and by adverse possession under the said deed by him and by the said persons through whom he claims for more than twenty-five years continuously, next preceding the filing of the said bill of complaint; that Leneila Glass and Allee Kirksey are each over the age of twenty-one years, the said Allee Kirksey resides at and her Post Office address is Sweetwater, Texas, the said Leneila Glass resides at and her Post Office address is Tallassee, Alabama; that Alfred Sewell and F. Blount are unknown to Complainant; that it is unknown to him as to whether or not they are living or dead, and if dead whether or not they died testate or intestate, and who are their heirs and devisees, that he has made dligent inquiry to ascertain the same and the same cannot be ascertained upon diligent inquiry; that neither the said Allee Kirksey, Leneila Glass, F. Blount, Alfred Sewell, or the unknown heirs and devisees of the said F. Blount and of the said Alfred Sewell have had or exercised any possession over the whole or any part of the said described lands for more than twenty-five years, next preceding the filing of the said bill of complaint; that they and neither of them have paid any taxes on the said lands and that any title, interest, lien, incumbfance or claim by them or either of them to the said lands or any part thereof is invalid; that the said Ernest Hanks and those through whom he claim have annually for more than twenty-five years listed and paid taxes on the said lands to the proper officials of Baldwin County, Alabama; that no person other than the said Ernest Hanks and those through whom he claim have for more than twenty-five years been in the possession of the said lands or any part thereof, or listed the said lands for taxation, or paid the taxes thereon.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the fee simple title to the lands first described herein, namely,

The Southwest quarter of the Southwest quarter and the Southeastquarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East.

clear of incumbrance, and to each part thereof is vested in the Complainant, Ernest Hanks, as against the aforesaid Defendants and each of them, and as against any and all persons claiming any title to, interest in, lien or incumbrance on the said lands or any part thereof, and that the said Defendants, namely, Alfred Sewell, the unknown heirs and devisees of Alfred Sewell, F. Blount, and the unknown heirs and devisees of F. Blount, Leneila Glass and Allee Kirksey, and each of them have no title to, interest in, lien or incumbrance on the said lands or any part thereof and that no other person whomsoever than this Complainant, Ernest Hanks, has any title to, interest in, lien or incumbrance on the said lands or any part thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register of this Court file for record in the office of the Judge of

Probate of Baldwin County, Alabama, a duly certified copy of this decree and cause the same to be indexed in the proper indexes in the said Probate Office in the direct index in the name of Alfred Sewell, F. Blount, Allee Kirksey, Leneila Glass, and the unknown heirs and devisees of F. Blount and the unknown heirs and devisees of Alfred Sewell to Ernest Hanks, and in the reverse index in the name of Ernest Hanks from Alfred Sewell, F. Blount, and the unknown heirs and devisees of F. Blount and the unknown heirs and devisees of F. Blount, and from Allee Kirksey and Leneila Glass.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant pay the cost of this proceeding for which let execution Done this the 10 day of October, 1929. issue.

L. W. Nare

NOTICE OF PENDANCY OF BILL OF COMPLAINT.

ERNEST HANGS, Compleinant,

The Southwest quarter of the Southrest quarter and the Houtheast quarter of the Southwest quarter and that part of the North helf of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 455.75 yards, thence South 216 yards, thence West 455.75 yards to the place of beginning, all in Section twenty-four, Township two Bouth, Range three East, and Leneila Class, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he be deed, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, line or encumbrance on the said lands or any part thereof, lanicontanta.

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

and whose residence and Post Office address is Tallassee, Alabera; Allee Kirksey who is over the age of twenty-one years and whose residence and Post Office address is Sweet Rater, Texas; Alfred Sewell who is over the age of twenty-one and whose place of residence and Post Office address is unknown; T. Blount who is over the age of twenty-one and Post Office address is unknown; T. Blount who is over the age of twenty-one years and whose place of residence and Post Office address is unknown; the unknown heirs and devisees of Alfred Sewell whose names, ages and place of residence and Post Office address is unknown; the unknown heirs and devisees of F. Blount, whose names, ages, place of residence and Post Office address is unknown, and to any and all persons claiming any title to, interest in, lien or encumbrance on the whole or any part of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

The Companyon quarter of the Companyon quarter and the Companyon quarter and the part of the Companyon quarter and their part of the Morth helf of the Company of the Morth helf of the Company of the Morth helf of the Companyon quarter than the Company of the Companyon heat of the Companyon quarter and the Companyon theorem and the Companyon theorem and the Companyon theorem and the Companyon of the Companyon of

Motion is hereby given that Branst Henks did on the 14th day of May, 1928, file a bill of complaint in this, the Circuit Court of Daldwin County, Alabama, in equity, against the above described lands and the above named and described persons and against any and all persons claiming any title to, interest in .

lion or encumbrance on the said lands or any part thereof, to quiet and establish his title to the said lands, as and to be in fee simple, clear of encumbrance against the said named and described persons and against any and all persons claiming any title to, interest in, lion or encumbrance on the said lands or any part thereof, and to settle and clear up any and all coubts and disputes concorning the same.

that he is the owner in fee simple of the said lands and each part thereof, that the title to the samestands on the records of the frobate Court of Baldwin County, Alabama, in his name; that he am those through whom he claims title have been for more than twenty years consecutively next preceding the filling of the said bill of complaint in the actual adverse possespion of the said lands and each part thereof; that he and those through when he holds the said lands have for more than twenty years consecutively next preceding the filing of the said lands to the proper offices of Baldwin County, Alabama, and that during the whole of the said period no other

percent from his continues showing when his holder the cold lands have been in the possession of the cold lands or of one part thereof, and that are paid on turns on the cold lands of any part thereof, and that his claim to the cold lands is derived by means conveyances from the united States Coveragent through, under and by the following institutions:

Patents of United States to the State of Alabama, dated July Li. 1870, recorded in the office of the Judge of Probate of Dalfatz County, Alabama, in Read Book S. page 228, or sequal

Dock from the State of Alabora to this exceleinant, dated and Look 1989;

Dond from the Alabama Insule Complete, dated New 20, 1990;

Dond from Lawrence M. Wilson, of Gl. to D. C. Byrne, Cated

Forch S. 1981, Perorded in the office of the Judge of Evolute of

Believin Donnby, Alabama, in Deed Book L. Seres 700-706;

Dood from D. G. Dyrne, of al, to J. m. Intehricle, dated
January G. 1988, recorded in said office in Book N. pages 128-11

Deed from J. W. Litchfield, et al, to Charles Trayrung, dated

Recognor 50, 2004)

Patron from United States to Heary Taylor, dated Movember
15, 1994, recorded in mad Probate Office in Nook _______

Dood from Reserve I. Taylor, at al. to Charles Urspruns.
Gated October I. 1874, recorded in soid office in Dood Book 50,
page 645;

Deed from Rosemus I. Litebriold, of al, to Charles Crepause.

Clina for record July 14, 1980, recorded in said office in Deed Book

2003, page 6744

Deed from Charles Uranrung, et al, to Pollie V. Dayne, desed November 28, 1891, rescaled in said office in Book 2010, page 648.

Deed from J. M. Payne and Olle V. Payne, his wife, to C. R. Jones, dated Navember 25, 1891, resorded in said office in Book "R", pages 236-7:

Deed of 0. R. Jones to Ernest Hanks dated July 20, 1921, recorded July 30, 1921, in Deed Book 5135, page 151;

Deed of C. R. Jones to F. Tynos, dated May 5, 1921, recorded in said office in Report Book SONS, page 611;

Dood of F. Types to Erport Hunks dated July 20, 1981, recorded in said office in Book Sins, page 180.

IN WITHMAN WHENCE, I. T. W. Richerson, Register of the Caroutt Court of Baldwin County, Alabama, in equity, have hereto set my band and seal this the 47^{*} day of May, 1989.

Publisher Hall Faculture for Property Cercuit Court A English
BREET & HALL
SOLITIONS FOR CONTIAINANT.

NOTION OF PENDENCY OF BILL OF COMPLAINT.

 T^*V

ERNEST HANKS, Complainant,

VS

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the Worth half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence Rest 455.75 yerds, thence South 216 yards, thence West455.75 yards to the place of beginning, all in Section twenty-four, Township two South, See Range three East, and Leneila Glass, Allee Kirksey, Aifred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be doad, and the unknown heirs and devisees of Alfred Sewell if he be dead, and against ony and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Dofondunts.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

To Leneila Glass who is over the age of twenty-one years and whose residence and Post Office address is Tallassee, Alabama; Alles Kirksey who is over the age of twenty-one years and whose residence and Post Office address is Sweet Vater, Texas; Alfred Sewell who is over the age of twenty-one and whose place of residence and Post Office address is unknown; F. Blount who is over the age of twenty-one and Post Office address is unknown; the unknown heirs and devisees of Alfred Sewell whose names, ages and place of residence and Post Office address is unknown; the unknown heirs and devisees of F. Blount, whose names, ages, plageoff residence and Post Office address is unknown, and to any and all persons claiming any title to, interest in, lien or encumbrance on the whole or any part of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yerds, thence East 453.75 yards, thence South 216 yards, thence East 453.75 yards to the place of beginning, all in Section twenty-four, fourship two South, Renge three East.

Notice is hereby given that Ernest Hanks did on the 14th

day of May, 1929, file a bill of complaint in this, the Circuit Court of Baldwin County, Alabama, in equity, against the above described lands and the above named and described persons and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, to quade and establish his title to the said lands, as and to be in fee simple, clear of encumbrance against the said named and described persons and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and to settle and clear up any and all doubts and disputes concerning the same.

that he is the owner in fee simple of the said lands and each part thereof, that the title to the same stands on the records of the Probate Court of Baldwin County, Alabama, in his name; that he and those through whom he claims title have been foremore than twenty years consecutively next preceding the filing of the said bill of complaint in the actual adverse possession of the said lands and each part thereof; that he and those through whom he holds the said lands have for more than twenty years consecutively next preceding the filing of the said bill of complaint, annually listed and paid the taxes on the said lands to the proper officers of Baldwin County, Alabama, and that during the whole of the said period no other

person than he and those through whom he holds the said lands have been in the possession of the said lands or of any part thereof, or paid any taxes on the said lands or any part thereof, and that his title to the said lands is derived by mesne conveyances from the United States Government through, under and by the following instruments:

Patent of United States to the State of Alabama, dated July 11, 1870, recorded in the office of the Judge of Probate of Daldwin County, Alabama, in Deed Book 5, page 222, et sequa;

Deed from the State of Alabama to this complainant, dated April 29, 1929;

Deed from the Alabama Insane Hospitals, dated May 25, 1928;

Deed from Lorenzo M. Wilson, et al, to D. C. Byrne, dated

March 2, 1881, recorded in the office of the Judge of Probate of

Baldwin County, Alabama, in Deed Book L. pages 788-784;

Deed from D. C. Byrne, et al, to J. W. Litchfield, dated January 8, 1882, recorded in said office in Book N, pages 120-1;

Deed from J. W. Litchfiled, et al, to Charles Ursprung, dated December 50, 1884;

Patent from United States to Henry Taylor, dated November 15, 1854, recorded in said Probate Office in Book _____, page 6_____;

Deed from Rosenna E. Taylor, et al., to Charles Ursprung, dated October 1, 1884, recorded in said office in Deed Book 29, page 648;

Deed from Rosenna I. Litchfiled, et al. to Charles Ursprung, filed for record July 14, 1920, recorded in said office in Deed Book 29NS, page 678;

Deed from Charles Ursprang, et al. to Pollie V. Payne, duted November 28, 1891, recorded in said office in Book 2008, page 848;

Deed from J. D. Payne and Ollo V. Payne, his wife, to
O. R. Jones, dated November 28, 1891, recorded in said office in
Book "R", pages 856-7;

Deed of C. R. Jones to Ernest Hanks dated July 20, 1921, recorded July 20, 1921, in Deed Book BLNS, page 151;

Deed of C. R. Jones to F. Tynes, dated May 6, 1921, recorded in Beid office in Record Book 30MS, page 611;

Deed of F. Tynes to Ernest Hanks dated July 80, 1921, recorded in soid office in Book Sing, page 180.

