

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1766

FINAL DECREE

This cause coming on to be heard was submitted for final decree upon the pleadings, decrees pro confesso and proof as noted by the Register, and it appearing to the satisfaction of the court that the Complainant is the owner in fee simple of, is now and was at the time of the filing of the bill of complaint in this cause, in the actual and peaceable possession of the said land, and each and every part and parcel thereof; that service was perfected by personal service upon McKesson, Bedsole & Colvin Inc., a corporation, Merchants National Bank, a corporation, Royal Indemnity Company a corporation, Bedsole Investment Company, a corporation, Virginia-Carolina Chemical Company, Gulf Coast Citrus Exchange, a corporation, and Central Baldwin Bank, a corporation; that service was perfected upon all the Respondents herein by publication in the Baldwin Times, a newspaper published at Bay Minette in Baldwin County, Alabama, for four consecutive weeks commencing on the 7th day of November, 1946; that service was perfected by publication in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, for four consecutive weeks beginning with its issue of November 7, 1946, against the unknown heirs, devisees, grantees, personal representatives and assigns of the Respondents herein, and each of them, and any and all other persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land or any part or parcel thereof; that notice of the pendency of said suit was given by the filing of a lis pendens notice in the office of the Probate Judge of Baldwin County, Alabama, and by posting at the court house door in Bay Minette, Alabama; that the Respondents and each of them, having failed to appear and plead, answer or demur to the bill of complaint, as required by law, a decree pro confesso was entered against them and each of them;

that C. LeNoir Thompson, a practicing attorney at law, in Bay Minette, Baldwin County, Alabama, was appointed Guardian ad litem to represent the Respondents whose names were unknown, and duly filed his appearance agreeing to act as guardian ad litem and filed answer denying all the material allegations of the complaint, and appeared and cross examined the witnesses for the Complainant; that the title of the Complainant has been duly and legally established by legal and competent evidences, the court is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED, By the Court, that the Respondents, Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia-Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown heirs, devisees, grantees, personal representatives and assigns of them and each of them, and also any and all persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, have no right, title, estate, claim, interest in, or encumbrance upon the following described lands or any part or parcel thereof in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the full fee simple title to the said land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3, and 4, Block 7 in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of the Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning.

is vested absolutely in the Complainant, L. J. Postle.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that a certified copy of this decree be recorded in the office of the Probate Judge of Baldwin County, Alabama, in the direct index in the names of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia-Carolina Chemical corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and in the indirect index in the name of L. J. Postle.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Register shall within thirty days from the rendition of this decree file a certified copy hereof in the office of the Judge of Probate of Baldwin County, Alabama, and that the costs thereof be taxed in the costs of this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs of this cause for which execution may issue.

Dated at Bay Minette, Baldwin County, Alabama, this the ¹15 day of January, 1953.

Julius A. Middlebury
JUDGE

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L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

FINAL DECREE

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Filed 11-18-53
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L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1766

REQUEST FOR APPOINTMENT OF COMMISSIONER

TO: Mrs. Alice J. Duck, Register of the Circuit Court of Baldwin County,
Alabama:

The Complainant wishes to take orally, on behalf of the Complainant,
the testimony of the following witnesses:

L. J. Postle

Walter P. Hall

It is hereby requested that they be given proper and legal notice
and that Evelyn Watts be appointed as Special Commissioner, to take
testimony of said witnesses, and that due and legal notice be given as
required by law.

Dated this the 30 day of Dec, 1952.

L. J. Postle
Solicitor for the Complainant

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

REQUEST FOR APPOINTMENT
OF COMMISSIONER

Filed Dec 30, 1952

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L. J. POSTLE,

Complainant

VS.

GULF COAST CITRUS EXCHANGE,
et al,

Respondents.

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

This cause coming on for hearing on the Demurrer filed by Virginia-Carolina Chemical Company, a Corporation, on December 21, 1946, and the Court being of the opinion that the Demurrer should be sustained.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the Demurrer filed by the Virginia-Carolina Chemical Company, a Corporation, be and the same hereby is sustained.

Dated this 17th day of July, 1947.

J. M. Hare
Judge.

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DECREE SUSTAINING DEMURRER.

L. J. POSTLE,

Complainant,

VS.

GULF COAST CITRUS EXCHANGE,
et al,

Respondents.

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

Filed July 17, 1947.

Alice J. Welch
Registrar

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Evelyn Watts

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 L. J. Postle and Walter P. Hall

as witnesses in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein L. J. Postle

Complainant
and Gulf Coast Citrus Exchange, a corporation, et al

Respondent
on oath, to be by you administered, upon L. J. Postle and Walter P. Hall
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 30 day of Dec, 1952

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

L. J. Postle

Complainant—

VS.

Gulf Coast Citrus Exchange,

a corporation, et al,

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Evelyn Watts

WITNESSES:

L. J. Postle

Walter P. Hall

Filed Dec 30, 1954

Revised

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1766

NOTICE OF TIME OF TAKING TESTIMONY

TO: Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation:

Notice is hereby given that the Complainant will on the 14 day of January, 1953, before Evelyn Watts, as special Commissioner take the testimony of the following witnesses:

L. J. Postle

Walter P. Hall

Dated this the 30 day of Dec, 1953

L. J. Postle
Solicitor for the Complainant

Evelyn Watts
Special Commissioner

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE
A CORPORATION, ET AL,

RESPONDENTS

NOTICE OF TIME OF TAKING
TESTIMONY

Filed Dec 30, 1952

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BEST NEWSPAPER

BAY MINETTE, ALABAMA

LEGAL NOTICE

Notice is hereby given that the Complainant in the above styled cause, L. J. Postle, has filed his bill of Complaint duly verified in the Circuit Court of Baldwin County, Alabama, in Equity, against the following described land in Baldwin County, Alabama, to-wit:

and also against Gulf Coast Citrus Exchange, a corporation, Merchants Bank or Mobile, Alabama, trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin, Inc., a company, a corporation, Royal Indemnity corporation, Bedsole Investment Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and any other person, firm or corporation claiming any right, title, interest in, or encumbrance upon said land or any part or parcel thereof, and alleging that he is a bona fide resident of Baldwin County, Alabama, and over 21 years of age; that he is the owner in fee simple and in the actual possession of said land; that he acquired title to said land by purchase from Amos Garrett and Sara Garrett, his wife, by deed dated March 20, 1941, and of record in Deed Book 75 NS, pages 28-9, in the office of the Probate Judge of Baldwin County, Alabama; that no person is known to have paid any taxes upon said land or to have had any possession thereof, within ten years next preceding the filing of this bill of complaint except L. J. Postle and Amos Garrett; that the title to said land stands on the records of the Probate Court of Baldwin County, Alabama, the county in which said land lies in the name of L. J. Postle.

