

815

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Ex Parte

CHESTER MATTINGLY

No. 815

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

CHESTER MATTINGLY

and the affidavits filed therewith; and, upon consideration thereof, the Court is of the opinion that

the Petitioner is entitled to the relief prayed for in HIS said Petition;

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

CHESTER MATTINGLY

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

It is further ordered, that the said petitioner CHESTER MATTINGLY pay the costs herein taxed, for which execution may issue.

This the 29<sup>th</sup> day of May 1929

(Signed)

J. N. Nare

Judge of the 21st Judicial Circuit of Alabama.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

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

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

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

8350 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 192 \_\_\_\_\_

EX PARTE CHESTER MARTINGLY, Complainant

vs.

Defendant

To T. W. RICHESON, 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 BEEBE & HALL

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.

*Beebe & Hall*  
Solicitor for Complainant.

8581 NOTE OF TESTIMONY

EX PARTE

CHESTER MATTINGLY

VS.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,  
and the affidavits of Jesse Ard and Arval Ard

and in behalf of Defendant upon

*J. W. [Signature]*  
Register.

EX PARTE,  
CHESTER MATTINGLY.

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

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

Comes your Petitioner Chester Mattingly and respectfully  
represents and shows unto your Honor, that a decree of divorce  
was granted by Honorable John D. Leigh, as Judge of the Circuit  
Court of Baldwin County, Alabama, in equity, against your  
Petitioner, in favor of Ada Mattingly, on the 4th day of February,  
1928, on the grounds of cruelty; that more than sixty days have  
elapsed since said decree was granted as aforesaid, during all of  
which time your Petitioner has been sober and industrious and a  
peaceable citizen; that there is no reason so far as your Petitioner  
knows why he should not be granted the right to remarry.

Wherefore your Petitioner prays that your Honor will take  
jurisdiction of this petition and that upon consideration of same  
and of the evidence submitted herewith, that Petitioner may be  
granted the right to remarry.

Chester Mattingly  
Petitioner.

ADA MATTINGLY, Complainant,	)	IN THE CIRCUIT COURT
VS	)	BALDWIN COUNTY, ALABAMA.
CHESTER MATTINGLY, Defendant.	)	IN EQUITY.

This cause coming on to be heard was submitted upon the original bill of complaint and proof as noted by the Register; and upon consideration thereof the court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the court that the bonds of matrimony heretofore existing between the Complainant and the Defendant, be and the same are hereby dissolved and the Complainant is forever divorced from the Defendant.

It is further ordered that the said Ada Mattingly be and she is hereby permitted to again contract marriage upon the payment of the costs of court in this cause.

It is further ordered, adjudged and decreed that the said Ada Mattingly shall not again marry, except to said Chester Mattingly, until sixty days after this date, and that if any appeal is taken within sixty days, she shall not marry again, except to said Chester Mattingly, during the pendency of said appeal.

It is further ordered, adjudged and decreed that the said Ada Mattingly shall have the custody and control of the children, namely: Rena Mattingly, Woodrow Mattingly, Edith Mattingly, Yuvonne Mattingly and Lois Mattingly.

It is further ordered, adjudged and decreed that the Defendant pay to the Complainant the sum of Five Hundred Dollars as alimony temporary and permanent, the same to be paid

STATE OF ALABAMA }  
BALDWIN COUNTY }

Before me, the undersigned authority in and for said State and County, personally appeared Jesse Ard who is known to me and who being by me duly sworn deposes and says that he is personally acquainted with Chester Mattingly; that he has known him for the past 19 years; that he is a sober, energetic, peaceable, industrious and ambitious man of good habits; that he knows of no reason why the said Chester Mattingly should not be given or granted the right to remarry and in his opinion it is to the best interest of society that he be, by the court, given the right to remarry.

Jesse Ard

Sworn to and subscribed before me on this the 25 day of May, 1929.

Hunt  
Notary Public,  
Baldwin County, Alabama.

STATE OF ALABAMA )  
BALDWIN COUNTY )

Before me, the undersigned authority in and for said State and County, personally appeared Arval Ard who is known to me and who being by me duly sworn deposes and says that he is personally acquainted with Chester Mattingly; that he has known him for the past 19 years; that he is a sober, energetic, peaceable, industrious and ambitious man of good habits; that he knows of no reason why the said Chester Mattingly should not be given or granted the right to remarry and in his opinion it is to the best interest of society that he be, by the court, given the right to remarry.

Arval Ard.

Sworn to and subscribed before me on this the 25 day of May, 1929.

W M Hance  
Notary Public,  
Baldwin County, Alabama.

