(816)

GEORGIA WILSON, Complainant,

IN THE CIRCUIT COURT OF

vs.

Line 1

BALDWIN COUNTY, ALABAMA.

RICHARD LEE BRADLEY, et al., Respondents.

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; 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 onethird 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: (lst) 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. 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 Hulson.

## 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

-5-

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; 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 firth 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-l 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 seedfor use on said premises, for the crop of 1929.
- 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.

# CERTIFICATE.

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  $600\frac{1}{5}$ 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.

Wi thess my hand and seal this the law of

October, 1929.

\* A

State of Alabama, Baldwin County.

# QUIT CLAIM DEED.

KNOW ALL MEN BY THESE PRESENTS, That We, Andrew M.

Jackson, and Carrie C. Jackson, his wife,

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in consideration of the sum of One Dollar and other good and	istay. "
sufficient considerations to us in hand paid by Georgia Wilson,	
the receipt whereof is hereby acknowledged, we do remise, release	€,
Ouit-claim, and convey to the goid doors a will-on and	

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

Thanka manual Carry (SEAL)

State of California

San Diego County.

In and for said State and County, do hereby certify that Andrew

M. Jackson and Courie C. Jackson his wife

whose names as signed to the foregoing conveyance, and who is 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 March, 1926.

From Triego, State of California

State of California )
San Diego County.
I, P.W Browning , Notary Bublic
, 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.
Notary Public is 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, Baldwin County Probate Court

Filed in my office for record, this // day of recorded in Deed Book No3/. W.S., Pages 2/3.

STATE OF ALABARA

STAPLENON, Judge of Proto

Said county, hereby certiv that fro althe within instrument as been and on

acts 1922 &

Charles A. Tage of the county

Charles A. Tage of

(x)

State of Liebers, Allan Carbon Santa Baldwin County.

A 2

KNOW ALL LESS BY THUSE PRESENTS. That

Ella Corey Quick

of Rochester, New York, widow and sole devisee of J. H. Quick, late

of Berkeley Springs, West Virginia, deceased in complieration of the own of One Dollar and other good and eafficient considerations to us in hand paid by Georgia Wilson, the receipt whereof is hereby soknowledged, we do remise, release, quit-cleim, 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 so follows, to-wit:

Beginning at a point on Mobile Bay 1834 feet West at right engles from the East line of section thirteen (13) Township nine (9) South, Range two (2) East, themes in a southerly direction on a line parallel with and 1854 feet distant from said East line of enil section thirteen to the south line thereof; themse West along the South line of said Section 1400 feet, themse in a northerly direction on a line parallel with the East line of said Section to Hobile Bay; thense in a easterly direction along Mobile Bay to the place of beginning, containing 30 seres, more or less, and being a part of section 15. Township 3 South, Range 2 East, together with all right and appurtenances to said described promises in anyway belowing: -

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

GIVEN under our hand and seal this 3/9 day of March, 1926.

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State of New York Monroe Company

Rolary Public will E Wellson

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

Ella Cary Quick eigned to the foregoing conveyance, and who known to me, acknowledged before me, on this day that being informed executed the seme of the contents of said conveybade, \_ volunterly on the day the send bears date.

Given under my hand and seal, this IN day of March, 1925.

(SEAL)

BALDWIN COUNTY. STAPLETON, Judge of Probate, for said county, hereby certify that the following privilege tax has been paid on the within instrument as required by THESTATE OF ALABAMA Office of the Judge of BALDWIN COUNTY 1, 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 o'clock and I further certify that the same is duly recorded in Record Book No. Page 333-334 and duly examined. Witness my hand this .....day of Mon hall light of Property Court

STATE OF ALABAMA.

Ella Corey Jruck. Sole clivisse of J. H& welk decared. TO QUIT CLAIM DEED.

Georgia Wilson

State of Alabama, Probate Court Baldwin County.

Judge of Probate.

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 whereever 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 subscribing 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 testament 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.

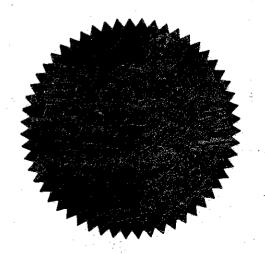
B. Dawson,

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. //annie lerk.



