

# THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

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

## LEGAL NOTICE

In the Circuit Court of Baldwin County, Alabama, In Equity, ~~ALBERT L. DEANE~~ Complainant, Vs. GABRIEL PURY and TERESA PURY and SW $\frac{1}{4}$  of NW $\frac{1}{4}$  of SECTION 4, TOWNSHIP 8 SOUTH OF RANGE 6 EAST, Respondents.

It having been made to appear in the above cause by the affidavit of Hubert M. Hall, Solicitor of record and Agent of the Complainant in the above cause, that some of the Respondents to the bill of complaint in said cause are non-residents of the State of Alabama, a more particular address being unknown;

It is therefore, Ordered, Adjudged and Decreed that said Respondents, Gabriel Pury and Teresa Pury, and the unknown heirs of Gabriel Pury and Teresa Pury and any other persons claiming to own an interest in said land, appear in this Court and plead, answer or demur to the bill of complaint in this cause filed on or before the 13 day of March, 1937, or on their having failed to do so at the expiration of thirty days from said date, a decree pro confesso be taken against them.

It is further Ordered, Adjudged and Decreed that the Register of this Court have this order published in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, once a week for four consecutive weeks, and further that a copy of said notice certified by the Register as being correct recorded as a Lis Pendens in the office of the Register.

BAY MINETTE, ALA.

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY

*J. H. Faulkner*, 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

*A. J. Deane vs. Gabriel Pury*

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

|                     |             |                |              |
|---------------------|-------------|----------------|--------------|
| <i>February 11,</i> | <i>1937</i> | Vol. <i>48</i> | No. <i>2</i> |
| <i>" 15,</i>        | <i>1937</i> | Vol. <i>48</i> | No. <i>3</i> |
| <i>" 25,</i>        | <i>1937</i> | Vol. <i>48</i> | No. <i>4</i> |
| <i>March 5,</i>     | <i>1937</i> | Vol. <i>48</i> | No. <i>5</i> |

Date of fourth publication

Subscribed and sworn before the undersigned this 6<sup>th</sup> day of

*March*, 1937  
*Mary Lou Fortenberry,*  
*Notary Public,*  
*Baldwin County, Ala.*

*J. H. Faulkner*  
Publisher

ALBERT L. DEANE,  
Complainant,

VS.

GABRIEL PURY and  
TERESA PURY and  
SW $\frac{1}{4}$  OF NW $\frac{1}{4}$  OF SECTION  
4, TOWNSHIP 8 SOUTH OF  
RANGE 6 EAST,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

It having been made to appear in the above cause by the affidavit of Hubert M. Hall, Solicitor of record and Agent of the Complainant in the above cause, that some of the Respondents to the bill of complaint in said cause are non-residents of the State of Alabama, a more particular address being unknown;

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that said Respondents, Gabriel Pury and Teresa Pury, and the unknown heirs of Gabriel Pury and Teresa Pury and any other persons claiming to own an interest in said land, appear in this Court and plead, answer or demur to the bill of complaint in this cause filed on or before the 13<sup>th</sup> day of March, 1937, or on their having failed to do so at the expiration of thirty days from said date, a decree pro confesso be taken against them.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register of this Court have this order published in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama, once a week for four consecutive weeks, and further that a copy of said notice certified by the Register as being correct recorded as a Lis Pendens in the Office of the Probate Judge of Baldwin County, Alabama.

IN WITNESS WHEREOF, I, R. S. DUCK, as Register, have hereunto set my hand and seal on this the 11<sup>th</sup> day of February, 1937.

R. S. Duck  
Register.

ALBERT L. DEANE,  
Complainant,  
VS.  
GABRIEL PURY, ET AL.,  
Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY,  
NO. 298.

TO MISS O'BYRNE JONES, WHO RESIDES AT BAY MINETTE, BALDWIN COUNTY, ALABAMA,  
GREETINGS:

Know you, that we, reposing confidence in your integrity, skill and ability, have appointed you commissioner to take the testimony of H. M. Gilly, W. M. Gilly, T. F. Gilly and Hubert M. Hall, material witnesses in a suit now pending in our Chancery Court of Baldwin County, Alabama, wherein Albert L. Deane, is Complainant, and Gabriel Pury, et al., Defendants; and we hereby authorize and empower you to call and cause to come before you the said witnesses and take their deposition on oath, as well as for the Plaintiff as for the Defendant, touching their knowledge of the matters and things in controversy in said suit, which deposition when so taken shall be signed by said witnesses and certified by you as such Commissioner; and you are further commanded that the deposition when so taken, with this commission, to return under your hand and seal to the Register of said Court, with all convenient speed.

