815

STATE OF ALABAMA, Baldwin County.

CIRCUIT COURT, IN EQUITY.

Ex Parte

CHESTER WATTINGLY
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
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 Muy 192.9
(Sighed)
Judge of the 21st Judicial Circuit of Alabama.
STATE OF ALABAMA, Baldwin County.  CIRCUIT COURT, IN EQUITY.
I, T. W. RICHERSON, Register of the Circuit Court, in and for said State and County, do
hereby certify that the above is a true and correct opy of the Decree allowing the within named
Petitioner to again contract marriage, rendered on theday of192
in the cause; all of which appears of record in this Court.
Witness my hand and scal of office, this theday of192

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

STATE OF ALABAMA, Baldwin County.	CIRCU	JIT COURT, IN EQUITY.
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NY TARAN		•
EX PARTE CHESTER	MARTINGLY	Complainant
	vs.	
		, Defendant
	· · · · · · · · · · · · · · · · · · ·	, Detendant
To T. W. RICHERSON	, Registe	r:
In the above stated cause a and evidence having been taken, a	Decree Pro Confesso having b	een taken against the Defendant, submission for final decree, and no
defense having been interposed, t	he Complainant, byBEF	BE & HALL
this written request to deliver the	Solicitors of record, now fi	les with the Register of this Court dge for final decree in vacation.

1 Teele More

Solicitor for Complainant.

CHESTER MATTINGLY.

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

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,

ADA MATTINGLY, Complinant,
vs
CHESTER MATTINGLY, Defendant.

IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA.
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, untilsixty 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 pendancy 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 Vesse 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 / g 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.

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

Notary Public, Baldwin County, Alabama.

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gerr Ard

BALDWIN COUNTY

State and County, personally appeared <u>Awal</u> and for said who is known to me and who being by me duly sworn deposes and says that he is personally acquainted with Chester Nattingly; that he has known him for the past <u>19</u> 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.

awal and.

Sworn to and subscribed before me on this the 24-

Notary Public.

Baldwin County, Alebama,

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 whi ch 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.

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

Filed May 27/929 To Milener Register

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# THE STATE OF ALABAMA BALDWIN COUNTY

IN EQUITY, CIRCUIT COURT OF BALDWIN COUNTY.

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NOTE OF TESTIMONY

Filed in Open Court this 27

day of they 1927

Register

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THE STATE OF ALABAMA	e e e
BALDWIN COUNTY	
CIRCUIT COURT, IN EQUITY	
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REQUEST FOR DECREE IN	
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MOORE PTG. CO

THE STATE OF ALABAMA, Baldwin County.

CIRCUIT COURT, IN EQUITY.

EX PARTE

Oliver Kallingy

DECREE.

Filed in office this the 150

day of June , 1929

Register.

MPJG SAY MINEYTE

MECRDED

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 G. Meyer
Carl T.Martin
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***************************************
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Mobile ofCounty, to be and appear before the Judge of the Circuit Cour
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sun mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited b
mons, and more to answer, piede or contain, without oath, to a bird of Complaint matery exhibited b
Georgia Wils <b>on</b>
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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 retur this writ with your endorsement thereon, to our said Court immediately upon the execution thereon
WITNESS, T. W. Richerson, Register of said Circuit Court, this12day of
June 192 9
192 Register
N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

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Circuit Court of Baldwin Cou In Equity.	inty
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SUMMONS	
Georgia Wilson	<u></u>
MECORE	u - u -
2!	<u>tt+//</u>
vs. Richard Lee Bradley	77-11
et al.	
RECORDED	
Beebe & Hall Solicitor for Compl	
Recorded in Vol	
s Copies of Re	e.el

# THE STATE OF ALABAMA, BALDWIN COUNTY.

Received in office this	12th
June day of	9 192
	Sheriff.
Executed this 12th	day of
June	
by leaving a copy of the within George V. Meyer.	* 1
& Carl T.Martin,	
Careum	Defendant.
By BOWizzin	Sheriff.
D	eputy Sheriff.



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COME OF BASIAN COUNTY, ALANCE, MINER OF SECURITY.

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The Completenant Further alleged that no said is pending to enforce of that the validity of such claim, there, there are an any of the law, have, and could have, and could have, and could have, and could have apparently and powerful. It said facts and creating the property and powerful, to said facts and creating the property and powerful.

