

1006

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your complainant, WILLIS J. WILLS, and humbly
complaining against the ALABAMA TOBACCO COMPANY, a non-resident
corporation, and the SOUTHERN PLANTATION DEVELOPMENT COMPANY, a
corporation organized under the laws of the State of Alabama,
and respectfully represents and shows unto your Honor as follows:

FIRST:

That your complainant is a bona fide resident of Bald-
win County, Alabama, over the age of twenty-one years.

SECOND:

That the Alabama Tobacco Company is a foreign corpora-
tion; that your complainant has made diligent search of the rec-
ords of Baldwin County, Alabama, in order to ascertain the pres-
ent known address of the said Alabama Tobacco Company; that your
complainant has made inquiry of the Probate Judge, the Tax Asses-
sor and the Sheriff of Baldwin County, Alabama, in order to as-
certain the present known address of the said Alabama Tobacco
Company; that your complainant has made inquiry in and around
Summerdale, where the said Alabama Tobacco Company at one time
owned lands, and has been unable to ascertain the present known
address of said Alabama Tobacco Company; that your complainant
has made inquiry of all persons living in Chicago, Illinois,
whom he might have reasonable cause to believe knew the present
place of business and post-office address of the said corpora-
tion and of its officers, the said corporation having last oper-
ated insofar as complainant is able to ascertain with its prin-
cipal place of business in the said City of Chicago, Illinois,
and that he has been unable to ascertain from such inquiry the
present place of business and the present officers and their
addresses of the said corporation; that the records of Baldwin
County, Alabama, disclose that the last known place of business

of the said corporation was in the City of Chicago, the particular address therein being unknown to this complainant, and that its last known officers were Thomas A. Moran, Vice President, and J. J. Cochran, Secretary, whose particular places of residence and post-office addresses are unknown. That the Southern Plantation Development Company is a corporation organized and existing under the laws of the State of Alabama.

THIRD:

Your complainant alleges that he is in the quiet and peaceable possession of certain lands in Baldwin County, Alabama, claiming to own the same in fee simple, said lands being described as follows, to-wit: Northwest quarter (NW $\frac{1}{4}$) of the Northeast quarter (NE $\frac{1}{4}$) of the Northwest quarter (NW $\frac{1}{4}$) of Section twelve (12), Township six (6) South of Range four (4) East of St. Stephens Meridian, containing ten (10) acres more or less.

FOURTH:

Complainant further alleges that the defendants, the Alabama Tobacco Company and the Southern Plantation Development Company, claim or are reputed to claim some right, title or interest in or incumbrance upon said lands.

FIFTH:

Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or interest in or incumbrance upon the said lands, and the complainant therefore calls upon the defendants, the Alabama Tobacco Company and the Southern Plantation Development Company, to set forth and specify their right, title or interest in or incumbrance upon said lands and to show how and by what instrument the same is derived and created.

PRAYER FOR PROCEED.

WHEREFORE, the premises considered, your complainant prays that your Honor will take jurisdiction of the cause made

by this bill of complaint and by appropriate process make the said Alabama Tobacco Company and the Southern Plantation Development Company parties defendant to this bill of complaint, requiring 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 FOR RELIEF.

Complainant further prays that upon a hearing of this cause this Honorable Court establish the title of complainant in and to the lands herein described, and further find and decree that the said Alabama Tobacco Company and the Southern Plantation Development Company have no claim, right, title or interest in or incumbrance upon the said lands herein described, or any part thereof, and grant unto your complainant such other, further or different relief as he may in equity be entitled to receive. And as in duty bound he will ever pray.

Beebe + Hall
Solicitors for Complainant.

FOOT NOTE:

The defendants are required to answer each and every allegation of the foregoing Bill of Complaint from paragraphs FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe + Hall
Solicitors for Complainant.

RECORDED

ORIGINAL.

TILLIS J. TILLIS,
Complainant;

VS

ALABAMA TRADING COMPANY,
ET AL.

Defendants.

FILED IN JUNE 1951.

FILED OCTOBER 18th 1951.

W. W. Beebe
Register.

BEEBE & HALL
LAWYERS
BAY MINETTE, ALA.

BAY MINETTE, ALA.

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

J. B. Beebe atty

Oct 22 - 1931.