IT IS THEREFORE ORDERED and notice is hereby given to Gulf Coast Citrus Exchange, a corporation; Merchants Bank of Mobile, Alabama, Trustee, a corporation; Pennsylvania Railroad Company, a corporation; New York Central Railroad Company, a corporation; Virginia Carolina Chemical Corporation, a corporation; McKesson-Bedsole-Colvin Inc., a corporation; Bedsole Investment Company, a corporation; Royal Indemnity Company, a corporation; Central Building Bank, a corporation, to appear in this court and plead, answer or demur to the bill of complaint filed herein on or before the 8th day of December, 1946, or upon their having failed to do so upon the expiration of thirty days from the date of the filing of the said bill of complaint.

James F. Baker, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

L. J. Pastler vs Gulf
Coast Citrus Exchange
Et Al. Respondents

606 WORDS @ 4 1/2 cents — — — \$ 27.27

I hereby certify this is correct, due and unpaid (~~paid~~).

Publisher.

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

Date of 1st publication Nov. 7, 1946 Vol. 57 No. 41

Date of 2nd publication Nov. 14, 1946 Vol. 57 No. 42

Date of 3rd publication Nov. 21, 1946 Vol. 57 No. 43

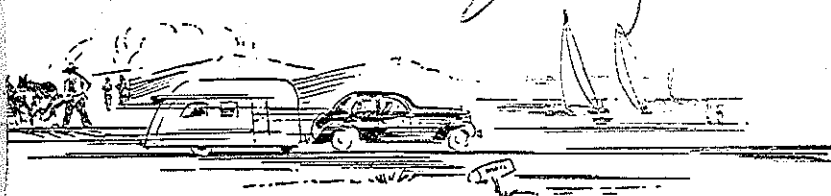
Date of 4th publication Nov. 28, 1946 Vol. 57 No. 44

Subscribed and sworn before the undersigned this 29 day of Nov, 1946.

Subscribed and sworn before me this _____ day of _____, 19____.

Charles T. Sims
Notary Public, Baldwin County.

Publisher



THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

L. J. Postle

Complainant

VS.

Gulf Coast Citrus Exchange

Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me L. J. Postle and Walter P. Hall

witnesses named in the Requirement for Oral Examination, on the 14 day of Dec 1945, at the office of Hubert M. Hall in Bay Minette, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said L. J. Postle and Walter P. Hall doth depose and say as follows:

My name is L. J. Postle, I am the complainant in the above styled cause. I am over twenty-one years of age and now and was at the time of the filing of this bill of complaint over twenty-one years of age and a bona fide resident of Baldwin County, Alabama.

The Gulf Coast Citrus Exchange was a corporation doing business at Robertsdale, Alabama, however, at the present time I know of no official of the company and have not been able to locate one after a diligent search and inquiry. The Central Baldwin Bank is a corporation with its office at Robertsdale, Alabama. The Merchants National Bank of Mobile is a corporation with its principal place of business in Mobile. The Virginia-Carolina Chemical Corporation, McKesson-Pedsole, Colvin Inc., Pedsole Investment Company, Royal Indemnity Company were at the time of the filing of the bill of complaint in this cause and are now located in Mobile, Alabama. Alabama Basket Company is a corporation of Eufaula, Alabama. The Pennsylvania Railroad Company is a corporation with its principal place of business in Philadelphia, Pa., and the New York Central Railroad Company is a corporation with its principal place of business in Cleveland, Ohio. I am the owner in fee simple and was at the time of the filing of the bill of complaint in this cause and am now in the actual possession of the lands described in the bill of complaint in this cause. There is no suit pending to test my title to, interest in, or rights of possession to said lands.

I obtained title to said land by purchase from Amos Garrett and Sara Garrett, his wife, by deed dated March 20, 1941, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 75 MS pages 28-9; that a copy of said deed is hereto attached and asked to be taken as a part hereof. The title to the said lands stands upon the records of the Probate Court of Baldwin County, Alabama, in my name. No one has at any time during the past ten years paid any taxes upon said lands or had any possession thereof except Amos Garrett through whom I hold title and me. Dr. Amos Garrett acquired title to the said property on July 10, 1940, and immediately went into the actual possession thereof, and he and I have been in the actual, adverse, peaceable and continuous possession of said land since that time.

I have made a diligent search and inquiry and had an abstract of title prepared to said lands to determine the names of any parties claiming any interest in said lands and the only ones shown by the records are those shown herein above who were named as respondents in this cause. No one has exercised or attempted to exercise any title to or rights of possession to said property since Amos Garrett acquired title thereto other than just he and I. There is a building on the property which I have had the actual possession of since purchasing it from Amos Garrett and prior to that time Mr. Garrett had actual possession thereof.

L. J. Postle

ORAL EXAMINATION.

I, Evelyn Watts, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition ~~is~~ on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and Hubert M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom 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 18th day of Dec, 1952

Evelyn Watts (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

L. J. Postle

vs. Complainant

Gulf Coast Citrus Exchange

Respondent.

Oral Deposition

Filed Dec 14, 1952

Miss J. Postle, Register.

Recorded in

Vol. _____ Page _____, Record

Register.

Walter Hall, a witness for the Complainant being first duly sworn,
deposes and says:

My name is Walter Hall. I now live at Loxley, in Baldwin County, Alabama. I am personally acquainted with the property described in the bill of complaint in this cause located at Robertsdale and know of my own personal knowledge that for the past ten years and more no one has exercised any rights of possession to the said property other than Amos Garrett and L. J. Postle. There is located upon the property a sheet metal building and Mr. Postle has either used the building himself or by tenant since he acquired title to the same. During the time that Mr. Postle has owned the property no other person has attempted to exercise any right of possession thereto.