IN WITNESS WHEREOF, I. T. W. Richerson, Register of the Circuit Court of Baldwin County, Alabama, in equity, have hereto set my hand and seal this the $\frac{2}{2}$ day of May, 1989.

Buche Have for complanant

Regester

(iii.ALi)

The State of Alabama

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

·	ERNEST HANK	S	COMPLA	INANT
		VS.	•	
· ·	LENEILA GLAS	S ET AL	RESPON	NDENT
Ι,	T. W.	RICHERSON	·	
as Register and	d Commissioner			
have called and	d caused to come before me	C. IRWIN	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
······································				<u>,, , , , , , , , , , , , , , , , , , ,</u>
	· · · · · · · · · · · · · · · · · · ·			en i i e e e e e
	ned in the Requirement for Ora			
19 29 , at th	e office of	CHERSON		,
in BAY MINE	STTE, Alabar	na, and having firs	t sworn said witne	essto speak the
	le truth, and nothing but the tr		A +10755*****	
. *				•

My name is C. Irwin, I am 51 years old. I have resided at Bay Minette, Baldwin County, Alabama, about 40 years, during the whole of which time I have known continuously and frequently seen the following land;

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, Baldwin County, Alabama.

That he knows Ernest Hanks; that Ernest Hanks is over the age of twenty-one years and a resident of Georgiana, Alabama; that Ernest Hanks is the owner in fee simple of and is in actual peaceable possession of the said lands; that there is no suit pending to test his title to or his right to possession of said lands or interest therein; that on November 28th, 1891, J. D. Payne and Olle V. Payne, his wife, were in the actual possession of the said lands; that on the said day the said J. D. and Olle V. Pavne, conveyed the said lands to O. R. Jones; that O. R. Jones immediately went into possession of said lands cultivating the same annually and living thereon; continuously until July 1921, when he sold a part of said lands to the Complainant Ernest Hanks, and a part of it to F. Tines, and F. Times about the same time sold the part that he bought to Ernest Hanks; that Ernest Hanks immediately went into possession of the whole of said lands and has remained in the continuous possession to the date of the filing of the bill in this case, May 14th, 1929; that the title of the said lands stands upon the record of Baldwin County, Alabama, in the name of Ernest Hanks; that the said O. R. Jones; F. Tines and Ernest Hanks have been successively in the continuous possession of said lands claiming to own the said adversely to the whole world from November 28th, 1931 to May 14th, 1929; that they successively have annually assessed and paid the taxes on the said lands and no other person during the said period have paid taxes on the same or any part thereof or have beenin possession or claim to be in possession of the said lands or any part thereof; that the possesion of the said lands or any part thereof; that the possesion of the said lands or any part thereof; that the possesion of the said lands or any part thereof; that the possesion of the said lands or any part thereof; that the possesion of the said lands or any part thereof; that the possesion of the said lands or any part thereof; that the possesion of the said lands

under color of title since November 28th, 1981, and under claim of ownership. Affiart further says that he knows Leneila Glass; that Leneila Glass is over the age of twenty-one years and is a resident of Tallasee, Alabama; that he also Alle Kirsey; that she is over the age of twenty-one years and resides at and her post office address is Sweetwater, Texas; that Alfred Sewell and F. Blount, he does not know; that he has never heard of them and has never heard the names of their heirs or devisees and does not know whether or not the said F. Blount or the said Alfred Sewell is living or dead.

Affiant

Sworn to and subscribed before me this the 4th day of October, 1929.

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

I, T. W. Richerson	, as Register and Commissioner hereby certify
that the foregoing deposition on Oral Exami	ination was taken down in writing by me in the words
of the witnessand read over tohim a	ind he signed the same in the presence of
at the time and place herein mentioned; that I	have personal knowledge of personal identity of said the identity of said witness; that I am not of
counsel or of kin to any of the parties to said c	ause, or any manner interested in the result thereof. an envelope to the Register of said Court.
	Ath day of October 1929. Register of the Circuit Court, Baldwin County, Alabama.
	In Equity.

Filed Calculated Register RECORDED IN Record Vol. Page Register		The State of Alabama BALDWIN COUNTY IN CIRCUIT COURT, IN EQUITY ERNEST HANKS
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ERNEST HANKS, Complainant,

The Southwest quarter of the South-west quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof. Defendants.

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

Comes the Complainant in the above styled cause and requests the oral examination of a Drawbinson and Walker Taylor, witnesses for the complainant who reside in the Town of Bay Minette, State of Alabama, and suggests T. W. Richerson, Register of this Court, as a suitable person to act as Commissioner to take the deposition of the said witnesses.

Witness our hands this // day of September, 1929.

Bube Hall

Entered on the orient book this Sept 17, 1929

The Regioner

Regioner

ERNEST HANKS, Complainant,

vs

The Southwest quarter of the Southwest quarter and the Southeest quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Seweal if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, a and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof. Defendants.

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

whereas Ernest Hanks has filed his bill of complaint in this court on the // day of Way, 1929, alleging that he is the owner in fee simple of, and is in the actual peaceable possession of the said lands described, situated in the County of Baldwin, State of Alabama, to-wit:

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East.

And further alleging in the said bill of complaint that the title to the said lands stands on the records of the Probate Court of Baldwin County, Alabama, in the said Complainant, Ernest Hanks; and further alleging that he and those through whom he claims title have been in the actual adverse possession, under color of title, of the said lands for more than twenty years consecutively, next preceding the

filing of the said bill of complaint; and that he and those through whom he claims title to said lands have annually listed and paid the taxes on the said lands in Baldwin County, Alabama, fore more than twenty years consecutively, next preceding the filing of the said bill of complaint; and that during the whole of said time no one else has paid the taxes thereon, or been in the possession of the said lands or any part thereof, andthat his bill of complaint is filed for the purpose of establishing his title to and interest in the said lands, and of elearing up all doubts and disputes concerning the same; and that the said Defendants, Leneila Glass, Allee Kirksey, F. Blount and Alfred Sewell, and the unknown heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, claim or are reputed to claim some title to, interest in, lien or encumbrance upon the said lands or some part thereof, and it appearing from the said bill of complaint, the same having been verified as required by law, that the place of residence and Post Office address of the Defendants F. Blount and Alfred Sewell is unknown to the Complainant, and it unknown whether or not the said F. Blount and Alfred Sewell are living or dead, and if dead their heirs and devisees are unknown to Complainant, and that diligent inquiry has been made by the said Complainant to ascertain such matters and that upon such diligent inquiry he has been unable to ascertain the same.

TT IS THEREFORE ORDERED, ADJUDGED AND DECREED that notice to F. Blount, Alfred Sewell, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs endidevisees of Alfred Sewell if he be dead, and Leneila Glass, Allee Kirksey, and any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, of the pendency of the said suit be drawn and signed by the Register and published once a week for four

consecutive weeks in the Baldwin Times, a newspaper published at Bay Witness my hand this the 157 day of May, 1929. Minette, in Baldwin County, Alabama.

J. W. Hare

ERNEST HANKS, Complainant,

VS

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North Half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs and devisees of Alfred Sewell if he be dead, and against any and all persons Claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

I, T. W. Richerson, Register of the said Court, do hereby certify that the foregoing and attached notice was drafted by me in accordance with, and under the directions of an order of the Hon.

F. W. Hare, Judge of the said Court, dated May 15, 1929, and caused to be published by me in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, in its issues of May 30th., June 6th., June 15th., June 30th., 1929, and that a copy of the said notice was by me mailed to Allee Kirksey, Defendant, at Sweetwater, Texas, postage prepaid, registered marked for delivery to addressee only, and return receipt requested, May 27, 1929, and on June 15, 1929, and that each of the said notices so addressed were returned to me unclaimed by the said Allee Kirksey; and that a copy of the said notice was issued by me and served on Leneila Glass,

Defendant, by the Sheriff of Elmore County, Alabama, June 14th., WITNESS my hand and seal this the ent day of October,

REGISTER. 1929.

1929.

NOTICE OF PENDENCY OF BILL OF COMPLAINT.

ERNEST HANKS, Complement,

T 3

The Southwest quarter of the Southwest quarter and the Southeast quartor of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 455.75 yards, thence South 216 yards, thence West 455.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknows heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lime or encumbrance on the said lends or any part thereof, Defendants.

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

and whose residence and Post Office address is Tallassee, Alabama; Allee Kirksey who is over the age of twenty-one years and whose residence and Post Office address is Sweet Water, Texas; Alfred Sewell who is over the age of twenty-one and whose place of residence and Post Office address is unknown; F. Blount who is over the age of twenty-one years and whose place of residence and Post Office address is unknown; the unknown heirs and devisees of Alfred Sewell whose names, ages and place of residence and Post Office address is unknown; the unknown heirs and devisees of F. Blount, whose names, ages, place of residence and Post Office address is unknown, and to any end all persons claiming any title to, interest in, lien or encumbrance on the whole or any part of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

The fortification of the forther description of the forther section of the first section of the forther section of the forther section of the forther section of the first section of the forther section of the first section of the forther section of the first se

Notice is hereby given that Ernest Fanks did on the 14th dury of May, 1988, file a bill of complaint in this, the Circuit court of Daldrin County, Alabama, in equity, against the above feeeribed lands and the above named and described persons and against any and all persons claiming any title to, interest in lies of anomalization on the said lands of any part thereof, to quiet and antablish his title to the said lands, as and to be in fee simple, and against any and all persons claiming any title to, interest in, lies or anomalization on the said lands or any part thereof, and to notice or anomalization on the said lands or any part thereof, and to notice and clear up any and all coubts and disputes concerning the

that the Completeent in his said bill of complaint alleges that he is the owner in fee simple of the said lands and each port thereof, that the title to the semicontends on the resords of the recent of Peldvin County, Alabers, in his name; that he are those through when he claims title have been for more than twenty years conscentively next proceeding the filing of the said bill of complaint in the actual adverse possession of the said lands and each part thereof; that he said those through when he helds the said lands and that have for more than treaty pears consecutively next proceeding the filing of the said lands and the tops on the said that it is the proper offices of Salesin County, alabors, and that during the whole of the said period no class.

Fact.

The late to the late late and the late to the late the late the late that the late the late that the

Patent of United States to the States of Alchema, depot out;
Li, 1870, recorded in the office of the Judge of Trobeto of Inlanta
County, Alchema, in Dood Rook D. man Sid, et Esquar

post from the State of Alabera to this completent, taked and all 20, 1021

Deed from the Aldrew Insens Institute, dated but 15, 1920;

Deed from Lorentz II. William, at al., to D. C. Syrne, dated

Deed from Lorentz II. William, at al., to D. C. Syrne, dated

Detail A. 1931, recorded in the office of the Judge of Machine of

Balanda County, Alabama, in Deed Book I., 2002 757-774;

Deed from D. G. Dynne, of the D. N. Litchfold, dailed Farmery D. 1880, respectable in sold office in Deel N. Section 128-14 Deed from D. N. Litchfold, of the Courtes Continue, dated

Payon from United States to Heary Taylor, dayed November
LS, 1834, rescribe in most Frobers Cifics in Book ____, was

Dead from Resource I. Inplies, at al. to Charles Ursprund: Lated Catober I. 1894, recorded in Exid office in Dead Hout St. page 648;

Dock from Reputer I. Litchfield, et al. to Charles Urstweens.

Clied for record July 14, 1980, recorded in maid office in Deed Book

2008, page 679:

peed from Charles Vraprums, of al. to Pollie V. Payno. deted November 23, 1891, recorded in said office in Book 2905, page 648.