W. J. Wells vs. Ala. Tobacco Co.

175 words @ 4 1/2

788

MADE
IN U.S.A.
1000

BAY MINETTE, ALA.,

193

Mr J W Robinson

June 7

IN ACCOUNT WITH

G. W. HUMPHRIES

JUDGE OF PROBATE

BALDWIN COUNTY

Please Return Bill With Remittance

Privilege Tax

Rec. Fee

Total

Deed
Rec. Mort. from

Wm J. McHugh to Wm J. McHugh & Co

85

*Recd 1/7/32
G. W. Humphries, Judge
J. W. Robinson*

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. Term, 192

WILLIS J. WELLS,

Complainant.

vs. ALABAMA TOBACCO COMPANY, a corporation, and SOUTHERN
PLANTATION DEVELOPMENT COMPANY, a corporation, Defendant S.

In this cause it appears to the Register T. W. Richerson, that the order of publi-
cation heretofore made in this cause, was published for four consecutive weeks, commencing on the
22nd day of October, 1923, in the Baldwin Times,

a newspaper published in Baldwin County, Alabama, that a copy of said order was posted
at the Court House door in Baldwin County, on the 16th day of
October, 1923, and

And it now further appearing to the Register T. W. Richerson, that the said
Alabama Tobacco Company, a non-resident corporation,

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
T. W. Richerson that the Bill of Complaint in this cause be, and it hereby is in all things
taken as confessed against the said Alabama Tobacco Company, a non-resident
corporation,

This 4th day of January, 1923.

T. W. Richerson Register.

Published Every Thursday

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.

AFFIDAVIT 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

Wells J. Wells
vs

Alabama Tobacco Co.

NOTICE FOR PUBLICATION

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

WILLIS J. WELLS, Complainant,
Vs. ALABAMA TOBACCO COM-
PANY, ET AL., Defendants.

In this cause it being made to ap-
pear to the Clerk of this Court by the
affidavit of J. P. Beebe, attorney for
the complainant, that the defendant,
Alabama Tobacco Company, is a non-
resident corporation of the State of
Alabama, its present place of busi-
ness and post-office address and that
of its officers being unknown to com-
plainant, it is therefore ordered that
publication be made in The Baldwin
Times, a newspaper published in Bay
Minette, Baldwin County, Alabama,
once a week for four consecutive
weeks, requiring the defendant, the
said Alabama Tobacco Company, a
corporation to answer or demur to
the bill of complaint in this cause
by the 23rd day of November, 1931
or after thirty days therefrom a de-
gree pro confesso may be taken
against the said Alabama Tobacco
Company.

T. W. RICHMOND, Register
J. P. BEEBE, Attorney for complain-
ant. 38-4t.

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

Date of first publication	<i>October 22 1931</i>	Vol. <i>42</i> No. <i>38</i>
Date of second publication	<i>October 29 1931</i>	Vol. <i>42</i> No. <i>39</i>
Date of third publication	<i>November 5 1931</i>	Vol. <i>42</i> No. <i>40</i>
Date of fourth publication	<i>November 12 1931</i>	Vol. <i>42</i> No. <i>41</i>

Subscribed and sworn before the undersigned this 2 day of

December 1931

T. W. Richmond
Clerk Circuit Court

R. B. Vail
Publisher

Volume 4, Page 373
RECORDED

No. 1006.

Page

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

WILLIS J. WELLS,

Complainant,

vs.

ALABAMA TOBACCO COMPANY,
a corporation, and SOUTHERN
PLANTATION DEVELOPMENT
COMPANY, a corporation,
Defendants.

**DECREE PRO CONFESSO
ON PUBLICATION**

Issued *June 4th* 1932

J. B. Williams
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

Moore Printing Company, Bay Minette, Ala.

or five days return to

. RICHIERSON
ND CLERK OF THE CIRCUIT
T. BALDWIN COUNTY
MINETTE, ALA.

REGISTERED

NO. 233

Direction Service Given

MINETTE
OCT 17 PM
ALA.

1931



(Return receipt requested)

Alabama Tobacco Company, a
corporation

(Deliver to addressee only)