Two Hundred Fifty Dollars on or before the rendition of the final decree of divorce and the balance to be paid on or before three months from date of decree, or in event such balance not be paid by date of decree, to be secured by lien on present real estate owned by Defendant.

It is further ordered, adjudged and decreed that the Defendant pay the Solicitors of record for Complainant the sum of One Hundred Fifty Dollars, as counsel fees for Complainant, same to be paid on or before rendition of final decree.

It is further ordered, adjudged and decreed that the Defendant pay the costs herein taxes, for which execution may issue.

This the 4th day of February, 1928.

John D. Leigh

Judge of the Circuit Court of  
Baldwin County, Alabama.

STATE OF ALABAMA )  
BALDWIN COUNTY )

I, T. W. Richerson, Clerk of the Circuit Court of in and for said Baldwin County, Alabama, hereby certify that the foregoing is a full, true, correct and complete copy of the original decree of divorce rendered on the 4th day of May, 1928, by John D. Leigh, Judge of the Circuit Court of Baldwin County, Alabama, in the cause of Ada Mattingly, Complainant, vs. Chester Mattingly, Defendant, as the same appears on record in this office.

In witness whereof, I hereunto set my hand and seal on this the 27th day of May, 1929.

T. W. Richerson

Clerk of the Circuit Court of  
and in Baldwin County, Alabama.



Filed May 27/929  
J. M. McInnis  
Register

Filed May 27th/929  
T. H. McIlwain  
Register

Filed May 27/929  
J. W. McInnis  
Register

Filed May 27<sup>th</sup> 1929  
R. W. Wickman  
Clerk

No. **RECORDED**

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

*Ex parte*  
*Charles Mattingly*

VS

NOTE OF TESTIMONY

Filed in Open Court this 27

day of May 1928

*D. M. R...*

Register

3rd

No. **RECORDED** Page

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

*E. J. Porter*  
*Plaintiff*

VS.

REQUEST FOR DECREE IN  
VACATION

FILED *May 27* 192*9*

*T. W. McIlwain*  
Register

RECORDED IN RECORD

VOL. PAGE

Register

No. \_\_\_\_\_

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

EX PARTE

*Chas. H. Hattings*

DECREE.

Filed in office this the

*1st*

day of

*June*, 192*9*

*T. W. Rice*

Register.

MPTG BAY MINETTE

RECORDED

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

George C. Meyer

Carl T. Martin

of Mobile

County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Georgia Wilson

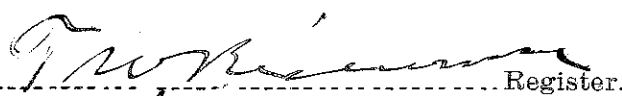
against said

Geo C. Meyer & Carl T. Martin et al

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 12

June 1929

  
Register.

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



3 Original

SERVE ON.....

Circuit Court of Baldwin County  
In Equity.

No. ....

SUMMONS

Georgia Wilson

vs.

Richard Lee Bradley

et al.

RECORDED

Beebe & Hall

Solicitor for Complainant

Recorded in Vol. .... Page .....

8 Copies of Bill

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this 12th

day of June 9  
1929

Sheriff.

Executed this 12th day of

June 1929

by leaving a copy of the within Summons with

George V. Meyer.

& Carl T. Martin,

Defendant.

Sheriff.

By B. Wiggins  
Deputy Sheriff.

RECORDED  
RECORDED

TO THE HONORABLE T. W. HARR, JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes your Complainant Georgia Wilson and hereby  
complaining against the Defendants hereinafter named,  
respectfully represents and shews unto your Honor as  
follows:

FIRST:

That the Complainant is a resident of Galena, Kansas,  
over twenty-one years of age.

SECOND:

That the Defendants to this cause are as follows:  
Richard Lee Bradley who is over twenty-one years of age and  
a non-resident of the State of Alabama, his post office  
address being, care of Baker Hotel, Dallas, Texas; Clara  
Page who is over twenty-one years of age and a non-resident  
of the State of Alabama, here address being, Grenada, Missis-  
sippi; Mary Bradley, a minor, eighteen years of age, a  
non-resident of the State of Alabama and who is in the cus-  
tody of her father Richard Lee Bradley, whose address is  
care of Baker Hotel, Dallas, Texas; Richard Lee Bradley, Jr.,  
a minor thirteen years of age, a non-resident of the State  
of Alabama and who is in the custody of his father Richard  
Lee Bradley, whose address is care of Baker Hotel, Dallas,  
Texas; George C. Meyer who is over the age of twenty-one  
years and a resident of Mobile, Mobile County, Alabama;  
Carl T. Martin, who is over the age of twenty-one and a resident  
of Mobile, Mobile County, Alabama.