Deed from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and Olle V. Payme, his wife, to C. R. Jones, dated from J. H. Payme and J. Payme, his wife, to C. R. Jones, dated from J. Payme, his wife, to C. R. Jones, dated from J. Payme, his wife, to C. R. Jones, dated from J. Payme, his wife, to C. R. Jones, dated from J. Payme, his wife, to C. R. Jones, dated from J. Payme, his wife, his wif

Deed of O. R. Jones to Ernest Hanks dated July 20, 1921, recorded July 20, 1921, in Deed Book SINE, page 151;

Deed of C. A. Jones to F. Tynes, dated May 6, 1921, recorded in maid office in Record Book SONS, page CLL;

Deed of F. Tynes to Exnest Hanks dated July 20, 1921, recorded in said office in Book SLNS, page 150.

IN WITHESS MERICOL, I. T. W. Richerson, Register of the Circuit Court of Delivin County, Alabama, in equity, have hereto set my hand and seel this the 27 day of May, 1980.

Buberton Strace Complanaet Regester.

I, T. W. Richerson, Register of the Circuit Court of Baldwin County, Alabama, in equity, do hereby certify that the foregoing attached is a true, correct and literal copy of a notice of the pendency of a bill of complaint in the Circuit Court of Baldwin County, Alabama, in equity, wherein Ernest Hanks is Complainant and the Southwest quarter of the Wouthwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and against the unknown heirs and devisees of Alfred Sewell if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, are Defendants;

and I do further certify that the said notice was drawn and signed by me as Register of this Court;

And under and inconformity with an order of this Court ma	ade
and entered on the day of May, 1929, the same was caused	
to be published in the Baldwin Times, the newspaper designated	
in such order, in the issues of the said paper of, %	·
and	٠

And I do further certify that a duly certified copy of the said notice was by me filed for record in the office of the Judge of Probate of Baldwin County, Alabama, and caused to be recorded

by the said Judge of Probate in Lis Pendens Record No. 1, page
, on the day of May, 1929.
And I do further certify that a copy of this notice
was by the Sheriff of Elmore County, Alabama, served on Leneila
Glass, at Tallassee, Alabama, on the day of,
1929, and due return of such service was made by the said Sheriff;
And I do further certify that a copy of this notice was by me
as Register of this Court sent to Allee Kirksey at Sweet Water,
Texas, by registered mail, postage prepaid, marked for delivery
only to the person to whom addressed, and return receipt demanded
addressed to the Register of this Court, and that return receipting
signed by the said Allee Kirksey, was by me as Register of this Cou
received on the day of, 1929, and filed in
this cause.
Witness my hand and seal of office this the 27
day of May, 1929.
Register of the Circuit Court of Baldwin County, Alabama, in Equit.

ERNEST HANKS, Complainant.

VS

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

To The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter, described as beginning at the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands of any part thereof.

Notice is hereby given that on October 4, 1929, Complainant will take the oral deposition of Walker Taylor and of C. Irwin, witnesses for the Complainant in the above styled cause, before T. W. Richerson, as Commissioner, in the office of the said T. W. Richerson, Clerk of the Circuit Court of BaldwinCounty, Alabama, at Bay Minette, at ten o'clock A. M.

Witness this the 1st., day of October, 1929.

Buche Hall
Attorneys for Complainant.

NOTICE OF PENDENCY OF BILL OF COMPLAINT.

beginning at the Southwest torner of the Rooth ball of i ERNEST HANKS, hance South 116 yerds, thence IN THE CIRCUIT COURT OF Complainant, beginning, all in Portion twenty four,

The Southwest exector of the Southwest quarter end the

Westship two Josth, lange three dast.

BALDWIN COUNTY, ALABAMA.

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and IN EQUITY. that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Class, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and sid no (oc and sessioned persons devisees of F. Blount if he be dead, and the unknown heirs and devisees had (any vitte to, interest in, of Alfred Sewell if he be dead, and against any and all persons claim a (any last the east to eastle ing any title to, interest in, lien or encumbrance on the said lands or all you wender the said. any part thereof,

lasomilioù posanta trol evetnis That the D.Defendants are as sent bill of somplains alleger

To Leneila Glass who is over the age of twenty-one years and whose residence and Post Office address is Tallassee, Alabama; Allee Kirksey who is over the age of twenty-one years and whose residence and Post Office address is Sweet Water, Texas; Alfred Sewell who is over the age of twenty-one and whose place of residence and Post Office address is unknown; E. Blount who is over the age of twenty-one years and whose place of residence and Post Office address is unknown; the unknown heirs and devisees of Alfred Sewell whose names, ages and place of residence and Post Office address is unknown; the unknown heirs and devisees of F. Blount, whose names, ages, place of residence and Post Office address is unknown, and to any and all persons claiming any title to, interest in, lien or encumbrance on the whole or any part of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

ERNEST HANKS, Complainant,

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North hadf of the Southwest guarter, run North 216 yards, thence Mast 453.75 yards, thence South 216 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, township two south Mange three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell of he had devisees of Alfred Sewell of he be dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof. Defendants.

(IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Notice is hereby given that Complainant in the above atyled cause by his attorneys of record have this day made application for oral examination of C. Irwin and Walker Taylor, witnesses for the Complainant and have suggested T. W. Richerson, as commissioner to take depositions of such witnesses and that such motion will be heard before the Commissioner at his office on the 23rd., day of September, 1929.

Auche Hall
Attorneys for Complainant.

De Register.

Served Sept 17 1929 by entry on their Registers
Order Book Torrange Regester

ERNEST HANKS, Complainant,

VS

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 455.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs and devisees of Alfred Sewell if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY,

The Complainant having on to-wit, September 17, 1929, made application to this Court for oral examination of C. Irwin and Walker Taylor, witnesses for the Complainant, and due and proper notice of the said application having been given by entry on the Register's Order Book September 17, 1929, and the said cause coming on to be heard, this September 23, 1929:

IT IS THEREFORE ORDERED that the said application be and is hereby granted.

WITNESS my hand this the 23rd., day of September, 1929.

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fn account with

G. W. HUMPHRIES

JUDGE OF PROBATE

BALDWIN COUNTY Please Return Bill With Remittance

TO THE HONORABLE PRANCES W. MARE, JUNES OF THE CIRCUIT COURT OF BALDWIN OCCUPY, ALLEGAE, IN EQUIFICATION

Comes broad Homics and brings this bill of complaint egainst the Southwest quarter of the Southwest quarter and that part of the Bouthwest currier and that part of the Bouthwest currier of the Southwest quarter, described as beginning at the Southwest corner of the Bouth half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 215 yards, thence West 453.75 yards to the place of beginning, all in Section Eventy-four, Township two South. Range three East, and against Lopella Glass, Alice Kirksey, Alfred Souell, and 7. Blount, and the unknown heirs and devisees of Alfred Souell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lien or ensumbrance on the said lands or any part thereof, and respectfully shows unbo your Honor as follows:

That your Completions, Traces Names, is over the age of twenty-one yours of age and a resident of Secretare, State of Alabams; that he is the owner in for simple of and is in the casual peaceable possession of the said lands described, situated in the County of Baldwin, State of Alabams, to-wit:

The Southerest quarter of the Southwest quarter and the Southeest quarter and that part of the North helf of the Southwest quarter and that part of the North helf of the bestiming at the Southwest corner of the North helf of the Southwest quarter, run North 216 yards, thereo Sast 455.75 yards, thence South 216 yards, thence North 216 yards, thence South 216 yards, thence North 2007. To yards to the place of beginning, all in Section bronty-four. Township too South, Sange three Sast.

That there is no suit pending to test his title to, interest in, or his sight to the possession of such lands; that his title to the said lands and each part thereof stands upon the record of the Probate Court of Beldwin County, Alabama, in his mame, that his title to the said lands was obtained by the following deeds: Putent of United States to the State

of Alabama, dated July 11, 1870, recorded in the office of the Judge of Exobate of Baldwin County, Alabama, in Bood Book 5, page 222, ot sequa, conveying the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North belf of the Southwest quarter and run North 216 yards, themse East 455.75 yards, thence South 216 yards. thence west 453.75 yards to place of beginning, all in Bestien twentyfour, Township two South, Range three East; dood from the State of Alabema to this complainant, dated April 39, 1020, conveying the same lunds; doed from the Alabama Insano Hospitals, dated May 25, 1923, conveying the same lands; dead from Lorenzo M. Wilson, of al, to D. C. Byrne, dated March 2, 1881, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book L, pages 700-704. conveying the said lands; deed from D. C. Byrne, et al. to J. W. Litchfield, dated January 9, 1888, recorded in said office in Book N. pages 120-1; deed from J. W. Litchfield, ot al. to Charles Upspring, dated December 50, 1884; patent from United States to Henry Taylor, dated dey of _____, M_, recorded in said Probate Cffice in Book ____, page ____, conveying the Southwest querter of the Southwest quarter of Section twenty-four, Township two South, Renge three East; deed from Rosenna I. Taylor, et al. to Charles Grepvung. dated October 1, 1884, conveying the Southwest quarter of the Southwest quarter of said Section, recorded in said office in Deed Book 20, page 645; deed from Rosanna I. Litchfield, et al, to Charles Ursurung. filed for record July 14, 1920, recorded in said office in Deed Book 29MS, page 67S, conveying the Southwost quarter of the Southwest quarter of said Spotion; deed from Charles Ursprung, of al, to Pollie V. Payme. dated November 28, 1891, recorded in said office in Book 2905, page 645, conveying all of the lands described in this bill of complaints

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East.

Notice is hereby given that Ernest Hanks did on the 14th day of May, 1929, file a bill of complaint in this, the Circuit Court of Baldwin County, Alabama, in equity, against the above described lands and the above named and described persons and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, to quiet and establish his title to the said lands, as and to be in fee simple, clear of encumbrance against the said named and described persons and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and to settle and clear up any and all doubts and disputes concerning the same.

that he is the owner in fee simple of the said lands and each part thereof, that the title to the same stands on the records of the Probate Court of Baldwin County, Alabama, in his name; that he and those through whom he claims title have been for more than twenty years consecutively next preceding the filing of the said bill of complaint in the actual adverse possession of the said lands and each part thereof; that he and those through whom he holds the said lands have for more than twenty years consecutively next preceding the filing of the said bill of complaint, annually listed and paid the taxes on the said lands to the proper officers of Baldwin County, Alabama, and that during the whole of the said period no other

person than he and those through whom he holds the said lands have been in the possession of the said lands or of any part thereof, or paid any taxes on the said lands or any part thereof, and that his title to the said lands is derived by mesne conveyances from the United States Government through, under and by the following instruments:

Patent of United States to the State of Alabama, dated July 11, 1870, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 5, page 222, et sequa;

Deed from the State of Alabama to this complainant, dated April 29, 1929;

Deed from the Alabama Insane Hospitals, dated May 25, 1928;

Deed from Lorenzo M. Wilson, et al, to D. C. Byrne, dated

March 2, 1881, recorded in the office of the Judge of Probate of

Baldwin County, Alabama, in Deed Book L, pages 735-734;

Deed from D. C. Byrne, et al, to J. W. Litchfield, dated January 8, 1882, recorded in said office in Book N, pages 120-1;

Deed from J. W. Litchfiled, et al, to Charles Ursprung, dated December 30, 1884;

Patent from United States to Henry Taylor, dated November 15, 1854, recorded in said Probate Office in Book _____, page _____;

Deed from Rosanna I. Taylor, et al, to Charles Ursprung,
dated October 1, 1884, recorded in said office in Deed Book 29,
page 648;

Deed from Rosanna I. Litchfiled, et al, to Charles Ursprung, filed for record July 14, 1920, recorded in said office in Deed Book 29NS, page 678;

Deed from Charles Ursprung, et al, to Pollie V. Payne, dated November 28, 1891, recorded in said office in Book 29NS, page 648;

Deed from J. D. Payne and Olle V. Payne, his wife, to O. R. Jones, dated November 28, 1891, recorded in said office in Book "R", pages 236-7;

Deed of O. R. Jones to Ernest Hanks dated July 20, 1921, recorded July 30, 1921, in Deed Book 31NS, page 131;

Deed of O. R. Jones to F. Tynes, dated May 6, 1921, recorded in said office in Record Book 30NS, page 611;

Deed of F. Tynes to Ernest Hanks dated July 20, 1921, recorded in said office in Book 31NS, page 130.

