

FARMERS & MERCHANTS BANK OF FOLEY,  
a Corporation,

Plaintiff,

vs.

DREWSILLA S. ROBERSON,

Respondent.

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

DECREE

This cause came on to be heard on the Bill of Complaint and Decree Pro Confesso upon personal service against the respondent and was submitted to the Court.

The allegations of the Bill of Complaint being confessed, the Court finds said allegations to be true and that the complainant is in the actual possession of, claiming in its own right the real estate hereinafter described. That the respondent, Drewsilla S. Roberson, has no right, title, interest or encumbrance on said lands or any part thereof and that the title of the Complainant therein ought to be quieted and confirmed.

IT IS, THEREFORE, ORDERED, ADJUDGED and DECREED that the title of the complainant is hereby quieted and confirmed in and to the following described lands in Baldwin County, Alabama, to-wit:

Beginning at a stake on Bon Secour River and on the line of the old Lamey Grant Survey made by Norman L. Durant and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Book 5, at pages 30 to 32 thereof and being the Northwest corner of lot one (1) of said Lamey Grant in Section thirty (30), township Eight (8) south of range four (4) east, run thence south 50 degrees east 824.1 feet to a stake in the road; thence south 22 degrees west 585.3 feet to a stake on the South boundary line of said lot number one (1); thence with said south boundary line north 50 degrees west 715 feet, more or less, to the bank of Bon Secour River; thence with said Bon Secour River, and its meanders a northerly course 755 feet to the place of beginning.....

That the respondent, Drewsilla S. Roberson, has no right, title, interest or encumbrance upon said lands or any part thereof and said respondent is hereby perpetually enjoined from having, claiming or asserting any right, title, interest or encumbrance upon said lands or any part thereof.

Complainant to pay the costs of this action taxes at

~~\$ 1480~~

Dated this 23<sup>rd</sup> day of January, 1937.

J. W. Hare

Judge

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 DREWSILLA S. ROBERSON

of Baldwin 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

FARMERS & MERCHANTS BANK OF FOLEY, a Corporation,

against said DREWSILLA S. ROBERSON

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, Robert S. Duck, Register of said Circuit Court, this 16th day of November 1936

R. S. Duck Register

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

FARMERS & MERCHANTS BANK OF FOLEY,  
a Corporation,

Complainant,

-vs-

DREWSILLA S. ROBERSON,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

BILL OF COMPLAINT

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

PART ONE

Your Complainant, Farmers & Merchants Bank of Foley, respectfully shows to the court that it is a corporation organized and existing under the laws of the state of Alabama with its principal place of business in Foley, Baldwin County, Alabama, and that the respondent, Drewsilla S. Roberson, is over the age of twenty-one years and a resident of Baldwin County, Alabama.

PART TWO

1. Your complainant avers that it is in the peaceable possession of, claiming to own the same in its own right, the following described lands in Baldwin County, Alabama, to-wit:-

Beginning at a stake on Bon Secour River and on the line of the old Lamey Grant Survey made by Norman L. Durant and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Book 5, at pages 30 to 32 thereof and being the Northwest corner of lot one (1) of said Lamey Grant in Section thirty (30), township Eight (8) south of range four (4) east, run thence south 50 degrees east 824.1 feet to a stake in the road; thence south 22 degrees west 595.3 feet to a stake on the South boundary line of said lot number one (1); thence with said south boundary line north 50 degrees west 715 feet, more or less, to the bank of Bon Secour River; thence with said Bon Secour River, and its meanders a northerly course 755 feet to the place of beginning.....

2. That the title of your complainant to the lands hereinbefore described is denied or disputed and the respondent claims, or is

reputed to own said lands or some part thereof, or some interest therein, and no suit is pending to enforce or test the validity of such title, claim or encumbrance of the respondent.

5. Your complainant calls upon the respondent to set forth and specify his title, claim, interest or encumbrance and how and by what instrument the same is derived and created.

#### PART THREE

#### PRAYER FOR PROCESS

The premises considered, your complainant prays that your Honor will grant to it a writ of summons of the State of Alabama, directed to the respondent, Drewsilla S. Roberson, commanding him to appear within thirty (30) days from the service of the writ to answer, or plead to or demur to this bill of complaint and to abide such decree as may be entered herein, and your complainant shall ever pray &c.