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Complications from the power that upon the homelog of this cause that incorreble decreases establish the pittle of Complications in and to the lands hereinsbore decreases and further that and testing that each end climate the Decembert herein meson, have no disting tight, thitle or interest in, or encountered to the lands herein meson in a surplication of the lands herein meson by a surplication of the lands are completed and make there for the lands of the lands are completed and make there for the lands of the lands are completed and make the lands of the lands are lands as a surplication will appear to the lands are lands as a land of the lands are lands on the lands and lands are lands as a land of the lands are lands on the lands are lands.

BEEBE & HALL

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BEEBE & HALL Solicitor for Complainant. TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF HALDMIN COURTY, ALABAMA, SITTING IN EQUITY:

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

#### FIRST:

That the Compleinant is a resident of Gelena, Eanues, over twenty-one years of age.

#### GWANTOW DE

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 of fice address being, care of Baker Hotel, Dallas, Texas; Clare Pope who is over twenty-one years of age end a non-resident of the State of Alabams, here address being, Granada, Mississippl: Mary Bradley, a minor, eighteen years of ago, 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 ago, a non-resident of the State of Alabama and who is in the oustody of his father Richard Los Bradley, whose address is care of Baker Notel, 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,

#### THIND:

Complainant alloger that she is in the quiet and peaceable possession of the following described land in Baldwin County, Alebema, even tlaining a treat the same, to-wit:

Section thirteen (1) Comming Mine (3) South Section thirteen (1) Comming Mine (3) South Section thirteen (3) Comming Mine (3) South Section on a line parallel will also the list feet distant from this parallel will be south line the continuous west close the South line the feet distant from (1) so the South line the feet on thirteen (1) so the South line the feet done west close the South line of the Sout

Segimming at a point on Mobile Bay where iron stake has been planted 5254 as , more or less, west at Mich a Wile's from the east line of Jection thirtheen (II) of Township Wine (II) and Township Wine (II) and I which said pteke marks the west line of the lands now held by the distributed; thence following the short line of said Mobile Bay wester! to the entregge of Shell Bank Sayou into Mobile Bay (a distance of 55 feet; more or less); thence in a southern the intersection of the bank of said sayou to the intersection of the same with the said quick Lands at which point an iron stake is also planted and thence has in a long Still West Line to the place of beginning.

#### FOURTH:

Compleinant elleges that the Derendents hereinabove hamed claim, or are deputed to claim, some title, right or interest in, or encumbrance upon the said lands hereinabove described.

#### FIFTE:

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.

#### PRAYING TON 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. Never and Carl T. Martin, Defendants, to this Bill of Complaint and require each of them 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.

#### 

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 a titled to receive, and as in duty bound your Complainant will over pray, etc.

BENDE & HALL

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#### IONT NOUS

The Defendants hereinabove named and each of them are required to enswer each and every allogation contained in the foregoing Bill of Complaint set out in paragraph let to 5th, inclusive, but not under eath. Oath being by oby expressly vaived.

BEIEBE & Ha

Solicitor for mplainant.

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

#### PERSONAL TON PROPER

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 Loe Bradley, Clere Pope, Mary Bradley, Richard Lee Bradley, Ir., Gerge C. Meyer and Carl B. Martin, Defendants, to this Bill of Compleint and require each of them to plead, answer or demur to the seme within the time end penalties prescribed by law and the practice of the Honorahle . .JIIIOO

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 grent unto your Complainant such other, further, or different relief as she may be in equity and good conscience a titled to receive, and as in duty bound your Complainant will ever prey, etc.

BEEBE & HALL

Bolld for for Complainent,

#### FOOT NOTE

The Defendants hereinabove named and each of them are required to enswer each and every allegation contained in the foregoing Hill of Compleint set out in paragraph 1st to 5th, inclusive, but not under cath. Oath being F cby expressly .Doview

BEIRE & HL

for amplainent. Solicitor TO THE HONORARUS F. W. HANN, JUDON OF THE GIRGULT COURT OF BALDNIN COUNTY, ALABAMA, STITLING IN ROULTY:

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

#### 77777

That the Complainant is a resident of Colona, Remses, over twenty-one years of ago.