IN WITNESS WHEREOF, I, T. W. Richerson, Register of the Circuit Court of Baldwin County, Alabama, in equity, have hereto set my hand and seal this the 27 day of May, 1929.

Buche Hace for complained Regioner (SEAL)

Hanks RECORDED

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Flans, et al

ordergranting motion fordral examination of milners

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Filed Ret 1,1929 Register Hanks

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Julie ther Sept 17, 1927 Miceran Ryster Hanks Man, ital.

RECORDED

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Dervedhymtry ord Registers ær ser book Oct 1, 14 ? 9 Der Ricerone Progress That your Complainant's title is derived through the following challe of title: Dead of J. D. Payme and Olle V. Payme, his wife, to C. H. Jones, deted Hovember 25, 1891, filed in the office of the Judge of Probate of Delowin County, Alabama, November 50, 1891, recorded in Book vow. Goes 538-7, conveying the following described lands:

All of the Southwest quarter of Southwest quarter and Southwest quarter of Southwest quarter of Section Westlyfour, Township two South, Range throo, Sest, equivilies 50.65 mores, more or less.

Also a serbile lot of land opposeding at the Mortioset corner of the Bouthwest quarter of Southwest quarter of section twenty-four, and running thence less if chains to a post; thence less if a post; thence East of the ins to a post at the branch; thence sions the west side chains to a post at the branch; thence sions the west side of the branch southward to the cast and west line on which the beginning as made in Section twenty-four. Township the Doubling as made in Section twenty-four, Township two South, thuse three East, containing ten names, more or less, all situated in the County of Bellevin, total of Land.

Deed of C. R. Jones to Errort Hanks, dated July 20, 1921, recorded July 50, 1921, in Deed Book SIMS, page 121, in the office of the Judge of Probate of Reldwin County, Alabama, conveying the following described lands:

Thei part of the South half of the Northwest quarter of section twenty-four, described as follows: Becaming at the Southwest country of North half of Southwest quarter of Section trenty-four, Tourship two South of Janes Large East. The North 215 yards, Lost 465.75 yards, South 215 yards on the Cast and west line of South Boundary, 1885 455.75 on the Cast and west line of South Boundary, 1885 455.75 yards to class of Declining, Bolle, in Souther trenty-four, losses to class of Declining, Bolle, in Souther trenty-four, lower to contract the South Boundary in South South South Investigation to the South Investi

Doed of C. R. Jones to F. Tynes, dated May S. 1921, recorded Day 7, 1921, in the office of the Probate Judge of Relatin County, Alabere, in Redord Book SONS, page 511, conveying the following described Lands:

The South half of the Southwest quarter of Section twentyfour, Township two South of Range three East, containing eighty acres, more or less.

Deed of F. Tynes to Ermest Hanks dated July 20, 1921, recorded July 50, 1921 in said Probate Office in Book Simu, rage 150, conveying the following described lands:

The South half of the Southwest quarter of Section twentyfour, Township two South, Range three East, containing eighty acres, more or less. That at the time of the execution of the eleveration doods by J. D. Payne and Olle V. Payne to U. A. Jones, the said J. D. Payne and Olle V. Payno were in the actual possession of said lands; that upon the execution of the aforesaid deed C. R. Jones went into possession of the whole of the lengt described in this bill of complaint, claiming to own the whole of the same and the entire interest therein in fee simple; that have remained in continuous possession thereof under such claim of own rahip and engually listed and paid the taxes thereon in Baldwin County, Alaboma, until May 8, 1921, when he conveyed the South helf of the Southwest quarter of Section twenty-four, Township two South, Renge three East, to F. Types, who issociately went into possession of said land claiming to own the seme and the whole interest thereof in fee simple, and continued in such possession thereof until July 20, 1921; that the remainder of said lands remained in such possession of the said O. R. Jones with July 20, 1961, when the said O. R. Jones and the said F. Types, each by deeds above described, conveyed the respective tracts owned by then as aforeseld to the equalsinant; that your complainant immediately went into possession of the said lands and has remained in continuous possession thereof, claiming to own the whole of the same and the entire interest therein in fee simple; Complainant further shows unto your Bonor that he and those persons aforeseld through whom he claims title have been continuously for more than twenty-five years next preceding the filing of this bill of complaint in the netwel adverse possession of the whole of the sforesaid lands under color of title, claiming to own the same in fee simple, that his and their possession thereof has been setual, open, notorious, exclusive, hostile, peaceable, visible and continuous under color of title for more than teenty-five years next proceding the filing of this bill of complaint, and that he and those through whom he claim as aforesaid have, each in succession, annually listed and paid the texes on the said property

in Baldwin County, Alabema, to the proper officer thereof.

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Complainent further shows that during the whole of the said period, namely, twenty-five years next proceeding the filing of this bill of complaint, no person other than he and those through show he claims as aforesaid have had any possession of the said lands or any part thereof, or have attempted to exertise any acts of possession over the said lands or any part thereof; that no other person than he and those through whom he claims as aforesaid have paid any bares on the said lands in Seldwin County, Alabama, during any part of the said period of twenty-five years.

Complainant further alloges that the said Defendants, length Class, Alloc Kirksey and Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell If he is dead, and the unknown heirs and devisees of I. Blount if he is dead, claim or ers reguled to claim some title to, interest in, lies or ensumbrance upon the sald lands or some part thereof; Completeent further shows wito your Honor that the said Allee Kirksey, Leneila Class are each over the age of twenty-one years, and the said Allee Kirksey resides at end hor Post Office address is Sweet Water, Texas; and the said Lenella Glass resides at and her Post Office address is Tallassee, Alabema, that this Complainant does not know whether or not the said Alfred Sewell and the said F. Blown, or oither of them is living or dood, and if living he does not know the place of residence and Post Office address of them of either of them; that if they or either of them are dead be does not know who their heirs and devinees are, or who are the heirs and devisees of either of them; that he has made diligent search to ascertain the Post Office address and place of residence of them and of each of them, and to ascertain whether or not they be living or

dead, and is dead weather or not they died sentage or intertate and sho are their beirs and devisees, or the heirs and devisees of either of those that in his search to escentain the same he has equod N. C. Joshe and N. M. Zall, hip appare and externeys in the premisor, to make secret of the Probate Records of Delivin County, Alabama, and of the records in the effices of the fax Collecter and Tex Assessor of Boldwin County, Aleboma, and in the office of the Clerk of the Circuit Court of Baldwin County, Alabema, and of the Shoriff of Baldwin County, Alabama, and that the sald records and books of addresses logic in the gaid offices do not disclose the address of either of than at this time or et say time, and do not disclose whether or not they or either of them ere dead, and whether or not they died testate or intestate, and who are their hairs and deviseor, or the heirs anddeviseos of either of them; and that through and by the said attorneys of this Compleinant be coused and they did make inquiry of each and all persons in each and all of the paid offices, and of J. W. Parker, W. T. Stanleton, C. C. Nall, C. R. Jones, and divers and namerous other persons who lived most to and have known continuously for more than townty-five years the said lands, as to the place of residence of the said F. Blount and Alfred Sevell, and as to whether they be living or dead, and if dead whether they died testate or intestate, and who are their heirs or devisoes, or the heirs and devisees of either of them; and neither of the seit persons know, or have everylenous, either of themsta F. Mount or the sail Alfred Sewell, nor whether they or either of them be living, or dead, and if dead, whether or not they or either of them died testate or intestate, and who are their beirs and devisees, or the beirs and devisors of either of them; and upon such inquiry as aforesaid this Complainant does believe and allege that the said Alfred Sevell and r. blount, if living, are ever the age of twenty-one years, that their Post Office address and place of residence is unknown, that he does not know whether they or either of them are living or dead, that if dead he does not know whether or not they died testate or intestate, nor who the heirs and devisees of either of them are, now what the ages and places of residence are of the heirs and devisees of either of them, and that diligent inquiry has been made to ascertain the seid matters, and that the same cannot be ascertained upon diligent inquiry.

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Defendants, nearly, Alles Kirksey, Leneila Glass, F. Blount, Alfred Sewell, and the unknown hairs and devisess of F. Blount and the unknown heirs and devisess of F. Blount and the unknown heirs and devisess of Alfred Sewell, have had or exercised any possession over the whole or any part of the lands described in this bill of complaint at any time during the twenty-five years next preceding the filing of this bill of complaint, and that neither of them have during any part of said period paid any taxes on the said lands or any part thereof; and that the title, interest, lien or encumbrance claimed by them or either of them to the said lands or any part thereof is invalid, and that this Complainant's aforesaid title to the said land and to every part thereof is parfect as against the said Defendants and each of them and as against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof.

Sherefore your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint, that by appropriate process the said lands and the aforesaid Defendants, namely, Alfred Sawell and the unknown heirsand devisees of Alfred Cowoll, F. Blount, and the unknown heirs and devisees of F. Blount, Lengtle Glass and Allee Kirksey, and any and all persons claiming any

title to, interest in, lien or encumbrance on said lands or any part thereof be made purty defendants to this bill of complaint, and by appropriate process be required to plead, answer or demar to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that upon the final hearing of the cause made by this bill of complaint this Henorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, clear of engumbraness, to the Rende described in this bill of complaint, and to each part thereof is vested in this Complainant as against the said Defendants and each of them and as against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and that the said Defendants, namely, Alfred Sewell, and the unknown heirs and deviseem of Alfred Sowell, F. Blount and the unknown heirs and devisees of II Blount, Lengila Glass and Allee Kirksey, and each of them have no title to, interest in, lien or encumbrance on the said lands or any part thereof, and that no other person whomsoever that this Complainant has any title, to, interest in, lien or enoundrance on the said lands or any pert thereof, and this Complainant prays for such other, further or different relief as in equity and good conscience he shall be entitled to receive in the premises.

Beebe & Hall Attorneys for Complainant.

FOOT NOTE:

The Defendants are required to answer every material allegation of the foregoing bill of complaint, in paragraphs first to fourth, inclusive, but not under eath, Oath being hereby expressly waived.

Beebe & Hall Attorneys for Complainant. STATE OF ALABAMA BALDWIN COUNTY

Before me, Eloise Slocumb, a Notery Public in and for said State and County, personally appeared W. C. Beebe who is known to me and who being by me first duly sworn deposes and says that he is attorney of record for Ernest Manks, Complainant in that certain cause pending in the Circuit Court of Baldwin County, Alabama, wherein the said Ernest Hanks is Complainant, and the Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning/the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 455.75 yards, thence South 216 yards, thence West 453.75 yards, to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and r. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs and devisees of Alfred Sewell if he be dead, and any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, are Defendants; that he has read the said bill of complaint and knows the facts alleged therein, to which said bill of complaint this affidavit is attached, end the said bill of complaint referred to and made a part of this affidavit and that the facts alleged in said bill of complaint are true.

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Sworn to and subscribed before me on this the 14 day of May, 1929.