Walter P Hall

No cross examination by guardian ad litem.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons GULF COAST CITRUS EXCHANGE, A CORPORATION, MERCHANTS BANK OF MOBILE, ALABAMA, TRUSTEE, A CORPORATION, PENNSYLVANIA RAILROAD COMPANY, A CORPORATION, NEW YORK CENTRAL RAILROAD COMPANY, A CORPORATION, VIRGINIA CAROLINA CHEMICAL CORPORATION, A CORPORATION, McKESSON-BEDSOLE-COLVIN INC., A CORPORATION, BEDSOLE INVESTMENT COMPANY, A CORPORATION, CENTRAL BALDWIN BANK, A CORPORATION, ROYAL INDEMNITY COMPANY, A CORPORATION, ALABAMA BASKET COMPANY, A CORPORATION, the unknown successors and assigns of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and all firms, persons or corporations claiming any right, title, interest in, or encumbrance upon the said land or any part or parcel thereof, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction, within thirty days after the service of summons and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by L. J. POSTLE, against the said GULF COAST CITRUS EXCHANGE, A CORPORATION, MERCHANTS BANK OF MOBILE, ALABAMA, TRUSTEE, A CORPORATION, PENNSYLVANIA RAILROAD COMPANY, A CORPORATION, NEW YORK CENTRAL RAILROAD COMPANY, A CORPORATION, VIRGINIA CAROLINA CHEMICAL CORPORATION, A CORPORATION, McKESSON-BEDSOLE-COLVIN INC., A CORPORATION, BEDSOLE INVESTMENT COMPANY, A CORPORATION, ROYAL INDEMNITY COMPANY, A CORPORATION, ALABAMA BASKET COMPANY, A CORPORATION, CENTRAL BALDWIN BANK, A CORPORATION, THE unknown successors and assigns of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and against any and all persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land or any part or parcel thereof, and further to do and perform what the said Judge shall order and direct in the behalf and this the Respondents shall in no wise omit under penalty of the law. And we command that you return this writ with your execution thereof, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court, this the 5 day of November, 1946.

Register.

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Your Complainant, L. J. Postle, presents this his bill of complaint against the following described land in Baldwin County, Alabama, to-wit:

Lots 1, 2, 3, and 4, Block 7, in Oscar Johnson, subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning,

and against Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin, Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown successors and assigns of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and any other persons, firms or corporation claiming any right, title, interest in, or encumbrance upon the said land or any part or parcel and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over 21 years of age and a bona fide resident of Baldwin County, Alabama.

2.

That Gulf Coast Citrus Exchange and Central Baldwin Bank are corporations with their principal place of business in Robertsdale, Baldwin County, Alabama; that Merchants Bank of Mobile, Alabama, Trustee, Virginia Carolina Chemical Corporation, McKesson-Bedsole-Colvin Inc., Bedsole Investment Company, Royal Indemnity Company are corporations with their principal place of businesses in Mobile, Alabama; that Alabama Basket Company is a corporation with its principal place of business in Eufaula, Alabama; that Pennsylvania Railroad

Company is a corporation with its principal place of business in Philadelphia Pennsylvania; that New York Central Railroad Company is a corporation with its principal place of business in Cleveland, Ohio.

3.

That your Complainant is the owner in fee simple and in the actual possession of the following described land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Port Morgan Railroad 270 feet, thence West 37 feet to the place of beginning.

4.

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

5.

That your Complainant obtained title to said land by purchase from Amos Garrett and Sara Garrett, his wife, by deed dated March 20, 1941, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 75 NS, pages 28-9.

6.

That the title to said land stands upon the records of the Probate Court of Baldwin County, Alabama, the court in which said land lies, in the name of L. J. Postle.

7.

That no one has at any time within ten years next preceding the filing of this bill of complaint paid any taxes upon or had any possession of said land or any part thereof except Amos Garrett and L. J. Postle.

8.

That the only persons known by your Complainant to claim said land or any part thereof or any interest therein are Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson Bedsole-Colvin, Inc., a corporation, Bedsole Investment Company, a corporation,

Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation.

WHEREFORE your Complainant prays that your Honor will by proper process make the said Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a Corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin, Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown successors and assigns of them and each of them, and any and all other persons, firms or corporations claiming any right, title, interest in or encumbrance upon the said land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4

East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning.

or any part thereof parties Respondent to this bill of complaint, and by appropriate process require them and each of them separate and severally, to plead, answer ordemur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof this Honorable Court will make and enter a decree that the Complainant, L. J. Postle, is the owner in fee simple and in the actual possession of the following described land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3, and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the South east quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning,

and that neither of the said Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia

Solicitor for the Complainant

Before me the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall, who is known to me and who having been by me first duly sworn, deposes and says: that he is Solicitor of record for the Complainant in the cause of L. J. Postle, Complainant, vs Gulf Coast Citrus Exchange, a corporation, et al, Respondents, and authorized to make this affidavit; that the facts stated in the foregoing bill of complaint from all information are true and from such information obtained verily that the same are true.

Notary Public, Baldwin County, Alabama

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE

RESPONDENTS

BILL OF COMPLAINT

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Book 2 Page 123

LIS PENDENS

Notice is hereby given that the Complainant in the above styled cause, L. J. Postle, has filed his bill of Complaint duly verified in the Circuit Court of Baldwin County, Alabama, in Equity, against the following described land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South and 425 Feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan railroad 270 feet, thence West 37 feet to the place of beginning,

and also against Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole- Colvin, Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and any other person, firm or corporation claiming any right, title, interest in, or encumbrance upon said land or any part or parcel thereof, and alleging that he is a bona fide resident of Baldwin County, Alabama, and over 21 years of age; that he is the owner in fee simple and in the actual possession of said land; that he acquired title to said land by purchase from Amos Garrett and Sara Garrett, his wife, by deed dated March 20, 1941, and of record in Deed Book 75 MS, pages 28-9, in the office of the Probate Judge of Baldwin County, Alabama; that no person is known to have paid any taxes upon said land or to have had any possession thereof, within ten years next preceding the filing of this bill of complaint except L. J. Postle and Amos Garrett; that the title to said land stands on the record of the Probate Court of Baldwin County, Alabama, the county in which said land lies in the name of L. J. Postle.

