

1071

JOHN T. STANTON,
Complainant,

VS.

J. V. CONWAY, HERMAN CONWAY,
PEARL CONWAY SUMMERALL, MARY CONWAY FOX,
T. A. CONWAY, ERNESTINE CONWAY, FRANK
CONWAY, EDWARD CONWAY, MINNIE LEE
JOHANSEN, HENRY CONWAY AND JESSIE CON-
WAY,

Defendants.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
ALABAMA.

This cause being submitted on the original Bill of Complaint, amended Bill of Complaint, Answer of Guardian ad litem, S. C. Jenkins, as to Ernestine Conway, T. A. Conway, Frank Conway and Edward Conway, minors, denying the allegations of the Bill of Complaint, notice and acceptance of guardian ad litem, decree pro confesso on personal service against Minnie Lee Johansen, Henry Conway, Jessie Conway, J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox by Registered mail, return receipt demanded, ~~decree pro confesso on publication against T. A. Conway, Ernestine Conway, Frank Conway and Edward Conway, and testimony of W. R. Conway and R. L. Keesler.~~

The pleading and evidence in this cause shows that John T. Stanton, the Complainant aforesaid, acquired the following described property in 1921, to-wit:

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two, Township Five South of Range Four East, thence running South forty Chains to a stake for a beginning corner, thence East Twenty Chains to a stake; thence South Ten chains, thence West Twenty Chains, thence North Ten Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest corner of Section Twenty-two, Township Five South of Range Four East, thence running South Fifty Chains for place of beginning; thence East Twenty Chains, Thence South Ten Chains, Thence West Twenty Chains to a stake on the Section Line, thence North Ten Chains to the place of beginning, containing Twenty Acres, all in Section Twenty-two, Township Five, South of Range Four East.

That he immediately went into the possession of the said

property and has continued therein ever since, and that during the time that he has owned the same he has paid the taxes on said property; that his said possession has been exclusive and adverse for more than ten years prior to the filing of this bill of complaint in this cause. That during his said occupancy of said lands he has been cultivating and farming the same by tenants and by himself, the said John T. Stanton's continuous occupancy of said lands having been for more than twelve years last passed.

D E C R E E.

It is, therefore, ordered, adjudged and decreed that the Complainant, John T. Stanton, is the absolute owner in fee simple of the following described property, to-wit:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two, Township Five, South of Range Four, East, thence running South Forty chains to a stake for a beginning corner, thence East Twenty Chains to a stake, thence South Ten chains, thence West Twenty Chains, thence North Ten Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two, Township Five, South of Range Four East, thence running South Fifty chains for place of beginning; thence East Twenty Chains, Thence South Ten Shains; thence West Twenty Chains to a stake on the Section Line, thence North Ten Chains to the place of beginning, containing Twenty acres, all in Section Twenty-two, Township Five, South of Range Four East.

It is further ordered, adjudged and decreed that all claims, rights, title, interest in, or incumbrance upon said lands held by any of said defendants, namely, J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, Minnie Lee Johansen, Henry Conway and Jessie Conway are hereby and herein declared null and void and is decreed to be a cloud upon the title of Complainant and removed as such.

It is further ordered, adjudged and decreed that a copy of the foregoing opinion and this decree shall be filed in the Probate Judge's office by the Register of this Court and recorded therein and is to be indexed in the direct index in said said office in the name of J. V. Conway, et al., and in the indirect index in the name of John T. Stanton.

It is further ordered, adjudged and decreed that the Complainant pay the cost of these proceedings.

This July 11th, 1933.

F. W. Hare
Judge.

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J.V.Conway,
Route 2, Biloxi, Miss,

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

John T. Stanton,

against said J.V.Conway,

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 18th day of October, 1932.

T. W. Richerson Register

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

Copy

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

~~J.V. Conway~~

John T. Stanton

vs.

J.V. Conway et al,

Myhart, Heard & Chason,
Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtle Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

(page two)

trying to ascertain these facts as shown by Paragraph
Bill of Complaint.

FIFTH:

Complainant further shows that no one within the
years next preceding the filing of this Bill of Complaint,
any taxes upon the said lands herein mentioned or any part of
them, other than the Complainant. Complainant has used such
diligence in trying to ascertain these facts as shown by paragraph
6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in
the actual, peaceable possession of said lands, claiming to own the
same under his purchases aforesaid, and that no one is known to
have been in the possession of said lands for the past ten years
other than the Complainant. And Complainant further avers that
there are no other persons that are known to your Complainant to
have had any possession whatsoever of said lands or any part there-
of within the last ten years next preceding the filing of this
Bill of Complaint, except those heretofore mentioned. And Com-
plainant further avers that no one is known to your Complainant to
have claimed this land or any part thereof, or any interest therein,
except the Complainant, and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mis-
sissippi;

Ernestine Conway, a minor, Route 2, Biloxi,
Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mis-
sissippi;

Edward Conway, a minor, Route 2, Biloxi, Mis-
sissippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Krtzinger & Sons' competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property, and that he afterwards employed the firm of Hybart, Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents, who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them Defendants to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama, authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described, and that no other person has any title to or interest in, or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof' and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index' and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County' Alabama' and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County' Alabama' and Complainant further prays for such other' further and different relief as in equity may seem just and meet' and your Complainant will ever pray.

Hyatt, Hend & Chason
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to' interest in' lien or encumbrance upon the property described in the Bill of Complaint or any part thereof' and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth" inclusive' but answer under oath is hereby expressly waived.

Hyatt, Hend & Chason
Solicitors for Complainant.

STATE OF ALABAMA'

BALDWIN COUNTY.

Personally appeared before me; Mary F. Green' a Notary Public in and for said County and State' R. C. Heard' who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause' and is duly authorized by him to make this oath' and that the facts stated in the foregoing Bill of Complaint upon knowledge are true' and that he is informed as to the facts stated upon, information and belief as therein stated' and verily believes' and so states' that the same are true.

R. C. Heard

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary J. Green
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

before me, the undersigned authority in and for said
State and County, personally appeared M. C. Heaps, who upon oath
deposes and says:
That J. V. Conway is the agent of the complainant in the above
cause, and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident
of the State of Alabama, residing at Route 2, Biloxi, Mississippi;
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 2, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years,
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That Mary Conway is over the age of twenty-
one years, and is a non-resident of the State of Alabama, residing
at Biloxi, Mississippi, Route 2; That T. A. Conway, Ernestine Con-
way, Frank Conway and Edward Conway are minors under the age of
twenty-one years, residing at Route 2, Biloxi, Mississippi, with
J. V. Conway, who is their natural guardian.

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary J. Green
Notary Public, Baldwin County,
State of Alabama.

Copy for
J. V. Conway

(Page 2142)



BILL OF COMPLAINT.

JOHN T. STANTON,

Complainant,

-vs-

J. V. CONWAY, HERMAN CON-
WAY, PEARL CONWAY, MARY
CONWAY, T. A. CONWAY, ERNES-
TINE CONWAY, FRANK CONWAY,
EDWARD CONWAY,

Defendants.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BAIDWIN COUNTY.

Filed October 16, 1932

D. W. Ransom
Register.



State of Alabama,
Baldwin County,
J. V. Conway, Plaintiff,
vs.
J. V. Conway, Herman Conway,
Pearl Conway, Mary Conway,
T. A. Conway, Ernestine Conway,
Frank Conway, Edward Conway,
Defendants.

J. V. Conway, who is their natural guardian,

D. W. Ransom

The State of Alabama, { Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J.V.Conway.

(Guardian of Frank Conway, a minor, Route 2, Biloxi, Miss.,

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
John T. Stanton,

against said J.V.Conway, Guardian of Frank Conway a minor,

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 18th day of

Oct 1932

T. W. Richerson Register

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

Original

SERVE ON

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton,

vs.

J.V. Conway as ,Guardian of

Frank Conway a minor,

Hybart, Heard & Chason.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Oct 18th/1932

*Copy of Bill of Complaint
Registered JV Conway,
As Guardian of
Frank Conway*

*W. H. H. H.
Register*

Original

SERVE ON

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton,

vs.

J.V. Conway as , Guardian of

Frank Conway a minor,

Hybart, Heard & Chason.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Oct 18th 1932

*Copy of Bill & Complaint
Registered JV Conway,
Att Guardian of
Frank Conway*

*W. H. H. H.
Register*

The State of Alabama, }
Baldwin County. } Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J. V. Conway, Guardian
for Edward Conway a minor,

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

against said _____
J. V. Conway, Guardian of Edward Conway a minor,

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 18th
October, 1932,

T. W. Richerson Register

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

Copy

SERVE ON.....
**Circuit Court of Baldwin County
In Equity.**

No.

SUMMONS

.....**John T. Stanton**.....

vs.

.....**J.V. Conway, Guardian of**
.....**for Edward Conway a minor,**

.....**Hybart, Heard & Chason.**

.....**Solicitor for Complainant**

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this.....
day of 192

.....**Sheriff.**

Executed this..... day of
..... 192

by leaving a copy of the within Summons with

.....**Defendant,**

.....**Sheriff.**

By
.....**Deputy Sheriff.**

Recorded in Vol..... Page.....

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtle Cooper, his wife, by Deed recorded in Book 51 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in
(page one)

(page two)

trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them, other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Sons, competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property, and that he afterwards employed the firm of Hybart, Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents, who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them Defendants to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama, authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described, and that no other person has any title to or interest in, or lien or encumbrance upon the

(page four)

lands or any part thereof, and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index, and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County, Alabama, and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County, Alabama, and Complainant further prays for such other, further and different relief as in equity may seem just and meet, and your Complainant will ever pray.

Hybert Heard & Chason
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to, interest in, lien or encumbrance upon the property described in the Bill of Complaint or any part thereof, and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth", inclusive, but answer under oath is hereby expressly waived.

Hybert Heard & Chason
Solicitors for Complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Personally appeared before me, Mary F. Green, a Notary Public in and for said County and State, R. C. Heard, who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause, and is duly authorized by him to make this oath, and that the facts stated in the foregoing Bill of Complaint upon knowledge are true, and that he is informed as to the facts stated upon information and belief as therein stated, and verily believes, and so states, that the same are true.

R. C. Heard

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

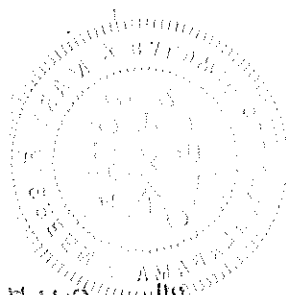
Mary E. Green
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

Before me, the undersigned authority in, and for said
State and County, personally appeared R. C. Heard, who upon oath
deposes and says:
That he is the agent of the Complainant in the above
cause and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident,
of the State of Alabama, residing at Route 2, Biloxi, Mississippi.
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 2, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That Mary Conway is over the age of twenty-
one years; and is a non-resident of the State of Alabama, residing
at Biloxi, Mississippi, Route 2; That T. A. Conway, Ernestine Con-
way, Frank Conway and Edward Conway are minors under the age of
twenty-one years, residing at Route 2, Biloxi, Mississippi, with
J. V. Conway, who is their natural guardian.

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary E. Green
Notary Public, Baldwin County,
State of Alabama.



State of Alabama.
ROBERTA DODDICO, BELGIAN CONWY,
Roberta Doddico

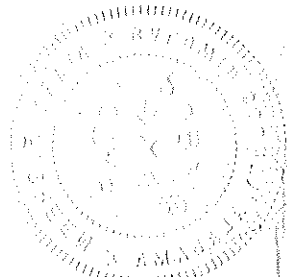
day of October, 1933.
is hereto entered, and
me, a Notary Public whose seal
is hereunto subscribed before

Roberta Doddico

J. A. Conway, who is their natural guardian.

BILL OF COMPLAINT.