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That the Defendants to this cause are as follows: Richard Lee Bradley who is ever twenty-one years of ego and a non-resident of the State of Alebama, his post of fice address being, care of Baker Botel, Dalles, Toxos: Clare Tope who is ever twenty-one years of age and a non-realdent of the State of Alabama, here address being, Grenada, Masinsippi; Mary Bradley, a minor, eighteen years of age, a non-resident of the State of Alabama and who is in the onetody of her father Richard Lee Bradley, whose eddress is care of Neker Hotel, Dellas, 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 Habbard Los Bradley, whose address is care of Baker Notel, Delles, Towas; George C. Meyer who is over the age of twenty-one years and a resident of Mobile, Mobile County, Alabama; Cerl T. Mortin, who is ever the age of twenty-one and a resident of Mobile, Mobile County, Alabam.

#### 0 0

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

Deciming at a point on Nobile Day 1874 fact west at right engles from the east line of Section thirteen (17) formably Mine (9) South, Range Two (2) East, blence in a southerly direction on a line parallel with and 1884 feet distant from said onet line of said Section thirteen (18) to the south line of said Section thirteen (18) to the south line of said Section to Medical with the cost line of said Section of a line parallel with the cost line of said section to Medical with the cost line of said section to Medical with the cost line of said section to Medical with the cost line of said section to Medical with the cost line of said section to Medical with the cost line of said section to Medical Section thirty acres, more or less, and being a part of Section thirteen (18) Township Nine (8) South of Gauge Two (2) Best, in Delowin County, Alebana; else

Deciming at a point on Mobile Pay where an iron stake has been planted 5234 feet, more or less; west it right explor from the east line of Section thirteen (15) of Township Nine (2) South of Beeg Ree (3) heat, which said stake marks the west line of the lands now head by 3. H. quick, trustes; thence following the plant line of Shell Jank Payon into Mobile Bay (a distance of 450 feet, more or less); thence in a scutheasterly direction along the horizon bank of said Payon, to the intersection of the more with the said Quick lands at which point has iron at also planted and thence nor the along said west line to the place of beginning.

#### FOUNDE:

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

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The Compinional 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 be reinabove described, and to show how and

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#### CONTOUR HOLDS

Sharefore, the procless considered, Completions proye that the cause and by the this day, four Motor will also procless of the cause and by proper process united the sale of Completing and by proper process united the third of Completing Clere tope, Hery Bradley, Brights Lee Tradley, Jr., Completing the Carl T. Harring, Defendants, to the Bill of Completing and require and then to plead, and to the this the plead, possible of the Bill of Completing and require and the moder the analysis of the Bill of Completing and the processor of the Bill of Completing and the third processor of the Bill of Completing and the third processor of the Bill of Completing and the third processor of the Bill of Completing and the third processor of the Bill of Completing and the third processor of the Honorabile

Completent trather proys that upon the besting of this cause this honorable Court establish the title of Completent find in and to the lends hereinnbove described and further find and forther find and forther find and forther find herein named, being the lends herein described, or any part bloreof, and upon the lends herein described, or any part bloreof, and upon the lends herein described, or any part bloreof, and trailed as the lends and of the lends herein described, or any part bloreof, and relief as the may be in equity and good consolence attitled to receive, and as in duty hourd your Completent of the lends and the lends and the lends and the lends and the lends are the lends and as in duty hourd your Completent was the lends and as in duty hourd your Completent and the lends and the lends are lends and the lends and the lends are lends as the lends are the lends and as in duty hourd your Completent and any lends are lends as the lends are lends are lends as the lends are lends as the lends are lends are lends as the lends are lends are lends are lends as the lends are lends ar

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The Defendants hereinghove named and each of them are required to shank and every allogation contained in the felt, foregained in the set out in paragraph let to 5th, inclusive, but not under oath. Oath being hereby expressly inclusive, but not under oath.

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of wist instrument or instruments the sense is derived or created.

#### PRAYER FOR PROCESS

Morefore, the premises considered, Complainant prays that your Monor will take jurisdiction of the cause made by the Still of Complaint and by proper process make the said alonged dee Bradley, Clere Pope, Mary Bradley, Richard Lee actions of the Strate of Complaint and require each of them to plead, you this to the same within the time and under the femalties presented by law and the practice of this Honorelle constitutions.