Book 2 Page 124

IT IS THEREFORE ORDERED and notice is hereby given to Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, to appear in this court and plead, answer or demur to the bill of complaint filed herein on or before the 8 day of December, 1946, or upon their having failed to do so upon the expiration of thirty days from said date this cause shall be at issue.

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

IN WITNESS WHEREOF, I, R. S. Duck, Register of the Circuit Court of Baldwin County, Alabama, have hereunto set my hand and seal of office on this the 5 day of November, 1946.

R. S. Duck
Register, Circuit Court, Baldwin County,
Alabama

Hubert M. Hall
Solicitor for the Complainant

STATE OF ALABAMA
BALDWIN COUNTY

I, R. S. Duck, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the foregoing is a full, true, correct, and complete copy of notice given by publication in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, in the cause of L. J. Postle, Complainant vs Gulf Coast Citrus Exchange, a corporation, et al, Respondents, and filed for record in the office of the Probate Judge of Baldwin County, Alabama; the county in which said land lies in accordance with the provisions of the laws of the State of Alabama.

IN WITNESS WHEREOF I have hereunto set my hand and seal of office on this the 5 day of November, 1946.

R. S. Duck
Register

STATE OF ALABAMA, BALDWIN COUNTY

Filed 11-13-46 2 P.M.

Recorded Lis. Pend. book 2 page 123-4

W. R. Stuart
Judge of Probate

L. J. FORTLE

COMPLAINANT

VS

GULF COAST CIGARETTE EXCHANGE
A CORPORATION, ET AL

RESPONDENTS

2 - 123-4

LBS. HENDERS

FILED: NOVEMBER 5, 1946

Register

R 140 R A Hend

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons GULF COAST CITRUS EXCHANGE, A CORPORATION, MERCHANTS BANK OF MOBILE ALABAMA, TRUSTEE, A CORPORATION, PENNSYLVANIA RAILROAD COMPANY, A CORPORATION, NEW YORK CENTRAL RAILROAD COMPANY, A CORPORATION, VIRGINIA CAROLINA CHEMICAL CORPORATION, A CORPORATION, McKESSON-BEDSOLE-COLVIN INC., A CORPORATION, BEDSOLE INVESTMENT COMPANY, A CORPORATION, ROYAL INDEMNITY COMPANY, A CORPORATION, ALABAMA BASKET COMPANY, A CORPORATION, CENTRAL BALDWIN BANK, A CORPORATION, the unknown successors and assigns of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and all firms, persons or corporations claiming any right, title, interest in, or encumbrance upon the said land or any part or parcel thereof, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction, within thirty days after the service of summons and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by L. J. POSTLE, against the said GULF COAST CITRUS EXCHANGE, A CORPORATION, MERCHANTS BANK OF MOBILE, ALABAMA, TRUSTEE, A CORPORATION, PENNSYLVANIA RAILROAD COMPANY, A CORPORATION, NEW YORK CENTRAL RAILROAD COMPANY, A CORPORATION, VIRGINIA CAROLINA CHEMICAL CORPORATION, A CORPORATION, McKESSON-BEDSOLE-COLVIN INC., A CORPORATION, BEDSOLE INVESTMENT COMPANY, A CORPORATION, ROYAL INDEMNITY COMPANY, A CORPORATION, ALABAMA BASKET COMPANY, A CORPORATION, CENTRAL BALDWIN BANK, A CORPORATION, the unknown successors and assigns of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and against any and all persons firms, or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land or any part or parcel thereof, and further to do and perform what the said Judge shall order and direct in the behalf and this the Respondents shall in no wise omit under penalties of the law. And we command that you return this writ with your execution thereof, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court, this the 5 day of November, 1946.

R. S. Duck
Register.

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Your Complainant, L. J. Postle, presents this his bill of complaint against the following described land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning,

and against Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown successors and assigns of Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, and any other persons, firms or coproations claiming any right, title, interest in, or encumbrance upon the said land or any part or parcel and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over 21 years of age and a bona fide resident of Baldwin County, Alabama.

2.

That Gulf Coast Citrus Exchange and Central Baldwin Bank are corporations with their principal place of business in Robertsdale, Baldwin County, Alabama; that Merchants Bank of Mobile, Alabama, Trustee, Virginia Carolina Chemical Corporation, McKesson-Bedsole-Colvin Inc., Bedsole Investment Company, Royal Indemnity Company are corporations with their principal place of businesses in Mobile, Alabama, ; that Alabama Basket Company is a corporation with its principal place of business in Eufaula, Alabama; that Pennsylvania Railroad

Company is a corporation with its principal place of business in Philadelphia, Pennsylvania; that New York Central Railroad Company is a corporation with its principal place of business in Cleveland, Ohio.

3.

That Your complainant is the owner in fee simple and in the actual possession of the following described land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South, and 425 feet East of Northwest corner of Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley, thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet thence West 37 feet to the place of beginning.

4.

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

5.

That your Complainant obtained title to said land by purchase from Amos Garrett and Sara Garret, his wife, by deed dated March 20, 1941, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 75 NS, pages 28-9.

6.

That the title to said land stands upon the records of the Probate Court of Baldwin County, Alabama, the court in which said land lies, in the name of L. J. Postle.

7.

That no one has at any time within ten years next preceding the filing of this bill of complaint paid any taxes upon or had any possession of said land or any part thereof except Amos Garrett and L. J. Postle.

8.

