

VIRGINIA PARDON,

Complainant,

vs

GRANT REA and THE HAND  
LUMBER COMPANY, a Corporation,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT:

Now comes your Complainant, Virginia Pardon, and presents this bill of complaint against Grant Rea and The Hand Lumber Company, an Alabama corporation, and humbly complaining shows unto your Honor as follows:

First: Your Complainant is a resident of the State of Alabama and is over twenty-one years of age. The Respondent, Grant Rea, is a nonresident of the State of Alabama and resides in Carthage, Illinois, and your Complainant is informed and believes and on such information and belief alleges the fact to be that he is over twenty-one years of age. The Respondent, The Hand Lumber Company, a corporation is a domestic corporation and all of its officers are absent from this state and your Complainant is informed and believes and on such information and belief alleges that there is no person in the employ of said corporation or doing business for it in this state.

Second: Your Complainant further shows unto your Honor that she is the owner of that certain land in Baldwin County, Alabama, particularly described as the Southwest Quarter of Section One in Township Three South of Range Four East, containing One Hundred Fifty-three and 38/100 (153.38) acres more or less; that your Complainant claims to own the said land in her own right and that she is in the actual, quiet and peaceable possession of the said land and that the Respondents claim, or are reputed to claim some right, title or interest in or encumbrance upon said land; and that no suit is pending to enforce or test the validity of such title, claim or encumbrance; and that your Complainant brings this her bill of complaint against the said Respondents to settle the title to said land and to clear up all doubts or disputes concerning the same; and your Complainant here and now calls upon the said Respondents and each of them to set forth and specify their title, claim interest or encumbrance in, to or upon said land or any part thereof and how and by what instrument the same is derived and created.


PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, your Complainant prays that your Honor will take jurisdiction of the cause made by this her bill of complaint, will cause notice thereof to be served upon the said Grant Rea and upon the said Hand Lumber Company, a corporation, in conformity with the rules of this Court and the laws of this state in such manners pertaining, making them and each of them a party

respondent to this bill of complaint, and your Honor will require the said Respondents and each of them to answer, plead or demur to this bill of complaint within the time required by law.


PRAYER FOR RELIEF.

Your Complainant further prays that upon a final hearing of this cause, your Honor will enter and grant a decree in favor of your Complainant and against said Respondents and each of them settling the title to the said land and adjudging and decreeing that your Complainant is the owner of the said land in her own right and that title to the said land is in the Complainant, and that the said Respondents and each and all of them are without right, title or interest in said land and have and hold no encumbrance upon the same and if your Complainant is mistaken in the relief prayed for that the Court will grant unto her such other, further and general relief as she may be entitled to, the premises considered.

  
Solicitor for Complainant.

FOOT NOTE:

The Respondents, and each of them, are required to answer each and every averment of the above and foregoing bill of complaint and especially the averments contained in the first and second paragraphs thereof, but not under oath, oath thereto being expressly waived.

  
Solicitor for Complainant.

**The State of Alabama,** }  
 Baldwin County

Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Grant Rea,  
Carthage Ill,

of Illinois ~~---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

Virginia Pardon

against said Grant Rea et al,

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

WITNESS, T. W. Richerson, Register of said Circuit Court, this 9th day of  
June 1931.

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

Virginia Raddon

vs.

Grant Rae et al

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this \_\_\_\_\_  
day of \_\_\_\_\_ 19\_\_

Sheriff.

Executed this \_\_\_\_\_ day of \_\_\_\_\_  
19\_\_  
by leaving a copy of the within Summons with

Defendant.

Sheriff.

By \_\_\_\_\_  
Deputy Sheriff.

June 9th, 1931.  
Copy of Summons and copy of Bill of Complaint registered Grant Rae, at Carthage Ill, this June 9th, 1931.

- - - - -Register.

J.B. Blackburn  
Solicitor for Complainant

VIRGINIA PARDON,

Complainant,

VS.

GRANT REA and THE HAND  
LUMBER COMPANY, a Corp-  
oration,

Respondents.

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

Before me, T. W. Richerson, Register in Chancery, of said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn deposes and says: That he is Solicitor for the Complainant in the above entitled cause, that he is informed and believes that the said Respondent, Grant Rea is a nonresident of the State of Alabama residing in Carthage, Illinois, his post office address being Route A, and that he is over twenty-one years of age.

That the Hand Lumber Company, a Corporation, is a domestic corporation other than a railroad corporation and that all of its officers and managing agents are absent from this state and that in the belief of affiant there is no person in the employ of such corporation or doing business for it in this state. The residence of all officers and agents is unknown.

J. B. Blackburn

Sworn to and subscribed before me  
on this the 9th day of June, 1931.

T. W. Richerson

Register in Chancery.

ORDER OF PUBLICATION.

VIRGINIA PARDON,

Complainant,

VS.

GRANT REA and THE HAND  
LUMBER COMPANY, a Corp-  
oration,

Respondents.

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

In this cause it appearing from an affidavit on file that the Respondent, Grant Rea, is over the age of twenty-one years and is a nonresident of the State of Alabama, whose post office address is Route A, Carthage, Illinois; that the Hand Lumber Company, a Corporation, is a domestic corporation other than a railroad corporation and that all of its officers and managing agents are absent from this state and that there is no person in the employ of such corporation or doing business for it in this State.

