

816

GEORGIA WILSON,
Complainant,

vs.

RICHARD LEE BRADLEY, et al.,
Respondents.

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

Deposition of Georgia Wilson and A. S. Wilson,
witnesses examined on behalf of the Complainant in the above
entitled case, by this Commissioner and at the place, time, and
in the manner hereinafter stated.

DEPOSITION OF GEORGIA WILSON.

1. To the first interrogatory she saith: My name is Georgia Wilson; I am seventy-three years old; I reside at Galena, Kansas.
2. To the second interrogatory she saith: I am, through my tenant, John A. Nelson.
3. To the third interrogatory she saith: There are two tracts of land involved in this suit; the first one is described as follows:

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

the second tract is described as follows:

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.

I acquired title to an undivided one-third interest in the first tract of land above described through a quit-claim deed from Andrew M. Jackson and his wife, Carrie C. Jackson, dated the 5th of March, 1926, which is recorded in the office of the Judge of Probate, of Baldwin County, State of Alabama, on the 17th of March, 1926, in Book No. 39 (N.S.), page 213; I also acquired title to an undivided one-third interest in the tract of land first above described from Ella Corey Quick, widow and sole devisee of J. H. Quick, through a quit-claim deed, dated the 31st of March, 1926, which was recorded in the office of the Judge of Probate of Baldwin County, State of Alabama, on the 7th of April, 1926, and recorded in Book No. 39, pages 333-334; a duly certified and authenticated copy of the last will and testament of said John Herbert Quick is attached to this deposition as one of the exhibits, they being marked Exhibit "A", pursuant to Interrogatory Sixth.

Also, there is attached to said will of John Herbert Quick, the order admitting the same to probate and of record.

Also, I acquired title to the remaining undivided one-third interest in this tract of land under quit-claim deed from Hugh J. Minhinnick and his wife, Annie Gillard Minhinnick, dated the 16th of March, 1926, and recorded in the office of the Judge of Probate, of Baldwin County, State of Alabama, on the 26th day of March, 1926, in Book 39, pages 277-278, which deed also conveys the other tract of land claimed by me in this suit.

As to the second tract of land above described, I acquired and hold this land under a certain quit-claim deed from Hugh J. Minhinnick and Annie Gillard Minhinnick, his wife, dated the 16th of March, 1926, and recorded in the office of the Judge of Probate of Baldwin County, State of Alabama, on the 26th

of March, 1926, in Book 39, at pages 277-278, this being the same deed which also conveys to me an interest in the other tract of land above described and hereinbefore mentioned.

The above mentioned Andrew M. Jackson, Hugh J. Minhinnick and J. H. Quick acquired their title as follows: On the 17th of August, 1905, one O. W. Towner and Lucy C. Towner, his wife, conveyed the tract of land first above described to J. H. Quick, as Trustee, this deed having been filed for record in the office of the Judge of Probate of Baldwin County, State of Alabama, on August 28th, 1905, and recorded on August 29th, 1905, in Book 9 (N.S.), page 307, and thereafter, and on the 18th of August, 1905, the said J. H. Quick, Trustee, executed a Declaration of Trust in favor of Hugh J. Minhinnick, Andrew M. Jackson and the said J. H. Quick, which said Declaration of Trust was filed for record in the office of the Judge of Probate of Baldwin County, Alabama on August 28th, 1905, and recorded August 29th, 1905, in Book 9 (N.S.), at page 308. The said Hugh J. Minhinnick also acquired title to the tract of land which is second above described by virtue of a Warranty Deed from Nancy B. Nelson and John C. Nelson, her husband, dated the 10th of March, 1906, and recorded in the office of the Judge of Probate, of Baldwin County, State of Alabama, on the 24th of March, 1926, in Book No. 39 (N.S.), page 263.

4. To the fourth interrogatory she saith: Said parties and none of them have ever been in possession of said lands, and neither they nor any of them have ever exercised any control over said lands.

5. To the fifth interrogatory she saith: None, except this suit, in which this deposition is being taken.

6. To the sixth interrogatory she saith: I here hand to the Commissioner to be attached to this deposition the following exhibits; which are marked as follows: (1st) Quit-claim deed from Andrew M. Jackson and wife, marked A-1; (2d) Quit-claim

1. To the first cross interrogatory she saith: I have given, as far as I can give, the chain of title under which I claim title to the lands above described. I claim title to the land first above described through the chain of title which vested said land in J. H. Quick and those for whom he was Trustee. I do not have the original instruments evidencing his title, nor the instruments in the chain of title which finally vested in him, but I claim under that chain of title. As to the other tract of land which is the small tract shown in the second description above given, I claim title through Hugh J. Minhinnick, and am not in possession of the instruments showing chain of title through which he held, except the deed from Nancy B. Nelson and her husband, which is hereto attached as part of Exhibit "A", and marked A-5, and I am not in possession or in control of the instruments vesting the title in the said Nancy B. Nelson, but I am advised that they are of record in the office of the Judge of Probate of Baldwin County, State of Alabama.

2. To the second cross-interrogatory she saith: I claim title to an undivided one-third interest in the land first above described by virtue of the deed from Andrew M. Jackson and wife, dated March 5th, 1926, and when I acquired title to this and the remaining undivided two-thirds' interest, I caused a portion of this land to be fenced and cultivated by my tenant, Mr. John A. Nelson.

Georgia Wilson

DEPOSITION OF A. S. WILSON.