That the only persons known by your Complainant to claim said land or any part thereof or any interest therein are Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation,

Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation,
Central Baldwin Bank, a corporation,

WHEREFORE your Complainant prays that your Honor will by proper process
make the said Gulf Coast Citrus Exchange, a corporation, Merchants Bank of
Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a
corporation, New York Central Railroad Company, a corporation, Virginia Carolina
Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation,
Bedsole Investment Company, a corporation, Royal Indemnity Company, a corpor-
ation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corpor-
ation, the unknown successors and assigns of them and each of them, and any
and all other persons, firms or corporations claiming any right, title, interest
in or encumbrance upon the said land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson sub-
division of East Silverhill in the Northwest quarter of the
Southeast quarter of Section 6, Township 6 South, Range 4 East,
and described as follows: Commencing at a stake 765 feet South,
and 425 feet East of Northwest corner of Northwest quarter of
the Southeast quarter of Section 6, Township 6 South, Range 4
East, thence South 250 feet, thence East 160 feet to the alley,
thence Northwest following said alley along right of way of
Bay Minette and Fort Morgan Railroad 270 feet, thence West 37
feet to the place of beginning,

or any part thereof parties Respondent to this bill of complaint, and by
appropriate process require them and each of them separately and severally,
to plead, answer or demur to the same within the time and under the penalties
prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof this
Honorable Court will make and enter a decree that the Complainant, L. J. Postle,
is the owner in fee simple and in the actual possession of the following
described land in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3 and 4, Block 7, in Oscar Johnson sub-
division of East Silverhill in the Northwest quarter of the
Southeast quarter of Section 6, Township 6 South, Range 4 East,
and described as follows: Commencing at a stake 765 feet South,
and 425 feet East of Northwest corner of Northwest quarter of
the Southeast quarter of Section 6, Township 6 South, Range 4
East, thence South 250 feet, thence East 160 feet to the alley,
thence Northwest following said alley along right of way of
Bay Minette and Fort Morgan Railroad 270 feet, thence West 37
feet to the place of beginning,

and that neither of the said Gulf Coast Citrus Exchange, a corporation, Merchants
Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company,
a corporation, New York Central Railroad Company, a corporation, Virginia

Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown successors and assigns of them and each of them nor any other person, firm or corporation has any right, title to, interest in or encumbrance upon the said land or any part thereof; that this Honorable Court will give and grant to the Complainant such other, further, different and general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

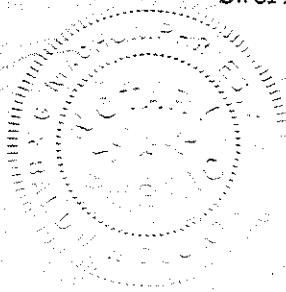
J. M. Hall
Solicitor for the Complainant

STATE OF ALABAMA
BALDWIN COUNTY

BEFORE me the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall, who is known to me and who having been by me first duly sworn, deposes and says: that he is Solicitor of record for the Complainant in the cause of L. J. Postle, Complainant, vs Gulf Coast Citrus Exchange, a corporation, et al, Respondents, and authorized to make this affidavit; that the facts stated in the foregoing bill of complaint from all information are true and from such information obtained verily that the same are true.

J. M. Hall
Sworn to and subscribed before me on this the 5 day of November, 1946.

J. M. Hall 6
Notary Public, Baldwin County, Alabama



By Max Bernstein USA

THE STATE OF ALABAMA, }
Baldwin County } No. 1766 Circuit Court, In Equity.

L. J. Postle

Complainant---

Vs.

Gulf Coast Citrus Exchange

Defendant----

Motion is hereby made for a Decree Pro Confesso against Bedsole Investment Company,

a corporation

Defendant----

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ----; and that said summons was duly served according to law, and that said Defendant -- ha failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 2 day of Dec 1954

[Signature]

Solicitor.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

L. J. Postle

Vs.

Gulf Coast Citrus

Exchange, a corporation,

et al,

Motion for Decree Pro Confesso on
Personal Service

Filed Dec 2 19 55

Archie W. Wicks
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA, }
Baldwin County } No. 1766 Circuit Court, In Equity.

L. J. Postle

Complainant---

Vs.

Gulf CoastCitrus Exchange, a corporation

Defendant----

Motion is hereby made for a Decree Pro Confesso against Merchants National Bank

Defendant-----

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ----; and that said summons was duly served according to law, and that said Defendant... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 2 day of Dec 1952

I. H. H. H. H.

Solicitor.

RECORDED

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

I. J. Postle

Vs.

Gulf Coast Citrus Exchange,

a corporation, et al

Motion for Decree Pro Confesso on
Personal Service

Filed Dec 2 1952

W. J. F. Newell
Register.

Recorded in _____ Record _____

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA, }
Baldwin County

No. _____ Circuit Court, In Equity.

L. J. POSTLE

Complainant---

Vs.

Gulf Coast Citrus Exchange, a corporation

Defendant----

Motion is hereby made for a Decree Pro Confesso against McKesson, Bedsole & Colvin Inc.,

Defendant-----

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ----; and that said summons was duly served according to law, and that said Defendant -- has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 2 day of Dec 1952

[Signature]

Solicitor.

RECORDED

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

L. J. Postle

Vs.

Gulf Coast Citrus Exchange,

Motion for Decree Pro Confesso on
Personal Service

Filed Dec 2 1952

W. J. Newcomb

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
NO. 1766

It appearing to the court that some of the Respondents in the above styled cause are unknown, and that their names and addresses cannot be ascertained after a diligent search and inquiry.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court that C. LeNoir Thompson, a practicing attorney at Bay Minette, Baldwin County, Alabama, be and he is hereby appointed guardian ad litem to represent and protect the interest of the respondents in the above styled cause, whose names and addresses are unknown, and cannot be ascertained after a diligent search and inquiry.

IT IS FURTHER ORDERED that the said C. LeNoir Thompson, be notified of his appointment, and of the time fixed to take testimony in this cause.

Dated this the 14 day of Dec, 1954.

W. J. W. W. W.

I hereby consent to act as guardian ad litem in the above styled cause for all parties whose names and addresses are unknown and cannot be ascertained after a diligent search and inquiry. I, as guardian ad litem, for the unknown respondents, deny all the material allegations contained in the bill of complaint and demands strict proof of the same.

Dated this the 14 day of Dec, 1954.

C. LeNoir Thompson

RECORDED

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

APPOINTMENT OF GUARDIAN AD
LITEM AND ACCEPTANCE

Filed Jan 14, 1913

*Deice French
Rex*

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

L. J. Postle
Complainant,
Vs. Gulf Coast Citrus Exchange
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

Gulf Coast Citrus Exchange, by service on O.F.E. Winberg and

Central Baldwin Bank by service on C. B. Ellis

by the Sheriff of Baldwin County, on the 21 day of December,
1946.