Rioise Sloumb Notary Public, Baldwin County, Alabama. O DE HOLDARE PRINCE E. LEE, JURIS OF THE CERCULE COURT OF LABORE, ALAREM, IN BUILT SERVICE.

against the Continuous quarter of the Bouthwest quarter and the Coutheast quarter of the Scathwest quarter and that part of the Bouth balf
of the Scathwest quarter, described as bodining at the Scathwest opens
of the Bouth balf of the Scathwest quarter, run Merch 216 parts, thence
fact 435.75 parts, thence Scath 216 parts, thence Vest 455.75 parts to
the place of beginning, all in Scation trenty for Township be Scath,
fact the Saat, and equinat Length Class, allow Elricay, Alfred Scall,
and J. Haant, and the unknown hours and devises of Alfred Scall if
he be dead, and the unknown hours and devises of J. Blownt if he be
deed, and equinat any and all persons claiming any withe to, interest in,
lien or ensumbrance on the said lands or any part thereof, and respectfully
above units your Honor as follows:

And of twenty-one recent of the sink a realizable of the following for the late of the control of the file of the

The southwest quarter of the southwest quarter and the Southwest quarter and their part of the Southwest quarter and their part of the southwest quarter described on the Southwest Quarter described on the Southwest Quarter of the Southwest believes to the Southwest Southwest

That there is no must remain to best his title to, interest in, or his bight to the possession of such lands; that his sittle to the send lands and another sent through a lands upon the record of the Probabe Court of Bullouin Courty, Liebens, in his mann, that his title to the sent lands was obtained by the following decids: ratema of United States to the States

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of Alabama, dated July 11, 1870, recorded in the office of the Judge of Frobate of Baldwin County, Alabama, in Deed Book 5, page 222, et sequa, conveying the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter and run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to place of beginning, all in Section twentye four, Township two South, Range three East; deed from the State of Alabama to this complainant, dated April 29, 1929, conveying the same lands; deed from the Alabama Insane Hospitals, dated May 25, 1923, conveying the same lands; deed from Lorenzo M. Wilson, et al, to D. C. Byrne, dated March 2, 1881, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book L, pages 755-784, conveying the said lands; deed from D. C. Byrne, et al, to J. W. Litchfield, dated January 9, 1882, recorded in said office in Book N. pages 120-1; deed from J. W. Litchfield, et al, to Charles Upspring, dated Desember 50, 1884; patent from United States to Henry Taylor, dated day of _____, 18_, recorded in said Probate Office in Book ____, page ___, conveying the Southwest quarter of the Southwest quarter of Section twenty-four, Township two South, Range three East; deed from Rosenna I. Taylor, et al, to Charles Ursprung, dated October 1, 1884, conveying the Southwest quarter of the Southwest quarter of said Section, recorded in said office in Deed Book 29, page 648; deed from Rosanna I. Litchfield, et al. to Charles Ursprung, filed for record July 14, 1920, recorded in said office in Deed Book 29NS, page 678, conveying the Southwest quarter of the Southwest quarter of said Section; deed from Charles Ursprung, et al, to Pollie V. Payne, dated November 28, 1891, recorded in said office in Book 29MS, page 648, conveying all of the lands described in this bill of complaint;

That your Complainant's title is derived through the following chain of title: Deed of J. D. Payne and Olle V. Payne, his wife, to O. E. Jones, dated November 28, 1891, filed in the office of the Judge of Probate of Baldwin County, Alabama, November 30, 1891, recorded in Book "R", pages 236-7, conveying the following described lands:

All of the Southwest quarter of Southwest quarter and Southeast quarter of Southwest quarter of Section twenty-four, Township two South, Range three East, containing 90.65 acres, more or less.

Also a certain lot of Land commencing at the Northeast corner of the Southwest quarter of Southwest quarter of Section twenty-four, and running thence West 17 chains to a post; thence Worth 19 chains to a post; thence East 37 chains to a post at the branch; thence along the west side of the branch southward to the east and west line on which the beginning was made in Section twenty-four, Township two South, Range three East, containing ten acres, more of less, all situated in the County of Baldwin, State of Alabama.

Deed of O. R. Jones to Ernest Hanks, dated July 20, 1921, recorded July 30, 1921, in Deed Book SINS, page 131, in the office of the Judge of Probate of Baldwin County, Alabama, conveying the following described lands:

That part of the South half of the Northwest quarter of Section twenty-four, described as follows: Beginning at the Southwest corner of North half of Southwest quarter of Section twenty-four, Township two South of Hange three East, run North 216 yards, East 453.75 yards, South 216 yards on the east and west line of South boundary, West 453.75 yards to place of beginning, being in Section twenty-four, Township two South, Range three East.

Deed of O. R. Jones to F. Tynes, dated May 6, 1921, recorded May 7, 1921, in the office of the Probate Judge of Baldwin County, Alabama, in Redord Book SONS, page 611, conveying the following described lands:

The South half of the Southwest quarter of Section twentyfour, Township two South of Range three East, containing eighty acres, more or less.

Deed of F. Tynes to Ernest Hanks dated July 20, 1921, recorded July 30, 1921 in said Probate Office in Book 51NS, page 130, conveying the following described lands:

The South half of the Southwest quarter of Section twenty-four, Township two South, Range three East, containing eighty acres, more or less.

That at the time of the execution of the aforesaid deeds by J. D. Payne and Olie V. Payne to O. R. Jones, the said J. D. Payne and Olie V. Payne were in the actual possession of said lands; that upon the execution of the aforesaid deed C. R. Jones went into possession of the whole of the lands described in this bill of complaint, claiming to own the whole of the same and the entire interest therein in fee simple; that have remained in continuous possession thereof under such claim of ownership and annually listed and paid the taxes thereon in Beldwin County, Alabama, until May 6, 1921, when he conveyed the South helf of the Southwest quarter of Section twenty-four, Township two South, Range three East, to F. Tynes, who immediately went into possession of said land claiming to own the same and the whole interest thereof in fee simple, and continued in such possession thereof until July 20, 1921; that the remainder of said lands remained in such possession of the said O. R. Jones until July 20, 1921, when the said O. R. Jones and the said F. Tynes, each by deeds above described, conveyed the respective tracts owned by them as aforesaid to the complainant; that your complainant immediately went into possession of the said lands and has remained in continuous possession thereof, claiming to own the whole of the same and the entire interest therein in fee simple; Complainant further shows unto your Honor that he and those persons aforesaid through whom he claims title have been continuously for more than twenty-live years next preceding the filing of this bill of complaint in the actual adverse possession of the whole of the aforesaid lands under color of title, claiming to own the same in fee simple, that his and their possession thereof has been actual, open, notorious, exclusive, hostile, peaceable, visible and continuous under color of title for more than twenty-five years next preceding the filing of this bill of complaint, and that he and those through whom he claim as aforesaid have, each in succession, annually listed and paid the taxes on the said property

in Baldwin County, Alabama, to the proper officer thereof.

Complainant further shows that during the whole of the said period, namely, twenty-five years next preceding the filing of this bill of complaint, no person other than he and those through whom he claims as aforesaid have had any possession of the said lands or any part thereof, or have attempted to exercise any acts of pessession over the said lands or any part thereof; that no other person than he and those through whom he claims as aforesaid have paid any taxes on the said lands in Baldwin County, Alabama, during any part of the said period of twenty-five years.

THIAD:

Complainant further alleges that the said Defendants, Leneila Glass, Allee Kirksey and Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he is dead, and the unknown heirs and devisees of F. Blount if he is dead, claim or are reputed to claim some title to, interest in, lien or encumbrance upon the said lands or some part thereof; Compleinant further shows unto your Honor that the said Allee Kirksey, Lenetla Glass are each over the age of twenty-one years, and the said Allee Kirksey resides at and her Post Office address is Sweet Water, Texas; and the said Leneila Glass resides at and her Post Office address is Tallassee, Alabema; that this Complainant does not know whether or not the said Alfred Sewell and the said F. Blount, or either of them is living or dead, and if living he ddes not know the place of residence and Post Office address of them om either of them; that if they or either of them are deed he does not know who their heirs and devisees are, or who are the heirs and devisees of either of them; that he has made diligent search to ascertain the Post Office address and place of residence of them and of each of them, and to ascertain whether or not they be living or

dead, and if dead whether or not they died testate or intestate and who are their heirs and devisees, or the heirs and devisees of either of them; that in his search to ascertain the same he has caused W. C. Beebe and H. M. Hall, his agents and attorneys in the premises , to make search of the Probate Records of Baldwin County, Alabama, and of the records in the offices of the Tex Collector and Tex Assessor of Baldwin County, Alabama, and in the office of the Clerk of the Circuit Court of Baldwin County, Alabama, and of the Sheriff of Baldwin County, Alabama, and that the said records and books of addresses kept in the said offices do not disclose the address of either of them at this time or at any time, and do not disclose whether or not they or either of them are dead, and whether or not they died testate or intestate, and who are their heirs and devisees, or the heirs anddevisees of either of them; and that through and by the said Attorneys of this Complainant he caused and they did make inquiry of each and all persons in each and all of the said offices, and of J. W. Taylor, W. D. Stapleton, C. C. Hall, O. R. Jones, and divers and numerous other persons who lived near to and have known continuously for more than twenty-five years the said lands, as to the place of residence of the said F. Blount and Alfred Sewell, and as to whether they be living or dead, and if dead whether they died testate or intestate, and who are their heirs or devisees, or the heirs and devisees of either of them; and neither of the said persons know, or have everyknown, either of the aid F. Blount or the said Alfred Sewell, nor whether they or either of them be living, or dead, and if dead, whether or not they or either of them died testate or intestate, and who are their heirs and devisees, or the heirs and devisees of eithersof them; and upon such inquiry as aforesaid this Complainant does believe and allege that the said Alfred Sewell and F. Blount, if living, are over the age of twenty-one years, that their Post Office address and place of residence is unknown, that he does not know whether they or either of them are living or dead, that if dead he does not know whether or not they died testate or intestate, nor who the heirs and devisees of either of them are, now what the ages and places of residence are of the heirs and devisees of either of them, and that diligent inquiry has been made to ascertain the said matters, and that the same cannot be ascertained upon diligent inquiry.

TOTATE

Defendants, namely, Allee Kirksey, Leneila Class, F. Blount, Alfred Sewell, and the unknown heirs and devises of F. Blount and the unknown heirs and devises of F. Blount and the unknown heirs and devises of Alfred Sewell, have had or exercised any possession over the whole or any part of the lands described in this bill of complaint at any time during the twenty-five years next preceding the filing of this bill of complaint, and that neither of them have during any part of said period paid any taxes on the said lands or any part thereof; and that the title, interest, lien or ensumbrance claimed by them or either of them to the said lands or any part thereof is invalid, and that this Complainant's aforesaid title to the said land and to every part thereof is perfect as against the said Defendants and each of them and as against any and all persons claiming any title to.

Wherefore your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint, that by appropriate process the said lands and the aforesaid Defendants, namely, Alfred Sewell and the unknown heirsand devisees of Alfred Sewell, F. Blount, and the unknown heirs and devisees of F. Blount, Lensila Glass and Allee Kirksey, and any and all persons claiming any

title to, interest in, lien or encumbrance on said lands or any part thereof be made party defendants to this bill of complaint, and by appropriate process be required to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that upon the final hearing of the cause made by this bill of complaint this Henorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, clear of encumbrances, to the mands described in this bill of complaint, and to each part thereof is vested in this Complainant as against the said Defendants and each of them and as against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and that the said Defendants, namely, Alfred Sewell, and the unknown heirs and devisees of Alfred Sewell, F. Blount, and the unknown heirs and devisees of M. Blount, Leneila Class and Allee Kirksey, and each of them have no title to, interest in, lies or encumbrance on the said lends or any part thereof, and that no other person whomsoever that this Complainant has any title, to, interest in, lien or ensumbrance on the said lands or any part thereof, and this Complainant prays for such other, further or different relief as in equity and good conscionce he shall be entitled to receive in the premises.

Beebe & Hell Attorneys for Complainant.

FOOT NOTE:

The Defendants are required to answer every material allegation of the foregoing bill of complaint in paragraphs first to fourth, inclusive, but not under cath. Oath being hereby expressly waived.

Boebe & Hall Attorneys for Complainant.

STATE OF ALABAMA)
RALLWIN COUNTY

Refore me. Eloise Slocumb. a Notery Public in and for said State and County, personally appeared W. C. Beebe who is known to me and who being by me first duly sworn deposes and says that he is automey of record for Ernest Hanks, Complainant in that certain cause pending in the Circuit Court of Baldwin County, Alabama, wherein the said Frnest Hanks is Complainant, and the Bouthwest quarter of the Southwest quarter and the Southeest quarter of the Southwest omerter and that part of the North half of the Southwest quarter, described as beginning/the Southwest corner of the North half of the Southwest querter, run North 216 yards, thence East 453.75 yards, thence South 215 yards, thomas West 453.75 yards, to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Lonella Glass, Alloe Kirksey, Affred Sewell and J. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown beirs and devisees of Alfred Sewell if he be dead, and any and all persons claiming any title to, interest in, lien or enoughrance on the said lands or any part thereof, are Defendants: that he has read the said bill of complaint and knows the facts alleged therein, to which said bill of compleint this affidavit is attached, and the said bill of complaint referred to and made a part of this affidavit and that the facts alleged in said bill of complaint are true.