1. To the first interrogatory he saith: A. S. Wilson; eighty-two years old; Galena, Kansas.

2. To the second interrogatory he saith: Georgia Wilson, through her tenant, John A. Nelson.

3. To the third interrogatory he saith: She acquired title to the land first above described, and first described in the Complaint as follows: An undivided one-third interest from

Andrew M. Jackson and wife, by virtue of a quit-claim deed, dated March 5th, 1926, which was recorded in the office of the Judge of Probate of Baldwin County, Alabama on the 17th of March, 1926, in Book No. 39 (N.S.), page 213, which quit-claim deed is attached to her deposition and marked A-1; she acquired title to an undivided one-third interest in said tract first described in said Complaint from Ella Corey Quick, by virtue of a quit-claim deed, dated March 31, 1926, which was recorded in the office of the Judge of Probate of Baldwin County, Alabama, on the 7th of April, 1926, in Book 39, pages 333-334, which said deed is attached to the deposition of Georgia Wilson and marked A-2; she also acquired title to an undivided one-third interest in this first tract of land through a quit-claim deed from Hugh J. Minhinnick and wife, dated March 16, 1926, which was recorded in the office of the Judge of Probate of Baldwin County, Alabama, on the 26th of March, 1926, in Book 39 at pages 277-278, and also acquired title to the tract of land which is described second in the Complaint by virtue of the same deed, this deed being attached to the deposition of said Georgia Wilson, and marked A-4.

Neither my wife nor I have possession or control of the original papers on which my wife's chain of title is based, further than are shown by the exhibits attached to her answers to the interrogatories and made a part of her answers, but the chain of title is shown by the records in the office of the Judge of Probate of Baldwin County, Alabama.

4. To the fourth interrogatory she saith: Neither of said parties have ever been in possession of said lands or exercised any control over said lands or any portion thereof.

5. To the fifth interrogatory he saith: There is no such suit pending, except this present law suit, in which these depositions are being taken.

6. To the sixth interrogatory he saith: The instruments under which my wife, Georgia Wilson, acquired title to said land have been introduced and attached as a part of the deposition of the said Georgia Wilson, and are marked Exhibits A-1 to A-5, inclusive.

7. To the seventh interrogatory he saith: My wife, Georgia Wilson, is now assessing said lands and paying the taxes on said lands and has paid all of the taxes since she acquired title in 1926, and also paid the back taxes for 1922, 1923, 1924 and 1925.

8. To the eighth interrogatory he saith: I am the husband of Georgia Wilson and have been aiding and assisting her in looking after this land, and have been familiar with all the transactions and negotiations through which she acquired title to this property and have acted for her all through said transactions; I assisted her in taking possession of the land and I negotiated the contract by which the tenant took possession of said land, and, acting for my wife, paid him the money to build the fencing on said land and have been on the land several times since, and have seen the improvements which the tenant made. I have seen the fencing which surrounded the place where the tenant raised his garden truck and vegetables; also, at another time, I furnished him money with which to buy seed for use on said premises, for the crop of 1929.

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1. To the first cross interrogatory he saith: I claim no title except as being the husband of Georgia Wilson.

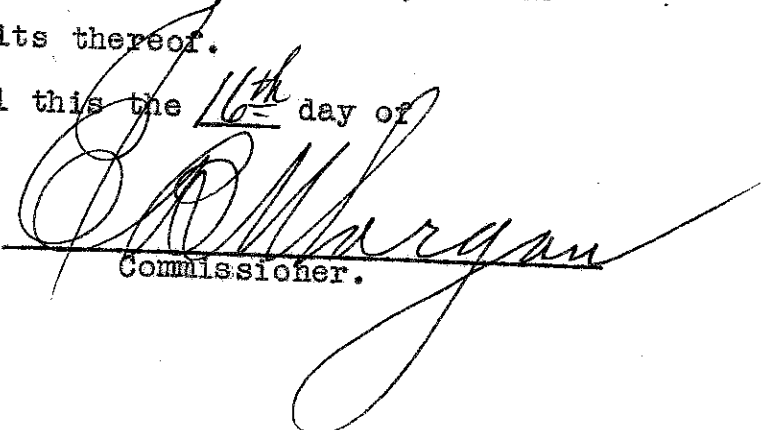
2. To the second cross interrogatory he saith: My wife claims title to an undivided one-third interest in the land first described in the Complaint through Andrew M. Jackson, and I have heretofore stated that the only act of possession which I took was in aiding and assisting my wife, Georgia Wilson.

 A. S. Wilson

C E R T I F I C A T E .

I, E. B. Morgan, under and by virtue of a commission issued out of the Circuit Court of Baldwin County, Alabama, in Equity, in said entitled cause therein pending, do hereby certify that I caused to come before me at my office at 600½ Main Street, Galena, Kansas, on the 16th day of October, 1929, the aforesaid witnesses, Georgia Wilson and A. S. Wilson; that I have personal knowledge of the said Georgia Wilson and A. S. Wilson; that each of the said witnesses, after being duly sworn to tell the truth, the whole truth and nothing but the truth, were examined by me and testified as hereinabove shown, their answers being reduced to writing as near as might be in their own language; whereupon they subscribed their names to the same in my presence. And I further certify that I am neither of counsel nor kin to any of the parties to said cause, nor in any manner interested in the results thereof.

Witness my hand and seal this the 16th day of
October, 1929.


Commissioner.

A

State of Alabama, }
Baldwin County. }

QUIT CLAIM DEED.

A.

KNOW ALL MEN BY THESE PRESENTS, That We, Andrew M. Jackson, and Carrie C. Jackson, his wife,

in consideration of the sum of One Dollar and other good and sufficient considerations to us in hand paid by Georgia Wilson, the receipt whereof is hereby acknowledged, we do remise, release, quit-claim, and convey to the said Georgia Wilson, all our right, title, interest and claim, in or to the undivided one-third interest in the following real estate, situated in Baldwin County, Alabama, and described as follows, 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 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 a easterly direction along Mobile Bay to the place of beginning, containing 30 acres, more or less, and being a part of section 13, Township 9 South, Range 2 East, together with all right and appurtenances to said described premises in anyway belonging;

To have and to Hold, to the said Georgia Wilson, her heirs and assigns forever.