THIRD:

Complainant alleges that she is in the quiet and peace-  
able possession of the following described land in Baldwin

County, Alabama, ever claiming to own the same, to-wit:

Beginning at a point on Mobile Bay 1854 feet west at right angles from the east line of Section thirteen (13) Township Nine (9) South, Range Two (2) East, thence in a southerly direction on a line parallel with and 1854 feet distant from said east line of said Section thirteen (13) to the south line thereof; thence west along the south line of said section 1400 feet; thence in a northerly direction on a line parallel with the east line of said section to Mobile Bay; thence in an easterly direction along Mobile Bay to the place of beginning; containing thirty acres, more or less, and being a part of Section thirteen (13) Township Nine (9) South of Range Two (2) East, in Baldwin County, Alabama; also

Beginning at a point on Mobile Bay where an iron stake has been planted 5254 feet, more or less, west at right angles from the east line of Section thirteen (13) of Township Nine (9) South of Range Two (2) East, which said stake marks the west line of the lands now held by J. R. Quick, trustee; thence following the shore line of said Mobile Bay westerly to the entrance of Shell Bank Bayou into Mobile Bay (a distance of 455 feet, more or less); thence in a southeasterly direction along the northern bank of said Bayou, to the intersection of the same with the said Quick lands at which point an iron stake is also planted and thence north along said west line to the place of beginning.

#### FOURTH:

Complainant alleges that the Defendants hereinabove named claim, or are reputed to claim, some title, right or interest in, or encumbrance upon the said lands hereinabove described.

#### FIFTH:

The Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the Defendants, or any of them may have, and Complainant therefore calls upon the Defendants, and each of them, separately and severally, to set forth and specify his or her claim, right, title or interest in or encumbrance upon said lands hereinabove described, and to show how and



by what instrument or instruments the same is derived or created.

PRAYER FOR PROCESS

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and by proper process make the said Richard Lee Bradley, Clara Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl T. Martin, Defendants, to this Bill of Complaint and require each of them 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.

PRAYER

Complainant further prays that upon the hearing of this cause this Honorable Court establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the Defendants herein named, have no claim, right, title or interest in, or encumbrance upon the lands herein described, or any part thereof, and grant unto your Complainant such other, further, or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound your Complainant will ever pray, etc.

BEEBE & HALL

Solicitor for Complainant.

POST VERDICT

The Defendants hereinabove named and each of them are required to answer each and every allegation contained in the foregoing Bill of Complaint set out in paragraph 1st to 8th, inclusive, but not under oath. Oath being hereby expressly waived.

BEEBE & HALL

Solicitor for Complainant.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes your Complainant Georgia Wilson and humbly  
complaining against the Defendants hereinafter named,  
respectfully represents and shows unto your Honor as  
follows:

FIRST:

That the Complainant is a resident of Celena, Kansas,  
over twenty-one years of age.

SECOND:

That the Defendants to this cause are as follows:  
Richard Lee Bradley who is over twenty-one years of age and  
a non-resident of the State of Alabama, his post office  
address being, care of Baker Hotel, Dallas, Texas; Clare  
Pope who is over twenty-one years of age and a non-resident  
of the State of Alabama, here address being, Grenada, Mississ-  
ippi; Mary Bradley, a minor, eighteen years of age, a  
non-resident of the State of Alabama and who is in the cus-  
tody of her father Richard Lee Bradley, whose address is  
care of Baker Hotel, Dallas, Texas; Richard Lee Bradley, Jr.,  
a minor thirteen years of age, a non-resident of the State  
of Alabama and who is in the custody of his father Richard  
Lee Bradley, whose address is care of Baker Hotel, Dallas,  
Texas; George C. Meyer who is over the age of twenty-one  
years and a resident of Mobile, Mobile County, Alabama;  
Carl T. Martin, who is over the age of twenty-one and a resident  
of Mobile, Mobile County, Alabama.

