

spondents to this Bill of Complaint, requiring them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER.

Complainant further prays that upon the hearing of this complaint, this Honorable Court establish the title of Complainant in and to the lands herein described, and further find and decree that the said A. L. LEE and THE PACE COMPANY, a Corporation, have no claim, right, title, or interest in, or encumbrance upon the said lands herein described, or any part thereof, and further grant unto your Complainant such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Bebersteele & Beber
Solicitors for the Complainant.

FOOT NOTE:

The Respondents, A. L. LEE and THE PACE COMPANY, a Corporation, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 5, inclusive, but not under oath, oath being hereby expressly waived.

Bebersteele & Beber
Solicitors for the Complainant.

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon THE PAGE COMPANY, a Corporation,
of Pensacola, Florida

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

MYRTLE M. KELLY,

against said A. L. LEE and THE PAGE COMPANY, a Corporation,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said
Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with
your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 19th day
of April, 193 7

Robert S. Duck—Register

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

MYRTLE M. KELLY,

Complainant,

VS.

A. L. LEE and THE PACE COMPANY,

Respondents.

IN THE CIRCUIT COURT OF

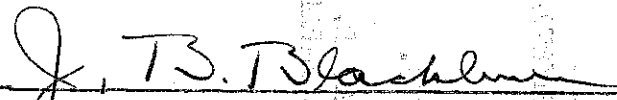
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. 322.

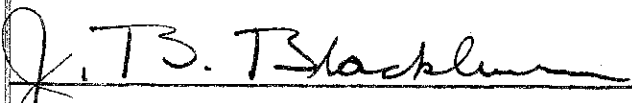
Now come the Respondents in the above entitled cause, by their attorney, and respectfully shows that the Complainant in the said cause is a non-resident of the State of Alabama.

WHEREFORE, Respondents move the Court to require the said Complainant to deposit or secure the Court costs in the said cause or dismiss said Bill of Complaint out of this Court.



Attorney for Respondents.

Respondents demand a trial of said cause by jury.



Attorney for Respondents.

BERNIE M. KELLY,

Complainant,

vs.

A. L. LEE and THE PACE
COMPANY, a Corporation,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Comes your Complainant, BERNIE M. KELLY, formerly BERNIE M. WATERS,
and respectfully represents and shows unto your Honor and this Honorable Court
as follows:

1. That she is a resident of San Diego, California, and over twenty-
one years of age.

2. That the Respondent, A. L. LEE, is over twenty-one years of age,
and a resident of Baldwin County, Alabama; that the Respondent, THE PACE COM-
PANY, is a corporation with its principal place of business in the City of
Pensacola, Florida.

3. That your Complainant is in the quiet and peaceable possession,
claiming to own the same in her own right, of the following described lands in
Baldwin County, Alabama, to-wit:

The North half of the Northwest quarter of Section
11, Township 4 South of Range 3 East.

4. Complainant further alleges that the Respondents, A. L. LEE and
THE PACE COMPANY, a Corporation, claim or are reputed to claim some right, title,
or interest in, or encumbrance upon said lands.

5. That your Complainant further alleges that no suit is pending to
question or test the validity of such claim, right, title, or interest in, or
encumbrance of the said Respondents, and the Complainant therefore calls upon
the Respondents to set forth and specify their right, title, or interest in,
or encumbrance upon said land and to show how and by what instrument the same
is derived or created.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, Complainant prays that your Honor
will take jurisdiction of the cause made by this Bill of Complaint and by appro-
priate process make the said A. L. LEE and THE PACE COMPANY, a Corporation, re-

MYRTLE M. KELLY,

Complainant,

VS.

A. L. LEE AND THE PACE COMPANY,
A CORPORATION,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.


IN EQUITY. NO. 322.

ANSWER AND CROSS BILL.

Now come the Respondents in the above entitled cause and for answer to the Bill of Complaint in said cause and to each and every paragraph thereof separately and severally and for this their Cross Bill say:

1. Respondents admit the allegations of paragraphs numbered 1 and 2 of the said Bill of Complaint.
2. Respondents deny that the Complainant owns and that she is in peaceable possession of the property described in the Bill of Complaint, namely: North Half of Northwest Quarter of Section 11, Township 4 South Range 5 East, Baldwin County, Alabama.
3. The Respondent, A. L. Lee, claims to own the land described in the Bill of Complaint, namely: North Half of Northwest Quarter of Section 11, Township 4 South Range 5 East, in Baldwin County, Alabama, under a tax title arising out of the tax sale held on to-wit, September 1, 1933, wherein the lands were sold by Jesse M. Smith, TaxCollector to the State of Alabama, which assigned the Certificate of Sale to A. L. Lee, and on to-wit, January 4, 1937 a tax deed was made by G. W. Robertson, Judge of Probate to A. L. Lee, dated January 4, 1937 and recorded in Deed Book 61 N. S. at Page 157, reference to which is hereby made as though the same were fully incorporated herein.
4. Respondents admit that no suit other than this suit is pending to enforce or test the validity of Complainant's title to or interest in the said lands.
5. Respondents deny each and all other allegations of the Bill of Complaint which are not herein specifically answered.

to answer each and every paragraph of the foregoing Cross Bill but not under oath, the benefit whereof is hereby expressly waived.