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 10 day of September 1926.

C. E. Sost 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 10 day of september A.D. 1926.

m.S. JVannion Blerk

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, towit:

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 /6 th day of March, 1926.

uted in the presence of:

State of Arizona:

Variationa:

In Make Analy 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 // day of March, 1926.

My commission expires april 8th 1928 Out Claim Derd Hugh J. Minhringk Oud Chife to Georgier Wilson

BALDWIN COUNTY.

BALDWIN COUNTY.

STAPLETON, 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

Clerk

Andera tem.

Per 100 mil

EALD VIN COUNTY the Probate Court

I, W. D. STAPLETON, Judge of said Count in and for said County, do hereby certify that the within instrument was filed in this office for record on the day of the probate County and I further certify that the same is duly recorded in Record Book No. 27 Pagest The Said duly examined.

Witness my hand this day of the probate Court in and I for the viction of the same is duly recorded in Record Book No. 27 Pagest The said duly examined.

Mell of Placebarra and John ( Mellor, he brokend of the first part, and Skill of Mahaman and John ( Mellor, he brokend of the first part, and Skill of Mahaman and John ( Mellor, he brokend of the first part, in consideration of the second part; Witnesseth that the part was of the first part by the part witnesseth that the part was of the first part by the part of the second part, Do grant, bargain, soll and convey, unto the said part of the second part, Lea heirs and assists, all that real proporty in wand broken follows:  Reddievie and Mell Mellor Market Bay other see were block has been follows:  Ment of the state them there are there was the least week follows:  Ment to the first which seed seed while there is an even block has been followed to the first been for the first been followed to the first been for the first been for the first been first part has expected to the first been for	And the second s	<u> Ludent</u>	Made the	eday	of Ma	<u>esch</u> 190 c	, between
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Signming at a point in twofile long when an via stake her been planted 5234 how however have however have have and have found and have found for a long from the last lave of stakes where the last lave of the land and have for the land of the last lave of the second part, her had assigns, against the lawful claims of all persons whatsoever.  IN WITNESS WHEREOF, The said part was of the first part had and hereunted they hand a and seal the day and year first above written.  Street walled and deterved to the weekeed.	of the seco	nd part, his	$heirs\ and\ as$	signs, all tha	t real prope	rty in said	County
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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 THE IR 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 is 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.

Beely Theelson 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.

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

E. B. Morgan, 600 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.

Beebe Trace

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.

Sworn to and subscribed before on this the 10 day

of Oclober, 1929.

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, 600% Main Street, Galena, Kansas: That we, having full foith in your prudence KNOW YE: 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 Gerogia 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,

Two Richmon Register.

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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 Gelena, 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 of fice 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, Mississippi; Mary Bradley, a minor, eighteen years of age, a non-resident of the State of Alabama and who is in the custody of her father Richard Lee Bradley, whose address is care of Baker Hotel, Dallas, Texas; Richard Lee Bradley, Jr., a minor thirteen years of age, a non-resident of the State of Alabama and who is in the custody of his father Richard Lee Bradley, whose address is care of Baker Hotel, Dallas, Texas; George C. Meyer who is over the age of twenty-one years and a resident of Mobile, Mobile County, Alabama; Carl T. Martin, who is over the age of twenty-one and a resident of Mobile, Mobile County, Alabama.

### THIRD:

Complainant alleges that she is in the quiet and peace-

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 I. 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 hamed 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 specifycally 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 many 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 ever pray, etc.

Solici tor 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,

Solicitor for Complainant.

STATE OF ALABAMA, Baldwin County.	No. 816	TREUIT COURT, IN EQU  Vacation	Term, 192
Georgia Wilson			, Complainant
Georgia Wilson	vs.	•	
Richard Lee Bradley et al			, Defendant
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To T. W. Richerson	, R	legister:	
In the above stated cause a Decree and evidence having been taken, and the	cause being reac	ly for submission for in	inti cioci so,
defense having been interposed, the Con	iplainant, by	Beebe & Hall	
Soli	citors of record	, now files with the Reg	gister of this Court
this written request to deliver the papers	s in this cause to	the Judge for final dec	cree in vacation.
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# The State of Alabama, Baldwin County.

\ No. \$16... CIRCUIT COURT IN EQUITY.