THIRD:

Complainant alleges that she is in the quiet and peace-  
able possession of the following described land in Baldwin

County, Alabama, ever claiming the same, to-wit:

Beginning at a point on Mobile Bay 1834 feet west at right angles from the east line of Section thirteen (13) Township Nine (9) South, Range Two (2) East, thence in a southerly direction on a line parallel with and 1834 feet distant from said east line of said Section thirteen (13) to the south line thereof; thence west along the south line of said section 1400 feet; thence in a northerly direction on a line parallel with the east line of said section to Mobile Bay; thence in an easterly direction along Mobile Bay to the place of beginning; containing thirty acres, more or less, and being a part of Section thirteen (13) Township Nine (9) South of Range Two (2) East, in Baldwin County, Alabama; also

Beginning at a point on Mobile Bay where an iron stake has been planted 5234 feet, more or less, west at right angles from the east line of Section thirteen (13) of Township Nine (9) South of Range Two (2) East, which said stake marks the west line of the lands now held by E. H. Quick, trustee; thence following the shore line of said Mobile Bay westerly to the entrance of Shell Bank Bayou into Mobile Bay (a distance of 455 feet, more or less); thence in a southeasterly direction along the northern bank of said Bayou, to the intersection of the same with the said Quick lands at which point an iron stake is also planted and thence north along said west line to the place of beginning.

FOURTH:

Complainant alleges that the Defendants hereinabove named claim, or are reputed to claim, some title, right or interest in, or encumbrance upon the said lands hereinabove described.

FIFTH:

The Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the Defendants, or any of them may have and Complainant therefore calls upon the Defendants, and each of



by what instrument or instruments the same is derived or created.

PRAYER FOR PROCESS

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and by proper process make the said Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl T. Martin, Defendants, to this Bill of Complaint and require each of them 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.

PRAYER

Complainant further prays that upon the hearing of this cause this Honorable Court establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the Defendants herein named, have no claim, right, title or interest in, or encumbrance upon the lands herein described, or any part thereof, and grant unto your Complainant such other, further, or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound your Complainant will ever pray, etc.

BENBEE & HALL

Solicitor for Complainant.

FOOT NOTE

The Defendants hereinabove named and each of them are required to answer each and every allegation contained in the foregoing Bill of Complaint set out in paragraph 1st to 5th, inclusive, but not under oath. Oath being hereby expressly waived.

BENBEE & HALL

Solicitor for Complainant.

Filed May 28/12  
T. M. McConner  
Register

by what instrument or instruments the same is derived or created.

PRAYER FOR PROCESS

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and by proper process make the said Richard Lee Bradley, Clara Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl E. Martin, Defendants, to this Bill of Complaint and require each of them to plead, answer or demur to the same within the time and to the penalties prescribed by law and the practice of the Honorable Court.

PRAYER

Complainant further prays that upon the hearing of this cause this Honorable Court establish the title of Complainant in and to the lands heretofore described and further find and decree that each and all of the Defendants herein named have no claim, right, title or interest in, or encumbrance upon the lands herein described, or any part thereof, and grant unto your Complainant such other, further, or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound your Complainant will ever pray, etc.

BEHRE & HALL

Solicitor for Complainant.

FOOT NOTE

The Defendants heretofore named and each of them are required to answer each and every allegation contained in the foregoing Bill of Complaint set out in paragraph 1st to 5th, inclusive, but not under oath. Oath being expressly

BEHRE & HALL

Solicitor for Complainant.

waived.



TO THE HONORABLE F. W. HARR, JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes your Complainant Georgia Wilson and humbly  
complaining against the Defendants hereinafter named,  
respectfully represents and shows unto your Honor as  
follows:

FIRST:

That the Complainant is a resident of Colona, Kansas,  
over twenty-one years of age.

SECOND:

That the Defendants to this cause are as follows:  
Richard Lee Bradley who is over twenty-one years of age and  
a non-resident of the State of Alabama, his post office  
address being, care of Baker Hotel, Dallas, Texas; Clara  
Pope who is over twenty-one years of age and a non-resident  
of the State of Alabama, here address being, Grenada, Mississ-  
ippi; Mary Bradley, a minor, eighteen years of age, a  
non-resident of the State of Alabama and who is in the cus-  
tody of her father Richard Lee Bradley, whose address is  
care of Baker Hotel, Dallas, Texas; Richard Lee Bradley, Jr.,  
a minor thirteen years of age, a non-resident of the State  
of Alabama and who is in the custody of his father Richard  
Lee Bradley, whose address is care of Baker Hotel, Dallas,  
Texas; George C. Meyer who is over the age of twenty-one  
years and a resident of Mobile, Mobile County, Alabama;  
Carl T. Martin, who is over the age of twenty-one and a resident  
of Mobile, Mobile County, Alabama.