And it further appears to the Register, that the said Gulf Coast Citrus Exchange,
and Central Baldwin Bank

_____, the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of H. M. Hall Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said _____

Gulf Coast Citrus Exchange, and Central Baldwin Bank

This 8 day of Dec, 1946.

Archie J. Smith
Register.

RECORDED

No. _____

CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation, et al,

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 8 day of Dec,
1945.

W. J. Smith
Register.

Baldwin Times Print

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1766

MOTION FOR DECREE PROCONFESSO ON PUBLICATION

Now comes the Complainant in the above styled cause and shows unto the court that an order of publication was made on the 5th day of November, 1946, which was duly published in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, in its issues of November 7, November 14, November 21, and November 28, 1946, and was directed to Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown heirs, devisees, personal representatives, grantees, and assigns of them and each of them, and any other persons, firms or corporation claiming any title to, right, interest in, lien or encumbrances upon the following described land situated in Baldwin County, Alabama, to-wit:

Lots numbered 1, 2, 3, and 4, Block 7, in Oscar Johnson subdivision of East Silverhill in the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, and described as follows: Commencing at a stake 765 feet South and 425 feet East of the Northwest corner of the Northwest quarter of the Southeast quarter of Section 6, Township 6 South, Range 4 East, thence South 250 feet, thence East 160 feet to the alley thence Northwest following said alley along right of way of Bay Minette and Fort Morgan Railroad 270 feet, thence West 37 feet to the place of beginning.

as Respondents, which required the said Respondents to answer or demur to the bill of complaint within thirty days after the 8th day of December, 1946, which said Respondents have to this day failed to do.

WHEREFORE, the Complainant moves the court to grant a decree pro confesso against the said Respondents.

Dated this the 7 day of Dec, 1952.

Hornall
Solicitor for the Complainant

RECORDED

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

MOTION FOR DECREE PRO CONFESSO
ON PUBLICATION

Filed Dec 2, 1954

Alvin French
Ryck

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1766

DECREE PRO CONFESSO ON PUBLICATION

In this cause it appearing to the court that the order of publication heretofore made in this cause was published four consecutive weeks commencing on the 7th day of November, 1946, in the Baldwin Times, a newspaper published in Bay Minette, in Baldwin County, Alabama; that a copy of said order was posted at the Court House door in Baldwin County, Alabama, on the 7th day of November, 1946, and it now further appearing to the court that the said Gulf Coast Citrus Exchange, a corporation, Merchants Bank of Mobile, Alabama, Trustee, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia Carolina Chemical Corporation, a corporation, McKesson-Bedsole-Colvin Inc., a corporation, Bedsole Investment Company, a corporation, Royal Indemnity Company, a corporation, Alabama Basket Company, a corporation, Central Baldwin Bank, a corporation, the unknown heirs, devisees, grantees, personal representatives and assigns of them and each of them, Respondents have to date hereof failed to plead, answer or demur to this bill of complaint.

It is therefore on motion of the Complainant, ordered and decreed, by the court, that the said bill of complaint be and it is hereby, in all things, taken as confessed against the Respondents named in this cause.

Witness my hand this the 8 day of Dec, 1952.

Reuben J. Winters
Register

RECORDED

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

DECREE PRO CONFESSO ON PUBLICATION

Filed Dec 18, 1952

Alvin G. Hucker
R. J. Postle

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

L. J. Postle
Complainant,
Vs. Gulf Coast Citrus Exchange,
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

McKesson, Bedsole & Colvin, Inc., by service on W. C. Todd, manager.

by the Sheriff of Mobile County, on the 21st day of November, 1946,
1946.

And it further appears to the Register, that the said McKesson, Bedsole & Colvin Inc.,
a corporation,

_____, the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of H. M. Hall Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said _____

McKesson, Bedsole & Colvin, Inc.

This 8 day of Dec, 1946

David J. Remick
Register.

RECORDED

No. _____

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

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 8 day of Dec,
1945 ✓

Reid J. French

Register.

RECORDED

No. _____

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

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 8 day of Dec,
1945.

Reis J. Newell

Register.

THE STATE OF ALABAMA,
Baldwin County

No. 1766 Circuit Court, In Equity.

L. J. Postle

Complainant---

Vs.

Gulf Coast Citrus Exchange, a corporation

Defendant----

Motion is hereby made for a Decree Pro Confesso against Gulf Coast Citrus Exchange and

~~Central Baldwin Bank~~

Defendant-----

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendants---; and that said summons was duly served according to law, and that said Defendant-- ha ~~ve~~ failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 2 day of Dec 1952

John Lee
Solicitor.

No. _____ Page _____

RECORDED

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

L. J. Postle

Vs.

Gulf Coast Citrus Exchange,
a corporation

Motion for Decree Pro Confesso on
Personal Service

Filed Dec 2 19 52

Alvin J. Leuch

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA,
Baldwin County

No. 1766 Circuit Court, In Equity.

L. J. Postle

Complainant---

Vs.

Gulf Coast Citrus Exchange, a corporation

Defendant----

Motion is hereby made for a Decree Pro Confesso against Virginia-Carolina Chemical Company

a corporation

Defendant-----

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant----; and that said summons was duly served according to law, and that said Defendant-- has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This ✓ day of Dec 1952

17miller

Solicitor.

RECORDED

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

L. J. Postle

Vs. .

Gulf Coast Citrus Exchange,

a corporation, et al,

Motion for Decree Pro Confesso on
Personal Service

Filed Dec 2 19 52

Alfred M. Murre
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA,
Baldwin County

No. 1766 Circuit Court, In Equity.

L. J. Postle

Complainant

Vs.

Gulf Coast Citrus Exchange, a corporation

Defendant

Motion is hereby made for a Decree Pro Confesso against Royal Indemnity Company

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 2 day of Dec 1955

[Signature]

Solicitor.

RECORDED

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

L. J. Postle

Vs.

Gulf Coast Citrus Exchange,
a corporation,

Motion for Decree Pro Confesso on
Personal Service

Filed Dec 1 19 52

Receiv. clerk
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

L.J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,
Respondent.