BEORGIA WILSON

VS.

RICHARD LEE BRADLEY, ET AL Defendant

Motion is hereby made for a Decree Pro Confesso against \_\_\_CEORGE 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\_\_ha\_s\_failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

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 Munite, Alabama, on this the & day of Murenber, 1929.

JUDGE OF THE 21ST JUI

CIRCUIT OF ALABAMA.

Georgia Wilson, Caruplainant, Caurt, Baldm Curry, ala Richard Lee Bradle, vale, Respondents. In Equity This cause is submitted for Avere an demurrer to the original Bill of Camplaint and upon considera tion thereof I am of the opinion that said Demurrer is not well It is therefore, asdered, adjudges and decreed by the Court that said Demurrer he, and same hereby is, anersulled -None at Chambers at Mansverill, alahama, This 19th day of august, 1929, I. W. Hare Judge

Inty arent

Georgia Wilson Richard Lee Brokly

Georgia Wilson

THE STATE OF ALABAMA, BALDWIN COUNTY

vs.

Richard Lee Bradley, Clare Pope Mary Bradley, Richard Lee Bradley IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

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

J Weeken

The State of Alab	ama,	CIRCUIT COURT, IN EQUITY.		
Baldwin County.		) No.816	¥acation Term, 192	
Ge	orgia Wi	lson,	Complainant	
vs. Richard Le	e Bradle		Defendant S	
In this cause it appears to t	the Register		that the order of publi-	
cation heretofore made in this cau	se, was pub	lished for four conse	ecutive weeks, commencing on the	
30thday ofMay_		, 192 .9_, in theB	aldwin Times	
a newspaper published in BayMi	nette Al	abamaAlabama, that	t a copy of said order was posted	
at the Court House door in			·	
<b>May</b>	9	<b>%</b>		
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And it now further appeari	ng to the R	egister	that the said	
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and Richard Lee Br	radley,J	( • • • • • • • • • • • • • • • • • • •	•••••••	
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having to the date hereof failed to	:	•		
is now, therefore, on motion of Co.				
		:	and it hereby is in all things	
taken as confessed against the said Mary B. Bradley, Richar		•		
		.c.a.t.a. A.² a. I. a. å		
This 16th day of	0)	MAR.		

Baldwin County.	Circuit Cou	ırt of Baldwi	County In	D'anien	1 V V V V V V V V V V V V V V V V V V V
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WITNESS, T. W. Richerson, Re	egister of said C	ircuit Court, th	nis28t	tecution the	recf. ay of
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The	State	of	Alabama,
	BALDW	'IN CO	OUNTY.

CIRCUIT COURT, IN EQUITY.

No. 816 Term, 1929

Georgia Wilson

Complainants

Richard Lee Bradley, et al

Defendants

Motion is hereby made for a Decree Pro Confesso against

Richard Lee Bradany, Mrs.

Clare Pope, Mary 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.

his 16 day of Syptimber 1929

746 Code.

Deele Voue

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*	Georg	gia Wilsom			. Complainant.
	- -	vs.			
	Richard	l Lee Bradle	y Et al		Defendant
In this cause it appears	to the	Register			
that a Summons requiring the				1	
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appear and demur, plead to	or answer t	he Bill of Compla	int in this caus	e within thi	rty days after th
ervice of said Summons upon	Geo	rge C.Meyer	and Carl	T. Mart	in
as served upon <b>him</b> b	y the Sheri Jun	ff ofB <b>aldwi</b> :	a	County	, Alabama, on the
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And the said Defendant	having	failed to demur,	plead to or ans	wer the said	Bill of Complain
this date, it is now, therefore	e, on motion	of Hall & B	eeb <b>e</b>		· • • • • • • • • • • • • • • • • • •
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Register.

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 min
and Richard Lee Bradley, a minor,
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ofCounty, 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 eath, to a Bill of Complaint lately exhibited by
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Georgia Wilson,
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and a formation of the second
against said above named defendants
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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 192 9/
Mille Some
N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Baldwin County.	Circuit Court of Baldwin Cour	aty, In Equity.
To any Sheriff of the State of A	Mabama-GREETING:	
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The State of Alabama, Baldwin County.  Circuit Court of Baldwin County, In Equity.
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WITNESS, T. W. Richerson, Register of said Circuit Court, this day of
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N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Circuit Court of Baldwin County, In Equity.
Alabama—GREETING:
That you summon Richard Lee Bradley and
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#### THE STATE OF ALABAMA, BALDWIN COUNTY.