JOHN T. STANTON,
Complainant
vs.
J. V. CONWAY, HERMAN CON-
WAY, PEARL CONWAY, MARY
CONWAY, T. A. CONWAY, ERN-
STINE CONWAY, FRANK CONWAY,
EDWARD CONWAY,
Defendants.
That HERMAN Conway is over the age of twenty-one years and is a
of the State of Alabama, residing at Route 3, Biloxi, Mississippi,
Conway is the son of twenty-one years and is a non-resident
County, and the defendant is the agent of the defendant
J. V. Conway, who is personally and personally
State of Alabama, Baldwin County, and is the undersigned
IN THE CIRCUIT COURT OF EQUITY, SIDE
STATE OF ALABAMA
BALDWIN COUNTY,
Filed October 1933
Register
who upon oath
and for said



get of October, 1933.
is hereto entered, and
me, a Notary Public whose seal
is hereunto subscribed before
by *for*
Conway
in for Edward
Conway
(page 214a)

The State of Alabama, } Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Herman Conway,

Route 2 Biloxi, Miss,

of Mississippi ~~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
John T. Stanton,

against said

Herman Conway,

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 18th

Oct 32 192

T. W. Richerson Register

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

Copy

SERVE ON.....

**Circuit Court of Baldwin County
In Equity.**

No.

SUMMONS

~~John T. Stalton~~

John T. Stalton

vs.

Herman Conway

Hybart, Heard & Chason

Solicitor for Complainant

Recorded in Vol. Page

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Copy

SERVE ON.....

**Circuit Court of Baldwin County
In Equity.**

No.

SUMMONS

~~John T. Stanton~~

John T. Stanton

vs.

Herman Conway

Hybart ,Heard & Chason

Solicitor for Complainant

Recorded in Vol.....Page.....

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By
Deputy Sheriff.

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtie Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

(page two)

trying to ascertain these facts as shown by Paragraph 5 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant, and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Krtzinger & Sons' competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property and that he afterwards employed the firm of Hybart' Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated' seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents, who have inhabited the country near these lands for a long time and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end' therefore' that equity may be done' Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway' Herman Conway' Pearl Conway' Mary Conway' T. A. Conway' Ernestine Conway' Frank Conway' Edward Conway' making them Defendants to this Bill of Complaint and requiring them to plead' answer or demur to the same within the time required by law and the practices of this Honorable Court' and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama' authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described' and that no other person has any title to or interest in' or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof' and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index' and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County, Alabama' and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County, Alabama' and Complainant further prays for such other' further and different relief as in equity may seem just and meet' and your Complainant will ever pray.

Hyatt Heard & Cheson
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to' interest in' lien or encumbrance upon the property described in the Bill of Complaint or any part thereof' and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth" inclusive' but answer under oath is hereby expressly waived.

Hyatt Heard & Cheson
Solicitors for Complainant.

STATE OF ALABAMA'

BALDWIN COUNTY.

Personally appeared before me; Mary F. Greer' a Notary Public in and for said County and State' R. G. Heard' who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause' and is duly authorized by him to make this oath' and that the facts stated in the foregoing Bill of Complaint upon knowledge are true' and that he is informed as to the facts stated upon, information and belief as therein stated' and verily believes' and so states' that the same are true.

R. G. Heard

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary E. Green
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA:

BALDWIN COUNTY.

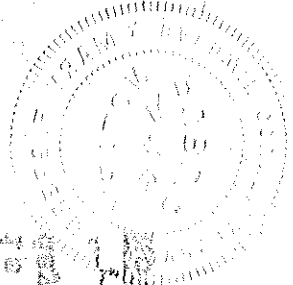
Before me, the undersigned authority in and for said
State and County, personally appeared R. C. Heard, who upon oath
deposes and says:—

That he is the agent of the Complainant in the above
cause, and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident
of the State of Alabama, residing at Route 2, Biloxi, Mississippi;
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 2, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years,
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That Mary Conway is over the age of twenty-
one years, and is a non-resident of the State of Alabama, residing
at Biloxi, Mississippi, Route 2; That T. A. Conway, Ernestine Con-
way, Frank Conway and Edward Conway are minors under the age of
twenty-one years, residing at Route 2, Biloxi, Mississippi, with
J. V. Conway, who is their natural guardian.

R. C. Heard

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary E. Green
Notary Public, Baldwin County,
State of Alabama.



State of Alabama,
Baldwin County,
Pearl Conway, Plaintiff,
vs.
J. V. Conway, Defendant.

T. A. Conway, who is both husband and guardian

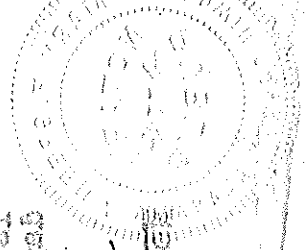
[Signature]

BILL OF COMPLAINT.

JOHN T. STANTON,
Complainant,
vs.
J. V. CONWAY, HERMAN CONWAY, PEARL CONWAY, MARY CONWAY, T. A. CONWAY, ERNESTINE CONWAY, FRANK CONWAY, EDWARD CONWAY,
Defendants.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY.

Filed October 18, 1932
Register.



State of Alabama,
Baldwin County,
Pearl Conway, Plaintiff,
vs.
J. V. Conway, Defendant.

[Signature]

(Duce Case)

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 10715, Term, 1935.

JOHN T. STANTON

, Complainant.

Vs.

J. V. CONWAY et al

Defendant.

Motion is hereby made for a Decree Pro Confesso against J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox, ~~Wanda Conway Summerall~~, ~~Wanda Conway Summerall~~, Minnie Lee Johansen, Henry Conway and Jesse Conway.

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

This 24th day of April, 1935.

Hyport, Mark O'Cheson
Solicitor.

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Pearl Conway

Route 2 Biloxi, Miss.

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

John T. Stanton,

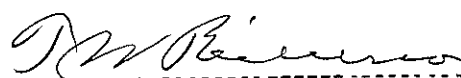
against said

Pearl Conway,

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 18th day of

October, 1923

 Register

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

Copy

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton

vs.

Pearl Conway.

Route 2 Biloxi, Miss.

Hybart, Heard & Chason,
Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtie Cooper, his wife, by Deed recorded in Book 51 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

(page two)

trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them, other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant, and the following named persons, viz:-

✓ J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

✓ Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

✓ Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Krtzinger & Sons' competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property, and that he afterwards employed the firm of Rybart, Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents, who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them Defendants to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama, authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described, and that no other person has any title to or interest in, or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof' and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index' and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County' Alabama' and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County' Alabama' and Complainant further prays for such other' further and different relief as in equity may seem just and meet' and your Complainant will ever pray.

Hyatt Henderson
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to' interest in' lien or encumbrance upon the property described in the Bill of Complaint or any part thereof' and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth" inclusive' but answer under oath is hereby expressly waived.

Hyatt Henderson
Solicitors for Complainant.

STATE OF ALABAMA'

BALDWIN COUNTY.

Personally appeared before me; Mary F. Green' a Notary Public in and for said County and State' R. C. Heard' who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause' and is duly authorized by him to make this oath' and that the facts stated in the foregoing Bill of Complaint upon knowledge are true' and that he is informed as to the facts stated upon, information and belief as therein stated' and verily believes' and so states' that the same are true.

R. C. Heard

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.



Mary F. Green
Notary Public, Baldwin County,
State of Alabama.

[Handwritten signatures and initials in the top right corner.]

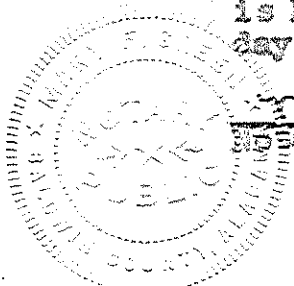
STATE OF ALABAMA:

WITNESSES:
J. T. JOHNSON,
Complainant.

Before me, the undersigned authority, in and for said
State and County, personally appeared H. C. Heard who upon oath
declared and swore that he is the agent of the complainant in the above
cause and is authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident
of the State of Alabama, residing at Route 2, Biloxi, Mississippi;
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 8, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That Mary Conway is over the age of twenty-
one years, and is a non-resident of the State of Alabama, residing
at Biloxi, Mississippi, Route 2; That T. A. Conway, Ernestine Con-
way, Frank Conway and Edward Conway are minors under the age of
twenty-one years, residing at Route 2, Biloxi, Mississippi, with
J. V. Conway, who is their natural guardian.

H. C. Heard

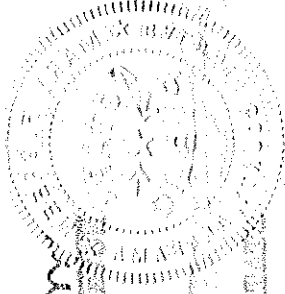
Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.



Mary F. Green
Notary Public, Baldwin County,
State of Alabama.

100-443887-100

Week 4 project



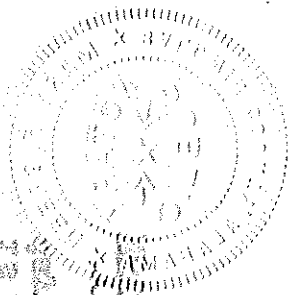
JOHN T. STANTON,
Complainant,
-vs-
J. V. CONWAY, HERMAN CON-
WAY, PEARL CONWAY, MARY
CONWAY, T. A. CONWAY, ERNE-
STINE CONWAY, FRANK CONWAY,
EDWARD CONWAY,
Defendants.

Filed October 20, 1932
R. M. Williams
 Register.

Copy for
Last Country

2018

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

[illegible]

HYBART, HEARD & CHASON
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

C. L. HYBART
R. C. HEARD
J. CHASON

JULY SIXTH, 1933.

Hon. C. L. Hybart,
Monroeville, Alabama.

Dear Sir:

I send you, through courtesy of Mr. Thames, the file in the case of Stanton vs. J. V. Conway et al, and would thank you to prepare the Decree for us and let us get it as soon as possible, for I want to get this man off of my hands as he is constantly inquiring of me as to when it will be finished.

With kindest personal regards, I am

Yours very truly,



RCH:G.
Enc.

NOTICE IS HEREBY GIVEN, that on this day John T. Stanton

has filed in the Circuit Court of Baldwin County, Alabama, in

Equity, his Bill of Complaint against the following described

lands, to-wit:-

TRACT NO. 1. Starting at the Northwest corner of
Section Twenty-two (22), Township Five (5) South
of Range Four (4) East, thence running South forty-
five (45) chains to a stake for a beginning corner,
thence East Twenty (20) chains to a stake; thence
South Ten (10) chains, thence West Twenty (20)
chains, thence North Ten (10) chains to the place
of beginning.

TRACT NO. 2. Also starting at the Northwest corner
of Section Twenty-two (22), Township Five (5) South
of Range Four (4) East, thence running South fifty-
five (55) chains for place of beginning; thence East
Twenty (20) chains, thence South Ten (10) chains,
thence West Twenty (20) chains to a stake on the
Section line, thence North Ten (10) chains to the
place of beginning, containing Twenty (20) Acres,
all in Section Twenty-two (22), Township Five (5)
South of Range Four (4) East;

and against the following named Defendants, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

J. V. Conway, a minor, Route 2, Biloxi, Mis-
sissippi;

Ernestine Conway, a minor, Route 2, Biloxi,
Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mis-
sissippi;

Edward Conway, a minor, Route 2, Biloxi, Mis-
sissippi.

The prayer of said Bill is to have declared in the said

John T. Stanton the title to the aforesaid lands, and the claim,

interest, title, lien or encumbrance of all persons whatsoever

to be declared a cloud upon the title of the said John T. Stanton

and by the appropriate Decree to be removed therefrom.

Solicitors for Complaint.