THIRD:

Complainant alleges that she is in the quiet and peace-  
able possession of the following described land in Baldwin

County, Alabama, ever claiming to own the same, to-wit:

Beginning at a point on Mobile Bay 1834 feet west at right angles from the east line of Section thirteen (13) Township Nine (9) South, Range Two (2) East, thence in a southerly direction on a line parallel with and 1834 feet distant from said east line of said Section thirteen (13) to the south line thereof; thence west along the south line of said section 1400 feet; thence in a northerly direction on a line parallel with the east line of said section to Mobile Bay; thence in an easterly direction along Mobile Bay to the place of beginning; containing thirty acres, more or less, and being a part of Section thirteen (13) Township Nine (9) South of Range Two (2) East, in Baldwin County, Alabama; also

Beginning at a point on Mobile Bay where an iron stake has been planted 3854 feet, more or less, west at right angles from the east line of Section thirteen (13) of Township Nine (9) South of Range Two (2) East, which said stake marks the west line of the lands now held by J. H. Quick, trustee; thence following the shore line of said Mobile Bay westerly to the entrance of Shell Bank Bayou into Mobile Bay (a distance of 455 feet, more or less); thence in a southeasterly direction along the northern bank of said Bayou, to the intersection of the same with the said Quick lands at which point an iron stake is also planted and thence north along said west line to the place of beginning.

FOURTH:

Complainant alleges that the Defendants hereinabove named claim, or are reputed to claim, some title, right or interest in, or encumbrance upon the said lands hereinabove described.

FIFTH:

The Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the Defendants, or any of them may have and Complainant therefore calls upon the Defendants, and each of them, separately and severally, to set forth and specify his or her claim, right, title or interest in or encumbrance upon said lands hereinabove described, and to show how and



BREMER & HALL

waived.

The defendants heretofore named and each of them are required to answer each and every allegation contained in the foregoing bill of complaint set out in paragraph 1st to 5th, inclusive, but not under oath, oath being hereby expressly

FOOT NOTE

BREMER & HALL

may, etc.

to receive, and as in duty bound your Complainant will ever  
rejoice as they may be in equity and good conscience entitled  
grant unto your Complainant such other, further, or different  
upon the lands herein described, or any part thereof, and  
have no claim, right, title or interest in, or encumbrance  
and decree that each and all of the defendants herein named,  
in and to the lands heretofore described and further find  
cause this Honorable Court establish the title of Complainant  
Complainant further prays that upon the hearing of this

PRAYER

Court.

Complaint prescribed by law and the practice of this Honorable  
answer or count to the same within the time and under the  
to this bill of complaint and require each of them to plead,  
Bradley, Jr., George C. Meyer and Carl H. Martin, Defendants,  
Richard Lee Bradley, Clara Pope, Mary Bradley, Richard Lee  
this bill of complaint and by proper process make the said  
that your Honor will take jurisdiction of the cause made by  
therefore, the premises considered, Complainant prays

PRAYER FOR PROCESS

created.

by what instrument or instrument the same is derived or

by which instrument or instruments the same is derived or created.

PRAYER FOR PROCESS

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and by proper process make the said Richard Lee Bradley, Clara Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl E. Martin, Defendants, answer to the Bill of Complaint and require each of them 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.

PRAYER

Complainant further prays that upon the hearing of this cause this Honorable Court establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the Defendants herein named, have no claim, right, title or interest in, or encumbrance upon the lands herein described, or any part thereof, and grant unto your Complaint such other, further, or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound your Complaint will ever pray, etc.

BERNIE & HALL

Solicitor for Complainant.

FOOT NOTE

The Defendants hereinabove named and each of them are required to answer each and every allegation contained in the foregoing Bill of Complaint set out in paragraph 1st to 5th, inclusive, but not under oath. Oath being hereby expressly waived.

BERNIE & HALL

Solicitor for Complainant.

Richard Lee Bradley Jr  
of Richard Lee Bradley

AFTER FIVE DAYS RETURN TO  
T. W. RICHERRSON  
AND CLERK OF THE CIRCUIT COURT  
BALDWIN COUNTY  
BAY MINETTE, ALA.



Return Receipt Requested,  
Fee Paid.

*will call*  
*20*

Mr. Richard Lee Bradley

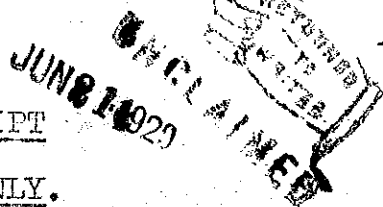
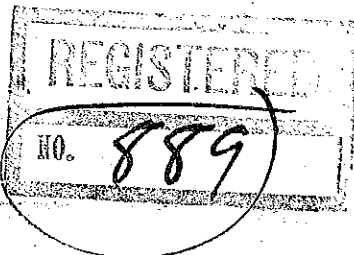
c/o Captain C. C. Calhoun.