In the Circuit Court.

In Equity No. _____

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent
Merchants National Bank by service on E. S. Wahl, vice, President

by the Sheriff of Mobile County, on the 21 day of November,
1946

And it further appears to the Register, that the said

Merchants National Bank

the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of H. M. Hall Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said

Merchants National Bank

This 8 day of Dec, 1946

Alvin J. ...
Register.

RECORDED
No.

CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation, et al

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 8 day of Dec,
1945.

Alvin H. Smith
Register.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

L. J. Postle
Complainant,
Vs. Gulf Coast Citrus Exchange,
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____
Bedsole Investment Company, by service on J. L. Bedsole, President

by the Sheriff of Mobile County, on the 23 day of November,
1946.

And it further appears to the Register, that the said, _____
Bedsole Investment Company, a corporation

_____, the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of H. M. Hall Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said _____
Bedsole Investment Company, a corporation

This 8 day of Dec, 1946.

W. J. W. W. W.
Register.

No. _____

RECORDED
CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation, et al,

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 8 day of Dec,
1945 ✓

Adolf. Lersch
Register.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

E. J. Postle
Complainant,
Vs. Gulf Coast Citrus Exchange,
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

Virginia-Carolina Chemical Company, by service on R. J. McGlewery,

general manager

by the Sheriff of Mobile County, on the 27 day of November,
1946.

And it further appears to the Register, that the said _____

Virginia-Carolina Chemical Company, a corporation

_____, the Respondent, having to the date hereof,

failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of H. M. Hall Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said _____

Virginia-Carolina Chemical Company, a corporation

This 8th day of Dec, 1946.

Archie. Newson
Register.

RECORDED

No. _____

CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 8 day of Dec,
1945 ✓.

Archie J. Newcomb
Register.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

L. J. Postle
Complainant,
Vs. Gulf Coast Citrus Exchange,
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____
Royal Indemnity Company, by services on J. A. Smith one of the firm of
Thames & Batre, Agents,

by the Sheriff of Mobile County, on the 22 day of November,
1946.

And it further appears to the Register, that the said Royal Indemnity Company, a
corporation

_____, the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of H. M. Hall Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said _____

Royal Indemnity Company, a corporation

This 8 day of Dec, 1946.

Alvin J. Bennett
Register.

RECORDED

No. _____

CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

L. J. Postle

Complainant,

Vs.

Gulf Coast Citrus Exchange,

a corporation, et al

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 8 day of Dec,
1945 ✓.

W. J. ...
Register.

L. J. Postle,
Complainant,

Vs.

Gulf Coast Citrus Exchange, et al.,
Respondents.

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

Comes The Merchants National Bank of Mobile, a National Banking Association, as Trustee, and for answer to the bill of complaint filed against it and others in the above styled cause, respectfully shows unto the Court as follows:

1. This Respondent admits the averments of paragraph 1 of the bill of complaint.

2. This respondent has no knowledge of the correctness of the allegations of paragraph 2 of the bill of complaint, other than the averments relative to this respondent, and this respondent respectfully shows unto the Court that it is a National Banking Association organized under the laws of the United States, with its principal place of business in Mobile, Alabama.

3. This respondent has no knowledge as to the correctness of the averments of the third paragraph of the bill of complaint, and demands strict proof of the allegations thereof.

4. This respondent has no knowledge as to the averments of the fourth paragraph of the bill of complaint, and demands strict proof thereof.

5. This respondent has no knowledge as to the correctness of paragraph 5 of the bill of complaint, and demands strict proof thereof.

6. This respondent has no knowledge as to the correctness of paragraph 6 of the bill of complaint, and demands strict proof thereof.

7. This respondent has no knowledge as to the correctness of paragraph 7 of the bill of complaint, and demands strict proof thereof.

8. This respondent has no knowledge of the averments of paragraph 8 of the bill of complaint, other than that this respondent in its capacity as Trustee claims a first lien on the property described in the 3rd and 8th paragraphs of the bill of complaint under and by virtue of that certain Deed of Trust dated the 15th day of June, 1927, executed by Gulf Coast Citrus Exchange, a corporation, to The Merchant

Bank of Mobile, Alabama, which Bank was subsequently converted into a National Bank under the name of "The Merchants National Bank of Mobile", and this respondent avers that the bonds secured by the said Trust Deed, which Trust Deed respondent is advised constitutes a first lien upon the said property have not been paid. This respondent does hereby respectfully show unto your Honor that in its capacity as such Trustee it has a first lien on the premises described in the said Trust Deed, included in which description is the real estate described in paragraph 3 and in paragraph 8 of the bill of complaint filed in this cause. This respondent does hereby expressly refer to the said Trust Deed which was filed for record in the office of the Judge of the Probate Court of Baldwin County, Alabama, on, to-wit, June 15th, 1927, and recorded in Mortgage Book No. 107 N. S., pages 571 - 575, and does hereby make the said Trust Deed as fully and completely a part of this its answer as if the said Trust Deed were copied herein at length.

And now having fully answered the bill of complaint filed herein, this respondent respectfully prays that the Court deny to the complainant the relief prayed for in its bill of complaint, and dismiss this respondent with its costs most unjustly sustained.

THE MERCHANTS NATIONAL BANK OF MOBILE,
Trustee,

By McCORVEY, TURNER & ROGERS,

Per Gessner T. McCorvey
(Gessner T. McCorvey) a

Per Robert F. Adams
(Robert F. Adams)
Its Solicitors.

The address of the solicitors for respondent is No. 907 - 916 Merchants National Bank Building, Mobile, Ala.

L. J. POSTLE,
Complainant

VS.

GULF COAST CITRUS EXCHANGE,
a corporation, et al,

Respondents.

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

Now comes the Virginia-Carolina Chemical Company
and files this its Demurrer to the Bill of Complaint filed in this
cause and for grounds therefore says:-

1: That said Bill of Complaint fails to show any
diligence on the part of the Complainant, to ascertain the
successors and assigns of the Gulf Coast Citrus Exchange, a
corporation.

Hyperion & Son
Solicitors for Virginia-Carolina
Chemical Company.