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# THE STATE OF ALABAMA, BALDWIN COUNTY.

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	STATE OF ALABAMA, Baldwin County.
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	Defendants.
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# THE STATE OF ALABAMA BALDWIN COUNTY

IN EQUITY, CIRCUIT COURT OF BALDWIN COUNTY.

Georgia Wilson

Richard Lee Bradley et al

NOTE OF TESTIMONY

Filed in Open Court this\_\_\_\_\_

day of

Maria

Register

TO THE REMONANCE F. W. MAND, JUNES OF THE CENTURY COURT OF BALDNIN COUNTY, ALADAMA, CITETING IN ROUTEY:

Comes your Complainant Coordin Wilson and humbly complaining against the Defendants hereinafter nemed, respectfully represents and shows unto your lamor as follows:

#### 

That the Complainant is a resident of Gelena, Kernes, over twenty-one years of age.

#### .

That the Defendants to this come are as follows: Richard Lee Dradley the is ever twenty-one years of age and a non-resident of the State of Alabam, his post of fice address being, care of Baker Robel, Dallas, Texas: Clare Pope who is over twenty-one years of age and a non-realizate of the State of Alebane, here address being, Cremede, Mariesippi; Nary Bradley, a minor, olektoon meers of ees, a non-resident of the State of Alabama and who is in the castody of her father Richard Los Dredley, whose alleres is ours of Buker Betsi, Daline, Terns; Meherd Lee Bredley, Jr., a minor Cilricon years of ago, a non-resident of the State of Alabama and who is in the oustody of his father Higherd Los Bredley, whose oddrone to care of leter botel, Deller, Taxed; Goode C. Hayar who is over the age of twenty-one yours and a rouldest of Mobile, Mobile County, Alabana; Gurl T. Martin, who is ever the ego of twesty-one and a resident of Mallo, Mobile County, Alebert.

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Complainant allogos that she is in the quiet and peaceable possession of the following described lend in Delivin County, Alebens, ever claiming to our the same, books

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to enforce or test the validity of such claim, plant, there of such claim, plant, there of such the Defendants, or out of them not have, and Completents therefore calls upon the Defendants, one of such as made of them, separately and separately, is set forth and specify the or her claim, it let, title or interest is or encountered upon said lands be related by securities, and to show and

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

#### 

that your honor will take jurisdiction of the came make by this Mill of Complaint and by proper process make the said Lee Inadia, Clare lose, Mary Emalley, Michard Lee Inadia, In., Good C. Mayor and Guil T. Martin, Defendants, to this Mill of Complaint and require each of them to plee d, make to death the said the practice of this Managable Carry.

Complainant further years that upon the hearing of this cause this Complainant establish the title of Complainant in end to the Isade bereinshove described and further find and decree that each and all of the Defendants herein needs, have no claim, right, title or interest in, or occumbrance upon the leads herein described, or any part thereof, and great 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 year, etc.

BEEBE & HALL

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BEEBE & HALL

Solicitor for Complainant.

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Completinant further proys that upon the hearing of this cense this Henorable Court establish the title of Completinent in and to the lands hereinalery described and further find and decree that each and all of the Defendants herein named, here no claim, right, title or interest in, or anomhrence upon the lands herein described, or any part thereof, and great unto your Completinant such other, further, or different relief as she may be in equity and good emiscience at titled to receive, and at in duty bound your Completinent will ever proy, etc.

# DEEDE & HALL

#### NOT WEE

The Defendents hereinabove hared and such of them are required to ensure each end every allegation contained in the foregoing bill of Complaint set out in paragraph last to Sth. Inclusive, but not under eath, Oath baing hereby expressly waited.