ITS PENDENS NOTICE.

NOTARIAL PUBLIC

NOTARIAL PUBLIC

NOTARIAL PUBLIC

NOTARIAL PUBLIC

LIS PENDENS NOTICE.

JOHN T. STANTON,

Complainant,

-VS-

J. V. CONWAY, HERMAN CONWAY, PEARL CONWAY, MARY CONWAY, T. A. CONWAY, IRNESTINE CONWAY, FRANK CONWAY, EDWARD CONWAY,

Defendants.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY.

Filed October 7, 1932

Register

WAY, PEARL CONWAY, MARY
CONWAY, T. A. CONWAY, ERNEST
TINE CONWAY, FRANK CONWAY,
EDWARD CONWAY,
defendants.

IN THE CIRCUIT COURT-EQUITY S
STATE OF ALABAMA
BALDWIN COUNTY.

Filed October 18, 1932

D. W. [Signature]
Register.

Mississippi; Edward Conway, a minor; Route 3, Biloxi, Mississippi;
Mississippi; Henry Conway, a minor; Route 8, Biloxi, Mississippi;
Mississippi; Investigative Conway, a minor; Route 5, Biloxi, Mississippi;
T. T. Conway, a minor; Route 3, Biloxi, Mississippi;
Route 3, Biloxi, Mississippi; Mary Conway, over twenty-one years of age.
Route 3, Biloxi, Mississippi;
Jesse Conway, over twenty-one years of age,
Route 3, Biloxi, Mississippi;
Route 3, Biloxi, Mississippi;
Thomas Conway, over twenty-one years of age;
Route 3, Biloxi, Mississippi;
T. T. Conway, over twenty-one years of age.

and if the appropriate Decree to be removed therefrom.
to be declared a storm upon the title of the said John E. Stanton
interest, title, lien or encumbrance of all persons whatsoever,
John E. Stanton, the title to the aforesaid lands, and the claim,
and prayer of said Bill is to have declared in the said

STATIONERY

[illegible]

1. The first of the following described parcels situated in the County of Berkeley, State of California, is:

8581 NOTE OF TESTIMONY

JOHN E. STANTON

Complainant

vs.

J. W. CONWAY ET AL.

Respondents

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
Decree Pro Confesso on Publication against Minnie Lee Johansen;
Henry Conway, Jessie Conway, J. V. Conway, Herman Conway, Pearl
Conway Summerall, Mary Conway Fox; Decree Pro Confesso on Personal
Service against Minnie Lee Johansen, Henry Conway, Jessie Conway,
J. V. Conway, Herman Conway, Pearl Conway, Summerall and Mary Conway
Fox; Testimony of W. R. Cooper and R. E. Hendricks;
and in behalf of ^{minor} Defendants upon T. A. Conway, Ernestine Conway, Frank
Conway and Edward Conway, by appearance of S. C. Jenkins as Guardian
Ad Litem.

T. W. Rievers

Register.

No. _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

VS

NOTE OF TESTIMONY

Filed in Open Court this

day of

1933

Register

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 31 N. S., page 394 and the title to Tract No. 2 by Deed from Charles Cooper and Myrtie Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama, both as shown by Exhibits "A" and "B" hereto attached and made a part hereof.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, A

bama, in his name. The Complainant has used such dili
(page one)

(page two)

trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them, as shown by Exhibit "C" hereto attached and made a part of them, other than the Complainant. / Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Sons, competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property, and that he afterwards employed the firm of Hybart, Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them Defendants to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama, authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described, and that no other person has any title to or interest in, or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof, and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index, and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County, Alabama, and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County, Alabama, and Complainant further prays for such other, further and different relief as in equity may seem just and meet, and your Complainant will ever pray.

Hybart Heard & Chason
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to, interest in, lien or encumbrance upon the property described in the Bill of Complaint or any part thereof, and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth", inclusive, but answer under oath is hereby expressly waived.

Hybart Heard & Chason
Solicitors for Complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Personally appeared before me, Mary F. Green, a Notary Public in and for said County and State, R. C. Heard, who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause, and is duly authorized by him to make this oath, and that the facts stated in the foregoing Bill of Complaint upon knowledge are true, and that he is informed as to the facts stated upon information and belief as therein stated, and verily believes, and so states, that the same are true.

R. C. Heard

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary E. Green.
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA:

BALDWIN COUNTY.

Before me, the undersigned authority in and for said
State and County, personally appeared R. C. Heard, who upon oath
deposes and says:-

That he is the agent of the Complainant in the above
cause, and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident
of the State of Alabama, residing at Route 2, Biloxi, Mississippi;
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 2, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi; That Mary Conway is over the age of twenty-one years,
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That T. A. Conway, Ernestine Conway, Frank
Conway and Edward Conway are minors under the age of twenty-one
years, residing at Route 2, Biloxi, Mississippi, with J. V. Conway,
who is their natural guardian.

R. C. Heard

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary E. Green
Notary Public, Baldwin County,
State of Alabama.

EXHIBIT "A".

DEED WITH WARRANTY.

THIS DEED made the 30th day of August 1921 between Josephine White a widow of the first part and John T. Stanton of the second part.

WITNESSETH. That the party of the first part, in consideration of Seven Hundred Fifty and no/100 (\$750.00) Dollars, to me in hand paid by the party of the second part, the receipt of which is hereby acknowledged, have bargained and sold, and by these presents does grant, bargain, sell convey and deliver unto the said party of the second part his heirs and assigns forever, all that real property in Baldwin County, Alabama, described as follows, to-wit:-

Starting at the North-west corner of Section Twenty-two (22), thence running South forty (40) chains to a stake, for a beginning corner, thence East Twenty (20) chains to a stake, thence South ten (10) chains, thence West Twenty (20) Chains to a stake on the Section line, thence North ten (10) chains to place of beginning, containing twenty (20) acres, all in Section Twenty-two (22), Township Five (5) South Range Four (4) East in Baldwin County, Alabama.

TOGETHER with all appurtenances thereunto belonging, to have and to hold forever and against any person lawfully claiming the same, said party of the first part shall ever warrant and defend.

IN WITNESS WHEREOF, the party of the first part have hereunto set her hands and seal the day and year first above written.

Josephine White

(SEAL)

Signed, sealed and delivered
in the presence of
A. J. Aubert
J. L. White

STATE OF ALABAMA.

BALDWIN COUNTY.

I, A. J. Aubert, Justice of the Peace in and for said County and State, hereby certify that Josephine White, a widow whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance has executed the same voluntarily on the day the same bears date.

Given under my hand and seal this 30th day of August, 1921.

A. J. Aubert.
Justice of the Peace.

(SEAL)

STATE OF ALABAMA,
BALDWIN COUNTY.

PROBATE COURT.

Filed in my office for record this 22nd day of Dec. 1921, and recorded in Deed Book No. 31 N. S. Pages 394.

James M. Voltz.
Judge of Probate.

EXHIBIT "B".

DEED WITH WARRANTY.

THIS DEED made the 27th day of December, 1921 between Charlie Cooper and Mertie Cooper his wife of the first part and John T. Stanton of the second part.

WITNESSETH. That the party of the first part, in consideration of Five Hundred and no/100 Dollars to us in hand paid by the party of the second part, the receipt of which is hereby acknowledged, have bargained and sold, and by these presents does grant, bargain, sell, convey and deliver unto the said party of the second part his heirs and assigns forever, all that real property in Baldwin County, Alabama, described as follows, to-wit:

Starting at the Northwest (NW) corner of Section Twenty two (22) thence running South fifty (50) chains for a place of beginning, thence east twenty (20) chains, thence South ten (10) chains, thence West Twenty (20) chains to a stake on Section line, thence North ten (10) chains to place of beginning, containing twenty (20) acres all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East, in Baldwin County, State of Alabama.

TOGETHER with all appurtenances thereunto belonging, to have and to hold forever and against any person lawfully claiming the same, said party of the first part shall ever warrant and defend.

IN WITNESS WHEREOF, the parties of the first part have hereunto set their hands and seal the day and year first above written.

Charlie Cooper (SEAL)

Mertie Cooper (SEAL)

STATE OF ALABAMA:

BALDWIN COUNTY.

I, A. J. Aubert, Justice of the Peace in and for said County and State, hereby certify that Charlie Cooper and Mertie Cooper his wife whose name 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 have executed the same voluntarily on the day the same bears date.

Given under my hand and seal this 27 day of December, 1921.

(SEAL)

A. J. Aubert
Justice of the Peace.

STATE OF ALABAMA,

BALDWIN COUNTY.

I, A. J. Aubert, Justice of the Peace in and for said County and State, do hereby certify that on the 27 day of December 1921, came before me the within named Mertie Cooper, known to me to be the wife of the within named Charlie Cooper, who being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord, and without fear, constraint or threats on the part of her husband.

(page one)

(page two)

IN WITNESS WHEREOF, I hereunto set my hand and seal
this 27 day of December, 1921.

(SEAL)

A. J. Aubert
Justice of the Peace.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

PROBATE COURT.

Filed in my office for record this 29th day of Dec.
1921. and recorded in Deed Book No. 31 W. S. Pages 399 and ex-
amined.

Jas. M. Voltz,
Judge of Probate.
By J. L. Kessler, Clerk.

EXHIBIT "C".

RECORD OF TAXES PAID ON THE NW $\frac{1}{4}$ OF SW $\frac{1}{4}$, SECTION 22, TOWNSHIP 5 SOUTH, RANGE 4 EAST, FROM 1923 TO 1933, INCLUSIVE:-

1923:- Tax Book 2, page 74, Beat 9, Loxley & Robertsdale. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East.....PAID.

1924:- Tax Book 2, page 90, Beat 9, Loxley & Robertsdale. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East.....PAID.

1925:- Tax Book 2, page 101, Beat 9, Loxley & Robertsdale. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1926:- Tax Book 2, page 78, Beat 9, Loxley and Robertsdale. Assessment No. 875. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1927:- Tax Book 2, page 83, Beat 9, Loxley and Robertsdale. Assessed to John T. Stanton. Assessment No. 984. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1928:- Tax Book 2, page 95, Beat 9, Loxley and Robertsdale. Assessment No. 961. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1929:- Tax Book 2, page 90, Beat 9, Loxley and Robertsdale. Assessment No. 1014. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1930:- Tax Book 2, page 89, Beat 9, Loxley and Robertsdale. Assessment No. 1011. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East...(with other land) Marked.....PAID.

1931:- Tax Book 2, page 91, Beat 9, Robertsdale & Silverhill. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1932:- Beat 9, Robertsdale & Silverhill. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Marked.....PAID.

1933:- Beat 9, Robertsdale & Silverhill. Assessed to John T. Stanton. NW $\frac{1}{4}$ of SW $\frac{1}{4}$ Section 22, Township 5 South, Range 4 East. Not yet due.

No.

Page

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

John Martin

vs.

J V Conway

**DECREE PRO CONFESSO
ON PUBLICATION**

Issued *April* 19*33*

J W McNamee

Register.

Recorded in Record

Vol. Page

Register.

Moore Printing Company, Bay Minette, Ala.

JOHN T. STANTON

Complainant

-vs-

J. V. CONWAY ET AL.

Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause it being made to appear to the Register that a Summons was served on the Defendants, Minnie Lee Johansen, Henry Conway, Jessie Conway, J. V. Conway and Herman Conway, Pearl Conway Summerall, Mary Conway Fox by registered mail, return receipt demanded, requiring them to appear and plead, answer or demur, to the Bill of Complaint in this cause within thirty days from the service of said Summons, and the said Defendants, Minnie Lee Johansen, Henry Conway, Jessie Conway, Pearl Conway Summerall, Mary Conway Fox, J. V. Conway and Herman Conway, having failed to plead, answer or demur to the said Bill to the date hereof, it is now therefore, on Motion of Complainant, 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 Defendants aforesaid.