IT IS ORDERED, that the said Respondents and each of them plead, answer or demur to the allegations of the Bill of Complaint filed against them and each of them in this cause before the 2nd day of July, 1931, or upon the expiration of thirty days from said date, the same will be taken as confessed against them.

IT IS FURTHER ORDERED that notice of this order be published once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama.

Dated this the 9th day of June, 1931.



T. W. RICHERRSON  
Register in Chancery.

J. B. BLACKBURN.  
Solicitor for Complainant.

VIRGINIA PARDON,

Complainant,

vs

GRANT REA and THE HAND  
LUMBER COMPANY, a Corporation,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO THE HONORABLE F. W. HANE, JUDGE OF SAID COURT:

Now comes your Complainant, Virginia Pardon, and presents this bill of complaint against Grant Rea and The Hand Lumber Company, an Alabama corporation, and humbly complaining shows unto your Honor as follows:

First: Your Complainant is a resident of the State of Alabama and is over twenty-one years of age. The Respondent, Grant Rea, is a nonresident of the State of Alabama and resides in Carthage, Illinois, and your Complainant is informed and believes and on such information and belief alleges the fact to be that he is over twenty-one years of age. The Respondent, The Hand Lumber Company, a corporation is a domestic corporation and all of its officers are absent from this state and your Complainant is informed and believes and on such information and belief alleges that there is no person in the employ of said corporation or doing business for it in this state.

Second: Your Complainant further shows unto your Honor that she is the owner of that certain land in Baldwin County, Alabama, particularly described as the Southwest Quarter of Section One in Township Three South of Range Four East, containing One Hundred Fifty-three and 38/100 (153.38) acres more or less; that your Complainant claims to own the said land in her own right and that she is in the actual, quiet and peaceable possession of the said land and that the Respondents claim, or are reputed to claim some right, title or interest in or encumbrance upon said land; and that no suit is pending to enforce or test the validity of such title, claim or encumbrance; and that your Complainant brings this her bill of complaint against the said Respondents to settle the title to said land and to clear up all doubts or disputes concerning the same; and your Complainant here and now calls upon the said Respondents and each of them to set forth and specify their title, claim interest or encumbrance in, to or upon said land or any part thereof and how and by what instrument the same is derived and created.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, your Complainant prays that your Honor will take jurisdiction of the cause made by this her bill of complaint, will cause notice thereof to be served upon the said Grant Rea and upon the said Hand Lumber Company, a corporation, in conformity with the rules of this Court and the laws of this state in such manners pertaining, making them and each of them a party

respondent to this bill of complaint, and your Honor will require the said Respondents and each of them to answer, plead or demur to this bill of complaint within the time required by law.

PRAYER FOR RELIEF.

Your Complainant further prays that upon a final hearing of this cause, your Honor will enter and grant a decree in favor of your Complainant and against said Respondents and each of them settling the title to the said land and adjudging and decreeing that your Complainant is the owner of the said land in her own right and that title to the said land is in the Complainant, and that the said Respondents and each and all of them are without right, title or interest in said land and have and hold no encumbrance upon the same and if your Complainant is mistaken in the relief prayed for that the Court will grant unto her such other further and general relief as she may be entitled to the premises considered.

J. B. Blackburn  
Solicitor for Complainant.

FOOT NOTE:

The Respondents, and each of them, are required to answer each and every averment of the above and foregoing bill of complaint and especially the averments contained in the first and second paragraphs thereof, but not under oath, oath thereto being expressly waived.

J. B. Blackburn  
Solicitor for Complainant.



BAY MINETTE, ALA.

*M. J. W. Richardson - Clerk -*

ORDER OF PUBLICATION

VIRGINIA PARDON, Complainant,  
VS. GRANT REA and THE HAND  
LUMBER COMPANY, a Corporation,  
Respondents.

In the Circuit Court of Baldwin  
County, Alabama. In Equity.

In this cause, it appearing from an  
affidavit on file that the Respondent,  
Grant Rea is over the age of twenty  
one years and is a non-resident of  
the State of Alabama, whose post of-  
fice address is Route A, Carthage,  
Illinois, that the Hand Lumber Com-  
pany, a Corporation, is a domestic  
corporation other than a railroad  
corporation and that all of its offi-  
cers and managing agents are absent  
from this state and that there is no  
person in the employ of such corpora-  
tion or doing business for it in this  
state.

IT IS ORDERED, that the said Re-  
spondent and each of them plead, an-  
swer or demur to the allegations of  
the Bill of Complaint filed against  
them and each of them in this cause  
before the 2nd day of July, 1931, or  
upon the expiration of thirty days  
from said date, the same will be taken  
as confessed against them.

It is further ordered that notice  
of this order be published once a  
week for four consecutive weeks in  
the Baldwin Times, a newspaper pub-  
lished in Bay Minette, Baldwin Coun-  
ty, Alabama.

Dated this, the 9th day of June,  
1931.

T. W. RICHESON, Regis-  
ter in Chancery.

J. B. BLACKBURN, Solicitor for  
Complainant.  
19-4t.

THE BALDWIN TIMES

PRINTED IN THE LAND OF THE GOLDEN SATSUMA

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

*J. B. Blackburn Atty*  
*Virginia Pardon vs Grant Rea.*

*words @ 3¢*

*705-*

RETURN RECEIPT

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

(Signature or name of addressee)

(Signature of article owner)

Date of delivery

POSTAGE PAID

U.S. GOVERNMENT PRINTING OFFICE

6-5-3116