GIVEN under our hand and seal this 5th day of March, 1926.

EXECUTED IN THE PRESENCE OF

James Jackson
Martha Margaret

Andrew M. Jackson (SEAL)
Carrie C. Jackson (SEAL)

State of California }
San Diego County. }

I, P.W. Browning, Notary Public

in and for said State and County, do hereby certify that Andrew M. Jackson and Carrie C. Jackson his wife whose names ~~are~~ signed to the foregoing conveyance, and who are known to me, acknowledged before me, on this day that being informed of the contents of said conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal, this 5th day of March, 1926.
P.W. Browning
Notary Public in and for the County of San Diego, State of California.

State of California }
San Diego County. }

I, P.W. Browning, Notary Public

, in and for said County and State, do hereby certify that on the 5th day of March, 1926, came before me the within named Carrie C. Jackson, known to me to be the wife of the within named Andrew M. Jackson, who being examined separate and apart from the husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord without fear, constraint or threats on the part of the husband.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal, this 5th day of March, 1926.

P.W. Browning
Notary Public in and for the County of
San Diego, State of California.

Andrew M. Jackson and
Carrie C. Jackson,
his wife

TO))) QUIT CLAIM DEED.

Georgia Wilson

State of Alabama, Probate Court
Baldwin County.

Filed in my office for record, this 17 day of March, 1926, and recorded in Deed Book No. 39 N.S., Pages 213.

[Signature]
Judge of Probate.

*Change of Name
3/19/26*

STATE OF ALABAMA,
BALDWIN COUNTY, I W. D.
SPALEON, Judge of Probate, for said county, hereby certify that the following privilege tax has been paid on the within instrument as required by acts 1922 &

[Signature]
Clerk

STATE OF ALABAMA }
BALDWIN COUNTY } I W. D.
STAPLETON, Judge of Probate, for
said county, hereby certify that the fol-
lowing privilege tax has been paid on
the within instrument as required by

acts 1922 §
cts. 50/100
W. D. Stapleton
Judge of Probate,
W. D. Stapleton
Clerk.

THE STATE OF ALABAMA } Office of the Judge of
BALDWIN COUNTY } the Probate Court

I, W. D. STAPLETON, Judge of said Court in and for
said County, do hereby certify that the within instrument
was filed in this office for record on the 7
day of April 1926 at 8
o'clock am and I further certify that the
same is duly recorded in Record Book No. 39
Page 333-334 and duly examined.

Witness my hand this 12 day of
April 1926
~~W. D. Stapleton~~ Judge of Probate Court,
By

Ella Corey Quirk
Sole devisee of J. H. Quirk
deceased.
TO } QUIT CLAIM DEED.

Georgia Wilson

State of Alabama, Probate Court
Baldwin County.

Filed in my office for
record, this ___ day of
_____, 1926, and
recorded in Deed Book
No. _____ N.S., Pages....

Judge of Probate.

A. S. Wilson
attorney
Baldwin County
4/20 am 27.50
100
150
2.50
100

I, John Herbert Quick, of Berkeley Springs,
Morgan County, West Virginia, do make this as and for my
last will and testament, hereby revoking and declaring
void all other wills by me made .

A 3.

FIRST: I give, devise and bequeath to my wife,
Ella Corey Quick, absolutely all my real, personal and
mixed property of every description and wherever located.

SECOND: I hereby nominate and appoint my wife,
Ella Corey Quick, sole executrix of this my last will
and testament, and direct that she serve without being
required to give bond.

In testimony whereof I have hereunto signed
and subscribed my name in the presence of the subscri-
bing witnesses at Berkeley Springs, W. Va., this 13th.
day of August, 1917.

John Herbert Quick,

Signed, published and declared by the said
John Herbert Quick as and for the last will and testa-
ment of John Herbert Quick, in the presence of us, who
in his presence, at his request, and in the presence
of each other have hereunto subscribed our names as
witnesses thereto.

T. H. B. Dawson,

Chas. H. Dawson

Morgan County Court May 23rd, 1925.

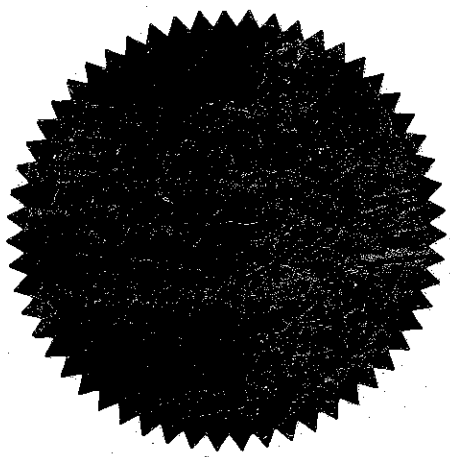
The within writing, purporting to be the last will and testament of John Herbert Quick, deceased, was this day presented in open court for probate, and was proven in part by the statement (under oath) of C. H. Dawson, one of the subscribing witnesses to said writing, the other subscribing witness to said writing, viz: T. H. B. Dawson, being dead, his signature was proven by J. Hammond Siler and N. H. Hobday, who being sworn upon their oath stated that they were both well acquainted with the hand writing of the said T. H. B. Dawson, in his life time, and that they verily believe that said signature is the genuine signature of the said T. H. B. Dawson,

Thereupon said writing was admitted to probate and ordered to be recorded as the last will and testament of the said John Herbert Quick, deceased.

TESTE: M. S. Harmison, Clerk

A true copy

TESTE M. S. Harmison Clerk.



State of West Virginia,

County of Morgan, to-wit:

I, P. C. Yost, President of the County Court of the County and State aforesaid, do hereby certify that M. S. Harmison, by whom the above certificate and attestation was made, and whose name is thereto subscribed in his proper handwriting, was, at the date thereof, and still is, Clerk of the County Court of our said County of Morgan, duly elected, commissioned and qualified; that the said attestation is in due form of law.