1389 National Press Building,

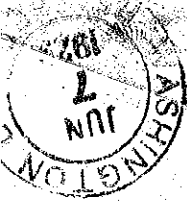
Washington,

D. C.

35958



REGISTERED RETURN RECEIPT  
REQUESTED.  
DELIVER TO ADDRESSEE ONLY.



TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY.

Comes your Complainant Georgia Wilson and humbly  
complaining against the Defendants hereinafter named, respect-  
fully represents and shows unto your Honor as follows:

FIRST:

That the Complainant is a resident of Galena, Kansas,  
over twenty-one years of age.

SECOND:

That the Defendants to this cause are as follows: Richard  
Lee Bradley who is over twenty-one years of age and a non-resident  
of the State of Alabama, his post office address being, care of  
Baker Hotel, Dallas, Texas; Clare Pope who is over twenty-one  
years of age and a non-resident of the State of Alabama, her  
address being Grenada, Mississippi; Mary Bradley, a minor,  
eighteen years of age, a non-resident of the State of Alabama  
and who is in the custody of her father Richard Lee Bradley,  
whose address is care of Baker Hotel, Dallas, Texas; Richard Lee  
Bradley, Jr., a minor thirteen years of age, a non-resident  
of the State of Alabama and who is in the custody of his father  
Richard Lee Bradley, whose address is care of Baker Hotel, Dallas,  
Texas; George C. Meyer who is over the age of twenty-one years and  
a resident of Mobile, Mobile County, Alabama; Carl T. Martin,  
who is over the age of twenty-one and a resident of Mobile,  
Mobile County, Alabama.

THIRD:

Complainant alleges that she is in the quiet and peace-  
able possession of the following described land in Baldwin  
County, Alabama, ever claiming to own the same, to-wit:



Beginning at a point on Mobile Bay 1834 feet west at right angles from the east line of Section thirteen (13) Township nine (9) South, Range two (2) East, thence in a southerly direction on a line parallel with and 1834 feet distant from said east line of said Section thirteen (13) to the south line thereof; thence west along the south line of said section 1400 feet; thence in a northerly direction on a line parallel with the east line of said section to Mobile Bay; thence in an easterly direction along Mobile Bay to the place of beginning; containing thirty acres, more or less, and being a part of Section thirteen (13) Township nine (9) South of Range two (2) East, in Baldwin County, Alabama; also

Beginning at a point on Mobile Bay where an iron stake has been planted 3234 feet, more or less, west at right angles from the east line of Section thirteen (13), of Township nine (9) South of Range two (2) East, which said stake marks the west line of the lands now held by J. H. Quick, trustee; thence following the shore line of said Mobile Bay westerly to the entrance of Shell Bank Bayou into Mobile Bay (a distance of 455 feet, more or less); thence in a southeasterly direction along the northern bank of said Bayou, to the intersection of the same with the said Quick lands at which point an iron stake is also planted and thence north along said west line to the place of beginning.

FOURTH:

Complainant alleges that the Defendants hereinabove named claim, or are reputed to claim some title, right or interest in or encumbrance upon the said lands hereinabove described.

FIFTH:

The Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the Defendants, or any of them may have and Complainant therefore calls upon the Defendants, and each of them, separately and severally, to set forth and specify his or her claim, right, title or interest in or encumbrance upon said lands hereinabove described, and to show how and by what instrument or instruments the same is derived or created.

PRAYER FOR PROCESS.

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this



bill of complaint and by proper process make the said Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl T. Martin, Defendants, to this bill of complaint and require each of them 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.

PRAYER.

Complainant further prays that upon the hearing of this cause this Honorable Court will establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the Defendants herein named, have no claim, right, title or interest in, or encumbrance upon the lands herein described, or any part thereof, and grant unto your Complainant such other, further or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound your Complainant will ever pray, etc.

Beebe & Hall,  
Solicitors for Complainant.

FOOT NOTE:

The Defendants hereinabove named and each of them are required to answer each and every allegation contained in the foregoing bill of complaint set out in paragraph 1st to 5th, inclusive, but not under oath. Oath being hereby expressly waived.

Beebe & Hall,  
Solicitors for 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 Richard Lee Bradley and  
Richard Lee Bradley as natural guardian of Mary Bradley, a minor,  
and Richard Lee Bradley, Jr., a minor.

of \_\_\_\_\_ County, to be and appear before the Judge of the Circuit Court  
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by  
Georgia Wilson

against said above named defendants

and further to do and perform what said Judge shall order and direct in that behalf. And this the  
said Defendant shall in no wise omit, under penalty, etc. And we further command that you return  
this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this \_\_\_\_\_ day of \_\_\_\_\_

James 192 9

T. W. Richerson Register.

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

AFTER FIVE DAYS RETURN TO  
T. W. RICHESON  
AND CLERK OF THE CIRCUIT COURT  
BALDWIN COUNTY  
BAY MINETTE, ALA.