#### PART FOUR

#### PRAYER FOR RELIEF

Your Complainant further prays that your Honor will take jurisdiction of this cause and proceed to a hearing thereof and that upon such hearing your Honor will consider and determine the title, claim, interest or encumbrance of the respondent in and to the lands hereinbefore described and will adjudge and decree that said respondent has no right, title, interest or encumbrance upon the lands hereinbefore described or any part thereof and that your Honor will enter a decree quieting and confirming the title of the complainant in and to said lands, and that your complainant may have such other, different and further relief in the premises as may be just and equitable.

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Solicitor for Complainant.

FOOT NOTE

The respondent, Drewsilla S. Roberson, is hereby required to answer the allegations of part two (2) of the foregoing Bill of Complaint from paragraph numbered one (1) to paragraph numbered three (3), inclusive, but not under oath, oath to answer being hereby expressly waived.

\_\_\_\_\_  
Solicitor for Complainant.

*[Handwritten signature]*

DEPT OF COMMERCE

C. O. L. A.

DEWESSILLA S. ROBESON

vs.

Complainant

W. C. ROBERTSON & COMPANY, INC.  
ATTORNEYS AT LAW  
1000 BROADWAY  
NEW YORK, N. Y.

RECEIVED  
JUL 10 1934  
U. S. DEPARTMENT OF COMMERCE

The State of Alabama,  
Baldwin County.

No. 275

CIRCUIT COURT IN EQUITY.

Farmers & Merchants Bank.

Complainant

vs.

Drewsilla. Roberson.

Defendant

In this cause it appears to the Register  
that a summons requiring the Defendant Drewsilla. Roberson.

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days  
after the service of said Summons upon Drewsilla. Roberson.  
was served upon Her. by the Sheriff of Baldwin. County, Alabama, on the  
18th day of November. 1936

And the said Defendant... having failed to demur, plead to or answer the said Bill of Complaint  
to this date, it is now, therefore, on motion of Lloyd A Magney.

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 Drewsilla. Roberson.

Defendant aforesaid.

This 18th ~~29th~~ day of January 1937

Register

Register.

FARMERS & MERCHANTS BANK OF FOLEY,  
a Corporation,  
Complainant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

MOORE PRINTING CO., BAY MINETTE, ALA.

8581. NOTE OF TESTIMONY

FARMERS & MERCHANTS BANK. OF FOLEY. A Corporation.

THE STATE OF ALABAMA  
Baldwin County

vs.

Drewsilla S Roberson.

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,

**Decree Proconfesso. on Personal Service.**

and in behalf of Defendant upon

*R. Deuch*

Register.

...one (1) of said Lamey  
grant in Section thirty (30), township Eight (8)  
south of range four (4) east, run thence south  
50 degrees east 824.1 feet to a stake in the road;  
thence south 22 degrees west 585.3 feet to a stake  
on the South boundary line of said lot number one  
(1); thence with said south boundary line north  
50 degrees west 715 feet, more or less, to the  
bank of Bon Secour River; thence with said  
Bon Secour River, and its meanders a northerly  
course 755 feet to the place of beginning.....

2. That the title of your complainant to the lands hereinbefore  
described is denied or disputed and the respondent claims, not is



reputed to own said lands or some part thereof, or some interest therein, and no suit is pending to enforce or test the validity of such title, claim or encumbrance of the respondent.

3. Your complainant calls upon the respondent to set forth and specify his title, claim, interest or encumbrance and how and by what instrument the same is derived and created.

PART THREE


PRAYER FOR PROCESS

The premises considered, your complainant prays that your Honor will grant to it a writ of summons of the State of Alabama, directed to the respondent, Drewsilla S. Roberson, commanding him to appear within thirty (30) days from the service of the writ to answer, or plead to or demur to this bill of complaint and to abide such decree as may be entered herein, and your complainant shall ever pray &c.