Chicago, Illinois

Return Receipt Requested
Fee Paid

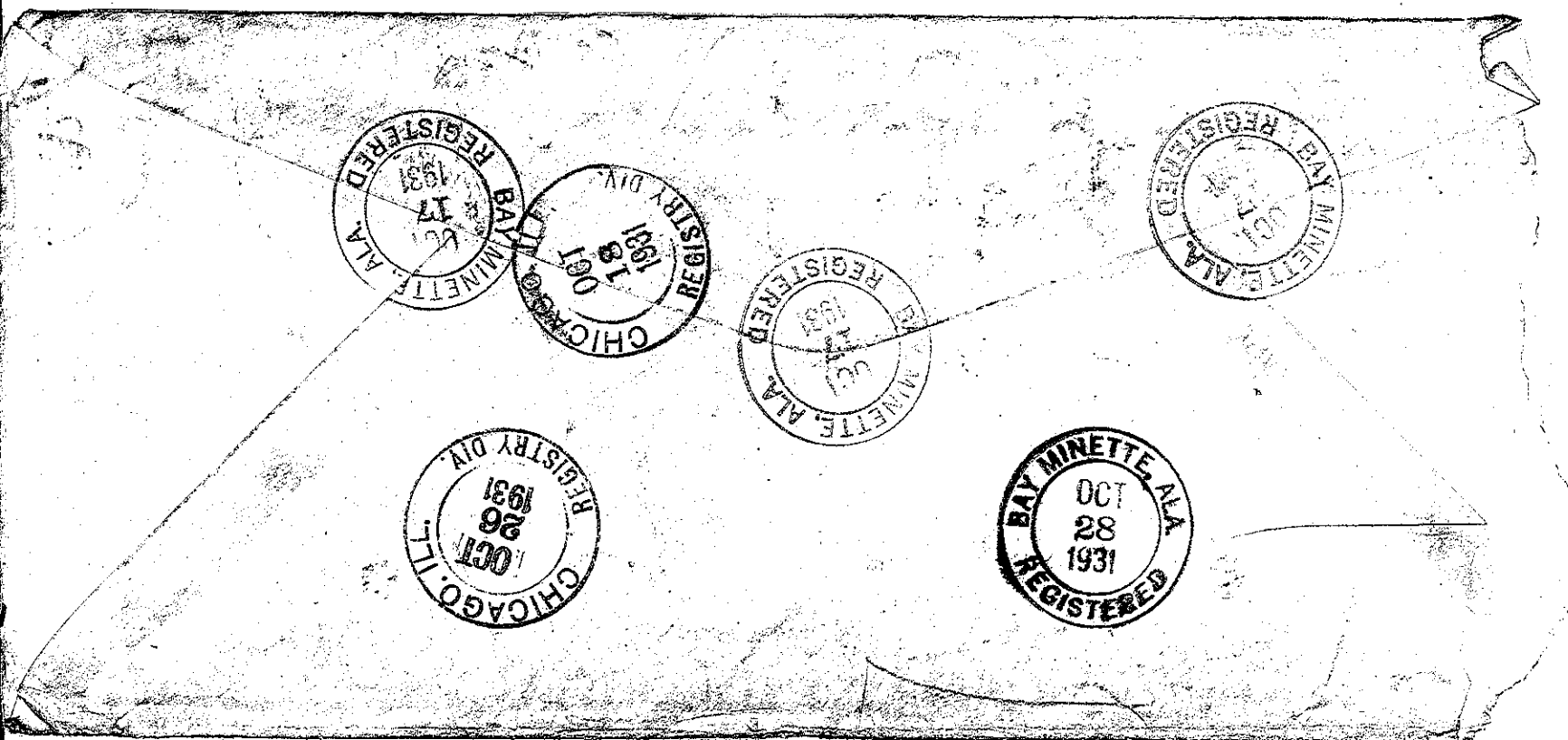
INSUFFICIENT ADDRESS
DIRECTORY SERVICE GIVEN

RETURN TO WRITER

NOTICE
OCT 22 1931

NOT FOUND

10119



8550 REQUEST FOR DECREE IN VACATION.

MOORE RTG CO.

STATE OF ALABAMA,
Baldwin County.

}

CIRCUIT COURT, IN EQUITY.
Vacation

No.

Term, 19232

Willis J. Wells,

Complainant ..

vs.

Alabama Tobacco Company, a corporation

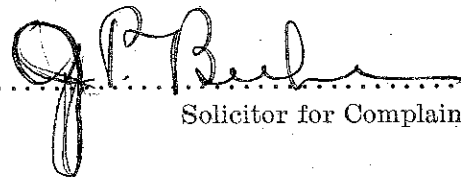
Defendant ..

To T.W. Richersono

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.



Solicitor for Complainant.

RECORDED

No. 1006

Page.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Wm J. Miller

VS.

Alma P. Mascolo

REQUEST FOR DECREE IN
VACATION

FILED Jan 4 1923
W. H. Miller
Register

RECORDED IN RECORD

VOL. PAGE

Register

NOTICE

BAY MINETTE, ALA.