Witness my hand and seal this 10th day of September 1926.

P. C. Yost Seal

State of West Virginia,

County of Morgan, to-wit:

I, M. S. Harmison, Clerk of the County Court of said county, do hereby certify that P. C. Yost, Esq., by whom the above certificate was given, whose name is thereto subscribed in his proper handwriting, was at the date thereof, President of said Court, duly commissioned, qualified and acting as such.

In Testimony Whereof, I have hereunto set my hand and affixed the seal of said Court, the 10th day of September A.D. 1926.

M. S. Harmison Clerk

QUIT CLAIM DEED

State of Alabama :
:
Baldwin County :

KNOW ALL MEN BY THESE PRESENTS, That We, Hugh J. Minhinnick and Annie Gillard Minhinnick, his wife, in consideration of the sum of One Dollar and other good and sufficient considerations to us in hand paid by Georgia Wilson, the receipt of which is hereby acknowledged, we do hereby remise, release, quit-claim and convey to the said Georgia Wilson all our right, title, interest and claim in and to the following described real estate, to-wit:

A 4

A certain tract described as follows: Beginning at 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 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, Township Nine South, Range Two East, in Baldwin County, Alabama;
also



The following described tract of land: Beginning at a point on Mobile Bay where an iron stake has been planted 3234 (three thousand two hundred thirty-four) feet, more or less, west at right angles from the east line of Section 13 of Township Nine South, Range Two 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 said 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.

It is intended that this description shall cover all lands and all interest in lands in said section Thirteen now held by us in Baldwin County, Alabama.

To have and to hold to the said Georgia Wilson, her heirs and assigns forever.

Given under our hands and seals this 16th day of March, 1926.

EXECUTED IN THE PRESENCE OF:

John H. Cunningham
Roman W. Mykoff

Hugh J. Minhinnick Seal
Annie G. Minhinnick Seal

State of Arizona :
Yavapai County : SS

I, N. F. Wykoff, a Notary
Public in and for said County and State, do hereby certify

that Hugh J. Minhinnick and Annie Gillard Minhinnick, his wife, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day, that being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and official seal, this 16th day of March, 1926.

N. F. Wykoff
Notary Public.

My commission expires
April 5th 1928

A
Quit Claim Deed

Hugh J. Minnick
and Wife

to

Georgie Wilson

STATE OF ALABAMA } I W. D.
BALDWIN COUNTY } STAPLETON, Judge of Probate, for
said county, hereby certify that the fol-
lowing privilege tax has been paid on
the within instrument as required by

acts 1924 §

cts. 50.00
I W. Stapleton
Judge of Probate.

by [Signature]
Clerk.

Judge D. S. Wilson,
Galena, Kans.

7/1/30 800 100.00
1.50 pd.

Ret 100
with deed

STATE OF ALABAMA } Office of the Judge of
BALDWIN COUNTY } the Probate Court
I, W. D. STAPLETON, Judge of said Court in and for
said County, do hereby certify that the within instrument
was filed in this office for record on the 26
day of March 1930, at 8
o'clock A.M. and I further certify that the
same is duly recorded in Record Book No. 39
Page 277-278 and duly examined.
Witness my hand this 2 day of
April 1930
[Signature] of Probate Court,
By

This Indenture,

Made the 10 day of March 1906, between

Nancy B. Nelson of Peluette Beach, Baldwin County in the
State of Alabama, and John C. Nelson, her husband of the first part, and
Hugh J. Winkiewicz of the same place of the second part;

Witnesseth that the part ies of the first part, in consideration
of Five hundred Dollars,

hereby acknowledged to have been paid the part ies of the first part by the part y
of the second part, Do grant, bargain, sell and convey, unto the said part y
of the second part, his heirs and assigns, all that real property in said County
of Baldwin and State of Alabama described as follows:

Beginning at a point on Mobile Bay where an iron stake has been
planted 3834 (Three thousand two hundred and thirty four) feet ^{more}
or less, ^{West at right angles} from the East line of Section Thirteen of Township nine South
Range Four (2) East which said stake marks the West line of the
lands now held by J. H. Dutch Trustee, thence following the
shore line of said Bay of Mobile, westerly to the entrance of Shell
Bank Bayou into said Bay of Mobile (a distance of four hundred
and fifty five 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 Dutch lands at which point an iron stake
is also planted and thence west along said West line to the
place of beginning. It is intended that this description shall cover
all lands and all interest in lands in said Section Thirteen now
held by the parties of the first part

Together with all rights and appurtenances to said described premises in anywise
belonging: To have and to hold the same forever.

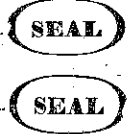
And the said parties of the first part for
themselves, heirs and assigns, the said described premises and appurtenances, will
forever Warrant and Defend unto the said part y of the second part, his heirs
and assigns, against the lawful claims of all persons whatsoever.

IN WITNESS WHEREOF, The said part ies of the first part ha. or hereunto
set their hands and seal s the day and year first above written.

Signed, sealed and delivered in the presence of

Stanley Muir

Nancy B. Nelson
John C. Nelson



State of Alabama,

Baldwin COUNTY.

I, Joseph D Nelson

Notary Public in and for said County and State, do hereby certify that

Nancy B Nelson and John C Nelson whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me, on this day, that being informed of the contents of the said conveyance they executed the same voluntarily on the day the same bears date.

Given under my hand and seal, this 10 day of March 1906.

Joseph D Nelson Notary Public

State of Alabama,

County.

I,

in and for said County and State, do hereby certify that on the day of 1906, came before me the within-named, known to me to be the wife of the within-named, who, being examined separate and apart from the husband touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord, without fear, constraint, or threats, on the part of the husband.

In Witness Whereof, I have hereunto set my hand and official seal, this day of 1906.