WITNESS my hand this 30th day of May, 1933.

E. M. Ruckman
Register.

The State of Alabama, }
Baldwin County

Circuit Court of Baldwin County, In Equity

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

WE COMMAND YOU, That you summon Pearl Conway Summerall,

Route 2, Bilxoi, Mississippi,

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 Bill of Complaint lately exhibited by
amended

JOHN T. STANTON

against said PEARL CONWAY SUMMERALL, 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 20th day of
February 1933

T. W. Richerson Register

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

SERVE ON

Circuit Court of Baldwin County

In Equity

No.

SUMMONS

JOHN A. GRAYSON

VS.

PERAL GONZALEZ SUAREZ

WITNESSETH

Solicitor for Complainant

WITNESS, THOMAS A. GRAYSON

Recorded in Vol

Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

19

Sheriff

Executed this day of

19

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff

copy of recorded bill and

py of summons sent by regis

tered bill to court convey

summons, filed

2/20/83

SERVE ON _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

JOHN T. GRANTON

vs.

PERAL CONWAY SUMMERALL,

Defendant.

WYATT, THOMAS A. CHASON

Solicitor for Complainant

Recorded in Vol. _____ Page _____

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.

copy of amended bill and copy of summons sent by registered mail to Pearl Conway Summerall, Biloxi, Miss., 2/20/33

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22) Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtle Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

(page two)

trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes ~~there~~ upon the said lands herein mentioned or any part of them, other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Sons, competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property, and that he afterwards employed the firm of Hybart, Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them Defendants to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama, authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described, and that no other person has any title to or interest in, or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof, and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index, and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County, Alabama, and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County, Alabama, and Complainant further prays for such other, further and different relief as in equity may seem just and meet, and your Complainant will ever pray.

Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to, interest in, lien or encumbrance upon the property described in the Bill of Complaint or any part thereof, and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth", inclusive, but answer under oath is hereby expressly waived.

Solicitors for Complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Personally appeared before me, Mary F. Green, a Notary Public in and for said County and State, R. C. Heard, who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause, and is duly authorized by him to make this oath, and that the facts stated in the foregoing Bill of Complaint upon knowledge are true, and that he is informed as to the facts stated upon information and belief as therein stated, and verily believes, and so states, that the same are true.

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this _____
day of October, 1932.

Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned authority in and for said
State and County, personally appeared R. C. Heard, who upon oath
deposes and says:-

That he is the agent of the Complainant in the above
cause, and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident
of the State of Alabama, residing at Route 2, Biloxi, Mississippi;
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 2, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That Mary Conway is over the age of twenty-
one years, and is a non-resident of the State of Alabama, residing
at Biloxi, Mississippi, Route 2; That T. A. Conway, Ernestine Con-
way, Frank Conway and Edward Conway are minors under the age of
twenty-one years, residing at Route 2, Biloxi, Mississippi, with
J. V. Conway, who is their natural guardian.

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this _____
day of October, 1932.

Notary Public, Baldwin County,
State of Alabama.

BILL OF COMPLAINT.

1. The first step is to identify the problem. This involves understanding the symptoms and the context in which they are occurring.

JOHN T. STANTON,
Complainant,
vs.
J. V. CONWAY ET AL.
Defendants.

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

Filed
~~XXXXXX~~ December 1938
Register.

IN THE CIRCUIT COURT IN SEAGUY

STATE OF ALABAMA
BALDWIN COUNTY.

Filed
~~XXXXXX~~ December 1932
Register.

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2000

JOHN T. STANTON'

Complainant'

-vs-

J. V. CONWAY' HERMAN CONWAY'
PEARL CONWAY SUMMERALL' MARY
CONWAY FOX' T. A. CONWAY'
ERNESTINE CONWAY' FRANK CON-
WAY' EDWARD CONWAY' MINNIE
LEE JOHANSEN' HENRY CONWAY'
JESSIE CONWAY'

Defendants.

IN THE CIRCUIT COURT-IN EQUITY

STATE OF ALABAMA

BALDWIN COUNTY.

Now comes the Complainant in the above cause' and by leave of the Court first had and obtained' amends the Sixth Paragraph of the original Bill of Complaint to read as follows:

SIXTH:

Complainant further shows unto the Court that he is in the actual' peaceable possession of said lands' claiming to own the same under his said purchases aforesaid' and that no one is known to have been in the possession, of said lands for the past ten years other than the Complainant' and Complainant avers that there are no other persons known to Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint' except those heretofore mentioned' and Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof' or interest therein' except the Complainant and the following named persons:-

Minnie Lee Johansen' over the age of 21 years'
Pensacola' Florida;

Henry Conway' over the age of 21 years' Biloxi'
Mississippi;

Jessie Conway' over the age of 21 years' Biloxi'
Mississippi;

J. V. Conway' over the age of 21 years' Route
2' Biloxi' Mississippi;

Herman Conway' over the age of 21 years' Route
2' Biloxi' Mississippi;

Pearl Conway Summerall' over the age of 21 years'
Route 2' Biloxi; Mississippi;

Mary Conway Fox' over the age of 21 years' Route
2' Biloxi' Mississippi;

(page two)

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Brtzinger & Son, competent abstractors. He then employed the Hon. Norborne Stone to examine the same to ascertain whom the records showed to have some claim to this property, and that he afterwards employed the firm of Hybart, Heard & Chason to examine the title to this property. That they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties, or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

Complainant also amends his Prayer for Process to read as follows:-

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to Minnie Lee Johansen, Henry Conway, Jessie Conway, J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them defendants to this amended Bill of Complaint, and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable

(page two)

(page three)

Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this amended Bill of Complaint as required by law in the State of Alabama authorizing quieting of title in rem.

Hybert, Herd & Chan
Solicitors for Complainant.

FILED IN THE OFFICE OF THE CLERK OF THE COURT

W. A. HERD

1938

W. A. HERD

RECORDED

IN THE OFFICE OF THE CLERK OF THE COURT

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RECORDS SECTION

FILED
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JAN 10

Hybert, Herd & Chan
W. A. Herd
W. A. Herd

THE UNIVERSITY OF CHICAGO

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- 78 -

Defendants:

STATE OF ALABAMA

BALDWIN COUNTY.

1870

W. P. Dickerson
 REGISTER.

Pearl Conway
Summersell
Bilotti

RETURN RECEIPT

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

(Signature of addressee's agent)

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RETURN RECEIPT

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UNITED STATES POSTAL SERVICE
REGISTERED ARTICLE
OFFICIAL BUSINESS
No. 62 824
INSURED PARCEL
No. 1
Return to J. W. Beckman
Street and Number
at Post Office Box
Post Office at
State
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UNITED STATES POSTAL SERVICE
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Street and Number
at Post Office Box
Post Office at
State

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Baldwin County
BAY MINETTE, ALA.

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Return Receipt Requested
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J. V. Conway
Guardian of T.A.
Conway & Minor
Route 2 Biloxi Miss.

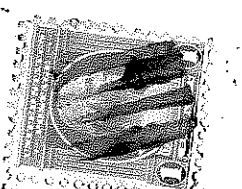
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Baldwin County
BAY MINETTE, ALA.

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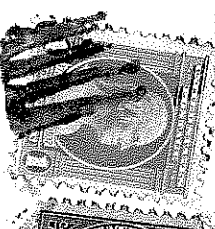
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J. V. Conway,
Guardian of Frank Conway
a minor.
Route 2 Biloxi, Miss.

Deliver to addressee only

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T. W. RICHERRSON
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.

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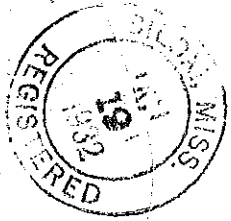
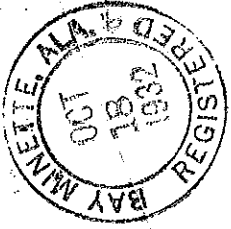


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J. V. Conway
Guardian of Ernestine
Conway a minor
Biloxi Miss. (Route 2)

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(Deliver to addressee only)

Deliver to addressee only



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T. W. RICHMOND
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.

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(Deliver to addressee only)

~~J.V. Conway,
Route 2 Bixi, Miss~~

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REGISTER AND CLERK OF THE CIRCUIT
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~~J. V. Conway, Guardian for Edward Conway and for Route 2, Elbert, Miss.~~

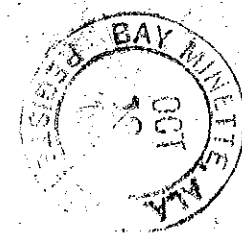
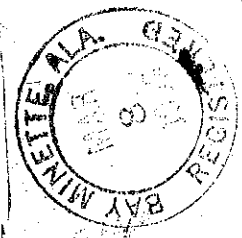
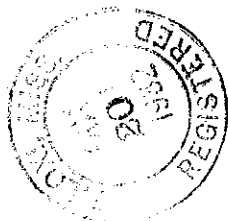
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Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.

RETURN TO WRITER
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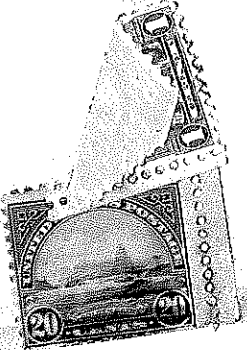
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(Deliver to addressee only)

Pearl Conway
~~Route 2 Elwood, Miss.~~

Deliver to addressee only.

Postage Requested,
Fee Paid.



After five days return to
T. W. RICHERSON
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.

RETURN TO WRITER
REASON FOR NON-DELIVERY CANCELED

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(Deliver to addressee only)

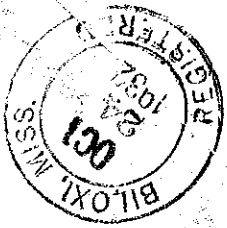
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Postage Requested,
Fee Paid.

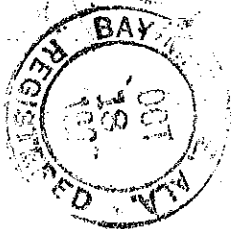
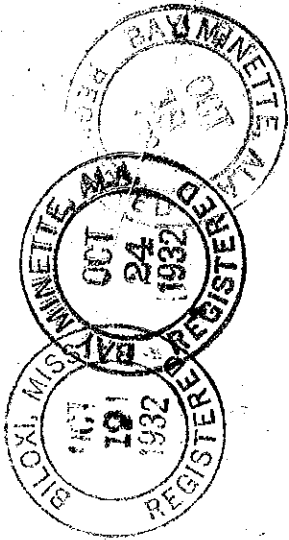


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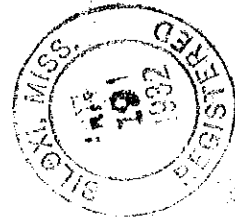
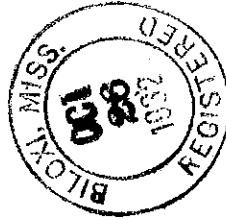
Herman Conway
~~Route 2 Elwood, Miss.~~



Register
10/24/32
26 K.



for house at
Anguilla, Miss.
R-1 - Box 14
10/20/32



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 J.V.Conway, Guardian of Ernestine
Conway a minor, Route 2 Biloxi, Miss,

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

John T.Stanton,

against said J.V.Conway, Guardian of Ernestine Conway a minor,

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 18th
October, 1932.

T. W. Richerson Register

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

Copy

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton

vs.

J.V. Conway, Guardian of

Bernestine Conway a Minor.

Hybart, Heard & Chason,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

..... 192

by leaving a copy of the within Summons with

Defendant,

Sheriff

By

Deputy Sheriff.