W. C. Beebe

Sworn to and subscribed before we on this the $\underline{14}$.

Eloise Slocumb Motery Public, Beldwin County, Alebamo.

BAY MINETTE, ALA. 19 IN ACCOUNT WITH W. HUMPHRIES
JUDGE OF PROBATE BALDWIN COUNTY Please Return Bill With Remittance Rec. Mort. from Privilege Tax no Lensila Elos etal Brondof Wilmpiles Dr. Magneste Opening Land Co. Jack 3/28/29
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NOTICE OF PENDONOY OF BILL OF CONTLAINT.

HANGET HAMES, Complainant,

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IN THE CINCUIT COURT OF BALCUIN COUNTY, ALABAMA IN BAUITY.

and whose residence and Post Office address is Tallassee, Alabama; Alice Eirksey who is over the age of twenty-one years and whose residence and Post Office address is Seest Vater, Texas; Alfred Sewell who is over the age of twenty-one and whose place of residence and Post Office address is unknown; I. Blount who is over the age of twenty-one and whose place of residence and Post Office address is unknown; I. Blount who is over the age of twenty-one years and whose place of residence and Post Office address is unknown; the unknown heirs and devisees of Alfred Sewell whose names, ages and place of residence and Post Office address is unknown; the unknown heirs and devisees of F. Blount, whose names, ages, place of residence and Post Office address is unknown, and to any and all persons claiming any title to, interest in, lies or encumbrance on the whole or any part of the following described lands situated in the County of Baldwin, State of Alabama, to-wit:

The Southwest quarter of the Southwest quarter and the Southwest quarter and that port of the Southwest quarter and that port of the Southwest quarter and that port of the North half of the Southwest corner of the North half of the Southwest quarter, run North 216 yerds, thence Sast 456.75 yerds, thence South 216 yards, thence Sast 456.75 yerds, the place of beginning, all in Section twenty-four, loweship two South, home three Sast.

day of May, 1989, file a bill of complaint in this, the Circuit Court of Baldwin County, Alabama, in equity, against the above described lands and the above named and described persons and against any and all persons claiming any title to, interest in , lies or encumbrance on the said lands or any part thereof, to quiet and establish his title to the said lands, as and to be in fee simple, clear of encumbrance against the said named and described persons and against any and all persons claiming any title to, interest in, lies or encumbrance on the said lands or any part thereof, and to settle and clear up any and all doubts and disputes concerning the same.

that he is the owner in fee simple of the said lands and each part thereof, that the title to the saidestands on the records of the Probate Court of Baldwin County, Alabama, in his name; that he and those through whom he claims title have been for more than twenty years consecutively next preceding the filing of the said bill of complaint in the actual adverse possession of the said lands and each part thereof; that he and those through whom he holds the said lands have for more than twenty years consecutively next preceding the filing of the said lands and the filing of the said bill of complaint, annually listed and paid the taxes on the said lands to the proper offices of Baldwin County, Alabama, and that during the whole of the said period no other

person than he undthose through when he holds the said lands have been in the possession of the said lands or of any part thereof, or paid any taxes on the said lands or any part thereof, and that his title to the said lands is derived by means conveyances from the United States Covernment through, under and by the following instruments:

Patent of United States to the State of Alabama, dated July 11. 1870, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 5, page 202, et sequal

Deel from the State of Alabama to this complainant, dated April 20, 1929:

Deed from the Alabama Insume Morpitals, dated May 25, 1923;

Deed from Lorenzo M. Wilson, et al., to D. G. Dyrne, dated

Moron S. 1881, recorded in the office of the Judge of Brobate of

Balawin County, Alabama, in Deed Book L. reges 785-774;

Dood from D. C. Dynne, et al. to J. W. Litchfield, dated January 9, 1888, recorded in suid office in Dook M. pages 188-1; Dood from J. W. Litchfield, et al. to Charles Ursyrung, dated

Necesia: 50, 1894;

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> Patent from United States to Henry Taylor, dated November 15, 1854, recorded in seld Probate Office in Book ____, page ____;

Deed from Roseums I. Taylor, et al, to Charles Urspring. dated October 1, 1884, recorded in soid office in Deed Book 59, page 648;

Deed from Rosents I. Livehfield, et el, to Charles Unsprung. filed for record July 14, 1920, recorded in soid office in Deed Book fond, page 6771 Deal Spun Charles Unsurung, of all to Follo V. Daywo.

Anted November 28, 1891, remarked in smil office in Deak 2000,

page 640.

Dood from J. D. Peyro and Clip V. Peyro, his vife, to C. R. Jones, dated Nevember 23, 1891, recepted in said office in Dook "N", pages 220-71

Deed of C. R. Jones to Expect Homes dated July 80, 1921. recorded July 80, 1921. In Deed Dook 5155, page 1911

Deed of 0. S. Jones to J. Tynes, dated May 6, 1981, recorded In said office in Record Deek 5088, page 6111

Deed of F. Types to Errost Healts dated July 20, 1921,

IN VICTORIES THERMOT, I. T. H. Maderess, Register of the Cinematic Court of Belowin County, Alabama, in equity, have horoto set my hand and seal this the 27% day of May, 1989.

Solinton for Camplainant

Segster lineat logithoron SOLICITORS FOR CONTLAINANT.

Exact Haux

BAY MINETTE, ALA 6/1/29

M T.W. Richerson

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

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NOTICE OF PENDENCY OF BILL OF COMPLAINT

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N	THE CIRCUIT COURT OF BALD-	•
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ERNEST HANKS, Complainant, vs. The Southwest quarter of the Southwest quarter and that west quarter and the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning all in South Page three

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

BAY MINETTE, ALA.

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and whose residence and Post Office sidress is Taliansee, Mahemany allow Kirkmay who is ever the age of twenty-one years and shore residence and Post Office address is hereb later, Torany Alfred Sancil who is ever the age of twenty-one and whose place of residence and Post Office address is unknown; J. Manna who is ever the age of twenty-one and whose place of residence and Post Office address is unknown; J. Manna who is ever the age of twenty-one years and shows place of residence and Post Office address is unknown; the unknown heirs and devicess of Alfred Sancil whose names, ages and place of residence and Post Office endress is unknown; the unknown heirs and devicess of J. Mount, whose names, ages, place of residence and Post Office address is unknown, and to any and all parsons claiming any title to, interest in, lies or enqualmence on the shole or any part of the following described lands situated in the County of Baldein, State of Alabams, to-with

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East.

Notice is hereby given that Ernest Henks did on the 14th day of May, 1929, file a bill of complaint in this, the Circuit Court of Baldwin County, Alabama, in equity, against the above described lands and the above named and described persons and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, to quiet and establish his title to the said lands, as and to be in fee simple, clear of encumbrance against the said named and described persons and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and to settle and clear up any and all doubts and disputes concerning the same.

That the Complainant in his said bill of complaint alleges that he is the owner in fee simple of the said lands and each part thereof, that the title to the saidestands on the records of the Probate Court of Baldwin County, Alabama, in his name; that he and those through whom he claims title have been for more than twenty years consecutively next preceding the filing of the said bill of complaint in the actual adverse possession of the said lands and each part thereof; that he and those through whom he holds the said lands have for more than twenty years consecutively next preceding the filing of the said bill of complaint, annually listed and paid the taxes on the said lands to the proper offices of Baldwin County, Alabama, and that during the whole of the said period no other

person than he and those through whom he holds the said lands have been in the possession of the said lands or of any part thereof, or paid any taxes on the said lands or any part thereof, and that his title to the said lands is derived by mesne conveyances from the United States Government through, under and by the following instruments:

Patent of United States to the State of Alabama, dated July 11, 1870, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 5, page 223, et sequa;

Deed from the State of Alabama to this complainant, dated April 29, 1929;

Deed from the Alabama Insane Hospitals, dated May 25, 1928;

Deed from Lorenzo M. Wilson, et al. to D. C. Byrne, dated

March 2, 1881, recorded in the office of the Judge of Brobate of

Baldwin County, Alabama, in Deed Book L, pages 755-754;

Deed from D. C. Byrne, et al, to J. W. Litchfield, dated January 9, 1882, recorded in said office in Book N, pages 129-1;

Deed Ivom J. W. Litchfield, et al, to Charles Ursprung, dated Becomber 50, 1884;

Patent from United States to Henry Taylor, dated November 15, 1854, recorded in said Probate Office in Book _____, page _____;

Deed from Rosenna I. Taylor, et al, to Charles Ursprung, dated October 1, 1884, recorded in said office in Deed Book 29, page 648;

Deed from Rosanna I. Litchfield, et al, to Charles Ursprung, filed for record July 14, 1920, recorded in said office in Deed Book 29NS, page 678;

Deed from Charles Uranrung, et al., to Pollie V. Payne. dated November 28, 1891, recorded in said office in Book 29MS. page 646.

Deed from J. D. Payne and Olle V. Payne, his wife, to O. R. Jones, dated November 28, 1891, recorded in said office in Book "R", mages 256-7;

Deed of O. R. Jones to Ernest Hanks dated July 20, 1921, recorded July 30, 1921, in Deed Book 31M3, page 131:

Deed of O. R. Jones to F. Tynes, dated May 6, 1921, recorded in said office in Record Book BONS, page 611;

Deed of F. Tynes to Ernest Henks dated July 20, 1921. recorded in said office in Book SLNS, page 130.

IN WITHESS WHEREOF, I. T. W. Richerson, Register of the Circuit Court of Baldwin County, Alabama, in equity, have hereto set my hand and seal this the 27 day of May, 1929.

Bube & Hell . Il Meire (SEAL)
Selectors of Complainment Register County County
alshama In Equate

I, T. W. Richerson, Register of the Circuit Court of Beldwin County, Alabama, in equity, do hereby certify that the foregoing attached is a true, correct and literal copy of a notice of the pendency of a bill of complain t in the Circuit Court of Beldwin County, Alabama, in equity, whe rein Ernest Hanks is Complainant and The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 455.75 yards, thence South 216 yards, thence West 453,75 yards to the playe of beginning, all in Section twentyfour, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, are Defendants;

And I do further certify that the said notice was drawn and sened by me as Register of this Court.

Witness my hand and seal of office this the $\frac{27}{}$ day of

1/2v. 929.

Register of the Circuit Court of Ballwin County, Alabama, in equity.

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes Ernest Hanks and brings this bill of complaint against the Southwest quarter of the Southwest quarter and the Southwest quarter and the Southwest of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and against Leneila Glass, Allee Kirksey, Alfred Sewell, and F. Blount, and the unknown heirs and devisees of Alfred Sewell if he be dead, and the unknown heirs and devisees of F. Blount if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, and respectfully shows unto your Honor as follows:

FIRST:

That your Complainant, Ernest Hanks, is over the age of twenty-one years of age and a resident of Georgiana, State of Alabama; that he is the owner in fee simple of and is in the actual peaceable possession of the said lands described, situated in the County of Baldwin, State of Alabama, to-wit:

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East.