WITNESS my hand this the 14 day of April, 1937.

R. S. Duck.  
Register.

ALBERT L. DEANE,  
Complainant,  
VS.  
GABRIEL PURY, ET AL.,  
Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY,  
NO. 298.

TO GABRIEL PURY AND TERESA PURY, OR THEIR HEIRS OR DEVISEES, AND ANY AND ALL PERSONS CLAIMING ANY TITLE TO, INTEREST IN OR ENCUMBRANCE UPON THE SW $\frac{1}{4}$  OF THE NW $\frac{1}{4}$  OF SECTION 4, TOWNSHIP 8 SOUTH, RANGE 6 EAST:

Take notice that the Complainant in the above entitled cause has this day filed an application to have examined orally before O'Byrne Jones, as Commissioner, the following named witnesses, all of whom reside in Baldwin County, Alabama, viz:

H. M. Gilly; W. M. Gilly; T. F. Gilly and Hubert M. Hall;  
and further that an order has this day been made allowing the said examination of said witnesses as applied for, and that the same will be had at Bay Minette, in Baldwin County, Alabama, on the 11 day of May, 1937.

You may attend if you choose to do so.

WITNESS my hand this the 6 day of May, 1937.

RS Ketch  
Register.

ALBERT L. DEANE,  
Complainant,  
VS.  
GABRIEL PURY, ET AL.,  
Respondents.


IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY,  
NO. 298.

Now comes the Complainant, by Beebe, Hall & Beebe, his Solicitors of record, and makes application to the Register of said Court to issue a commission to take the testimony in said cause, on oral examination, of the following witnesses who reside in Baldwin County, Alabama, viz:

|                |                      |
|----------------|----------------------|
| H. M. Gilly    | Lillian, Alabama     |
| W. M. Gilly    | Lillian, Alabama     |
| T. F. Gilly    | Lillian, Alabama     |
| Hubert M. Hall | Bay Minette, Alabama |

And Complainant suggests the name of O'Byrne Jones, who resides at Bay Minette, Alabama, as a suitable person to be appointed commissioner to take the testimony of said witnesses.

This 14 day of April, 1937.

  
Solicitors for the Complainant.



RECORDED  
J. M. R. Duck  
7-112

ORDER OF REGISTER UPON APPLICATION  
FOR ORAL EXAMINATION

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURX, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NO. 298.

*Filed May 6, 1937.*

*P. S. Myers  
Register.*

*Deeds*  
RECORDED  
7-112

APPLICATION FOR ORAL  
EXAMINATION

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURX, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN-COUNTY, - ALABAMA,

IN EQUITY,

NO. 298.

*Filed May 6, 1937.*  
*R. S. Deeds, Register*



RECORDED  
*Swick*  
*7-113*

NOTICE OF TAKING TESTIMONY

ALBERT L. DEANE,  
Complainant,  
VS.  
GABRIEL PURY, ET AL.,  
Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY,  
NO. 298.

*Filed May 6, 1937.*  
*R. S. Swick, Register.*

COMMISSION TO TAKE DEPOSITION

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURY, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NO. 298.

*Filed May 6 1937.  
R. S. Smith, Register.*

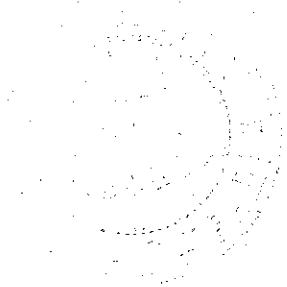
STATE OF ALABAMA,  
BALDWIN COUNTY.

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 in the matter of Albert L. Deane vs. Gabriel Pury and others, as entered in this cause and duly published in the Baldwin Times, a newspaper published at Bay Minette, Alabama.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on this the 11<sup>th</sup> day of February, 1937.

*R. S. Duck*

(SEAL)



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

*157 1/2  
2/11/37*

Respondents.

GABRIEL PURY and  
TERESA PURY and  
SHEPHERD OF SECTION  
4, TOWNSHIP 8 SOUTH OF  
RANGE 6 EAST,

VS.