Solicitor for Respondents and Cross
Complainants.

PLAINT FOR REDEMPTION

The said A. J. Lee and The Trust Company, a Corporation,

having now answered the said Bill of Complaint, pray that their
their answer may be taken and treated in all respects as if it were
Bill and that the said Article 11.11 may be made a party respondent
to this Cross Bill and that she have notice of same according to
the rules and practice of this Honorable Court.

PLAINT FOR REDEMPTION

Respondents and Cross Complainants pray that upon a final

hearing of this cause it be decreed that the Respondent and Cross
Complainant, A. J. Lee, is the owner of the said property as defined
the Complainant and Cross Respondent, subject only to her right to
redeem the said property from the said sale, and upon her failure
to redeem the said property and pay the full amount due thereon, in-
cluding taxes, fees, costs, penalties, interest, attorney's fees and
Respondents and Cross Complainants' attorney in bringing this Bill,
and all other proper and lawful charges within some reasonable time
to be fixed by the Court; that Respondents and Cross Complainants be
placed in possession of said lands; that it be adjudged and decreed
that Complainant and Cross Respondent has no lien, title, claim or
interest in or charge upon the said lands or any part thereof;
that the title to the said land be deleted and established in the
Respondents and Cross Complainant, A. J. Lee, in favor of the Com-
plainant and Cross Respondent, and that she be forever enjoined from
asserting, attempting to assert, claiming or extending or claim
any right, title, claim or interest in, lien or charge upon or
possession of the said lands or any part thereof.
Respondents and Cross Complainants further pray for such
other, further and general relief as they or either of them may be
legally entitled to the premises considered.

Subscribed for Respondents and Cross
Complainants.

JOHN ROBEY: The said Complainant and Cross Respondent is produced

**CIRCUIT COURT, BALDWIN COUNTY, ALA.
IN EQUITY**

No. *Master Bailey*
322

vs. *A Lee et al*

PLAINTIFF
DEFENDANT

BILL OF COSTS

FEES OF REGISTER		Dollars	Cents		
Filing each bill and other papers	\$ 10			Brought Forward	\$ 3 60
Issuing each subpoena	50			For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
Issuing each copy thereof	40			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Entering each return thereof	15			Each notice sent by mail to creditor	15
For each order of publication	1 00			Filing receipting for and docketing each claim, etc.	25
Issuing Writ of injunction	1 50			For all entries on subpoena docket, etc.	50
For each copy thereof	50			For all entries on commission docket, etc.	50
Entering each return thereof	15			Making final record. per 100 words	15
Issuing Writ of Attachment	1 00			Certified copy of decree	1 00
Entering each return thereof	15			Report of divorce to State Health Office (Acts 1915)	50
Docketing each case	1 00			TOTAL FEES OF REGISTER..	
Entering each appearance	25	100		FEES OF SHERIFF	67 60
Issuing each decree pro confesso on per ser.	1 00			Serving and returning subpoena on deft.	1 50
issuing each decree pro confesso on publica	1 00			Serving and returning subpoena for witness	65
Each order appointing guardian	1 00			Levying attachment	1 50
Any other order by Register	50			Entering and returning same	25
Issuing Commission to take testimony	50			Selling property attached	75
Receiving and filing	10			Impanelling Jury	75
Endorsing each package	10			Executing Writ of possession	2 50
Entering order submitting cause	50			Collecting execution for costs	1 50
Entering any other order of court	25			Serving and returning sci. fa., each	65
Noting all testimony	50			Serving and returning notice	65
Abstract of cause, etc.	1 00			Serving and returning writ of injunction	1 50
Entering each decree	75			Serving and returning writ of exeat	1 50
For every 100 words over 500	15			Taking and approving bonds, each	75
Taking account, etc.	3 00			Collecting money on execution	2 50
Taking testimony, etc	15			Making Deed	2 50
Each report, 500 words or less	2 50			Serving and returning application, etc.	1 00
For every 100 words over 500	15			Serving attachment, contempt of court	1 50
Amount claimed less than \$500, etc	2 00			TOTAL FEES OF SHERIFF..	1 50
Issuing each subpoena	25			RECAPITULATION	
Witness certificate, each	25			Register's Fees	7 60
Issuing execution, each	75			Sheriff's Fees	1 50
Entering each return	15			Commissioner's Fees	
Taking and approving bond, each	1 00			Solicitor's Fees	
Making copy of bill, etc	15			Witness Fees	
Each notice not otherwise provided for	50			Guardian Ad Litem	
Each certificate or affidavit, with seal	50			Printer's Fees	
Each certificate or affidavit, no seal	25			Trial Tax	3 00
Hearing and passing on application, etc.	3 00			Recording Decree in Probate Court	
Each settlement with Receiver, etc.	3 00			TOTAL	12 10
Examining each voucher of Receiver, etc	10				
Examining each answer, etc.	3 00				
Recording resignation, etc	75				
Entering each certificate to Supreme Court	50				
Taking questions and answers, etc	25				
For all other ser relating to such proceedings	1 00				
For services in proceeding to relieve minors, etc., same fee as in similar cases.					
Commission on sales, etc: 1st \$100, 2 per cent; all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward					

Received payment this _____ day of _____ 193_____

Register.