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtle Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

(page two)

trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant, and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Sons' competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property' and that he afterwards employed the firm of Hybart' Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated' seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents, who have inhabited the country near these lands for a long time' and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end' therefore' that equity may be done' Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway' Herman Conway' Pearl Conway' Mary Conway' T. A. Conway' Ernestine Conway' Frank Conway' Edward Conway' making them Defendants to this Bill of Complaint and requiring them to plead' answer or demur to the same within the time required by law and the practices of this Honorable Court' and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama' authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described' and that no other person has any title to or interest in' or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof' and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index' and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County' Alabama' and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County' Alabama' and Complainant further prays for such other' further and different relief as in equity may seem just and meet' and your Complainant will ever pray.

Hybart Heard Thoson
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to interest in' lien or encumbrance upon the property described in the Bill of Complaint or any part thereof' and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth" inclusive' but answer under oath is hereby expressly waived.

Hybart Heard Thoson
Solicitors for Complainant.

STATE OF ALABAMA'

BALDWIN COUNTY.

Personally appeared before me; Mary F. Green' a Notary Public in and for said County and State' R. C. Heard' who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause' and is duly authorized by him to make this oath' and that the facts stated in the foregoing Bill of Complaint upon knowledge are true' and that he is informed as to the facts stated upon, information and belief as therein stated' and verily believes' and so states' that the same are true.

R. C. Heard

(page four)

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 18th day of October, 1932.

W. V. Heard
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA

BALDWIN

COUNTY.

Before me, the undersigned authority in and for said State and County, personally appeared R. C. Heard, who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause, and is duly authorized by him to make this oath; that J. V. Conway is over the age of twenty-one years and is a non-resident of the State of Alabama, residing at Route 2, Biloxi, Mississippi; that Herman Conway is over the age of twenty-one years and is a non-resident of the State of Alabama, residing at Route 2, Biloxi, Mississippi; That Pearl Conway is over the age of twenty-one years, and is a non-resident of the State of Alabama, residing at Biloxi, Mississippi; Route 2; That Mary Conway is over the age of twenty-one years; and is a non-resident of the State of Alabama, residing at Biloxi, Mississippi; Route 2; That T. A. Conway, Ernestine Conway, Frank Conway and Edward Conway are minors under the age of twenty-one years, residing at Route 2, Biloxi, Mississippi, with J. V. Conway, who is their natural guardian.

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 18th day of October, 1932.

W. V. Heard
Notary Public, Baldwin County,
State of Alabama.

The State of Alabama, { Circuit Court of Baldwin County, In Equity.
To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon
Herman Conway,
Route 2 Biloxi, Miss.

of Mississippi, 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
John T. Stanton,

against said
Herman Conway,

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. Richardson, Register of said Circuit Court, this 18th day of

Oct 1952

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

~~John T. StaEnton~~

John T. StaEnton

vs.

Herman Conway

Route 2 Diloxi, Miss.

Hybart, Heard & Chason.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By.....

Deputy Sheriff.

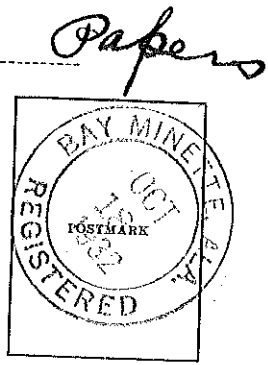
Act 18th 1932
Copy of Summons & Complaint
Registered Herman Conway
Route 2 Diloxi Miss

RECEIPT FOR REGISTERED ARTICLE NO.

15 fee paid. class postage paid. 10-18-1932
 From J.W. Richardson (Sender) City

Addressed to Mary Conway (Post office and State)
 Rt. 2 Biloxi (Address)
 (Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery.
 Return receipt fee 3 in person ☒ Special delivery fee
 Delivery restricted to addressee { or order Postmaster, per L

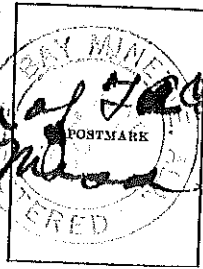


RECEIPT FOR REGISTERED ARTICLE NO.

15 fee paid. class postage paid. 10-18-1932
 From J.W. Richardson (Sender) City

Addressed to J.V. Conway (Post office and State)
 a minor Route 20 Biloxi (Address)
 (Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery.
 Return receipt fee 3 in person ☒ Special delivery fee
 Delivery restricted to addressee { or order Postmaster, per L

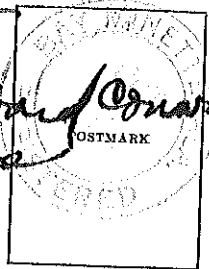


RECEIPT FOR REGISTERED ARTICLE NO.

15 fee paid. class postage paid. 10-18-1932
 From J.W. Richardson (Sender) City

Addressed to J.V. Conway (Post office and State)
 a minor Route 20 Biloxi (Address)
 (Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery.
 Return receipt fee 3 in person ☒ Special delivery fee
 Delivery restricted to addressee { or order Postmaster, per L

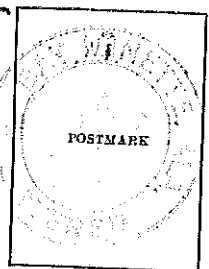


RECEIPT FOR REGISTERED ARTICLE NO.

15 fee paid. class postage paid. 10-18-1932
 From J.W. Richardson (Sender) City

Addressed to J.V. Conway (Post office and State)
 Rt. 2 Biloxi (Address)
 (Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery.
 Return receipt fee 3 in person ☒ Special delivery fee
 Delivery restricted to addressee { or order Postmaster, per L



The State of Alabama, {
Baldwin County }

CIRCUIT COURT

To T.W. Richerson, Jr.,

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine John T. Stanton, Will Cooper and Kendrick

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein John T. Stanton

Complainant
and J.V. Conway, Et al.,

Defendant,
on oath to be by you administered, upon them
to take and certify the deposition S. of the witnesses. and return the same to our Court, with all convenient speed, under your hand.

Witness 9th day of May 19 23

T.W. Richerson

REGISTER

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

NO. _____

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

John T. Stanton

Complainant

vs.

J.V. Conway, Et al.,

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

T.W. Richerson, Jr.,

WITNESSES:

Will Cooper, J.T. Stanton

Kendrick

NO. _____

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

John T. Stanton

Complainant
vs.

J.V. Conway, Et al.,

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

T.W. Richerson, Jr.,

WITNESSES:

Will Cooper, J.T. Stanton

Kendrick

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 Jesse Conway,

Biloxi, Mississippi,

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

John T. Stanton

against said Jesse Conway, 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 20th day of

February 193 3

T. W. Richerson Register

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

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____
SUMMONS

JOHN T. STANTON
vs.
JESSE CONWAY, ET AL.,

Hybart, Heard & Chason
Solicitor for Complainant

Recorded in Vol _____ Page _____

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

Copy of amended bill and
summons sent by registered
mail to Jesse Conway, B1-
10x1, Miss., 2/20/33

T. W. RICHMONSON
REGISTER.

T. W. Richmondson

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 192

J. T. STANTON, _____, Complainant.

vs.

J. V. CONWAY ET AL. _____, Defendant. S

To T. W. RICHMOND, 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 Hybart, Heard & Chason, his

_____ 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.

Hybart, Heard & Chason
Solicitors for Complainant.

The State of Alabama, } Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J.V.Conway,
Route 2,Biloxi, Miss,

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

John T.Stanton,

against said J.V.Conway,

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 18th day of October, 1932.

T.W. Richerson Register

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

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

~~John T. Stanton~~

John T. Stanton

vs.

J.V. Conway et al,

Lybart, Heard & Chason,
Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

Oct 18th 1932
Copy of Summons &
Copy of Bill Registered
J.V. Conway Route 2
Blount County
W. H. Simmons
Register

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

~~John T. Stanton~~

John T. Stanton

vs.

J.V. Conway et al,

Lybart, Heard & Chason,
Solicitor for Complainant

Recorded in Vol..... Page.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of..... 192

Sheriff.

Executed this..... day of.....

192

by leaving a copy of the within Summons with.....

Defendant,

Sheriff.

By

Deputy Sheriff.

*Act 18th 1932
Copy of Summons
Copy of Bill Registered
J.V. Conway Route 2
Birmingham
R.M. Williams
Register*

J. T. STANTON

Complainant.

-vs-

J. V. CONWAY ET AL.

Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Comes J. T. Stanton, Complainant, by Hybart, Heard & Chason, as his Solicitors of Record, and makes this his application to the Register of this Court for an oral examination of the following witnesses for Complainant, all the witnesses being citizens of and residing in the State of Alabama, viz:-

W. R. Cooper,

R. H. Kendricks;

such examination to be taken before T. W. Richerson, the Register of this Court.

Hybart, Heard & Chason
Solicitors for Complainant.

The foregoing Application coming on to be heard is granted, and it is ordered that the oral examination of said witnesses be had at the office of the Register at the Courthouse at Bay Minette, Alabama, on the 9th day of May, 1933, at 1:30 o'clock; that notice thereof be given for ten days by an entry on the Order Book of the Register.

Dated this 26th day of April, 1933.

T. W. Richerson
Register.

Application for
Prob & annuities

Filed Apr 28/1933
PA Williamson
Register

Williamson

The State of Alabama, } Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J.V.Conway, Guardian of
T.A.Conway, a minor

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

against said J.V.Conway, Guardian of T.A.Conway a minor,

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 18th day of
October, 1932. 192

T. W. Richerson Register

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

Original

SERVE ON

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton

vs.

J.V. Conway, Guardian of

P.A. Conway a minor.

Hybart, Heard & Chason,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

Oct 18th 1932
Copy of Bill & Copy of
Summons. Registered
J.V. Conway Guardian of
P.A. Conway a minor.
J.M. Ransom
Register

The State of Alabama,
Baldwin County. } Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mary Conway,

Route 2 Biloxi, Miss,

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
..... John T. Standard,

against said Mary Conway.

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 18th day of

October, 1932.

DM Rimmer Register

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

SERVE ON

No.

John P. Hanton

VS.

Mary Conway

Hyatt, Hood & Cron
Solicitor for Complainant

Recorded in Vol.....Page.....

Received in office this.

day of 192

Sheriff.

Executed this _____ day of _____

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By _____ Deputy Sheriff

Oct 18th 1932
Copy of Bill & Son's
Registered Mary Conway,
J. W. Richardson
Registered

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John B. Hanton

vs.

Mary Conway

Hyatt H. Hurd

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Oct 18th 1932
Copy of Rice v. Summons,
Registered Mary Conway,
D. W. Richardson
Register

The State of Alabama, }
Baldwin County. } Circuit Court of Baldwin County, in Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J. V. Conway, Guardian
for Edward Conway a minor,

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

against said

J. V. Conway, Guardian of Edward Conway a minor,...

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 18th day of October, 1932,

Dr. P. K. ... Register

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

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton

vs.

J.V. Conway, Guardian of

for Edward Conway a minor,

Hybart, Heard & Chason.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff,

Oct 18th / 1932
Copy of Summons to
W. H. of Complainant
Registered J. V. Conway
Residence of
Edward Conway a
Minor Plaintiff
Robert L. Smith
R. L. Smith
Register

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John A. Stanton

vs.

J.V. Conway, Guardian of
for Edward Conway a minor,

Hybart, Heard & Chason.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Oct 18th/1932
Copy of Summons &
Copy of Complaint
Registered J.V. Conway
Solicitor of
Edward Conway a
Minor Rattle
Belotti miss
M. H. H. H.
August

The State of Alabama, } Circuit Court of Baldwin County, In Equity,
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J.V.Conway, Guardian of Ernestine
Conway a minor, Route 2 Biloxi, Miss,

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

John P. Stanton,

against said J.V.Conway, Guardian of Ernestine Conway a minor,

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 18th
October, 1932.