#### PRAYER

Complainent further prays that upon the hearing of this cause this Homorable Court establish the title of Complainent in and to the lands hereinabove described and further find and decree that each and all of the Defendants herein named, have no claim, if ght, title or interest in, or enumbrane upon the lands herein described, or any part thereof, and grant unto your Complainent such other, further, or different relief as she may be in equity and good conscience a titled to receive, and as in duty bound your Complainant will ever to receive, and as in duty bound your Complainant will ever

BEERE & HALL Soite for for Complement.

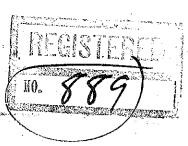
#### TON TONE

The Defendants bereinabove named and each of them are required to enswer each and every allegation contained in the foregoing Mill of Complaint set out in paragraph let to 5th, inclusive, but not under cath. Oath being hereby expressly waived.

BEEBE & HALL

Solicitor for Complainant.

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



REGISTERED RETURN RECEIPT REQUESTED.

DELIVER TO ADDRESSEE ONLY.



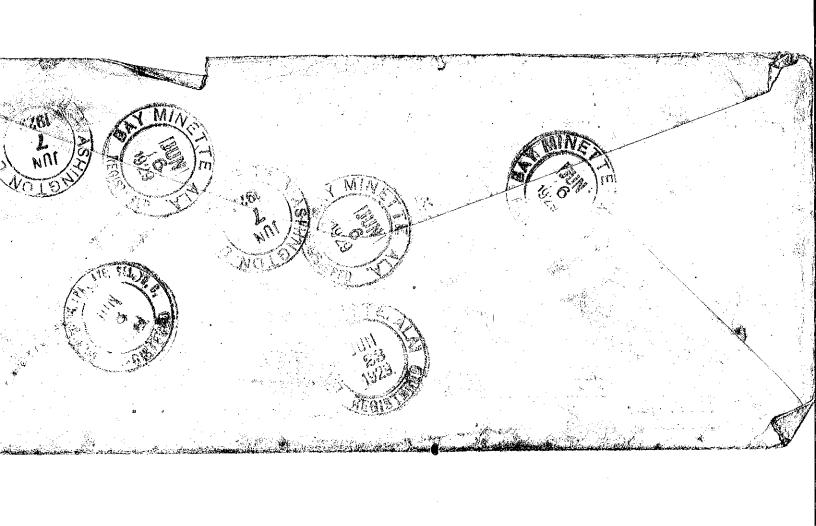
Retain Receipt Requested, Eee Paid.

Mr. Richard Lee Bradley

Captain C. C. Calhoun

1589 National Press Building,

3505A-



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:

#### TINGLE

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

#### SECOMD:

That the Defendants to this cause ere as follows: Richard Lee Bredley 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, Toxas; Clare Pope who is over twenty-one years of age and a non-resident of the State of Alebama, her address being Grenada, Masissippi; Mary Bradley, a minor, eighteen years of age, a non-resident of the State of Alabama and who is in the oustony of her father Richard Lee Bradley, whose address is care of Boker Hotel, Dallas, Texas; Richard Lee Bradley, Jr., adminor thirteen years of age, a non-resident of the State of Alabama and who is in the custody of his father Richard Leo Bradley, whose address is care of Baker Hotel, Dallas, Tems; George C. Neyer who is ever the age of twenty-one years and a resident of Mobile, Mobile County, Alabama; Carl T. Mertin, who is over the age of twenty-one and a resident of Mobile. Mobile County, Alabama.

#### THINL

Complainant alleges that she is in the quiet and peaceable 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 section1400 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 southmenterly 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.

FOURIE:

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 enforceer 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.

#### IRATIR.

cause this Honorable Court will establish the title of Compadinant 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 8th, inclusive, but not under oath, Oath being hereby expressly weived.

Beebe & Hell, Solicitors for Complainant.

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To any Sheriff of	the State of Alaban	na—GREETING:	Lee Bradley and
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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 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., alminor 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 peaceable 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 section1400 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 (15), 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, trastee; 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 enforceor 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 grays 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 on demur to the same within the time and under the penalties prescribed by law and the practice of this Monorable Court.

#### PRIYUR.

cause this Monorable 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 the reof, 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.