Sept 6. 35

P. S. Duck, Clerk

E. BALDWIN TIMES

ISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$1.50 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

Notice

W. Kay vs Bldg Colonization Co

0 W-4 1/2 T

\$9.45

In the Circuit Court of Baldwin County, Alabama. In Equity. No. 138.
ALEX W. KAY, Complainant, Vs.
BALDWIN COUNTY COLONIZATION COMPANY, a Corporation, Respondent.

It being made to appear from the affidavit of Hubert M. Hall, Solicitor of record for the Complainant, that the respondent, Baldwin County Colonization Company, is a domestic corporation, with its principal place of business in Elberta, Alabama, whose president or other head, secretary, cashier and managing agent are absent from the state and that there is no person in the employ of such corporation or doing business for it in this state, it is therefore ordered that notice to said respondent be given by publication.

It is further ordered that said respondent, Baldwin County Colonization Company, a Corporation, is hereby required to answer or demur to the Bill of Complaint in this cause on or before the 22nd day of August, 1935.

It is further ordered that this order be published in the Baldwin Times, a newspaper published at Bay Minette, Alabama for four consecutive weeks and a copy thereof posted at the door of the Court House, Baldwin County, Alabama.

Dated this the 17th day of June, 1935.

ROBERT S. DUCK, Register.
BEEBE & HALL, Solicitors for Complainant.

20-4t.

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

PLAINTIFF

DEFENDANT

BILL OF COST

Fees of Register		Dollars	Cts.	AMOUNT BROUGHT FORWARD	\$	Cts.
Filing each bill and other papers	7	\$	10	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.		
Issuing each Subpoena			50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof			30	Each Notice Sent by Mail to Creditors	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 hundred 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	50	
Entering each return thereof			15	Acts 1915		
Docketing each case		1	00	Total Fees of Register		
Entering each Appearance			25			
Issuing each Decree Pro Confesso on personal service		1	00	FEES OF SHERIFF		
Issuing each Decree Pro Confesso on publication		1	00	Serving and Returning Subpoena on Deft.	\$	15
Each Order Appointing Guardian		1	00	Serving and Returning Subpoena for Witness		65
Any other order by Register			50	Levy and Attachment		3 00
Issuing Commission to Take Testimony			50	Entering and Returning same		25
Receiving and Filing			10	Entering and Returning Execution		25
Endorsing each package			10	Selling Property Attached		25
Entering Order Submitting Cause			50	Impanelling Jury		75
Entering any other Order of Court			25	Executing Writ of Possession		2.50
Noting all Testimony			50	Collecting Execution for Costs		1.50
Abstract of Cause, etc.		1	00	Serving and Returning Sci. Fa., each		65
Entering each Decree		75		Serving and Returning Notice		65
For Every Hundred Words Over Five Hundred		15		Serving and Returning Writ of Injunction		1.50
Taking Account on Reference		3	00	Serving and Returning Writ of Exeat		1.50
Taking Testimony, etc.			15	Taking and Approving Bonds, each		1.00
Each Report, Five Hundred Words or less		2	50	Collecting Money on Execution		
For every Hundred Words Over Five Hundred		15		Making Deed		2.50
Amount Claimed, Less than Five Hundred Dollars, etc.		2	00	Serving and Returning Application		1.00
Issuing each Subpoena			25	Serving Attachment, Contempt of Court		1.50
Witness Certificate, each			25	TOTAL FEES OF SHERIFF		
Issuing Execution, each		75				
Entering each Return		15		Recapitulation		
Taking and Approving Bond, each		1	00	Register's Fees		
Making Copy of Bill, etc.			15	Sheriff's Fees		
Each notice not otherwise provided for			50	Commissioner's Fees		
Each Certificate or Affidavit, with Seal			50	Solicitor's Fees		
Each Certificate or Affidavit, no Seal			25	Witness Fees		
Hearing and passing on application for Receiver or Trustee		3	00	Guardian Ad Litem		
Each Settlement with Receiver or Trustee		3	00	Printer's Fees		
Examining each Voucher of Receiver or Trustee			10	Trial Tax		3 00
Examining each Answer on Exception			3 00	Recording Decree in Probate Court		
Recording Resignation or Suggestion of Death of Trustee		75		Total		
Entering each Certificate to Supreme Court			75			
Taking Questions and Answers, etc.			25			
For all other service relating to such proceedings		1	00			
For service in proceeding to relieve minors, etc. same fee as in similar cases.						
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.						
Sub Total Carried Forward						

Received payment this _____ day of _____ 193_____

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

Register.