T. W. Richerson Register

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John L. Stanton

vs.

J.V. Conway, Guardian of
Ernestine Conway a Minor,

Hybart, Heard & Chason,
Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

..... 192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Oct 18th 1932
Copy of Bill & Copy of
Complaint Registered
JV Conway Guardian
of Ernestine Conway
Route 2 Blot & River
W. H. H. H. H.
Register

The State of Alabama, } Circuit Court of Baldwin County, In Equity
 Baldwin County

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

WE COMMAND YOU, That you summon Pearl Conway Summerall,

Route 2, Biloxi, Mississippi,

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


JOHN T. STANTON

against said PEARL CONWAY SUMMERALL, 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 20th day of

February 1933

 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

JOHN T. STANTON

vs.

PERAL CONWAY SUMMERALL,

ETAL.,

HYBART, HEARD & CHASON

Solicitor for Complainant

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,

copy of amended bill and co
py of summons sent by regis
tered mail to Pearl Conway
Summerall, Biloxi, Miss.,
2/20/33

J. M. Richardson

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 Henry Conway,

Biloxi, Mississippi,

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

John T. Stanton

against said Henry Conway, 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 20th day of

February 193 3

T. W. Richerson Register

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

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

JOHN T. STANTON

vs.

HENRY CONWAY, ET AL.,

Solicitor for Complainant

Recorded in Vol _____ Page _____

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

Copy of amended bill and
summons sent by registered
mail to Henry Conway, Bi-
loxi Mississippi, 2/20/33

W. M. Nicholson

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 Minnie Lee Johansen,

(Pensacola, Fla.,)

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

John T. Stanton

against said Minnie Lee Johansen, 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 20th day of

February 193 3

T. W. Richerson Register

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

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

JOHN T. STANTON

vs.

MINNIE LEE JOHANSEN

ET AL

Hybart, Heard & Chason
Solicitor for Complainant

Recorded in Vol _____ Page _____

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.

Copy of Bill and summons
sent by registered mail
to Minnie Lee Johansen,
Pensacola, Fla. 2/20/33

M. Fishburne

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 Mary Conway, Fox,

Route 2, Biloxi, Miss.

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

JOHN T. STANTON

against said MARY CONWAY FOX

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 20 day of

February 193 3

T. W. Richerson Register

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

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

JOHN T. STANTON

vs.

MARY CONWAY FOX, ET AL.,

HYBART, HEARD & CHASON

Solicitor for Complainant

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,

Copy of amended bill and
summons sent by registered
mail to Mary Conway Fox,
Biloxi, Miss., 2/20/33

W. Richardson

Recorded in Vol _____ Page _____

SERVE ON _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

JOHN T. STANTON

vs.

MARY CONWAY FOX, ET AL.,

HYBART, HEARD & CHASON

Solicitor for Complainant

Recorded in Vol. _____ Page _____

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.

Copy of amended bill and
summons sent by registered
mail to Mary Conway Fox,
Biloxi, Miss., 2/20/33

W. M. Richardson

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Pearl Conway

Route 2 Biloxi, Miss,

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

John T. Stanton,

against said

Pearl Conway,

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 18th day of October, 1932

T. W. Richerson

Register

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

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton

vs.

Pearl Conway.

Route 2 Biloxi, Miss,

Hybart, Heard & Chason,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of 192

Sheriff.

Executed this..... day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Oct 18th, 1932
Copy of Bill of Summons
Registered Pearl Conway
J. McKinnon
Register

W. R. COOPER, WITNESS FOR COMPLAINANT, BEING DULY SWORN TESTIFIED
AS FOLLOWS:-

My name is W. R. Cooper. I am 47 years of age and a resident of Baldwin County, Alabama, where I have resided all my life. I am personally and intimately acquainted with the following described lands in Baldwin County, Alabama:-

Starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South Forty Chains to a stake for a beginning corner, thence East twenty chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains; thence North Ten (10) Chains to the place of beginning.

Also starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South 50 chains for place of beginning; thence East 20 chains, thence South 10 Chains, thence West 20 chains to a stake on the Section line, thence North 10 Chains to the place of beginning, containing 20 Acres, all in Section 22, Township 5 South of Range 4 East;

knowing all the lines and corners of said property, and having known the same during all the time I was a resident of Baldwin County, Alabama. I reside only three miles from this piece of land and have had occasion to see it on an average of once every two weeks, sometimes oftener and sometimes less, and have at all times known who had the possession and who was in possession. I know that John T. Stanton acquired a portion of this property in 1921, which said portion is described as follows:

Starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South 40 Chains to a stake for a beginning corner, thence East 20 Chains to a stake; thence South 10 Chains, thence West 20 Chains, thence North 10 Chains to the place of beginning;

and the other portion, described as follows:-

Also starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South 50 chains for place of beginning; thence East 20 Chains, thence South 10 Chains, thence West 20 Chains to a stake on the Section Line, thence North 10 Chains to the place of beginning, containing 20 Acres, all in Section 22, Township 5 South of Range 4 East;

he acquired shortly thereafter. That he immediately went into possession of said land, living in the dwelling house thereon and

(page two)

cultivating the lands. That he actively cultivated the lands for about a year, after which he placed a tenant thereon by the name of Mabry Abercrombie, who went into the active possession living in the dwelling house, farming and cultivating the said land as a tenant of John T. Stanton. He remained there for a year, after which the place was occupied by Archie Hinote, who lived in the dwelling house thereon, was in active possession of the lands, cultivating and farming the same for a period of one year. The place was then rented to Bye Boyington, who remained in possession for about a year. R. M. Stanton then entered into the possession thereof, farming and cultivating the said lands, the dwelling house being occupied by a sub-tenant of R. M. Stanton. After Mr. R. M. Stanton left, the place was occupied by S. L. Price, who remained thereon as a tenant of John T. Stanton for one year, living in the dwelling house on the place and cultivating and farming the land. The place was then rented by John T. Stanton to a man by the name of J. Wolfe, who lived in the house, cultivated the lands, residing there as a tenant for a period of one year. Mr. Wolfe occupied this land on or about the year 1927 as a tenant. Since that time John T. Stanton has had the following tenants on said land:- Ed Shaw; G. L. Price; Jim Jones and R. M. Stanton, all of whom have lived in the dwelling house or have farmed said lands, there having been a continuous occupation by John T. Stanton for the past twelve years, either through himself or by a tenant, during all of which time said lands have been constantly in the state of cultivation.

CROSS EXAMINATION BY HON. S. C. JENKINS, GUARDIAN AD LITEM.

Q: Your name is W. R. Cooper?

A: Yes.

Q: How long have you known these lands?

A: All my life.

Q: Do you know of your own knowledge that John T. Stanton has had a tenant on these lands for the past 11 years, or since 1921?

A: Yes.

Q: Do you know of your own knowledge that he is paying taxes on

(page two)

(page three)

this property?

A. Yes.

Q: Have you ever heard of anyone else owning or claiming to own this property or to pay taxes thereon?

A: No.

Q: Has this property at all times since 1921 been in the possession of J. T. Stanton or his tenants?

A: Yes.

W. R. Cooper

R. H. KENDRICKS, WITNESS FOR COMPLAINANT, BEING DULY SWORN TESTIFIED AS FOLLOWS:-

My name is R. H. Kendricks. I am _____ years of age and a resident of Baldwin County, Alabama, where I have resided all my life. I am personally and intimately acquainted with the following described lands in Baldwin County, Alabama:-

Starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South Forty Chains to a stake for a beginning corner, thence East twenty chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

Also starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South 50 chains for place of beginning; thence East 20 Chains, thence South 10 Chains, thence West 20 Chains to a stake on the Section line, thence North 10 Chains to the place of beginning, containing 20 acres, all in Section 22, Township 5 South of Range 4 East;

knowing all the lines and corners of said property, and having known the same during all the time I was a resident of Baldwin County, Alabama. I reside only half a mile from this piece of land and have had occasion to see it on an average of practically every day, and have at all times known who had the possession and who was in possession. I know that John T. Stanton acquired a portion of this property in 1921, which said portion is described as follows:

Starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South 40 Chains to a stake for a beginning corner, thence East 20 Chains to a stake; thence South 10 Chains, thence West 20 Chains, thence North 10 Chains to the place of beginning;

and the other portion, described as follows:-

Also starting at the Northwest Corner of Section 22, Township 5 South of Range 4 East, thence running South 50 Chains for place of beginning; thence East 20 Chains; thence South 10 Chains, thence West 20 Chains to a stake on the Section Line, thence North 10 Chains to the place of beginning, containing 20 Acres, all in Section 22, Township 5 South of Range 4 East;

he acquired shortly thereafter. That he immediately went into

(page two)

possession of said land, living in the dwelling house thereon and cultivating the lands. That he actively cultivated the lands for about a year, after which he placed a tenant thereon by the name of Mabry Abercrombie, who went into the active possession, living in the dwelling house, farming and cultivating the said land as a tenant of John T. Stanton. He remained there for a year, after which the place was occupied by Archie Hinote, who lived in the dwelling house thereon, was in active possession of the lands, cultivating and farming the same for a period of one year. The place was then rented to Bye Boyington, who remained in possession for about a year. R. M. Stanton then entered into the possession thereof, farming and cultivating the said lands, the dwelling house being occupied by a sub-tenant of R. M. Stanton. After Mr. R. M. Stanton left, the place was occupied by G. L. Price, who remained thereon as a tenant of John T. Stanton for one year, living in the dwelling house on the place and cultivating and farming the land. The place was then rented by John T. Stanton to a man by the name of J. Wolfe, who lived in the house, cultivated the lands, residing thereon as a tenant for a period of one year. Mr. Wolfe occupied this land on or about the year 1927 as a tenant. Since that time John T. Stanton has had the following tenants on said land:- Ed Shaw; G. L. Price; Jim Jones and R. M. Stanton, all of whom have lived in the dwelling house or have farmed said lands, there having been a continuous occupation by John T. Stanton for the past twelve years, either through himself or by a tenant, during all of which time said lands have been constantly in the state of cultivation.

CROSS EXAMINATION BY HON. S. C. JENKINS, GUARDIAN AD LITEM.

Q: Your name is R. H. Kendricks?

A: Yes.

Q: How long have you known these lands?

A: All my life.

Q: Do you know of your own knowledge that John T. Stanton has had a tenant on these lands for the past 11 years, or since 1921?

A: Yes.

(page two)

(page three)

Q: Do you know of your own knowledge that he is paying taxes on this property?

A: Yes.

Q: Have you ever heard of anyone else owning or claiming to own this property or to pay taxes thereon?

A: No.

Q: Has this property at all times since 1921 been in the possession of J. T. Stanton or his tenants?

A: Yes.

R. H. Kendrick

LIS PENDENS NOTICE.

NOTICE IS HEREBY GIVEN, that on this day John T. Stanton has filed in the Circuit Court of Baldwin County, Alabama, In Equity, his Bill of Complaint against the following described lands, to-wit:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty-(40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against the following named Defendants, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

The prayer of said Bill is to have declared in the said John T. Stanton the title to the aforesaid lands, and the claim, interest, title, lien or encumbrance of all persons whomsoever to be declared a cloud upon the title of the said John T. Stanton and by the appropriate Decree to be removed therefrom.

Hybart Howard & Thos
Solicitors for Complainant.

JOHN T. STANTON,

Complainant,

-VS-

J. V. CONWAY, HERMAN CON-
WAY, PEARL CONWAY, MARY
CONWAY, T. A. CONWAY, ERNES-
TINE CONWAY, FRANK CONWAY,
EDWARD CONWAY,

Respondents.

IN THE CIRCUIT COURT-IN EQUITY

STATE OF ALABAMA

BALDWIN COUNTY.

ORDER OF PUBLICATION.