That there is no suit pending to test his title to, interest in, or his tight to the possession of such lands; that his title to the said lands and each part thereof stands upon the pecord of the Probate Court of Baldwin County, Alabama, in his name, that his title to the said lands was obtained by the following deeds: Patent of United States to the State *

of Alabama, dated July 11, 1870, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 5, page 222, et sequa, conveying the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter and run North 216 yards, thence East 453,75 yards, thence South 216 yards, thence West 453.75 yards to place of beginning, all in Section twenty four, Township two South, Range three East; deed from the State of Alabama to this complainant, dated April 29, 1929, conveying the same lands; deed from the Alabama Insane Hospitals, dated May 25, 1928, conveying the same lands; deed from Lorenzo M. Wilson, et al, to D. C. Byrne, dated March 2, 1881, recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book L, pages 733-734, conveying the said lands; deed from D. C. Byrne, et al, to J. W. Litchfield, dated January 9, 1882, recorded in said office in Book N, pages 120-1; deed from J. W. Litchfield, et al, to Charles Ursprung, dated December 30, 1884; patent from United States to Henry Taylor, dated 13 day of Wounder, 1854, recorded in said Probate Office in Book _____, page ____, conveying the Southwest quarter of the Southwest quarter of Section twenty-four, Township two South, Range three East; deed from Rosanna I. Taylor, et al, to Charles Ursprung, dated October 1, 1884, conveying the Southwest quarter of the Southwest quarter of said Section, recorded in said office in Deed Book 29, page 648; deed from Rosanna I. Litchfield, et al, to Charles Ursprung, filed for record July 14, 1920, recorded in said office in Deed Book 29NS, page 678, conveying the Southwest quarter of the Southwest quarter of said Section; deed from Charles Ursprung, et al, to Pollie V. Payne, dated November 28, 1891, recorded in said office in Book 29NS, page 648, conveying all of the lands described in this bill of complaint;

That your Complainant's title is derived through the following chain of title: Deed of J. D. Payne and Olle V. Payne, his wife, to O. R. Jones, dated November 28, 1891, filed in the office of the Judge of Probate of Baldwin County, Alabama, November 30, 1891, recorded in Book "R", pages 236-7, conveying the following described lands:

All of the Southwest quarter of Southwest quarter and Southeast quarter of Southwest quarter of Section twenty-four, Township two South, Range three, East, containing 90.65 acres, more or less.

Also a certain lot of land commencing at the Northeast corner of the Southwest quarter of Southwest quarter of Section twenty-four, and running thence West 17 chains to a post; thence North 19 chains to a post; thence East 37 chains to a post at the branch; thence along the west side of the branch southward to the east and west line on which the beginning was made in Section twenty-four, Township two South, Range three East, containing ten acres, more or less, all situated in the County of Baldwin, State of Alabama.

Deed of O. R. Jones to Ernest Hanks, dated July 20, 1921, recorded July 30, 1921, in Deed Book 31NS, page 131, in the office of the Judge of Probate of Baldwin County, Alabama, conveying the following described lands:

That part of the South half of the Northwest quarter of Section twenty-four, described as follows: Beginning at the Southwest corner of North half of Southwest quarter of Section twenty-four, Township two South of Range three East, run North 216 yards, East 453.75 yards, South 216 yards on the east and west line of South boundary, West 453.75 yards to place of beginning, being in Section twenty-four, Township two South, Range three East.

Deed of O. R. Jones to F. Tynes, dated May 6, 1921, recorded May 7, 1921, in the office of the Probate Judge of Baldwin County, Alabama, in Redord Book 30NS, page 611, conveying the following described lands:

The South half of the Southwest quarter of Section twentyfour, Township two South of Range three East, containing eighty acres, more or less.

Deed of F. Tynes to Ernest Hanks dated July 20, 1921, recorded July 30, 1921 in said Probate Office in Book 31NS, page 130, conveying the following described lands:

The South half of the Southwest quarter of Section twentyfour, Township two South, Range three East, containing eighty acres, more or less. That at the time of the execution of the aforesaid deeds by J. D. Payne and Olle V. Payne to O. R. Jones, the said J. D. Payne and Olle V. Payne were in the actual possession of said lands; that upon the execution of the aforesaid deed 0. R. Jones went into possession of the whole of the lands described in this bill of complaint, claiming to own the whole of the same and the entire interest therein in fee simple; that he remained in continuous possession thereof under such claim of ownership and annually listed and paid the taxes thereon in Baldwin County, Alabama, until May 6, 1921, when he conveyed the South half of the Southwest quarter of Section twenty-four, Township two South, Range three East, to F. Tynes, who immediately went into possession of said land claiming to own the same and the whole interest thereof in fee simple, and continued in such possession thereof until July 20, 1921; that the remainder of said lands remained in such possession of the said 0. R. Jones until July 20, 1921, when the said 0. R. Jones and the said F. Tynes, each by deeds above described, conveyed the respective tracts owned by them as aforesaid to the complainant; that your complainant immediately went into possession of the said lands and has remained in continuous possession thereof, claiming to own the whole of the same and the entire interest therein in fee simple; Compaainent further shows unto your Honor that he and those persons aforesaid through whom he claims title have been continuously for more than twenty-five years next preceding the filing of this bill of complaint in the actual adverse possession of the whole of the aforesaid lands under color of title, claiming to own the same in fee simple, that his and their possession thereof has been actual, open, notorious, exclusive, hostile, peaceable, visible and continuous under color of title for more than twenty-five years next preceding the filing of this bill of complaint, and that he and those through whom he claim as aforesaid have, each in succession, annually listed and paid the taxes on the said property

in Baldwin County, Alabama, to the proper officer thereof.

SECOND:

of the said period, namely, twenty-five years next preceding the filing of this bill of complaint, no person other than he and those through whom he claims as aforesaid have had any possession of the said lands or any part thereof, or have attempted to exercise any acts of possession over the said lands or any part thereof; that no other person than he and those through whom he claims as aforesaid have paid any taxes on the said lands in Baldwin County, Alabama, during any part of the said period of twenty-five years.

THIRD:

Complainant further alleges that the said Defendants, Leneila Glass, Allee Kirksey and Alfred Sewell and F. Blount, and the unknown heirs and devisees of Adfred Sewell if he is dead, and the unknown heirs and devisees of F. Blount if he is dead, claim or are reputed to claim some title to, interest in, lien or encumbrance upon the said lands or some part thereof; Complainant further shows unto your Honor that the said Allee Kirksey, Leneila Glass are each over the age of twenty-one years, and the said Allee Kirksey resides at and her Post Office address is Sweet Water, Texas; and the said Leneila Glass resides at and her Post Office address is Tallassee, Alabama; that this Complainant does not know whether or not the said Alfred Sewell and the said F. Blount, or either of them is living or dead, and if living he does not know the place of residence and Post Office address of them or either of them; that if they or either of them are dead he does not know who their heirs and devisees are, or who are the heirs and devisees of either of them; that he has made diligent search to ascertain the Post Office address and place of residence of them and of each of them, and to ascertain whether or not they be living or

dead, and if dead whether or not they died testate or intestate and who are their heirs and devisees, or the heirs and devisees of either of them; that in his search to ascertain the same he has caused W. C. Beebe and H. M. Hall, his agents and attorneys in the premises, to make search of the Probate Records of Baldwin County, Alabama, and of the records in the offices of the Tax Collector and Tax Assessor of Baldwin County, Alabama, and in the office of the Clerk of the Circuit Court of Baldwin County, Alabama, and of the Sheriff of Baldwin County, Alabama, and that the said records and books of addresses kept in the said offices do not disclose the address of either of them at this time or at any time, and do not disclose whether or not they or either of them are dead, and whether or not they died testate or intestate, and who are their heirs and devisees, or the heirs anddevisees of either of them; and that through and by the said Attorneys of this Complainant he caused and they did make inquiry of each and all persons in each and all of the said offices, and of J. W. Taylor, W. D. Stapleton, O. C. Hall, O. R. Jones, and divers and numerous other persons who lived near to and have known continuously for more than twenty-five years the said lands, as to the place of residence of the said F. Blount and Alfred Sewell, and as to whether they be living or dead, and if dead whether they died testate or intestate, and who are their heirs or devisees, or the heirs and devisees of either of them; and neither of the said persons know, or have everyknown, either of thesaid F. Blount or the said Alfred Sewell, nor whether they or either of them be living, or dead, and if dead, whether or not they or either of them died testate or intestate, and who are their heirs and devisees, or the heirs and devisees of either of them; and upon such inquiry as aforesaid this Complainant does believe and allege that the said Alfred Sewell and F. Blount, if living, are over the age of twenty-one years, that their Post Office address and place of residence is unknown, that he does not know whether they or either of them are living or dead, that if dead he does not know whether or not they died testate or intestate, nor who the heirs and devisees of either of them are, now what the ages and places of residence are of the heirs and devisees of either of them, and that diligent inquiry has been made to ascertain the said matters, and that the same cannot be ascertained upon diligent inquiry.

FOURTH:

Complainant further alleges that neither the said Defendants, namely, Allee Kirksey, Leneila Glass, F. Blount, Alfred Sewell, and the unknown heirs and devisees of F. Blount and the unknown heirs and devisees of Alfred Sewell, have had or exercised any possession over the whole or any part of the lands described in this bill of complaint at any time during the twenty-five years next preceding the filing of this bill of complaint, and that neither of them have during any part of said period paid any taxes on the said lands or any part thereof; and that the title, interest, lien or encumbrance claimed by them or either of them to the said lands or any part thereof is invalid, different relief as in again, and consolerate said land and to and that this Complainant's aforesaid title to the said land and to every part thereof is perfect as against the said Defendants and each of them and as against any and all persons claiming any title to, interest in; lien or encumbrance on the said lands or any part thereof. The Defenden Wherefore your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint, that by appropriate process the said lands and the aforesaid Defendants, namely, Alfred Sewell and the unknown heirsand devisees of Alfred

title to, interest in, lien or encumbrance on said lands or any part thereof be made party defendants to this bill of complaint, and by appropriate process be required to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that upon the final hearing of the practice of this Honorable Court will make

Sewell, F. Blount, and the unknown heirs and devisees of F. Blount,

Leneila Glass and Allee Kirksey, and any and all persons claiming any

STATE OF ALABAMA)
BALDWIN COUNTY

Before me, Eloise Slocumb, a Notary Public in and for said State and County, personally appeared W. C. Beebe who is known to me and who being by me first duly sworn deposes and says that he is attorney of record for Ernest Hanks, Complainant in that certain cause pending in the Circuit Court of Baldwin County, Alabama, wherein the said Ernest Hanks is Complainant, and the Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning/the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards, to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs and devisees of Alfred Sewell if he be dead, and any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, are Defendants; that he has read the said bill of complaint and knows the facts alleged therein, to which said bill of complaint this affidavit is attached, and the said bill of complaint referred to and made a part of this affidavit and that the facts alleged in said bill of complaint are true. Bech

Sworn to and subscribed before me on this the 144 day of May, 1929.

Notary Public,
Baldwin County, Alabama,

NOTE OF EVIDENCE.

ERNEST HANKS, Complainant,

VS.

The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter, described as beginning at the Southwest corner of the North half of the Southwest quarter, run North 216 yards, thence East 453.75 yards, thence South 216 yards, thence West 453.75 yards to the place of beginning, all in Section twenty-four, Township two South, Range three East, and Leneila Glass, Allee Kirksey, Alfred Sewell and F. Blount, and unknown heirs and devisees of F. Blount if be dead, and the unknown heirs and devisees of Alfred Sewell if he be dead, and against any and all persons claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

This cause is submitted on behalf of the Complainant:

FIRST: On the original bill of complaint filed May 14,

1929, and the affidavit thereto attached.

SECOND: On the order of the Judge of this Court, dated May 15, 1929, ordering notice of the pendency of such bill of complaint published in the Baldwin Times a newspaper published at Bay Minette, in Baldwin County, Alabama.

THIRD: Notice of such bill of complaint as drawn and filed by the Register of this Court May 27, 1929.

FOURTH: Notice of the pendency of the bill of complaint as published, together with the affidavit of the Publisher of the Baldwin Times making proof of such publication.

FIFTH: Original notice of pendency of the bill of complaint served on Leneila Glass, Defendant, together with the Sheriff's return thereon.

SIXTH: Certificate of the Register of this Court as to publication of notice of the pendency of the said bill of complaint, and as to the mailing of notice of the pendency of the bill of complaint to Allee Kirksey, Defendant, at Sweetwater, Texas, by registered mail, marked for delivery to addressee only, and of the fact that such notice was unclaimed.

SEVENTH: Notice of the pendency of such suit as filed for record in the office of the Judge of Probate, May 22, 1929, and certificate of the Probate Judge that the same was recorded May 28, 1929, in Book of Lis Pendens #1, pages 88-89.