WILLIS J. WELLS,

Complainant,

vs.

ALABAMA TOBACCO COMPANY
ET AL.,

Defendants.

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

It being made to appear in the above styled cause from the affidavit of J. P. Beebe, attorney for the complainant, that the Alabama Tobacco Company, a defendant to the said bill of complaint in said cause, is a non-resident of the State of Alabama, its present place of business and post-office address and that of its officers being unknown to complainant, but that in the belief of complainant the said defendant is a non-resident corporation, with its last known place of business in the City of Chicago, Illinois; it is therefore ordered, adjudged and decreed that the said defendant appear in this court and answer or demur to the bill of complaint in this cause before the 23rd day of November, 1931, lest on its having failed so to do within thirty days from said date a decree pro confesso be taken against it and it is further ordered, adjudged and decreed that the Register of this court have this order published with as little delay as may be in The Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, once a week for four consecutive weeks; and further that within twenty days from the date of this order, he post a copy of this order at the door of the courthouse of Baldwin County, Alabama, and send a copy hereof to the said defendant, Alabama Tobacco Company, addressed to it at Chicago, Illinois, marked for delivery to addressee only, postage prepaid and return receipt requested.

Ordered, adjudged and decreed this 16 day of October, 1931.

J. W. Riceman
Register.

J. P. Beebe
Attorney 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 Alabama Tobacco Company, a non
resident corporation,

of Chicago 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

Willis J. Wells,

against said Alabama Tobacco Company a non resident Corporation

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 16th, day of

October, 193 1.

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

No. _____

SUMMONS

Wien, 1. März 1892

vs.

vs.
Ala To Co

22

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

The State of Alabama,
BALDWIN COUNTY.

Received in office this _____

day of _____ 193_____

Sheriff.

Executed this _____ day of _____

193

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By _____

Deputy Sheriff.

Deputy Sheriff,
 20217 17/31
 17/31

Copy of Supplement

Married by Reg. Clerk

W. A. R. Co., Chicago

Dr. J. J. Macnamara
Baltimore

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your complainant, WILLIS J. WELLS, and humbly
complaining against the ALABAMA TOBACCO COMPANY, a non-resident
corporation, and the SOUTHERN PLANTATION DEVELOPMENT COMPANY, a
corporation organized under the laws of the State of Alabama,
and respectfully represents and shows unto your Honor as follows:

FIRST:

That your complainant is a bona fide resident of Bald-
win County, Alabama, over the age of twenty-one years.

SECOND:

That the Alabama Tobacco Company is a foreign corpora-
tion; that your complainant has made diligent search of the rec-
ords of Baldwin County, Alabama, in order to ascertain the pres-
ent known address of the said Alabama Tobacco Company; that your
complainant has made inquiry of the Probate Judge, the Tax Asses-
sor and the Sheriff of Baldwin County, Alabama, in order to as-
ertain the present known address of the said Alabama Tobacco
Company; that your complainant has made inquiry in and around
Summerdale, where the said Alabama Tobacco Company at one time
owned lands, and has been unable to ascertain the present known
address of said Alabama Tobacco Company; that your complainant
has made inquiry of all persons living in Chicago, Illinois,
whom he might have reasonable cause to believe knew the present
place of business and post-office address of the said corpora-
tion and of its officers, the said corporation having last oper-
ated insofar as complainant is able to ascertain with its prin-
cipal place of business in the said City of Chicago, Illinois,
and that he has been unable to ascertain from such inquiry the
present place of business and the present officers and their
addresses of the said corporation; that the records of Baldwin
County, Alabama, disclose that the last known place of business

of the said corporation was in the City of Chicago, the particular address therein being unknown to this complainant, and that its last known officers were Thomas A. Moran, Vice President, and J. J. Cochran, Secretary, whose particular places of residence and post-office addresses are unknown. That the Southern Plantation Development Company is a corporation organized and existing under the laws of the State of Alabama.

THIRD:

Your complainant alleges that he is in the quiet and peaceable possession of certain lands in Baldwin County, Alabama, claiming to own the same in fee simple, said lands being described as follows, to-wit: Northwest quarter (NW $\frac{1}{4}$) of the Northeast quarter (NE $\frac{1}{4}$) of the Northwest quarter (NW $\frac{1}{4}$) of Section twelve (12), Township six (6) South of Range four (4) East of St. Stephens Meridian, containing ten (10) acres more or less.