STATE OF ALABAMA, I W. D. BALDWIN COUNTY, Judge of Probate, for said county, hereby certify that the following privilege tax has been paid on the within instrument as required by acts 1923 § 1001

00 Judge of Probate, Clerk.

Nancy B Nelson and John C Nelson

To Deed with Warranty.

Steph J Nelson

Handwritten notes and signatures in the bottom section.

State of Alabama, Baldwin County, Probate Court.

Filed in my office for record this 24 day of March 1906, and recorded in Deed Book No. 39 N. S. pages 263

Handwritten signature of Judge of Probate.

GEORGIA WILSON,
Complainant,

vs

RICHARD LEE BRADLEY, et al,
Respondents.

(IN THE CIRCUIT COURT OF
(BALDWIN COUNTY, ALABAMA.
(EQUITY SIDE.
(No. 816.

INTERROGATORIES TO BE PROPOUNDED TO A. S. WILSON AND GEORGIA WILSON, SEPARATELY, WITNESSES FOR THE COMPLAINANT IN THE ABOVE STYLED CAUSE, AND BOTH BEING NON-RESIDENTS OF THE STATE OF ALABAMA, AND THEIR POST OFFICE ADDRESS BEING GALENA, KANSAS, AND WHO ARE MATERIAL WITNESSES FOR THE COMPLAINANT.

INTERROGATORY FIRST: Please state your name, age and place of residence.

INTERROGATORY SECOND: Please state who is in possession of the lands described in the bill of complaint of Georgia Wilson vs Richard Lee Bradley, et al, and which suit is now pending in the Circuit Court of Baldwin County, Alabama, Equity Side.

INTERROGATORY THIRD: If you state that Georgia Wilson is in possession of said lands, please state how and by what means she acquired said lands and under what instruments she acquired and holds the same.

INTERROGATORY FOURTH: Please state whether or not Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer or Carl Martin are now in possession or have ever been in possession of said lands. Please state whether either of these parties have ever exercised any control over said lands.

INTERROGATORY FIFTH: Please state whether or not any suit is pending to enforce or test the validity of any claim, right, title or incumbrance that the Respondents or any of them have in or to said lands.

INTERROGATORY SIXTH: Please attach to your answers of the above interrogatories the original deeds whereby Georgia

Wilson acquired said lands, and mark them exhibit "A" for identification.

INTERROGATORY SEVENTH: Please state whether or not Georgia Wilson is now assessing said lands for taxes and paying the taxes thereon, and if so over how long a period has she been doing so.

INTERROGATORY EIGHTH: Please give in detail any facts concerning Georgia Wilson's ownership and possession of said lands that are pertinent to this issue.

Beche & Hall
SOLICITORS FOR COMPLAINANT.

CROSS INTERROGATORIES TO A. S. WILSON AND GEORGIA WILSON, PROPOUNDED BY S. C. JENKINS, GUARDIAN AD LITEM FOR MARY BRADLEY AND RICHARD LEE BRADLEY, JR., MINORS.

CROSS INTERROGATORY FIRST: Please state under what title or chain of title you claim title to lands described in the bill of complaint filed in this cause.

CROSS INTERROGATORY SECOND: If you state you claim under quit-claim deed of March 5, 1926, from Andrew M. Jackson and wife, please state what acts of possession, if any, you have taken through yourself or agent as to said lands.

S. C. Jenkins

GUARDIAN AD LITEM FOR MARY
BRADLEY AND RICHARD LEE
BRADLEY, JR., MINORS.

E. B. Morgan, 600½ Main Street, Galena, Kansas, is suggested as a suitable person to act as Commissioner in taking the deposition of Georgia Wilson and A. S. Wilson.

Beche & Hall

GEORGIA WILSON,
Complainant,

vs

RICHARD LEE BRADLEY, et al,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

EQUITY SIDE.

No. 816.

Before me, T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared H. M. Hall who is one of the Attorneys of record for the Complainant in the above styled cause, and who having been by me first duly sworn deposes and says that A. S. Wilson and Georgia Wilson, who are non-residents of the State of Alabama, and live more than one hundred miles from the Court House of Baldwin County, Alabama, and whose Post Office address is Galena, Kansas, are material witnesses for the Complainant, and that their testimony will be used in said cause.

H M Hall

Sworn to and subscribed before on this the 10th day
of October, 1929.

T. W. Richerson
Clerk of the Circuit Court of
Baldwin County, Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

To E. B. Morgan, 600½ Main Street, Galena, Kansas:

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Georgia Wilson and A. S. Wilson, as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Georgia Wilson, Complainant and Richard Lee Bradley, et al Defendants, on oath to be by you administered, upon interrogatories annexed to this commission, to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness my hand this the 10 day of October,

1929.

T. W. Richardson
Register.

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 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 specifically 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 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.

Beabe & 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,

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 816

Vacation

Term, 192 9

Georgia Wilson

, Complainant

vs.

Richard Lee Bradley et al

, Defendant

To T. W. Richerson

, 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.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Georgia Wilson

vs.

Richard Lee Bradley et al

REQUEST FOR DECREE IN
VACATION

FILED *NOV 5* 192*9*

T. W. [Signature]

Register

RECORDED IN RECORD

VOL. PAGE.....

Register

The State of Alabama,
Baldwin County.

{ No. 816... CIRCUIT COURT IN EQUITY.

GEORGIA WILSON

Complainant

vs.

RICHARD LEE BRADLEY, ET AL

Defendant

Motion is hereby made for a Decree Pro Confesso against ~~GEORGE C. MEYER AND~~

CARL T. MARTIN

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant...; and that said summons was duly served according to law, and that said Defendant... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 16th day of September 1929

George W. Hall

Solicitor,

Solicitors for Complainant

GEORGIA WILSON,
Complainant,

vs

RICHARD LEE BRADLEY,
CLARE POPE, MARY BRADLEY,
RICHARD LEE BRADLEY, JR.,
GEORGE C. MEYER, and
CARL T. MARTIN,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

No. 816.