It having been made to appear in the above cause from the Affidavit of R. C. Heard, the agent of the Complainant, that J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, and Edward Conway, Respondents to the Bill of Complaint in said cause, are non-residents of the State of Alabama, and are believed to reside at Biloxi, Mississippi, Route 2;

It is ordered that the 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 20th day of Dec., 1932, or upon the expiration of thirty days from said date the same will be taken as confessed against them. It is further ordered that a copy 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; that within twenty days from this date a copy of said order be posted at the front door of the Courthouse in Bay Minette, Baldwin County, Alabama, and that a copy of the Bill of Complaint in said cause be mailed by the Register in Chancery of the Circuit Court of Baldwin County, Alabama, to the Respondents, J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway and Edward Conway, Route 2, Biloxi, Mississippi, by registered mail, postage prepaid, marked "For delivery only to person to whom addressed", and return receipt demanded, addressed to the said Register in Chancery in Bay Minette, Alabama.

Dated this 18th day of October, 1932.

HYBART, HEARD & CHASON:
Solicitors for Complainant.

D. W. Rieun
Register of Circuit Court of
Baldwin County, Alabama.

JOHN T. STANTON,

Complainant,

-vs-

J. V. CONWAY, HERMAN CONWAY,
PEARL CONWAY, SUMMERALL, MARY
CONWAY FOX, T. A. CONWAY,
ERNESTINE CONWAY, FRANK CONWAY,
EDWARD CONWAY, MINNIE LEE JO-
HANSEN, HENRY CONWAY, JESSIE
CONWAY,

Defendants.

IN THE CIRCUIT COURT-IN EQUITY

STATE OF ALABAMA

BALDWIN COUNTY.

ORDER OF PUBLICATION.

It having been made to appear in the above cause from the Affidavit of R. C. Heard, the agent of the Complainant, that J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, Minnie Lee Johansen, Henry Conway and Jessie Conway, Respondents to the amended Bill of Complaint in said cause, are non-residents of the State of Alabama, and are believed to reside at Biloxi, Mississippi, Route 2, with the exception of Minnie Lee Johansen, who resides at Pensacola, Florida;

It is ordered that the Respondents, and each of them, plead, answer or demur to the allegations of the amended Bill of Complaint filed against them and each of them in this cause before the 28 day of April, 1933, or upon the expiration of thirty days from said date the same will be taken as confessed against them. It is further ordered that a copy 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; that within twenty days from this date a copy of said order be posted at the front door of the Courthouse in Bay Minette, Baldwin County, Alabama, and that a copy of the Bill of Complaint in said cause be mailed by the Register in Chancery of the Circuit Court of Baldwin County, Alabama, to the Respondents, J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, Henry Conway and Jessie Conway, Route 2, Biloxi, Mississippi, and Minnie Lee

Johansen' Pensacola' Florida' by registered mail' postage prepaid'
marked' "For delivery only to person to whom addressed"' and re-
turn receipt demanded' addressed to the said Register in Chancery
in Bay Minette' Alabama.

Dated this 22th day of Feb ~~December~~ 1952.

M. Richardson
Register of Circuit Court of
Baldwin County' Alabama.

HYBART' HEARD & CHASON'
Solicitors for Complainant.

JOHN T. STANTON'

Complainant'

-vs-

IN THE CIRCUIT COURT-IN EQUITY

'J. V. CONWAY', 'HERMAN CONWAY',
'PEARL CONWAY SUMMERALL', 'MARY
CONWAY FOX', 'T. A. CONWAY',
'ERNESTINE CONWAY', 'FRANK CON-
WAY', 'EDWARD CONWAY', 'MINNIE
LEE JOHANSEN', 'HENRY CONWAY',
'JESSIE CONWAY'

STATE OF ALABAMA

BALDWIN COUNTY.

Defendants.

Now comes the Complainant in the above cause' and by
leave of the Court first had and obtained' amends the Sixth Para-
graph of the original Bill of Complaint to read as follows:

SIXTH:

Complainant further shows unto the Court that he is in
the actual' peaceable possession of said lands' claiming to own
the same under his said purchases aforesaid' and that no one is
known to have been in the possession of said lands for the past
ten years other than the Complainant' and Complainant avers that
there are no other persons known to Complainant to have had any
possession whatsoever of said lands or any part thereof within
the last ten years next preceding the filing of this Bill of Com-
plaint' except those heretofore mentioned' and Complainant further
avers that no one is known to your Complainant to have claimed
this land or any part thereof' or interest therein' except the
Complainant and the following named persons:-

Minnie Lee Johansen' over the age of 21 years'
Pensacola' Florida;

Henry Conway' over the age of 21 years' Biloxi'
Mississippi;

Jessie Conway' over the age of 21 years' Biloxi'
Mississippi;

J. V. Conway' over the age of 21 years' Route
2' Biloxi' Mississippi;

Herman Conway' over the age of 21 years' Route
2' Biloxi' Mississippi;

Pearl Conway Summerall' over the age of 21 years'
Route 2' Biloxi' Mississippi;

Mary Conway Fox' over the age of 21 years' Route
2' Biloxi' Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Son, competent abstractors. He then employed the Hon. Norborne Stone to examine the same to ascertain whom the records showed to have some claim to this property, and that he afterwards employed the firm of Hybart, Heard & Chason to examine the title to this property. That they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties, or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

Complainant also amends his Prayer for Process to read as follows:-

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done. Complainant prays that your Honor will cause the usual Writ of Process to issue to Minnie Lee Johansen, Henry Conway, Jessie Conway, J. V. Conway, Herman Conway, Pearl Conway Summerall, Mary Conway Fox, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them defendants to this amended Bill of Complaint, and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable

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Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this amended Bill of Complaint as required by law in the State of Alabama authorizing quieting of title in rem.

Robert Ward Wilson
Solicitors for Complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned authority in and for said State and County, personally appeared R. C. Heard, who upon oath deposes and says:-

That he is the agent of the Complainant in the above styled cause, and is duly authorized by him to make this oath; that Minnie Lee Johansen, Jessie Conway, Henry Conway, Pearl Conway Summerall and Mary Conway Fox, the parties Defendant added in the Amended Bill of Complaint, are non-residents of the State of Alabama; that Minnie Lee Johansen is over the age of twenty-one years and resides at Pensacola, Florida; that Jessie Conway is over the age of 21 years and resides at Biloxi, Mississippi; that Henry Conway is over the age of 21 years and resides at Biloxi, Mississippi; that Pearl Conway Summerall is over the age of twenty-one and resides at Biloxi, Mississippi; that Mary Conway Fox is over the age of twenty-one years and resides at Biloxi, Mississippi.

R. C. Heard

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 20th day of February, 1933.

Mary F. Green
Notary Public, Baldwin County,

State of Alabama.

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtie Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

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trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them, other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Sons' competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property' and that he afterwards employed the firm of Hybart' Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated' seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents who have inhabited the country near these lands for a long time' and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end' therefore' that equity may be done' Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway' Herman Conway' Pearl Conway' Mary Conway' T. A. Conway' Ernestine Conway' Frank Conway' Edward Conway' making them Defendants to this Bill of Complaint and requiring them to plead' answer or demur to the same within the time required by law and the practices of this Honorable Court' and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama' authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described' and that no other person has any title to or interest in' or lien or encumbrance upon the

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lands or any part thereof' and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index' and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County' Alabama' and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County' Alabama' and Complainant further prays for such other' further and different relief as in equity may seem just and meet' and your Complainant will ever pray.


Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to' interest in' lien or encumbrance upon the property described in the Bill of Complaint or any part thereof' and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth" inclusive' but answer under oath is hereby expressly waived.

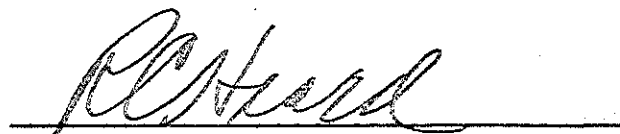

Solicitors for Complainant.

STATE OF ALABAMA'

BALDWIN COUNTY.

Personally appeared before me' Mary F. Green' a Notary Public in and for said County and State' R. C. Heard' who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause' and is duly authorized by him to make this oath' and that the facts stated in the foregoing Bill of Complaint upon knowledge are true' and that he is informed as to the facts stated upon information and belief as therein stated' and verily believes' and so states' that the same are true.



(page four)

(page five)

Sworn to and subscribed before
me' a Notary Public whose seal
is hereto affixed' this 18th
day of October' 1932.

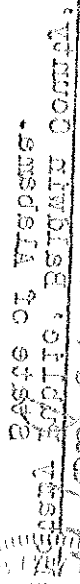
Mary D. Green
Notary Public' Baldwin County'
State of Alabama.

STATE OF ALABAMA'
BALDWIN COUNTY

Before me' the undersigned authority, in and for said
State and County personally appeared R. C. Heard, who upon oath
deposes and says:
That J. V. Conway is the agent of the Complainant in the above
cause and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident
of the State of Alabama' residing at Route 2' Biloxi' Mississippi'
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama' residing at Route 2' Biloxi'
Mississippi; That Pearl Conway is over the age of twenty-one years'
and is a non-resident of the State of Alabama' residing at Biloxi'
Mississippi' Route 2; That Mary Conway is over the age of twenty-
one years' and is a non-resident of the State of Alabama' residing
at Biloxi' Mississippi' Route 2; That T. A. Conway' Ernestine Con-
way' Frank Conway and Edward Conway are minors under the age of
twenty-one years' residing at Route 2' Biloxi' Mississippi' with
J. V. Conway' who is their natural guardian.

Sworn to and subscribed before
me' a Notary Public whose seal
is hereto affixed' this 18th
day of October' 1932.

Mary D. Green
Notary Public' Baldwin County'
State of Alabama.



STATE OF MISSISSIPPI
COUNTY OF BENTON

STATIONED Bedliners & one of HOWARD
LASS & SONS, 1101 N. 1st St.,
and Bedliners offered at
\$100.00, reduced to 70 cents

[Handwritten signature]

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~~BITT OF COMPLAINT.~~

State of Virginia.
Essex, Bright County.

erected bedrock line of mounds
1922 south of Hudson station, N. H.
1923, and, bellies overed at
1924, 1925 to 1926

(1414)
(1415)

Copy for
J. V. Conway
Gdn of Frank
Conway, a Miss

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 J.V. Conway,
(Guardian of Frank Conway, a minor Route 2 Biloxi, Miss.,

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
John T. Stanton,

against said J.V. Conway, Guardian of Frank Conway a minor,

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 18th
Oct 1932
T. W. Richerson Register

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

Copy

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton,

vs.

J.V. Conway as Guardian of

Frank Conway a minor,

Hybart, Heard & Chason,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of..... 192.....

Sheriff.

Executed this..... day of

..... 192.....

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By.....

Deputy Sheriff.

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 J. V. Conway, Guardian of
T. A. Conway, a minor

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

against said J. V. Conway, Guardian of T. A. Conway a minor,

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 18th day of October, 1932. 192

T. W. Richerson Register

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

Copy

SERVE ON

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

John T. Stanton

vs.

J.V. Conway, Guardian of

T.A. Conway a minor,

Hybart, Heard & Chason,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By

Deputy Sheriff.

Comes your Complainant, John T. Stanton, and files this his Bill of Complaint against the following described lands in the County of Baldwin and State of Alabama, viz:-

TRACT NO. 1. Starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Forty (40) Chains to a stake for a beginning corner, thence East Twenty (20) Chains to a stake; thence South Ten (10) Chains, thence West Twenty (20) Chains, thence North Ten (10) Chains to the place of beginning.