ALBERT L. DEANE,  
Complainant.

*See Deane's notice*

State of Alabama, }  
Baldwin County, }

Probate Court  
FEB 11 1937

Filed in office this \_\_\_\_\_ day of \_\_\_\_\_

19 \_\_\_\_\_ at 11:30 a.m. and duly recorded

*Deane* Book No. 1 at page 60-1

and I certify that \$ \_\_\_\_\_ cts. Deed  
tax and \$ \_\_\_\_\_ cts. Mitge tax, has  
been paid as required by law.

*R. S. Duck*  
Judge of Probate

OK

*63*

*R S Duck*

The State of Alabama,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.  
No. 298. Spring. Term, 192 37

~~Albert L Deane.~~ Albert L Deane. Complainant.  
vs: Gabriel Pury and Teresa Pury. Defendant.

In this cause it appears to the Register R S Duck. that the order of publi-  
cation heretofore made in this cause, was published for four consecutive weeks, commencing on the  
11th day of February, 192 37, in the Baldwin Times.  
a newspaper published in Bay Minette Alabama, that a copy of said order was posted  
at the Court House door in Baldwin. County, on the 11th day of  
February 192 37., and

And it now further appearing to the Register R S Duck., that the said  
Gabriel Pury and Teresa Pury

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it  
is now, therefore, on motion of Complainant., ordered and decreed by the Register  
R S Duck. that the Bill of Complaint in this cause be, and it hereby is in all things  
taken as confessed against the said Gabriel Pury and Teresa Pury.

This 12th day of April. 192 37

*R S Duck* Register.

ALBERT L. DEANE,  
Complainant,

VS.

GABRIEL PURY and  
TERESA PURY and  
SW $\frac{1}{4}$  of NW $\frac{1}{4}$  of Section  
4, Township 8 South of  
Range 6 East,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NO. 298.

This cause coming on to be heard was submitted for final decree upon the pleadings, decree pro confesso and proof as noted by the Register, and it appearing to the Court that the Complainant is the owner of and in the possession of the said property and that the title of the Complainant has been duly proven by legal and competent evidence, the Court is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the Respondents, Gabriel Pury and the unknown heirs and devisees of Gabriel Pury, and Teresa Pury, and the unknown heirs and devisees of Teresa Pury, have no estate, right, claim, interest in, or encumbrance upon the following described lands or any part thereof, to-wit:

The Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East, in Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the full fee simple title to said lands, to-wit, The Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East, in Baldwin County, Alabama, is vested absolutely in the Complainant, Albert L. Deane.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that a certified copy of this decree be recorded in the Office of the Judge of Probate of Baldwin County, Alabama, in the Direct Index in the name of Gabriel Pury, Teresa Pury, the unknown heirs of Gabriel Pury, and the unknown heirs of Teresa Pury, and in the Indirect Index in the name of Albert L. Deane.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register shall, within thirty days from the rendition of this decree, file a certified copy thereof in the Office of the Judge of Probate of Baldwin County, Alabama, for record, and that the cost 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.

Done at Monroeville, Alabama, on the 22<sup>nd</sup> day  
of May, 1937.

J. W. Hare

Judge of the 21st Judicial Circuit  
of Alabama.

H. M. GILLY, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is H. M. Gilly. I am sixty-three years of age and live at Lillian, in Baldwin County, Alabama, where I have lived for the past forty-two years.

I am personally acquainted with Albert L. Deane, who is over twenty-one years of age and a resident of New York City, New York, his Post Office address being 1775 Broadway.

I am acquainted with that tract of land in Baldwin County, Alabama, described as the Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East. It is about four and a quarter miles from where I live.

I have worked for Mr. Deane, during the latter part of the year 1929 and a part of the year 1930.

In 1929, I was employed by Mr. Deane, together with my four sons, W. M. Gilly, T. F. Gilly, J. J. Gilly, and R. G. Gilly.

We were employed to fence Mr. Deane's land. He at that time owned a large tract of land in Baldwin County, Alabama, including the above. We set posts and stretched wire around practically all of his land; that the above land was completely fenced.

I have had occasion to pass by this land from time to time since the fence was built and know that the fences are still maintained and the above parcel of land is enclosed. I know of my own personal knowledge that Mr. Deane has been in the open, visible, peaceable, adverse and continuous possession of said land, ever claiming to own the same and having it under fence since the latter part of 1929.