This cause coming on to be heard was submitted for final decree on the pleadings, decree pro confesso and proof as noted by the Register, and upon the consideration thereof the Court is of the opinion that the Complainants are entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Respondents, Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., George C. Meyer and Carl T. Martin, have no claim, right, title or interest in or incumbrance upon the following lands or any part or parcel thereof, situated in Baldwin County, Alabama, 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.

That the title to said land is vested in the said Georgia Wilson absolutely, as against the said Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., George Meyer and Carl T. Martin.

IT IS FURTHER ORDERED that the Register of this Court, within thirty days from the rendition of this decree, file a certified copy thereof in the office of the Judge of Probate of Baldwin County, Alabama, for record thereof and that the cost thereof be taxed with the cost of this cause.

IT IS FURTHER ORDERED that the Complainant pay the cost of this cause for which let execution issue.

Done at Bay Minette, Alabama, on this the 8th day of November, 1929.

P. W. Harl
JUDGE OF THE 21ST JUDICIAL
CIRCUIT OF ALABAMA.

Georgia Wilson,
Complainant,

M.
Richard Lee Bradley, et al.,
Respondents.

In the Circuit
Court, Baldwin
County, Ala

In Equity

This cause is submitted for review
and demurred to the original Bill of
Complaint and upon considera-
tion thereof I am of the opinion
that said demurrer is not well
taken -

It is, therefore, ordered, adjudged
and decreed by the Court that said
demurrer be, and same
hereby is, overruled -

Done at Chambers at Mansville,
Alabama, this 19th day of
August, 1929.

F. W. Hare
Judge

Georgia Wilson

PL

Richard Lee Brasley

Alfred

Filed Aug 20th 1929

J. W. Williamson

Register

Georgia Wilson

THE STATE OF ALABAMA,
BALDWIN COUNTY

vs.

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Richard Lee Bradley, Clare Pope..
Mary Bradley, Richard Lee Bradley
Jr., George C. Meyer, Carl T. Martin

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,.....
Decree pro confesso against Richard Lee Bradley, Clare Pope, Mary..
Bradley, Richard Lee Bradley Jr., George C. Meyer and Carl T. Martin,
Answer of S. C. Jenkins, guardian ad litem for Mary Bradley and
Richard Lee Bradley Jr., Testimony of Georgia Wilson and A. S.....
Wilson, witnesses for the complainant,.....

and in behalf of Defendant upon Answer of S. C. Jenkins, guardian ad litem
for Mary Bradley and Richard Lee Bradley Jr.; and testimony of.....
Georgia Wilson and A. S. Wilson, on cross examination.....


Register.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 816 Vacation Term, 1929

Georgia Wilson,

Complainant.

vs. Richard Lee Bradley, et als,

Defendant.

In this cause it appears to the Register that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 30th day of May, 1929, in the Baldwin Times a newspaper published in Bay Minette Alabama, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 30th day of May 1929, and

And it now further appearing to the Register, that the said Richard Lee Bradley, Sr., Mrs. Clara Pope, Mary B. Bradley and Richard Lee Bradley, Jr.,

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Richard Lee Bradley, Mrs. Clara Pope, Mary B. Bradley, Richard Lee Bradley, Jr.,

This 16th day of September 1929.

J. W. Peterson Register.

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, 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 28th day of
May 1929

Register.

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

The State of Alabama, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 816 Term, 1929

Georgia Wilson

Complainants

vs.

Richard Lee Bradley, et al

Defendants

Motion is hereby made for a Decree Pro Confesso against Richard Lee Bradley, Mrs.

Clare Pope, Mary^B Bradley, Richard Lee Bradley Jr.,

Defendant

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

This 16 day of September 1929

746 Code.

Deebe W. Lee
Solicitor for Complainants

The State of Alabama, }
Baldwin County.

No. 816.

CIRCUIT COURT, IN EQUITY

Georgia Wilson

Complainant

vs.

Richard Lee Bradley Et al

Defendant

In this cause it appears to the Register
that a Summons requiring the Defendant George C. Meyers and Carl T. Martin

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to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the
service of said Summons upon George C. Meyer and Carl T. Martin
was served upon him by the Sheriff of Baldwin County, Alabama, on the
12th day of June 1929

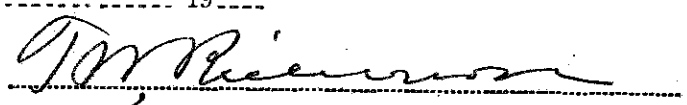
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And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint
to this date, it is now, therefore, on motion of Hall & Beebe

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as
confessed against the said George C. Meyer and Carl T. Martin

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This 16th day of September 1929. Defendant aforesaid.


Register.

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, a minor.

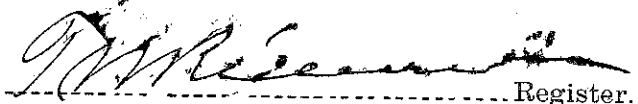
of _____ County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

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 28th day of
May 1929/


Register.

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

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

Mrs. Mary Bradley

Grenada Ala

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

George W. ...

against said

Mary Bradley

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 28 day of

May 1927

T. W. Richerson Register.

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

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

Mr. Clarence Pope

Ernesta King

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

Benjamin Wilson

against said

Mr. Clarence Pope

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

May 192 *9*

T. W. Richerson Register.

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

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 6 day of

June 1922

T. W. Richerson Register.

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

vs.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

*Copy of Summons & Copy of
Bill Registered vs.
Richard Lee Bradley,
C/o Captain C. C. Calhoun
1389 National Base
Bldg. Washington
D.C.
June 6/1929
& Copy Bill & Summons
mailed Richard Lee Bradley
C/o Baker Hotel, Dallas Texas*

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

vs.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

..... 192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By Deputy Sheriff.

