

STATE OF ALABAMA,
BALDWIN COUNTY.

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

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

Your petitioner, Mrs. Lenora Long, respectfully
represents and shows unto your Honor as follows:

FIRST: That she is over twenty-one years of age and resides
at Bay Minette, Baldwin County, Alabama; That Winston Aaron
is a minor over Twelve years of age and resides at

Owassa, Conecuh County, Ala-
bama; That Lenora Long and the said Winston Aaron are joint
owners of the following described real estate situated in the
County of Baldwin, State of Alabama, to-wit:

Lots Numbered One (1) and Two (2) in Stapleton's
Addition to the Town of Bay Minette, Alabama.

SECOND: That during the month of October 1924, your petitioner,
Lenora Long was married to one John D. Aaron and that during
the said month of October, 1924, your petitioner and the said
John D. Aaron purchased a lot, being Lot No. 1, described herein
and erected a home upon the said lot; That your petitioner,
Lenora Long was working for the Southern Bell Telephone Co., and
actually paid practically all that was paid for the lot and for
the improvements placed thereon; That your petitioner and the
said John D. Aaron, her husband, lived upon this lot until the
death of the said John D. Aaron on the 16th day of February, 1927;

THIRD: That the title to the said lot purchased was taken in the name of John D. Aaron, husband of your petitioner, although your petitioner, as stated herein paid practically all the purchase money for the lot and for the improvements placed thereon;

That in April 1926, Lot No. 2 herein was purchased by Lenora Aaron and husband, John D. Aaron and that while your petitioner, Lenora Long, who was then the wife of John D. Aaron, paid practically all of the purchase price for the said Lot No. 2, the title to same was taken in the name of John D. Aaron, her husband; That as stated hereinbefore, said John D. Aaron died on the 16th day of February, 1927, leaving your petitioner, who is now Lenora Long, as his widow, and a young child, Winston Aaron, who is party respondent to this petition;

That Lot No. 2 was adjoining Lot No. 1 which was used as their residence and home.

FOURTH: That \$700.00 would be a fair and reasonable value for the Lot No. 1, together with improvements thereon and that the sum of \$250.00 would be a fair and reasonable value for Lot. No. 2 described herein;

That both lots are under mortgage in the sum of \$350.00 to the Baldwin County Bank and it is necessary that the said sum of \$350.00 be paid within a very short time, or both your petitioner and the minor, Winston Aaron will lose their rights in and to the said property;

FIFTH: That your petitioner is willing and she hereby consents that the property be divided between herself and the said minor, in order to protect the interests of both parties hereto and in order to carry out the purpose, your petitioner suggests

that she be given the lot with her residence located upon same and that she be required to assume the payment of the entire mortgaged indebtedness in the sum of \$350.00, and that Lot No. 2 be given to the minor, Winston Aaron, free from encumbrance.

Your petitioner, Lenora Long is desirous of obtaining her interest in the above described property for the purpose of protecting the property from foreclosure and for the purpose of protecting the interests of the said minor and alleges that the said property can be equitably divided or partitioned among the owners without a sale of the same; That it is to the interest of the said Minor, Winston Aaron, and Lenora Long that the said property be divided or partitioned.

Your petitioner, therefore, prays Your Honor issue all orders and subpoenas necessary for the purpose of making Winston Aaron party respondent to this petition and that the property described herein be divided or partitioned and that your Honor make and issue all such orders and decrees that may be necessary to effect the division or partition of said property.

That if your petitioner is mistaken in the relief prayed for, then Your Honor will grant unto her such other, further, different and general relief as she may in equity and good conscience be entitled, she will ever pray, etc.,

Mrs. Lenora Long.

Subscribed and sworn to before me
this 10th day of July, 1931.

Margaret H. Huggins
Notary Public, Baldwin Co. Ala.,

FOOT NOTE:

Defendant is required to answer every allegation contained in the foregoing bill, paragraph One to Fifth, inclusive, but not under oath. Answer under oath is hereby expressly waived.

Henry J. Moore

Copy

Madame de
98

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Madame de

HENRY D. MOORE

Attorney at Law
Day Office, Ala.