FOURTH:

Complainant further alleges that the defendants, the Alabama Tobacco Company and the Southern Plantation Development Company, claim or are reputed to claim some right, title or interest in or incumbrance upon said lands.

FIFTH:

Complainant further alleges that no suit is pending to enforce or test the validity of such claim, right, title or interest in or incumbrance upon the said lands, and the complainant therefore calls upon the defendants, the Alabama Tobacco Company and the Southern Plantation Development Company, to set forth and specify their right, title or interest in or incumbrance upon said lands and to show how and by what instrument the same is derived and created.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, your complainant prays that your Honor will take jurisdiction of the cause made

by this bill of complaint and by appropriate process make the said Alabama Tobacco Company and the Southern Plantation Development Company parties defendant to this bill of complaint, requiring 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 FOR RELIEF.

Complainant further prays that upon a hearing of this cause this Honorable Court establish the title of complainant in and to the lands herein described, and further find and decree that the said Alabama Tobacco Company and the Southern Plantation Development Company have no claim, right, title or interest in or incumbrance upon the said lands herein described, or any part thereof, and grant unto your complainant such other, further or different relief as he may in equity be entitled to receive. And as in duty bound he will ever pray.

Beeche & Hall
Solicitors for Complainant.

FOOT NOTE:

The defendants are required to answer each and every allegation of the foregoing Bill of Complaint from paragraphs FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Beeche & Hall
Solicitors 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 Alabama Tobacco Company, a non
resident corporation,

of Chicago 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

Willis J. Wells,

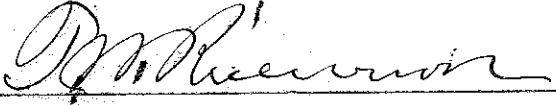
against said

Alabama Tobacco Company a non resident Corporation

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 16th day of

October, 193 1.

 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.

The State of Alabama,
BALDWIN COUNTY.

Received in office this _____

day of _____ 193_____

Sheriff.

Executed this _____ day of _____

193_____

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____
Deputy Sheriff.

Beebe & Hall,

Solicitor for Complainant.
Bay Minette Ala.

Recorded in Vol. _____ Page _____

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 Southern Plantation Development
Company, a corporation,

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
Willis J. Wells,

against said Southern Plantation Development Company, a
corporation,

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 17th day of
October, 1931.

T. W. Richerson Register.

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

RECORDED

Serve on _____
Circuit Court of Baldwin County
In Equity.

No. _____
SUMMONS

Willis J. Wells,

vs.
Southern Plantation
Development Co., a
corporation,

Bebee & Hall,
Solicitor for Complainant.

Recorded in Vol. 4 Page 373
*Charles C. Clegg on for Clegg & Co.
are agents for Southern
Plantation Development Co.*

The State of Alabama,
BALDWIN COUNTY.

Received in office this _____

day of _____ 193

Sheriff.

Executed this 17 th day of _____
Oct. 1931

by leaving a copy of the within Summons with
J. A. Clegg
Ag't for Southern Plant.
Southern Development Defendant.
a copy to Ward
By J. B. Wilson Sheriff.
Deputy Sheriff.

The State of Alabama, }
Baldwin County.

No. _____ CIRCUIT COURT, IN EQUITY

WILLIS J. WELLS,

Complainant.

vs.

ALABAMA TOBACCO COMPANY, a corporation, and
 SOUTHERN PLANTATION DEVELOPMENT COMPANY, a corporation, DefendantS.

In this cause it appears to the Register, T. W. Richerson,
 that a Summons requiring the Defendant Southern Plantation Development
 Company, a corporation,

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 J. A. Ertzinger, as agent for the Southern
 Plantation Development Company, a corporation,
 was served upon him by the Sheriff of Baldwin County, Alabama, on the
 17th day of October, 1931.

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 complainant, Willis J. Wells,

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 Southern Plantation Development Company, a
 corporation,

Defendant aforesaid.

This 4th day of January, 1932.



Register.

RECORDED

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The State of Alabama,
Baldwin County

Circuit Court In Equity

, WILLIS J. WELLS,

Complainant,

VS.

ALABAMA TOBACCO COMPANY,
a corporation, and SOUTHERN
PLANTATION DEVELOPMENT COM-
PANY, a corporation,
Defendants.

Decree Pro Confesso On
Personal Service.

Issued Jan 4th 1932

W. J. Wells
Register.