*Copy of Case
VS Summons
Mailed Nov
Chas P. H
Gruada
J. W. W.*

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

vs.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

May 28/1919
Copy of Bill v
Summons
Registered Mary
Bradley, Geneva
Quinn

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

vs.

Solicitor for Complainant

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

*Copy of Bill sent by
for Reg. mail
Aug 27 to
Capt. C. C. Bradley,
National Press
Bldg., Washington
D.C.*

Recorded in Vol. Page

No. 816.

Page

**The State of Alabama,
Baldwin County**

Circuit Court In Equity

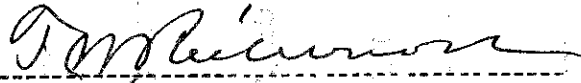
Georgia Wilson

vs.

Richard Lee Bradley et al

**Decree Pro Confesso On
Personal Service.**

Issued Sept 16th 1929



Register.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Georgia Wilson

Complainants.

Vs.

Richard Lee Bradley

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed Sept 16 1929

D. W. Minner

Register.

Recorded in Record,

Vol. Page

Register.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

~~Richard Lee Bradley~~

Georgia Wilson

vs.

Richard Lee Bradley, et al

DECREE PRO CONFESSO
OF PUBLICATION

Issued Sept 16th 192 9

T. W. Beaman
Register.

Recorded in Record

Vol. Page

Register.

No. 816

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Georgia Wilson


VS

Richard Lee Bradley et al

NOTE OF TESTIMONY

Filed in Open Court this 8

day of Nov 192


Register

TO THE HONORABLE F. W. HANE, 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 Selma, 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
Fope 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. Hayer 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 3834 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. E. 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 appear 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.

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

Solicitor for Complainant.

BEEBE & HUNT

NOTICE

THE STATE OF CALIFORNIA, COUNTY OF ...

NOTICE FOR COMPLETION

BEEBE & HUNT

NOTICE

THE STATE OF CALIFORNIA, COUNTY OF ...

NOTICE

THE STATE OF CALIFORNIA, COUNTY OF ...

NOTICE FOR COMPLETION

NOTICE

THE STATE OF CALIFORNIA, COUNTY OF ...

Miss Mary Dudley
of Richard Lee Bradley

W. M. Dudley
Richard Lee Bradley
Mary Dudley
W. M. Dudley

STATE OF ALABAMA)
BALDWIN COUNTY)

Before the undersigned, a Notary Public, in and for said County in State State, personally appeared H. M. Hall, who is known to me and who having been by me first duly sworn, deposes and says that he is one of the Solicitors of Record for the Complainant in the cause of Georgia Wilson, Complainant, vs Richard Lee Bradley, et al, Defendants, now pending in the Circuit Court of Baldwin County, Alabama, in equity; that he has as such Solicitor and at the request of the Complainant, Georgia Wilson, made a diligent search to ascertain and determine the ages and addresses of Richard Lee Bradley, Clare Pope, Mary Bradley, Richard Lee Bradley, Jr., having inquired of Mr. J. H. Webb of Mobile, Alabama, Mr. George C. Meyer of Mobile, Alabama, Miss Bessie Lee Tucker of Columbus, Mississippi, Mrs. Clare Pope of Grenada, Mississippi, Mr. John J. Richards, Clerk of the Chancery Court of Columbus, Mississippi, Messrs. Loving and Loving, Attorneys, Columbus, Mississippi, Mr. Richard Lee Bradley of Dallas, Texas, Messrs McLean, Carothers and McLean, Attorneys, Grenada, Mississippi,

GEORGIA WILSON

Complaint

No.

vs.

RICHARD LEE BRADLEY, CLARE POPE, MARY

BRADLEY, ROBERT LEE BRADLEY JR.,

The State of Alabama,

BALDWIN

County.

Circuit Court, in Equity.

This the 29th day of

May, 1929

In this cause it being made to appear to the Clerk of this Court by the affidavit of H. N. Hall, Solicitor of Record for Complainant

that the Defendant ^s RICHARD LEE BRADLEY, CLARE POPE, MARY BRADLEY and RICHARD LEE BRADLEY JR.;

are

~~non-resident~~ of the State of Alabama; that Richard Lee Bradley is over twenty-one years of age, post office address being c/o Baker Hotel, Dallas, Texas; that Clare Pope is over twenty-one years of age, her post office address being Grenada, Mississippi; that Mary Bradley is a minor eighteen years of age and in the custody of Richard Lee Bradley, whose post office address is c/o Baker Hotel, Dallas, Texas; that Richard Lee Bradley is a minor, thirteen years of age and in the custody of Richard Lee Bradley, whose post office address is c/o Baker Hotel, Dallas, Texas

it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper publish-

ed in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

them the said Richard Lee Bradley, Clare Pope, Mary

Bradley and Richard Lee Bradley Jr.,

to answer or demur to the Bill of Complaint in this cause by the 29th day of

June 1929, or after thirty days therefrom a decree Pro Confesso may be

taken against them

J. N. ...

Register.

BREBE & HALL?
SOLICITORS FOR COMPLAINANT

BAY MINETTE, ALA.

6/17/39

M. J. W. Richardson

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

See Ad Copy

*Notice of Georgia Wilson vs Bradley et al
Run 5/30 - 6/6-13-20 - 270 words @ 4 1/2*

12 1/2

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

ALFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail

being duly sworn, deposes and says that he is
the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Georgia Wilson

vs
R. Lee Bradley et al

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

issues:

Date of first publication	<i>May 30 1929</i>	Vol. <i>40</i>	No. <i>17</i>
Date of second publication	<i>June 6 1929</i>	Vol. <i>40</i>	No. <i>18</i>
Date of third publication	<i>June 13 1929</i>	Vol. <i>40</i>	No. <i>19</i>
Date of fourth publication	<i>June 20 1929</i>	Vol. <i>40</i>	No. <i>20</i>

Subscribed and sworn to before the undersigned this 21 day of June 21 1929
R. B. Vail
Publisher.