Hyperion & Son
Solicitors for Virginia-Carolina
Chemical Company.
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
L. J. POSTLE,
Complainant
VS.
GULF COAST CITRUS EXCHANGE,
a corporation, et al,
Respondents.

RECORDED

DEMURRER

L. J. POSTLE,

Complainant

VS.

GULF COAST CITRUS EXCHANGE,
a corporation, et al,

Respondents.

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

Filed December 21, 1946.

Alice J. Duck
Register.

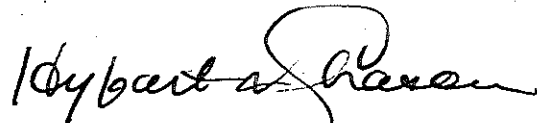
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JAN 1 1947
BALDWIN COUNTY, ALABAMA
CITRUS EXCHANGE
L. J. POSTLE
GULF COAST CITRUS EXCHANGE
a corporation, et al
Respondents
IN EQUITY
FILED
DEC 21 1946
CLERK OF COURT
BALDWIN COUNTY, ALABAMA

L. J. POSTLE, Complainant,
VS
GULF COAST CITRUS EXCHANGE,
et als,
Respondents.

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

Now comes Virginia-Carolina Chemical Corporation, a corporation, one of the respondents in this cause, and amends its demurrer heretofore filed herein, and demurs to the bill of complaint, and separately and severally each paragraph thereof, and for grounds of demurrer, assigns separately and severally the following:

1. There is no equity in said bill of complaint.
2. The averments of said bill of complaint fail to show that complainant has any cause of action against this respondent.
3. It is not alleged in said bill of complaint with sufficient certainty what relief complainant seeks against this respondent.
4. The averments of said bill of complaint are vague and indefinite.


Solicitors for Respondent
Virginia-Carolina Chemical Corporation

~~DEMURRER~~
~~RECORDED~~

L. J. POSTLE,

Complainant,

VS.

GULF COAST CITRUS EXCHANGE,
et al,

Respondents.

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

Filed December 24, 1946.

Alice J. Vucke
Register.

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS
EXCHANGE, A CORPORATION, ET AL,

RESPONDENT

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IN THE CIRCUIT COURT OF

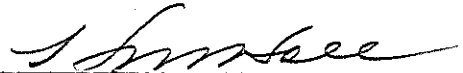
BALDWIN COUNTY, ALABAMA,

IN EQUITY

Now comes the Complainant and demurrers having been sustained to his original bill of complaint, and amends paragraph six of said original bill of complaint so that it shall read as follows:

6.

That the title to said land stands upon the records of the Probate Judge of Baldwin County, Alabama, the county in which said lands lies in the name of L. J. Postle; that the Complainant has secured an abstract of title to determine any claimants to said lands, but there are none other than as herein shown and whose addresses are set out in this bill of complaint; that the Complainant calls upon the said Respondents, herein named and each of them, to set out and specify what right, title or interest they claim in and to said land, and how such title or claim was obtained.



Solicitor for the Complainant

RECORDED
1766

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE
A Corporation, ET AL

RESPONDENT

Amendment

FILED

SEP 10 1947

ALICE J. DUCK, Register

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1786

NOTE OF TESTIMONY

This cause is submitted on behalf of the Complainant upon the following:

1. Original summons and complaint.
2. Amended complaint.
3. Disclaimer of Virginia-Carolina Chemical Company.
4. Answer of Merchants National Bank of Mobile.
5. Waiver and consent of Merchants National Bank of Mobile.
6. Lis Pendens filed for record in the Probate Office.
7. Proof of publication of notice in the BaldwinTimes.
8. Decree pro confesso on publication.
9. Decree pro confesso on personal service.
10. Request for appointment of commissioner.
11. Commission to take deposition.
12. Notice of time of taking testimony.
13. Appointment of guardian ad litem and acceptance.
14. Oral depositions of L. J. Postle and Walter P. Hall with exhibits attached.

Dated this the 14 day of Jan, 1953.

W. H. Hall
Solicitor for the Complainant

W. H. Hall
Register

RECORDED

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

NOTE OF TESTIMONY

Filed Jan 14, 1953

Alfred H. Smith
Referee

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 1766

Now comes the Respondent, The Merchants National Bank of Mobile, a national banking association, as trustee, and waives notice of the time of taking testimony on behalf of the Complainant, and the right to cross examine Complainant's witnesses and agrees that this cause be submitted for final decree upon the pleadings and proof as submitted on behalf of the Complainant. *Jan. 14th 1953*

Orbany, James, Roger, John, John
By James B. Orbany
Solicitor for the Respondent,
The Merchants National Bank of Mobile,
a corporation.

RECORDED

L. J. POSTLE

COMPLAINANT

VS

GULF COAST CITRUS EXCHANGE,
A CORPORATION, ET AL,

RESPONDENTS

WAIVER AND CONSENT OF
MERCHANTS NATIONAL BANK

Filed Jan 14th 1952

Deice French
Regist

L. J. POSTLE,

Complainant,

-VS-

GULF COAST CITRUS EXCHANGE,
ET AL,

Respondents.

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

Comes the Virginia-Carolina Chemical Company,
one of the Respondents in the above styled cause and disclaims
all title to, interest in or encumbrance on the lands described
in the Bill of Complaint filed in said cause.

Hybart & Sherson
Solicitors for Virginia-Carolina
Chemical Company.

1764
RECORDED ~~DIS~~ **CLAIMER**

L. J. POSTLE,

Complainant,

-VS-

GULF COAST CITRUS EXCHANGE,
ET AL,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed January 8, 1948.

Alice J. Rucke

RECORDED ~~DISCLAIMER~~

L. J. POSTLE,
Complainant,

-VS-

GULF COAST CITRUS EXCHANGE,
ET AL,
Respondents.

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

Filed January 8, 1948.

Alice J. Reucke

L. J. POSTLE,

Complainant,


-VS-

GULF COAST CITRUS EXCHANGE,
ET AL,

Respondents.

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

Comes the Virginia-Carolina Chemical Company,
one of the Respondents in the above styled cause and disclaims
all title to, interest in or encumbrance on the lands described
in the Bill of Complaint filed in said cause.


Solicitors for Virginia-Carolina
Chemical Company.