TRACT NO. 2. Also starting at the Northwest Corner of Section Twenty-two (22), Township Five (5) South of Range Four (4) East, thence running South Fifty (50) Chains for place of beginning; thence East Twenty (20) Chains, thence South Ten (10) Chains, thence West Twenty (20) Chains to a stake on the Section Line, thence North Ten (10) Chains to the place of beginning, containing Twenty (20) Acres, all in Section Twenty-two (22), Township Five (5) South of Range Four (4) East;

and against any and all persons claiming any title to, interest in, lien or encumbrance on said lands or any part thereof, and Complainant respectfully shows unto your Honor:-

FIRST:

That he is over the age of twenty-one years, a resident of Baldwin County, Alabama, and is in the actual, peaceable possession of both of said tracts of land, claiming to own the same in his own right in fee simple.

SECOND:

That no suit is pending to test Complainant's title to, interest in, or his right to the possession of said land.

THIRD:

Complainant further shows that he acquired the fee simple title to Tract No. 1 in and to said lands by purchase from one Josephine White, by Deed recorded in Deed Book 28 N. S., page 102, and the title to Tract No. 2 by Deed from Charles Cooper and Myrtle Cooper, his wife, by Deed recorded in Book 31 N. S., page 399 of the Probate Records of Baldwin County, Alabama.

FOURTH:

Complainant further shows that the title to said lands stands on the Records of the Probate Court of Baldwin County, Alabama, in his name. The Complainant has used such diligence in

(page two)

trying to ascertain these facts as shown by Paragraph 6 of this Bill of Complaint.

FIFTH:

Complainant further shows that no one within the ten years next preceding the filing of this Bill of Complaint paid any taxes upon the said lands herein mentioned or any part of them other than the Complainant. Complainant has used such diligence in trying to ascertain these facts as shown by paragraph 6 of this Bill of Complaint.

SIXTH:

Complainant further shows unto the Court that he is in the actual, peaceable possession of said lands, claiming to own the same under his purchases aforesaid, and that no one is known to have been in the possession of said lands for the past ten years other than the Complainant. And Complainant further avers that there are no other persons that are known to your Complainant to have had any possession whatsoever of said lands or any part thereof within the last ten years next preceding the filing of this Bill of Complaint, except those heretofore mentioned. And Complainant further avers that no one is known to your Complainant to have claimed this land or any part thereof, or any interest therein, except the Complainant, and the following named persons, viz:-

J. V. Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Herman Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Pearl Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

Mary Conway, over twenty-one years of age,
Route 2, Biloxi, Mississippi;

T. A. Conway, a minor, Route 2, Biloxi, Mississippi;

Ernestine Conway, a minor, Route 2, Biloxi, Mississippi;

Frank Conway, a minor, Route 2, Biloxi, Mississippi;

Edward Conway, a minor, Route 2, Biloxi, Mississippi.

(page two)

(page three)

Complainant avers that he has made a diligent search through his agents and attorneys to ascertain the facts herein mentioned. Complainant further avers that in his efforts to ascertain the facts he had a complete Abstract of Title made of this property by J. A. Ertzinger & Sons' competent Abstractors. He then employed the Hon. Norborne Stone to examine the same and ascertain whom the record showed to have some claim to this property, and that he afterwards employed the firm of Hybart' Heard & Chason to examine the title to this property; that they have made a thorough inquiry in the community where this land is located and situated, seeking to get any information whatsoever about the said named parties or any other parties who might claim title to or interest in said lands; that they have interviewed numerous people and made special effort to locate old residents, who have inhabited the country near these lands for a long time, and all the information they have been able to accumulate relative to prior ownership and possession is herein set out.

PRAYER FOR PROCESS.

To the end, therefore, that equity may be done, Complainant prays that your Honor will cause the usual Writ of Process to issue to J. V. Conway, Herman Conway, Pearl Conway, Mary Conway, T. A. Conway, Ernestine Conway, Frank Conway, Edward Conway, making them Defendants to this Bill of Complaint and requiring them to plead, answer or demur to the same within the time required by law and the practices of this Honorable Court, and that your Honor will cause notice to be published of the proceedings instituted by the filing of this Bill of Complaint as required by law in the State of Alabama, authorizing the quieting of title in rem.

PRAYER FOR RELIEF.

Complainant further prays that upon a hearing of this cause that your Honor will be pleased to establish Complainant's right of title to and will decree that Complainant is the owner in fee simple of said lands above described, and that no other person has any title to or interest in, or lien or encumbrance upon the

(page three)

(page four)

lands or any part thereof' and that in said Decree your Honor will direct in whose name it shall be indexed upon the direct index' and in whose name it shall be indexed in the indirect index of the Records thereof in the Probate Court of Baldwin County' Alabama' and that your Honor will order a certified copy of said Decree to be copied in the Probate Court of Baldwin County' Alabama' and Complainant further prays for such other' further and different relief as in equity may seem just and meet' and your Complainant will ever pray.

Hyatt, Heard & Nelson
Solicitors for Complainant.

FOOT NOTE:-

All persons claiming any title to interest in' lien or encumbrance upon the property described in the Bill of Complaint or any part thereof' and all persons mentioned as Defendants to this Bill of Complaint are required to answer all of the allegations of said Bill of Complaint in Paragraphs "First" to "Sixth" inclusive' but answer under oath is hereby expressly waived.

Hyatt, Heard & Nelson
Solicitors for Complainant.

STATE OF ALABAMA'

BALDWIN COUNTY.

Personally appeared before me; Mary F. Green' a Notary Public in and for said County and State' R. C. Heard' who upon oath deposes and says:-

That he is the agent of the Complainant in the above cause' and is duly authorized by him to make this oath' and that the facts stated in the foregoing Bill of Complaint upon knowledge are true' and that he is informed as to the facts stated upon, information and belief as therein stated' and verily believes' and so states' that the same are true.

R. C. Heard

(page four)

(page five)

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary J. Green
Notary Public, Baldwin County,
State of Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, the undersigned authority in, and for said
State and County, personally appeared R. C. Heard, who upon oath
deposes and says:

That he is the agent of the Complainant in the above
cause, and is duly authorized by him to make this oath; that J. V.
Conway is over the age of twenty-one years and is a non-resident,
of the State of Alabama, residing at Route 2, Biloxi, Mississippi.
That Herman Conway is over the age of twenty-one years and is a
non-resident of the State of Alabama, residing at Route 2, Biloxi,
Mississippi; That Pearl Conway is over the age of twenty-one years,
and is a non-resident of the State of Alabama, residing at Biloxi,
Mississippi, Route 2; That Mary Conway is over the age of twenty-
one years; and is a non-resident of the State of Alabama, residing
at Biloxi, Mississippi, Route 2; That T. A. Conway, Ernestine Con-
way, Frank Conway and Edward Conway are minors under the age of
twenty-one years, residing at Route 2, Biloxi, Mississippi, with
J. V. Conway, who is their natural guardian.

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 18th
day of October, 1932.

Mary J. Green
Notary Public, Baldwin County,
State of Alabama.

JOHN T. STANTON,

Complainant,

-vs-

J. V. CONWAY ET AL,

Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY.

TO S. C. JENKINS, ESQ.:--

You are hereby notified that you have been appointed as Guardian Ad Litem to represent the interests of the following minors: Ernestine Conway, T. A. Conway, Frank Conway and Edward Conway, in that certain cause now pending in the Circuit Court--Equity Side, Baldwin County, Alabama, wherein John T. Stanton is Complainant and J. V. Conway et al, are Defendants.

W. Richardson
Register.

ACCEPTANCE OF GUARDIAN AD LITEM.

I hereby accept the appointment as Guardian Ad Litem for Ernestine Conway, T. A. Conway, Frank Conway and Edward Conway, in the above named cause, and deny the allegations of the Bill of Complaint and demand strict proof thereof.

S. C. Jenkins

NOTICE TO AND ACCEPTANCE OF
GUARDIAN AD LITEM.

JOHN T. STANTON,

Complainant,

-vs-

J. V. CONWAY ET AL.,

Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Issued February 21, 1933

J. M. Richardson
Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. Term, 192

....., Complainant...

vs.

....., Defendant...

To, 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

..... 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.

NOTICE TO AND ACCEPTANCE OF
GUARDIAN AD LITEM.

JOHN T. STANTON,

Complainant,

-VS-

J. V. CONWAY ET AL.,

Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY.

Issued February 21, 1933

J. M. Richardson
Register.

JOHN T. STANTON.

Complainant.

-vs-

J. V. CONWAY, ET AL.,

Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

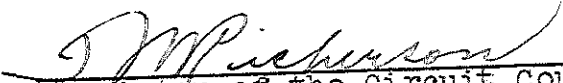
APPOINTMENT OF GUARDIAN AD LITEM.

In this cause, it having been made to appear to the Register by Affidavit of Complainant attached to the Bill of Complaint, that the Defendants, T. A. Conway, Ernestine Conway, Frank Conway and Edward Conway are all minors over the age of fourteen years, and that service upon them has been had by publication and registered mail on the _____ day of _____, 1933, and no one having been nominated by said minors to act as Guardian ad Litem;

And it further appearing that S. C. Jenkins is in all respects a suitable person to act as Guardian Ad Litem for said infants, and the said S. C. Jenkins having filed his consent in writing to act as such;

It is now therefore ordered by the Register of this Court that the said S. C. Jenkins be and hereby is appointed Guardian Ad Litem in said cause for said minors.

Witness my hand this 20th day of February, 1933.


Register of the Circuit Court--
Equity Side.

APPOINTMENT OF GUARDIAN AD LITEM

JOHN T. STANTON,
Complainant,

-VS-

J. V. CONWAY ET AL.,
Respondents.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY.

Issued February 20, 1933

J. M. Richardson
Register.

The State of Alabama }
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

J. T. STANTON'

COMPLAINANT

VS.

J. V. CONWAY ET AL.'

RESPONDENT S.

I, T. W. Richerson'

as Register and Commissioner

have called and caused to come before me W. R. Cooper and R. H. Kendricks'

witnesses named in the Requirement for Oral Examination, on the

9th day of

1923, at the office of T. W. Richerson'

in Bay Minette', Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said W. R. Cooper and R. H.

Kendricks doth depose and say as follows:

ORAL EXAMINATION

I, T. W. Richardson as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself R. C. Heard, Atty for Complainant & C. J. Stewart, Esq. and ad libitum at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 9 day of May 1923
T. W. Richardson (L. S.)
Register

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

John J. Stewart

VS.

COMPLAINANT

J. W. Courney, et al

RESPONDENT

ORAL DEPOSITION

Filed May 9, 1923

T. W. Richardson, Register
RECORDED IN

Record

Vol. _____ Page _____

Register

BAY MINETTE, ALA.

M J. W. Richardson - Clerk.

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

Hybart Heard & Chason
attys
SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

Oct 20-22 - Notice to Non Resident -

John T. Stanton vs J. V. Conway -

348 words. 4 T.

\$15.66

ORDER OF PUBLICATION

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

John T. Stanton, Complainant, Vs.

J. V. Conway, Herman Conway, Pearl

Conway, Mary Conway, T. A. Conway,

Ernestine Conway, Frank Conway, Ed-

ward Conway. Respondents.

It having been made to appear in the

above cause from the Affidavit of R.

C. Heard, the agent of the Complain-

ant that J. V. Conway, Herman Con-

BAY MINETTE, ALA.

March 8.

M J. W. Richardson - Register -
THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

Feb. 23.

John T. Stanton vs Conway et al

396 words 4T.

\$17.82.

ORDER OF PUBLICATION

In the Circuit Court — In Equity
State of Alabama, Baldwin County:

JOHN T. STANTON, Complainant,

Vs.—

J. V. Conway, Herman Conway,
Pearl Conway, Summerall, Mary Con-
way Fox, T. A. Conway, Ernestine
Conway, Frank Conway, Edward Con-
way, Minnie Lee Johansen, Henry