J. M. Williams
Clara Brent Court

NOTICE TO NON-RESIDENT

The State of Alabama, Baldwin County.
Circuit Court, in Equity.
This the 28th. day of May, 1929.
Georgia Wilson, Complainant, vs,
Richard Lee Bradley, Clare Pope, Mary Bradley, Robert Lee Bradley, Jr., defendants.

In this cause it being made to appear to the Clerk of this Court by the affidavit of H. M. Hall, Solicitor of Record for Complainant that the defendants, Richard Lee Bradley, Clare Pope, Mary Bradley and Richard Lee Bradley, Jr., are non-residents of the State of Alabama.

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THE STATE OF ALABAMA,
Baldwin County.

No. 816.

CIRCUIT COURT, IN EQUITY.

Georgia Wilson Complainant

vs.

Richard Lee Bradley et als Defendant

In this cause it is made to appear to the Register by the Complainant,

that the Defendant's Mary Bradley a minor 18 years of age and
Richard Lee Bradley, Jr., a minor thirteen years of age,

in the belief of affiant, infant^s are the age^s of 13 & 18 years; and that a summons on the Bill of
Complaint in this cause was served upon the Defts by Reg mail and upon their father
Richard Lee Bradley, Sr.,

said infant^s, on the 7th ~~June~~ day of June 19 29, and that as no
one has been nominated by the said Hon. S. C. Jenkins

to act as Guardian ad Litem for said infant.....; and it further appearing that

Hon. S. C. Jenkins, is in all respects a suitable person to act as
Guardian ad Litem for said infant^s.....; and having filed his consent in writing to act as such, it is now ordered
by the Register that he is hereby appointed Guardian ad Litem in this cause for the said infant^s Defendant^s.

Witness my hand, this 25th day of September 19 29.

[Signature]
Register.

ACCEPTANCE.

I, S. C. Jenkins hereby accept the above appointment as Guardian
ad Litem, and consent to act as such in the above cause.

Witness my hand, this 25th day of Sept 19 29.

[Signature]
Guardian ad Litem.

GEORGIA WILSON, Complainant,

IN THE CIRCUIT COURT-EQUITY SIDE

vs.

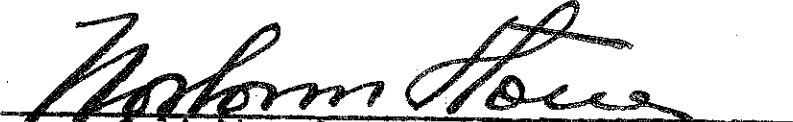
STATE OF ALABAMA
BALDWIN COUNTY.

RICHARD LEE BRADLEY ET AL.,
Respondents.

DEMURRER TO ORIGINAL BILL OF COMPLAINT.

Comes the Defendant and Respondent, George C. Meyer, by his solicitor of record, Norborne Stone, and demurs to the Bill of Complaint in this cause filed, and to each paragraph thereof separately and severally, and for grounds of demurrer assigns, separately and severally, the following:

1. For that there is no equity in said Bill.
2. For that it is not alleged or averred whether the Complainant's alleged possession of the lands described therein be actual or constructive.
3. For that it fails to allege that the Complainant owns the lands described in the Bill of Complaint.
4. For that it is not shown whether the claim of ownership of the Complainant is in her own right, in a representative capacity or as guardian.


Solicitor for Respondent,
George C. Meyer.

No. 876 Page.....

THE STATE OF ALABAMA,
Baldwin.....County.

CIRCUIT COURT, IN EQUITY.

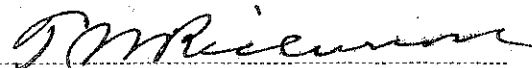
Georgia Wilson,

vs.

R.L. Bradley et al,

APPOINTMENT AND ACCEPTANCE
OF GUARDIAN AD LITEM.

Filed..... Sept 25th 19 29


Register.

Recorded in.....Record,

Vol.....Page.....

Register.

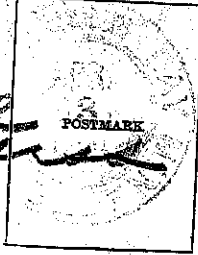
Georgia Wilson
US
Account Lee Bradley
et al

Filed June 21/1929
D. Williams
Registry

RECEIPT FOR REGISTERED ARTICLE NO. 726

15 fee paid. class postage paid. 4-13-1929
From Beebe & Hall

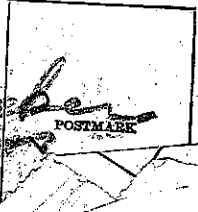
Addressed to Mrs. Clara Peck
1724 ...
Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee 3 Special delivery fee
Delivery restricted to addressee in person or order Postmaster, per 2



RECEIPT FOR REGISTERED ARTICLE NO. 727

15 fee paid. class postage paid. 4-13-1929
From Beebe & Hall

Addressed to Miss Bessie Lee Fisher
Columbus Miss
Accepting employee will place initials in space below, indicating restricted delivery.
Return receipt fee 3 Special delivery fee
Delivery restricted to addressee in person or order Postmaster, per 2



Post Office Department OFFICIAL BUSINESS REGISTERED ARTICLE No. 846 INSURED PARCEL Return to J. W. Richardson Post Office 4

Post Office Department OFFICIAL BUSINESS REGISTERED ARTICLE No. INSURED PARCEL Return to Post Office 4

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article the original number of which appears on the face of this Card.

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Handwritten signature



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PS-7071

*Received June 18/1921
D. M. [unclear]*

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(Signature of addressee's agent)

Date of delivery, 192

Form 3811

U.S. POSTAL SERVICE

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