**CIRCUIT COURT, BALDWIN COUNTY, ALA.
IN EQUITY**

No. *Margaret Kelley*
322

vs. *A L Lee et al*

PLAINTIFF
DEFENDANT

BILL OF COSTS

FEES OF REGISTER		Dollars	Cents	Brought Forward	
Filing each bill and other papers	\$ 10				\$ 3 60
Issuing each subpoena	50				
Issuing each copy thereof	40				
Entering each return thereof	15				
For each order of publication	1 00				
Issuing Writ of injunction	1 50				
For each copy thereof	50				
Entering each return thereof	15				
Issuing Writ of Attachment	1 00				
Entering each return thereof	15				
Docketing each case	1 00				
Entering each appearance	25				
Issuing each decree pro confesso on per ser.	1 00				
Issuing each decree pro confesso on publica	1 00				
Each order appointing guardian	1 00				
Any other order by Register	50				
Issuing Commission to take testimony	50				
Receiving and filing	10				
Endorsing each package	10				
Entering order submitting cause	50				
Entering any other order of court	25				
Noting all testimony	50				
Abstract of cause, etc.	1 00				
Entering each decree	75				
For every 100 words over 500	15				
Taking account, etc.	3 00				
Taking testimony, etc.	15				
Each report, 500 words or less	2 50				
For every 100 words over 500	15				
Amount claimed less than \$500, etc.	2 00				
Issuing each subpoena	25				
Witness certificate, each	25				
Issuing execution, each	75				
Entering each return	15				
Taking and approving bond, each	1 00				
Making copy of bill, etc.	15				
Each notice not otherwise provided for	50				
Each certificate or affidavit, with seal	50				
Each certificate or affidavit, no seal	25				
Hearing and passing on application, etc.	3 00				
Each settlement with Receiver, etc.	3 00				
Examining each voucher of Receiver, etc.	10				
Examining each answer, etc.	3 00				
Recording resignation, etc.	75				
Entering each certificate to Supreme Court	50				
Taking questions and answers, etc.	25				
For all other ser relating to such proceedings	1 00				
For services in proceeding to relieve minors, etc., same fee as in similar cases.					
Commission on sales, etc: 1st \$100, 2 per cent: all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward					
				For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
				Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
				Each notice sent by mail to creditor ...	15
				Filing receipting for and docketing each claim, etc.	25
				For all entries on subpoena docket, etc.	50
				For all entries on commission docket, etc.	50
				Making final record. per 100 words	15
				Certified copy of decree	1 00
				Report of divorce to State Health Office (Acts 1915)	50
				TOTAL FEES OF REGISTER	3 60
				FEES OF SHERIFF	7 60
				Serving and returning subpoena on deft.	1 50
				Serving and returning subpoena for witness	65
				Levying attachment	1 50
				Entering and returning same	25
				Selling property attached	75
				Impaneling Jury	2 50
				Executing Writ of possession	1 50
				Collecting execution for costs	65
				Serving and returning sci. fa., each	65
				Serving and returning notice	1 50
				Serving and returning writ of injunction	1 50
				Serving and returning writ of exeat	75
				Taking and approving bonds, each	2 50
				Collecting money on execution	1 00
				Making Deed	1 50
				Serving and returning application, etc.	
				Serving attachment, contempt of court.	
				TOTAL FEES OF SHERIFF	7 60
				RECAPITULATION	1 50
				Register's Fees	7 60
				Sheriff's Fees	1 50
				Commissioner's Fees	
				Solicitor's Fees	
				Witness Fees	
				Guardian Ad Litem	
				Printer's Fees	
				Trial Tax	3 00
				Recording Decree in Probate Court	3 00
				TOTAL	12 10

Post Office Department
OFFICIAL BUSINESS



REGISTERED ARTICLE

No. _____

INSURED PARCEL

No. _____

Return to R. E. Duck Clark

(NAME OF SENDER)

Street and Number, or Post Office Box, _____

Post Office at Bay Minette

State Alabama

RECEIPT FOR REGISTERED ARTICLE No. _____

14 fee paid. _____ class postage paid. 4-19 1937

Declared value 10.00 Surcharges paid _____

From R. E. Duck Clark (Sender) block of board

Addressed to _____ (Post office and State)

Pensacola (Address) _____ (Post office and State)

Accepting employees will place initials in space below, indicating restricted delivery

Return receipt fee _____ { In person 10 Special delivery fee _____
or order _____

Delivery restricted to addressee { Fee paid 3 Postmaster, per 1/2



THE
CROSS
CO.
BY
THE
CROSS
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BY
THE
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