*ForWARDED.*



Mr. Richard Lee Bradley

~~4319810764~~

c/o Baker Hotel,

~~53302~~

Dallas,

REGISTERED RETURN RECEIPT  
REQUESTED.  
DELIVER TO ADDRESSEE ONLY.

~~43198~~

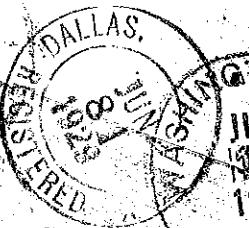
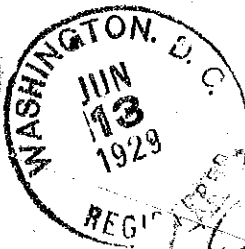
Texas.

*Washington*

*CCA Calhoun - not pres club*

*D. C.*

out of city  
40



TO THE HONORABLE T. W. HARE, JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY.

Comes your Complainant Georgia Wilson and humbly  
complaining against the Defendants hereinafter named, respect-  
fully represents and shows unto your Honor as follows:

FIRST:

That the Complainant is a resident of Galena, Kansas,  
over twenty-one years of age.

SECOND:

That the Defendants to this cause are as follows: Richard  
Lee Bradley who is over twenty-one years of age and a non-resident  
of the State of Alabama, his post office address being, care of  
Baker Hotel, Dallas, Texas; Clare Pope who is over twenty-one  
years of age and a non-resident of the State of Alabama, her  
address being Grenada, Mississippi; Mary Bradley, a minor,  
eighteen years of age, a non-resident of the State of Alabama  
and who is in the custody of her father Richard Lee Bradley,  
whose address is care of Baker Hotel, Dallas, Texas; Richard Lee  
Bradley, Jr., a minor thirteen years of age, a non-resident  
of the State of Alabama and who is in the custody of his father  
Richard Lee Bradley, whose address is care of Baker Hotel, Dallas,  
Texas; George C. Meyer who is over the age of twenty-one years and  
a resident of Mobile, Mobile County, Alabama; Carl T. Martin,  
who is over the age of twenty-one and a resident of Mobile,  
Mobile County, Alabama.

THIRD:

Complainant alleges that she is in the quiet and peace-  
able possession of the following described land in Baldwin  
County, Alabama, ever claiming to own the same, to-wit:

Beginning at a point on Mobile Bay 1834 feet west at right angles from the east line of Section thirteen (13) Township nine (9) South, Range two (2) East, thence in a southerly direction on a line parallel with and 1834 feet distant from said east line of said Section thirteen (13) to the south line thereof; thence west along the south line of said section 1400 feet; thence in a northerly direction on a line parallel with the east line of said section to Mobile Bay; thence in an easterly direction along Mobile Bay to the place of beginning; containing thirty acres, more or less, and being a part of Section thirteen (13) Township nine (9) South of Range two (2) East, in Baldwin County, Alabama; also

Beginning at a point on Mobile Bay where an iron stake has been planted 3234 feet, more or less, west at right angles from the east line of Section thirteen (13), of Township nine (9) South of Range two (2) East, which said stake marks the west line of the lands now held by J. H. Quick, trustee; thence following the shore line of said Mobile Bay westerly to the entrance of Shell Bank Bayou into Mobile Bay ( a distance of 455 feet, more or less); thence in a southeasterly direction along the northern bank of said Bayou, to the intersection of the same with the said Quick lands at which point an iron stake is also planted and thence north along said west line to the place of beginning.

FOURTH:

Complainant alleges that the Defendants hereinabove named claim, or are reputed to claim some title, right or interest in or encumbrance upon the said lands hereinabove described.

FIFTH:

The Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or encumbrance the Defendants, or any of them may have and Complainant therefore calls upon the Defendants, and each of them, separately and severally, to set forth and specify his or her claim, right, title or interest in or encumbrance upon said lands hereinabove described, and to show how and by what instrument or instruments the same is derived or created.

PRAYER FOR PROCESS.

Wherefore, the premises considered, Complainant prays that your Honor will take jurisdiction of the cause made by this

bill of complaint and by proper process make the said Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl T. Martin, Defendants, to this bill of complaint and require each of them 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.

PRAYER.

Complainant further prays that upon the hearing of this cause this Honorable Court will establish the title of Complainant in and to the lands hereinabove described and further find and decree that each and all of the Defendants herein named, have no claim, right, title or interest in, or encumbrance upon the lands herein described, or any part thereof, and grant unto your Complainant such other, further or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound your Complainant will ever pray, etc.