EIGHTH: Application for oral examination of C. Irwin and Walker Taylor, witnesses for the Complainant, filed September 17, 1929.

NINTH: Notice of application of oral examination of C. Irwin and Walker Taylor, witnesses for Complainant, served by entry on the Register's Order Book September 17, 1929.

TENTH: Order of the Register granting motion for oral examination of witnesses C. Irwin and Walker Taylor for complainant, dated September 23, 1929.

eleventh: Notice of time and place of taking testimony of C. Irwin and Walker Taylor, witnesses for Complainant, served by entry on the Order Book October 1st., 1929.

- λ TWELFTH: Deposition of C. Irwin, witness for Complainant.
- THIRTEENTH: Certified copy of deed from United States to State of Alabama, dated July 11, 1870, recorded Deed Book 5NS, pages 222, et seque.

FOURTEENTH: Patent from United States to Henry Taylor, dated November 15, 1854.

FIFTEENTH: Deed from Alabama Insane Hospitals to Ernest Hanks, dated May 23, 1928.

SIXTEENTH: Deed from State of Alabama to Ernest Hanks, dated April 29, 1929.

SEVENTEENTH: Certified copy of deed from J. D. Payne and Olle V. Payne, his wife, to O. R. Jones, dated November 28, 1891.

EIGHTEENTH: Deed from 0. R. Jones to Ernest Hanks dated July 20, 1921.

NINETEENTH: Deed from O. R. Jones to F. Tynes, dated May 6, 1921.

dated July 20, 1921. OR James to Ernest Hanks,

This the _____ day of October, 1929.

REGISTER.

TRIEST HANGE, Completent.

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The Southwest quarter of the Southwest quester and the Southeast quarter of the coutinest querter and that part of the North half of the Southwest quarter, described as posimiles as the positive of person of the forth lair of the party though the guarden and the contract of the Rast 455.75 yards, themse South 216 yards, themse Set 455.75 yards to the place of beginning, all in Section twonty-four, Township two South, Range three Rost, and Lemella Class. Alloo Kirksoy, Alfrod Sowell end T. Blount, and the unknown heirs and devisees of P. Blount 12 he be dead, and the unknown helve and devisees of Alfred Sewell 15 be be dead. and against any and all persons Claiming any title to, interest in, lion or encumbrance on the said lands or any part thereof, Pefondents.

IN THE CHOUTE COURT OF

The state of the s

This cause coming on to be heard is submitted for final decree on the original bill of complaint filed May 14, 1929, and the affidavit thereto attached; on the order of the Judge of this Court, dated May 15., 1929, ordering notice of the pendency of such bill of complaint published in the Baldwin Times a newspaper published at Bay Minette, in Baldwin County, Alabama; notice of such bill of complaint as frawn and filed by the Register of this Court May 27, 1929; notice of the pendency of the bill of complaint as published, together with the affidavit of the Publisher of the Baldwin Times making proof of such publication; original notice of pendency of the bill of complaint served on Lenetla Glass, Defendant, together with the Sheriff's return thereon; Certificate of the Register of this Court as to publication of notice of the pendency of the said bill

of compliant, and as to the mailing of notice of the pendency of the bill of complaint to Alloe Kirksey, Defendant, at Sweetwater, Texas, by registered mail, marked for delivery to addressee only, and of the fact that such notice was unclaimed; notice of the pendency of such suit as filed for record in the office of the Judge of Toobate, May 28, 1920, and certificate of the Pacheto Judge that the same was recorded May 28, 1929, in Book of Lis Fandens /1, pages 88-0. opplication for oral examination of G. Irvin and Walker Taylor, withersee for the Compleinne, filed September 17, 1820; notice of epolication of aral americation of C. Irula and Talker Jaylor, vitacesco for Complainent, served by entry on the Register's Order Book September 17, 1929; order of the Register granting motion for oral can insting of withouses (. Irein and walker topics for Compleinant, dated September 23, 1929; notice of time and place of toking testimony of C. Irvin and Valler Taylor, witnesses for Compleinent, served by embry on the Order Book Cotober Ist., 1920; deposition of C. Irwin, withous for Complainant; cortified copy of doed from United States to State of Alabama, dated July 11, 1970, recorded leed Book Edd, pages 282, et segle; patent from United States to Newry Taylor, dated November 15, 1854; deed from Alabama Insone Hospitals to Trast Hanks, dated May 25, 1928; doed from State of Alabama to Preset Manke, dated April 20, 1920; certified copy of deed from J. D. Payne and Olle V. Payne, his wife, to G. R. Jones, deted November 28, 1091; Geod from V. D. Jones to Expect Henko, dated July 20, 1921; deed from 0. A. Jones to J. Tynes, dated May C, 1981; deed from F. Tynes to Ernest Henks, deted July 20, 1921; all as noted by the Register, and the same being considered, the Court is of the opinion that the Compleinent is entitled to the relief prayed for in his bill of complaint.

IN IS THERESORS ORDERED, ADJUDGED AND DECREED that
the Complainest Engle is over the age of twenty-one years
and a resident of Ceorgians, in the State of Alabema; that he is
the owner in fee simple of, and in the actual peaceable possession
of the following described lands situated in DelawinCounty, State
of Alabama, to-mit:

The Southwest quarter of the Southwest quarter and the Southwest quarter that the Southwest quarter was that art of the Southwest quarter, quarter, described as Degianning at the Southwest corner of the North half of the Southwest quarter, run Jarch Sic arts, those has 455.75 rares the place of beginning it is easier transported to the place of beginning it is easier transported.

That there is no suit pending to test the time to, interest in or his right to possession of such lands, and that his title to the said land atomic upon the record of the Probate Court of Baldwin County, Alebers, in his name; that his title to the said land was obtained by the following deeds: Futont from United States to State of Alabama, deted July 11, 1897, recorded in Dood Book 500, pages Ens, et seque, conveying the Southons quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North helf of the Southwest quarter, run Morth 216 yards, thonce Mast 450.75 yards, themes South 216 yards, thence West 455.75 yards to place of beginning, all in Section twenty-four, Township two South, Hange three East; deed from State of Alabama to the seld Ernest Hanks dated April 20, 1020, conveying the said lands; deed from Alabama Insome No pitals Cated New 25, 1928, conveying the said lands, and patent from United States to Henry Taylor, dated Hevember 15, 1864, convoying the Southmest marter of the Southwest querter of seld Section twenty-four; deed from J. D. Payne and Clie V. Payne, his

wife, to 0. R. Jones, dated November 10, 1891, recorded in the office of the Judge of Trobate of Reldwin County, Liebane, in Record Book "R", page 230-7; doed from C. R. Jones to Expect Hanks, deted July 20, 1921, recorded in said Probate Office in Deed Pook 5170, page 131, conveying that part of the said above described land lying in the North half of the Southwest quarter of eath Scotton; deed from G. R. Jones to F. Types, detecting 6, 1981, recorded in cold office in Jood Book 2002, map Oll, conveying the South helf of the Southwest conter of said Section twenty-four; deed from F. Tymes to said Ernest Henks dated July 20, 1921, recorded 5202, page 130, conveying the said South helf of the Southwest quarter of eald Section twentyfour, and by adverse possession under the sald deed by him and by the acid persons through when he claims for more than twenty-five years continuously, seat proceding the filing of the said bill of complaint; that Lenella Class and Alles Eirkeey are each over the ago of twenty-one years, the said Alice Mirksey resides at and her Post Office address is Sweetmater, Texas, the cald Lenella Class resides at and her Post Cirios address is Tallessee, Alabama; that Alfred Sevell and 7. Slount are unknown to Completens; that it is unknown to him as to whother or not they are living or dead, and if doed whother or not they died tentate or intestate, and who are their being and devisoes, that he has made digont inquiry to apportain the same and the seme campot be apportained upon diligent inquiry; that noither the said Alice Kirksoy, Lonella Glass, F. Blooms, Alfred Sowell, or the unknown being and devices of the said ?. Mount and of the said Alfred Sevell have had or exercised ony possession over the made or any part of the said described lands for more than twenty-five years, next proceding the filing of the said bill of complaint; that they and neither of them have peld any texes on the said lands and that any title, interest, lien,

incumbrance or claim by them or either of them to the seld lands or any part thereof is invalid; that the seld Ernest Hanks and those through whom he claim have annually for more than teenty-five years listed and paid tames on the said lands to the proper officials of Baldwin County, Alabama; that no person other than the said Ernest Hanks and those through whom is claim have for more than tempty-five years been in the possession of the said lands or any part thereof, or listed the said lands for taxation, or paid the taxes thereon.

IF IS TELEFORE CREEKED, ADJUNCED AND D.CHEED that the fee simple title to the lends first described herein, memoly,

The Couchwest querter of the Couchwest querter and the Couchwest querter of the Couchwest querter and that pert of the Couch half of the Couchwest quarter quarter, described as beginning at the Couchwest quarter to the Couchwest quarter run Forth Sit 18:25, thence Seat 455,75 varies thence couch Sityants, thence Seat 455,75 varies to the place of Cockwest quarter four Sityants, thence couch Sityants to the place of Cockwest and Cockwest to the place of Cockwest and Coc

clear of incumbrance, and to each part thereof is vested in the Completenent, Ernest Hanks, as against the aforesaid Jefendants and each of them, and as against any and all persons claiming any title to, interest in, lies or impumbrance on the said lands or any part thereof, and that the said Defendants, namely, Alfred Sewell, the unknown heirs and devisces of Alfred Sewell, f. Elcunt, and the unknown heirs and devisces of f. Blount, Leneila Class and Alloc Eintsey, and each of them have no title to, interest in, lies or incumbrance on the said lands or any part thereof and that no other person whomseever than this Complainent, Ernest Hanks, has any title to, interest in, lies or incumbrance on the said lands or any part thereof.

IT IS FURTHER CREEKED, ADJUNCED AND DECREED that the Register of this Court file for record in the office of the Judge of

Probete of Belawin County, Alabama, a duly certified comy of this decree and cause the same to be indexed in the proper indexes in the said Probate Cffice in the direct index in the name of Alfred Sevoll, F. Blount, Alse Kirksey, Lemella Glass, and the unknown hoirs and devisees of F. Blannt and the unknown heirs and devisees of Alfred Sewell to Expect Sanks, and in the referse index in the name of Errest Hanks from Alfred Secoll, F. Blount, and the unknown heirs and devisoes of ". Mount and the unknown heirs and devisoes of . Mount, and from Alles Mickey and Landia Glass.

II IS PURTER CHERED, ANDRESS AT LEGISLA ONE Sho Compleinant pay the cost of this proceeding for which let execution ioouo,

Dome this the loth you of October, 1980.

F.W.Hare, Judge

State of Alabama, Baldwin County.

Circuit Court in Equity.

I.T.W.Richerson, Register of said Court of said County, Alabama, do hereby certify that the foregoing is a full, true and correct copy of the decree rendered by said Court on the 10th day of

October, 1929 in the cause of Ernest Hanks Complainant, vs The Southwest quarter of the Southwest quarter and the Southeast quarter of the Southwest quarter and that part of the North half of the Southwest quarter described as beginning at the Southwest corner of the North half of the Southwest quarter run North 216 yards, thence East 453.75 yards, thence South 216 yards to the place of beginning, and Lenelia Glass, Allee Kirksey, Alfred Sewell and F. Blount, and the unknown heirs and devisees of F. Blount if he be dead, and the unknown heirs and devisees of Alfred Sewellif he be dead, and against any and all persons, claiming any title to, interest in, lien or encumbrance on the said lands or any part thereof, Defendants. as appears of record

Witness my hand this 30 th day of October, 1929.

- -Register.

That Michelen of 11/29 Res 3. a. H. 3/200m,

Decree in cause of Certified copy of Final

Ernest Hanks, Complainant

* SA

Certain Lands.

Filed October 12th, 1929,

PROBATE COURT

THE STATE OF ALABAMA

BALDWIN COUNTY

Hanks Blue et al

RECORDED

notesf induce

Filed Oct 7 1929 Taskenn Regenter