I have watched after land in this section of the County and am well acquainted with practically all of the land. I know that no one has disputed Mr. Deane's title to the above land during the time I have known it.

Prior to the time Mr. Deane acquired and fenced this land, it was open with nobody in the actual possession.

I am not personally acquainted with either Gabriel Pury or Teresa Pury, his wife, but do know that they have never lived in Baldwin County, Alabama - that is - at least they have never lived on the above described land.

I do not know whether Gabriel Pury or Teresa Pury, his wife, are living or dead.

I am, as I have stated, acquainted with lands in this section of the County and know of no suit pending in any of the Courts of this County to question the title to the said land.

During sometime in 1929, Mr. Deane had a local representative here by the name of Ben W. Sture, who lived on Mr. Deane's tract of land and he was daily over the property protecting Mr. Deane's interest and seeing that there were no trespassers.

  
(H. M. Gilly)



HUBERT M. HALL, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN,  
DEPOSES AND SAYS:

My name is Hubert M. Hall. I am a resident of Bay Minette, Baldwin County, Alabama; that he is one of the Solicitors of record for the Complainant in the case of Albert L. Deane, Complainant, vs. Gabriel Pury and Teresa Pury, Respondents; that as such Solicitor and at the request and in accordance with instructions from the Complainant, he made and caused to be made a diligent search of the records in the Office of the Probate Judge of Baldwin County, Alabama, with reference to the ownership of that tract of land in Baldwin County, Alabama, described as the Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East; that said land at one time belonged to the Southern States Lumber Company, a Corporation, which conveyed it to the Baldwin County Colonization Company, a Corporation; that the Baldwin County Colonization Company, on January 1st, 1916, conveyed the said land to Gabriel Pury and Teresa Pury, husband and wife, as shown by deed of record in Deed Book 24 NS, page 160, in the office of the Probate Judge of Baldwin County, Alabama; that there was a recital in the said deed to the affect that the Grantees are Gabriel Pury and Teresa Pury, husband and wife, as joint tenants and not as tenants in common of the City of Wadsworth, in the County of Medina, in the State of Ohio; that he made inquiry among the citizens and residents of Baldwin County, Alabama, in and near Elberta and Lillian, in said County, this being in the vicinity of the said land, and also of Wayne W. Garver, Citizens Bank Building, Wadsworth, Ohio; Roy E. Sebrell, Albrecht Building, Wadsworth, Ohio; J. B. Irwin, Assistant Cashier of the First National Bank of Wadsworth, Wadsworth, Ohio; C. E. Curtis of LeRoy, Ohio, and of various other parties relative to the present addresses of the Respondents, Gabriel Pury and Teresa Pury, or either of them, and as to whether or not they were dead or living, and as to any heirs they might have, but was unable to obtain any information, but from such information as available, the said Gabriel Pury and Teresa Pury are and have been at all times non-residents of the State of Alabama and over twenty-one years of age; that he has also made a search of the records with reference to any other claimants to said property, but has found none except the said Gabriel Pury and Teresa Pury, Albert L. Deane and those through whom he claims;

W. M. GILLY, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is W. M. Gilly. I live at Lillian, in Baldwin County, Alabama. I know and have known for the past fifteen years the following described lands in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East;

This land was formerly a part of what is known as the Southern States Lumber Company Tract. Some several years ago this land was supposed to have been owned by Gabriel Pury and Teresa Pury, his wife, however, they never did live on it. It was open, unfenced land until in the latter part of 1929, when Mr. Albert L. Deane came into possession of it and my father and I and my brothers were employed by Mr. Deane to fence it. We at that time built a fence which completely enclosed the said land. Mr. Deane has kept up the fences since that time and has at all times been in the actual possession of said land. I do not know the said Gabriel Pury or Teresa Pury, but do know that they do not live in Baldwin County, Alabama, and am advised and have been advised that they are non-residents of the State of Alabama, living somewhere in Ohio, or did live there.

W. M. Gilly  
(W. M. Gilly)

EXHIBIT "A"


STATE OF ALABAMA, )  
BALDWIN COUNTY. )

KNOW ALL MEN BY THESE PRESENTS, That I, H. M. HALL, unmarried, for and in consideration of the sum of ONE (\$1.00) DOLLAR and other good and valuable considerations to me in hand paid by ALBERT L. DEANE, the receipt of which is hereby acknowledged, do hereby REMISE, RELEASE, QUIT CLAIM and CONVEY unto the said ALBERT L. DEANE, all my right, title, interest and claim, in and to the following described lands in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East.