Beebe & Hall,  
Solicitors for Complainant.

FOOT NOTE:

The Defendants hereinabove named and each of them are required to answer each and every allegation contained in the foregoing bill of complaint set out in paragraph 1st to 5th, inclusive, but not under oath. Oath being hereby expressly waived.

Beebe & Hall,  
Solicitors for 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 Richard Lee Bradley and  
Richard Lee Bradley as natural guardian of Mary Bradley, a minor,  
and Richard Lee Bradley, Jr., a minor.

of \_\_\_\_\_ County, to be and appear before the Judge of the Circuit Court  
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by  
Georgia Wilma

against said above named defendants

and further to do and perform what said Judge shall order and direct in that behalf. And this the  
said Defendant shall in no wise omit, under penalty, etc. And we further command that you return  
this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 6th day of

June 192 2

T. W. Richerson Register.

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



# RECEIPT FOR REGISTERED ARTICLE NO. 846

13 fee paid 15 class postage paid. 5/29, 1929

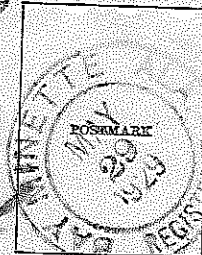
From J. W. Richardson (Date)

Addressed to Mrs. Mary P. Richardson

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee 30 Special delivery fee

Delivery restricted to addressee { in person or order Postmaster, per M.H.



# RECEIPT FOR REGISTERED ARTICLE NO. 847

15 fee paid 15 class postage paid. 5/29, 1929

From J. W. Richardson (Date)

Addressed to Capt. C. E. Bradley

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee 30 Special delivery fee

Delivery restricted to addressee { in person or order Postmaster, per M.H.



# RECEIPT FOR REGISTERED ARTICLE NO. 848

15 fee paid 15 class postage paid. 5/29, 1929

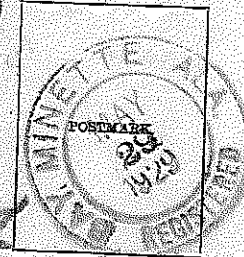
From J. W. Richardson (Date)

Addressed to Mary P. Richardson

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee 30 Special delivery fee

Delivery restricted to addressee { in person or order Postmaster, per M.H.



# FOR REGISTERED ARTICLE NO. 849

15 fee paid 15 class postage paid. 5/29, 1929

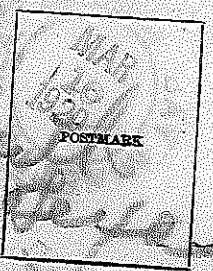
From J. W. Richardson (Date)

Addressed to R. P. Richardson

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee 30 Special delivery fee

Delivery restricted to addressee { in person or order Postmaster, per M.H.



E. B. MORGAN  
ATTORNEY  
GALENA, KANSAS

GEORGIA WILSON, Complainant,  
vs.  
Richard Lee Bradley, et al.,  
Respondents.

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, STATE OF ALABAMA

*In Equity No. 816*

DEPOSITION OF GEORGIA WILSON AND  
A. S. WILSON.

*E. B. Morgan*  
Commissioner.

*Filed Oct 19/329*  
*W. Morgan*  
*Adverses*

CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
BayMinette,  
Alabama.

AFTER FIVE DAYS RETURN TO  
T. W. RICHESON  
REGISTER AND CLERK OF THE CIRCUIT COURT  
BALDWIN COUNTY  
BAY MINETTE, ALA.

Return Receipt Requested,  
Noe Paid.

Deliver to addressee only.

(Deliver to addressee onley)  
(Return receipt demanded)

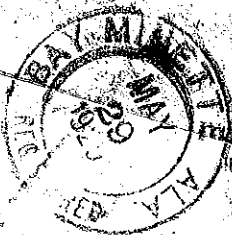
REGISTERED  
NO. 847

Capt G.C. Bradley  
National Press Bldg  
Washington D.C.

24903

JUN 5 1929





*Underwood  
Merrill*  
40

MAY 31 1929  
X S

BAY MINETTE, ALA., Nov 9 1929

Mr. J. H. Robinson

IN ACCOUNT WITH  
**G. W. HUMPHRIES**  
JUDGE OF PROBATE  
BALDWIN COUNTY

Please Return Bill With Remittance

Privilege Tax      Rec. Fee      Total

Deed  
Rec. Mort. from

Wm. H. Wilson      to      Robt. Lee Barclay et al

1.00

*Paid 11/9/29  
G. W. Humphries Judge  
by J. H. Robinson*