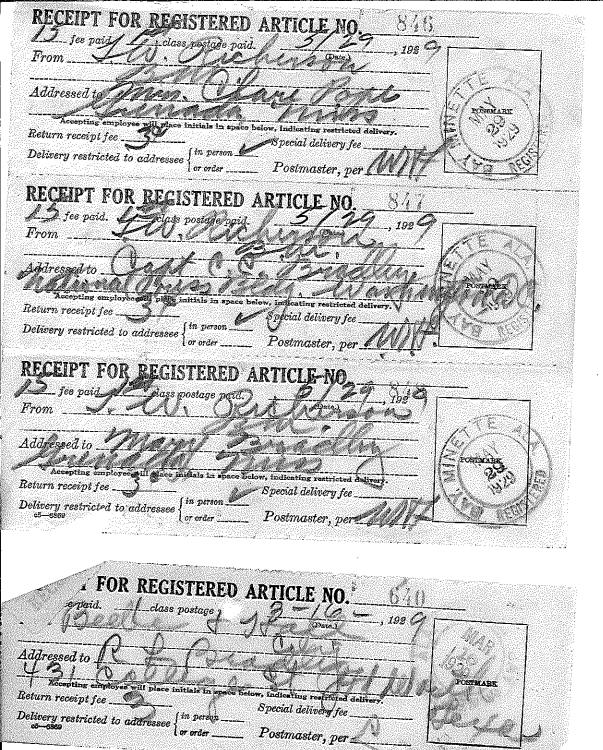
Beebe & Hall, Solicitors for Complainant.

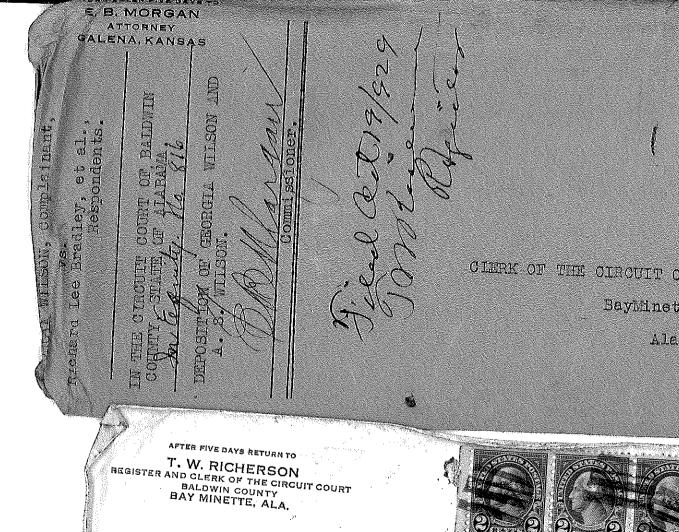
#### FOOT NOTE:

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.

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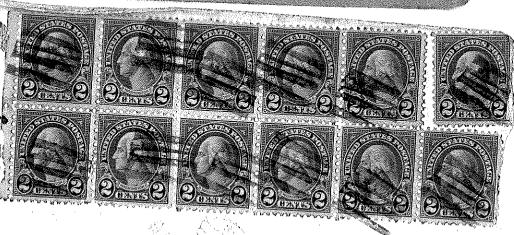
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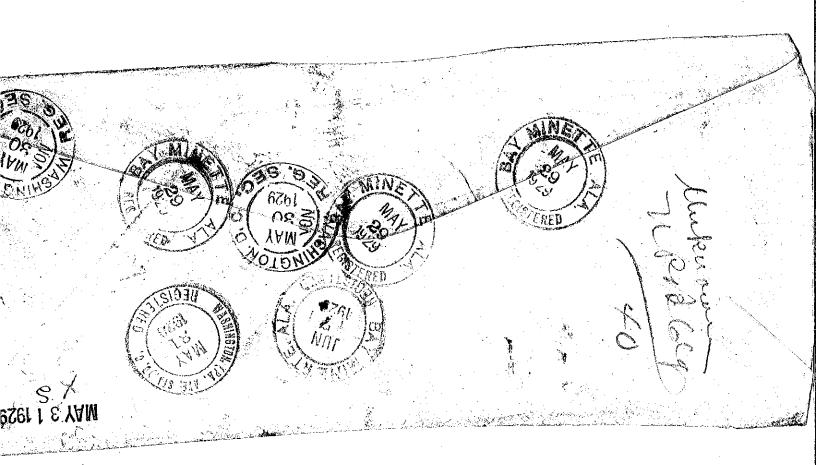
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# JUDGE OF PROBATE BALDWIN COUNTY

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