TO HAVE AND TO HOLD with the appurtenances thereunto belonging unto the said ALBERT L. DEANE, his heirs and assigns forever.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on this the 12th day of August, 1935.

 (SEAL)

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

I, W. C. Beebe, a Notary Public, in and for said County, in said State, hereby certify that H. M. Hall, unmarried, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 12th day of August, 1935.

  
Notary Public, Baldwin County, Alabama.

ALBERT L. DEANE,  
Complainant,  
VS.  
GABRIEL PURY, ET AL.,  
Respondents.

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

CERTIFICATE

I, O'BYRNE JONES, under and by virtue of a commission issued out of the Circuit Court, in Equity, of Baldwin County, Alabama, in said entitled cause, therein pending, do hereby certify that I caused to come before me at Bay Minette, in Baldwin County, Alabama, on the 11th day of May, 1937, the aforesaid witnesses, H. M. Gilly, W. M. Gilly, T. F. Gilly, and Hubert M. Hall; that I have personal knowledge of the said H. M. Gilly, W. M. Gilly, T. F. Gilly and Hubert M. Hall; that each of said witnesses, after being duly sworn to tell the truth, the whole truth, and nothing but the truth, was examined by me and testified as hereinbefore shown, his answer being reduced to writing as near as might be, in his own language; whereupon he subscribed his name to the same, in my presence. And I further certify that I am neither of counsel nor kin to any of the parties to said cause, nor in any manner interested in the result thereof.

WITNESS my hand and seal, this 11th day of May, 1937.

O'Byrne Jones  
Commissioner.

TO O'BYRNE JONES, COMMISSIONER:

To taking the testimony of H. M. Gilly, W. M. Gilly, T. F. Gilly and Hubert  
M. Hall ..... \$10.00

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURY and  
TERESA PURY and  
SW $\frac{1}{4}$  OF NW $\frac{1}{4}$  OF SECTION  
4, TOWNSHIP 8 SOUTH OF  
RANGE 6 EAST.

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Comes your Complainant, Albert L. Deane, and presenting this his bill of complaint against that certain tract of land in Baldwin County, Alabama, described as follows, to-wit: The Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East, and against Gabriel Pury, if he be living, and if he be dead, against his heirs and devisees, and against Teresa Pury, if she be living, and if she be dead, against her heirs and devisees, and against any and all persons claiming any title to, interest in, lien or encumbrance upon the said land or any part thereof, and respectfully represents and shows unto your Honor as follows:

FIRST:

That your Complainant is over the age of twenty-one years and a resident of 1775 Broadway, New York City, New York; that he is the owner in fee simple of and in the actual possession of said lands, described as follows, situated in Baldwin County, Alabama, to-wit:

The Southwest quarter of the Northwest quarter of Section 4, Township 8 South of Range 6 East.

SECOND:

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

THIRD:

That the Complainant obtained title to said land by purchase from H. M. Hall, by deed dated August 12th, 1935, and of record in the Office of the Probate Judge of Baldwin County, Alabama.

FOURTH:

That the title to said lands claimed by Complainant stands upon the records in the Probate Court of Baldwin County, Alabama, in the name of your Complainant, Albert L. Deane.

to each part thereof, is vested in your Complainant, as against any and all persons claiming any title to, interest in, lien or encumbrance upon the said land, or any part thereof, and that all doubts and disputes concerning the same be cleared up. And your Complainant prays for such other, further, different or general relief as in equity and good conscience shall seem mete and proper.

Beulah Deane Beale  
Solicitor for the Complainant.

FOOT NOTE:

The Respondents, and each of them, and all persons claiming any title to, interest in, lien or encumbrance upon the said land described in this bill of complaint, or any part thereof, are required to answer all the allegations of said bill of complaint from paragraphs First to Sixth, inclusive, but not under oath, oath being hereby expressly waived.

Beulah Deane Beale  
Solicitor for the Complainant.