BENDE & HAIL

STATE OF ALABAMA BAIDWIN 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 WIISON	
Complainant	The State of Alabama,
M.	BATAWIN County.
VS.	Circuit Court, in Equity.
CHARD LEE BRADLEY, CLARE POPE, MARY ADLEY, ROBERT LEE BRADLEY JR.,	This the 28th day of
	, 192 <sup>9</sup>
In this cause it being made to appear to the	
at the Defendant RICHARD LEE BRADLEY. CLA	
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RICHARD LEES BRADLEY JR. ?	
a non-resident of the State of Alabam; The Richard Resident Reside	dley is a minor eighteen years - <del>Bradley, whose post office add</del> Richard Lee Bradley <b>/18</b> a minor,
it is, therefore, ordered that publication be made in t	he Baldwin Times, a newspaper publish-
l in Bay Minette, Baldwin County, Alabama, once a week	for four consecutive weeks, requiring
adley and Richard Lee Bradley Jr.,	Approximation of the second of
answer or demur to the Bill of Complaint in this cause b	y theday of
192 , or after thirty days the	erefrom a decree Pro Confesso may be
ken against them	
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BEEBE & HALL? SOLICITORS FOR COMPLAINANT BAY MINETTE, ALA 6/7/29

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## THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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Notice of Georgia Mileson 1/3 Brothy et ale Run 5/30-6/6-13-20-2702041/2

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#### 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

BT.	CONTRACTOR AND ADDRESS OF THE PARTY OF THE P	THE CO	NON-RI	CONTRACTOR

The State of Alabama, Baldwill 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 Les Bradley, Jr., are non-residents of the

issues:

Gerfull particulars Lee dhoels mon sahd 431 are On Your Bloycle are 2916#100010#S200 ge, Ĭά, a Dealer or from us m from your Local Aperper Lon pna

Date of first publication

#### BAY MINETTE, ALA.

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ALFIDAVIT OF PUBLICATION STATE OF ALABAMA, BALDWIN COUNTY. 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 \_\_ Was published in said Newspaper for consecutive weeks in the following Date of second publication Date of third publication \_ Date of fourth publication Subscribed and sworn to before the undersigned this day of

THE STATE OF ALABAMA,	<sub>No.</sub> 816.		
Baldwin County.	CIRCU	UIT COURT, IN I	QUITY.
Georgia	a Wilson		Complainant
	vs.		Compacina no
Richard Lee	Bradley et al	S	Defendant
In this cause it is made to appear to the Regis	ter by theCompl	aint,	
			•
		4	•
that the Defendant s Mary Bradley a mino	or 18 years of	age and	
Richard Lee Bradley, Jr., a minor th	irteen years o	f age,	·
in the belief of affiant, infant are the age o	f <b>13</b> & 18 ye	ears; and that a sur	mmons on the Bill of
Complaint in this cause was served upon the Defts	by Reg mail a	nd upon their	father
Richard Lee Bradley, Sr.,			
	<del></del>	40.00	7.17.01.00
said infant S, on the 7th Especial act nof	·		
one has been nominated by the said Hon.S.C.Jer	lkins		
to act as Guardian ad Litem for said infant; an	d it further appearing	g that	•••••
Hon.S.C.Jenkins,	is in	all respects a suit	able person to act as
Guardian ad Litem for said infants; and havin	g filed his consent in t	writing to act as su	ch, it is now ordered
by the Register that he is hereby appointed Guardi	an ad Litem in this ca	use for the said inj	<sup>c</sup> ant <b>S</b> .Defendant <b>S</b> .
Witness my hand, this 25th	day of September	er	.19.29
	Dav	Recei	
		keen	Register.
	· · · · · · · · · · · · · · · · · · ·		
ACCEPTANCE.			
I, S.C. Jenkins	hereby ac	cept the above appor	intment as Guardian
ad Litem, and consent to act as such in the above cau			
	lay of	40	29.
Witness my hand, this 25th a	l 00		·
	Ø Cy	lufur a	uardian ad Litem.
	<i>[]</i>	u i	occurre coop sacrotito.

GEORGIA WILSON, Complainant,

IN THE CIRCUIT COURT-EQUITY SIDE

VS.

HICHARD LEE BRADLEY ET AL., Respondents. STATE OF ALABAMA BALDWIN COUNTY.

#### 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.

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THE STATE OF ALABAMA,	<b>!</b>							
Baldwin County.			 :					
CIRCUIT COURT, IN EQUITY.	:							
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vş.								
R.L.Bradley et al,								
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