PART FOUR

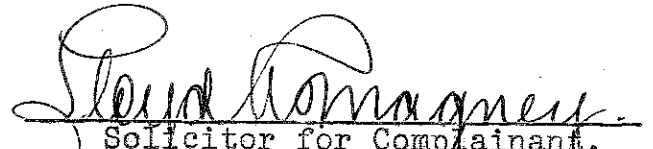
PRAYER FOR RELIEF

Your Complainant further prays that your Honor will take jurisdiction of this cause and proceed to a hearing thereof and that upon such hearing your Honor will consider and determine the title, claim, interest or encumbrance of the respondent in and to the lands hereinbefore described and will adjudge and decree that said respondent has no right, title, interest or encumbrance upon the lands hereinbefore described or any part thereof and that your Honor will enter a decree quieting and confirming the title of the complainant in and to said lands, and that your complainant may have such other, different and further relief in the premises as may be just and equitable.

  
Solicitor for Complainant.

FOOT NOTE

The respondent, Drewsilla S. Roberson, is hereby required to answer the allegations of part two (2) of the foregoing Bill of Complaint from paragraph numbered one (1) to paragraph numbered three (3), inclusive, but not under oath, oath to answer being hereby expressly waived.

  
Solicitor for Complainant.

FARMERS & MERCHANTS BANK. OF FOLEY. A Corporation.

THE STATE OF ALABAMA  
Baldwin County

vs.

Drewsilla S Roberson.

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,

**Decree Proconfesso. on Personal Service.**

and in behalf of Defendant upon

*R. Deuch*

Register.

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Solicitor for Complainant.

FARMERS & MERCHANTS BANK OF FOLEY,  
a Corporation,  
  
Complainant,  
  
-vs-  
  
DREWSILLARS. ROBERSON,  
  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

BILL OF COMPLAINT

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

PART ONE

Your Complainant, Farmers & Merchants Bank of Foley, respectfully shows to the court that it is a corporation organized and existing under the laws of the State of Alabama with its principal place of business in Foley, Baldwin County, Alabama, and that the respondent, Drewsilla S. Roberson, is over the age of twenty-one years and a resident of Baldwin County, Alabama.

PART TWO

1. Your complainant avers that it is in the peaceable possession of, claiming to own the same in its own right, the following described lands in Baldwin County, Alabama, to-wit:-

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2. That the title of your complainant to the lands hereinbefore described is denied or disputed and the respondent claims, or is

RECORDED  
*check*  
6-600

No. 275

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

*Farmers - Merchants Bank*  
*a corp.*

VS.

*Drusilla Roberts*

**NOTE OF TESTIMONY**

Filed in Open Court this 23

day of January 1937

*[Signature]*  
REGISTER

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

FARMERS & MERCHANTS BANK OF  
FOLEY, a corporation,

Complainant.

vs.

DREWSILLA S. ROBERSON,

Respondent.

C O P Y  
BILL OF COMPLAINT

*Filed Nov 16 1936*  
*Ernest*  
*Dray*

LLOYD A. MAGNEY  
Attorney  
Foley, Alabama.

*Original*

Drewsilla S. Roberson,  
Oak Road, Foley, Ala.

Serve on \_\_\_\_\_

**Circuit Court of Baldwin County  
IN EQUITY**

No. 275

**SUMMONS**

FARMERS & MERCHANTS BANK OF

FOLEY, a Corporation,

Complainant,

vs.

DREWSILLA S. ROBERSON,

Respondent.

LLOYD A. MAGNEY  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

*Book*  
RECORDED  
6-5-38

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

Received in office this 16th

day of Nov, 1936

*John S. Davis*  
SHERIFF

Executed this 18th day of

Nov 1936

by leaving a copy of the within Summons with

*Drewsilla Roberson*  
Defendant

*M. H. Dickinson*  
Sheriff

By *John S. Davis*  
Deputy Sheriff



*Quoted*  
RECORDED

2-241

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

FARMERS & MERCHANTS BANK OF FOLEY,  
a Corporation,

Plaintiff,

vs.

DREWSTILLA S. ROBERSON,  
Respondent.

DECREE

*Final decree 31 1937*  
*D. H. Foley*  
*Deponent*

LLOYD A. MASONRY  
Attorney  
Foley Alabama.

RECORDED  
INDEXED

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The State of Alabama,  
Baldwin County.

CIRCUIT COURT, IN EQUITY

Farmers & Merchants Bank.

vs.

R Drewsilla Roberson.

DECREE PRO CONFESSO ON  
PERSONAL SERVICE

Issued Jan 18th 1907

*R. B. Bank*  
Register.

Moore Printing Company, Bay Minette, Ala.