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

Before me, the undersigned authority, in and for said County, in said State, personally appeared Hubert M. Hall, who is known to me, and who having been by me first duly sworn, deposes and says, that he is the Solicitor of record and agent of the Complainant, Albert L. Deane, in the above styled cause, and duly authorized by him to make this oath and that the facts stated in the foregoing bill of complaint/upon knowledge are true and that he is informed as to the facts stated upon information and belief as therein stated and verily believes, and so states, that the same are true.

Hubert M. Hall

Sworn to and subscribed before me this 11<sup>th</sup> day of February, 1937.

Mary Lou Fortenberry  
Notary Public, Baldwin County,  
Alabama.

That the Complainant, Albert L. Deane, is over the age of twenty-one years and his Post Office address being 1775 Broadway, New York City, New York; that no suit is pending to test the Complainant's title to, interest in or his rights to the possession of the said land; that the Complainant went into the actual possession of said land during the latter part of 1929 and at that time enclosed the same with a forty-seven inch wire fence and has maintained the said fences continuously up to and including the present time; that the Complainant claims title to said lands by purchase from Hubert M. Hall, by a deed dated August 12th, 1935, and of record in the Office of the Probate Judge of Baldwin County, Alabama, and that the said land now stands upon the records in the Probate Court of Baldwin County, Alabama, in the name of the Complainant, Albert L. Deane; that he has made an examination as to the claimants of said lands during the last ten years, according to the land and tax records in the Offices of the Tax Assessor, Tax Collector and Probate Judge of Baldwin County, Alabama, and found that the lands had not been assessed by anyone or claimed upon the records by anyone other than Albert L. Deane, H. M. Hall and Gabriel Pury; that no one has been in the possession of said land, or any part thereof, during said time, except Albert L. Deane and those through whom he claims, attached as Exhibit "A" is original deed from H. M. Hall to Albert L. Deane, which is offered in evidence.

  
Hubert M. Hall  
(Hubert M. Hall)

Number 2-

RECORDED

273  
224

FINAL DECREE

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURY and TERESA  
PURY and SW $\frac{1}{4}$  of NW $\frac{1}{4}$  of  
Section 4, Township 8  
South of Range 6 East.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NO. 298.

*Filed May 24 1937*  
*Robert*  
*Ex parte*



DEPOSITION

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURY, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed May 15, 1937.  
R. D. Sikes, Register.*

Deed

H. M. Wallace

to

Albert P. Deane

8/12/35

51  
65

State of Alabama, Probate Court,  
Telfair County, MAY - 0 1937

Writ in office this day of  
846 and duly recorded

Deed No. 6245 118

50 Deed

paid I certify that  
has and is  
been paid as required by law.

*W. Deane*  
Judge of Probate

At 711 Wallace  
City  
D. J. Deane  
1960  
110

INDEXED  
Duck  
7-22

BILL OF COMPLAINT

ALBERT L. DEANE,

Complainant,

VS.

GABRIEL PURY and  
TERESA PURY and  
Sons of Mrs. OF SECTION  
4, TOWNSHIP 8 SOUTH OF  
RANGE 6 EAST,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN REPLY.

Filed February 11, 1939  
D. S. Duckel Register

BAY MINETTE, ALA

3-6-37

M R. S. Duck, Register

# THE BALDWIN TIMES

"Alabama's Best County's Best Newspaper"

A. L. Deane vs. Gabriel Perry

294 Words @ 4 1/2¢ — 13.23

Date \_\_\_\_\_

File # \_\_\_\_\_

Recorded Minute Book

ALBERT L. DEANE,

Complainant,

vs.

GABRIEL PURY and TERESA PURY

and CERTAIN LANDS,

Respondents.

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, Decree Pro Confesso on Publication, Application for Oral Examination, Order of Register upon Application for Oral Examination, Notice of taking Testimony, Depositions of H. M. Gilly, W. M. Gilly, T. F. Gilly and Hubert M. Hall.

and in behalf of Defendant upon

*R. J. Duck*

Register.

**Moore Printing Co.**  
Phone 142 Bay Minette, Ala.

10  
11 Dated  
12  
1 Filed  
2  
3 Taken from papers  
on file in said  
matter.

*Duck*  
RECORDED

*Minute 2-273*

No. \_\_\_\_\_

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

VS.

**NOTE OF TESTIMONY**

Filed in Open Court this 17<sup>th</sup>

day of May, 1937

R. L. Duck.

REGISTER

*Duck*

RECORDED

*Minute 2-273*

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**IN EQUITY**  
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REGISTER