980

CHANCERY EXECUTION
BILL OF COSTS

No. 980

Mrs. Geneva Long
Vs.
Winston Aaron (a minor)

Plaintiff
Defendant

FEES OF REGISTER		Dollars	Cents		Brought Forward	\$
Filing each bill and other papers	\$ 10		10		For Receiving, keeping and paying out or distributing money, etc.; 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
Issuing each subpoena	50		50		Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof	40		40		Each notice sent by mail to creditor	15
Entering each return thereof	15				Filing, receipting for and docketing each claim, etc.	25
For each order of publication	1 00				For all entries on subpoena docket, etc.	50
Issuing writ of injunction	1 50				For all entries on commission docket, etc.	50
For each copy thereof	50				Making final record, per 100 words	15
Entering each return thereof	15				Certified copy of decree	1 00
Issuing Writ of Attachment	1 00				Report of divorce to State Health Office (Acts 1915)	50
Entering each return thereof	15				Total Fees of Register	
Docketing each case	1 00				FEES OF SHERIFF	
Entering each appearance	25				Serving and returning subpoena on deft.	\$1 50
Issuing each decree pro confesso on per. ser.	1 00				Serving and returning subpoena for witness	65
Issuing each decree pro confesso on publica.	1 00				Levying attachment	3 00
Each order appointing guardian	1 00				Entering and returning same	25
Any other order by Register	50				Selling property attached	
Issuing commission to take testimony	50				Impanelling Jury	75
Receiving and filing	10				Executing writ of possession	2 50
Endorsing each package	10				Collecting execution for costs	1 50
Entering order submitting cause	50				Serving and returning sci. fa., each	65
Entering any other order of court	25				Serving and returning notice	65
Noting all testimony	50				Serving and returning writ of injunction	1 50
Abstract of cause, etc.	1 00				Serving and returning writ of exeat	1 50
Entering each decree	75				Taking and approving bonds, each	75
For every 100 words over 500	15				Collecting money on execution	
Taking account, etc.	3 00				Making deed	2 50
Taking testimony, etc.	15				Serving and returning application, etc.	1 00
Each report, 500 words or less	2 50				Serving attachment, contempt of court	1 50
For every 100 words over 500	15				Total Fees of Sheriff	
Amount claimed less than \$500, etc.	2 00				RECAPITULATION	
Issuing each subpoena	25				Register's Fees	4 40
Witness certificate, each	25				Sheriff's Fees	
Issuing execution, each	75				Commissioner's Fees	
Entering each return	15				Solicitor's Fees	
Taking and approving bond, each	1 00				Witness Fees	
Making copy of bill, etc.	15				Guardian Ad Litem	
Each notice not otherwise provided for	50				Printer's Fees	
Each certificate or affidavit, with seal	50				Trial Tax	3 00
Each certificate or affidavit, no seal	25				Recording Decree in Probate Court	
Hearing and passing on application, etc.	3 00				Total	7 40
Each settlement with receiver, etc.	3 00					
Examining each voucher of Receiver, etc.	10					
Examining each answer, etc.	3 00					
Recording resignation, etc.	75					
Entering each certificate to Supreme Court	50					
Taking questions and answers, etc.	25					
For all other ser relating to such proceedings	1 00					
For services in proceeding to relieve minors, etc.. same fee as in similar cases.						
Commission on sales, etc: 1st \$100, 2 per ct.; all over \$100 and not exceeding \$1,000, 1 1-2 per ct; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct.						
Sub Total Carried Forward		4	40			

The State of Alabama, { No. 980
Baldwin County. Circuit Court, In Equity Aug Term, 1935
To Any Sheriff of the State of Alabama-GREETING:
You are hereby commanded, That of the goods and chattels, lands and tenements of
Mrs. Geneva Long Defendant
you cause to be made the sum of _____ Dollars,
which Winston Aaron Plaintiff
recovered of her on the 21 day of Aug 1935
by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of _____ Dollars,
costs of suit, and have the same to render to the said Robert S. Buck
and make return of this Writ and the execution thereof, according to law.
Interest from 193 to date of collection.
Witness my hand, this 22 day of Aug 1935
Robert S. Buck Register.

Copy
82
No. _____

The State of Alabama,
Baldwin County.

Circuit Court, In Equity.

Mrs. John A. Day
vs.
Wm. H. Harrison

CHANCERY EXECUTION
Fi. Fa.

\$ _____

Total - - - \$ *7.40*

Fee Book *3* Page _____

Execution Docket *4* Page _____

H. H. Harrison

Complainant's Solicitor.

8/24/37
Adm. record 100007

The State of Alabama,
Baldwin County.

ha _____ duly waived _____ right
to the exemption of personal property as to
the collection of the debt for which this execu-
tion is issued.

Register.

Received in office this _____
day of _____ 193 _____

Sheriff

Execution Docket _____ Page _____

The State of Alabama,
Baldwin County.

By virtue of the within execution I have levied _____