

LOUISE LAWRENZ,
 Complainant,
 vs.
 GULF COAST CITRUS EXCHANGE,
 et al,
 Respondents.

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA

DECREE

This cause coming on to be heard on the Bill of Complaint, the Answer of the Respondent, Merchants National Bank of Mobile, decrees pro confesso against all other respondents and the evidence and was submitted to the Court and it appearing to the Court from the certificate of the Register that service upon each and all of the respondents was due and regular and in conformity with the laws of the State of Alabama, the Court finds, it has jurisdiction of the respondents and of the subject matter of the complaint.

Upon consideration of the pleadings and the evidence, the Court finds, that the allegations of the bill of complaint are true and that the complainant is entitled to relief as prayed.

IT IS, THEREFORE, ORDERED, ADJUDGED and DECREED that the Respondents, Gulf Coast Citrus Exchange, a corporation, Merchants National Bank, a corporation, Pennsylvania Railroad Company, a corporation, New York Central Railroad Company, a corporation, Virginia-Carolina Chemical Company, a corporation, McKesson-Bedsole Colvin, Inc., a corporation, Bedsole Investment Company, a corporation, Alabama Basket Company, a corporation, and Royal Indemnity Company, a corporation, have no right, title or interest in or lien or encumbrance upon the following described real estate in Baldwin County, Alabama, to-wit: Lots one (1) Two (2) and Three (3) in Block O in the Town of Foley.

That the title of the Complainant in and to said real estate be, and the same hereby is, quieted and confirmed in the Complainant and the Respondents and each of them be, and they hereby are, forever enjoined from having, claiming or asserting any right, interest, title, lien or encumbrance upon said land or any

part thereof and that the complainant pay the costs of this action
taxes at \$ 6937

Dated this 19th day of November, 1937.

F. W. Ware

Judge

The State of Alabama,
Baldwin County.

{ No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ, Complainant

vs.

ALABAMA, BASKET CO., ET AL., Defendant

In this cause it appears to the Register
that a summons requiring the Defendant ALABAMA BASKET COMPANY

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 it
was served upon by the Sheriff of Barbour County, Alabama, on the
1st day of June 19 37

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, Solicitor for Complainant.

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things
taken as confessed against the said
ALABAMA BASKET COMPANY

Defendant aforesaid.

This 18th day of August 19 37

R. S. Duch Register.

The State of Alabama,
Baldwin County.

No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ,

Complainant

vs.

GULF COAST CITRUS EXCHANGE, ET AL.,

Defendant

In this cause it appears to the Register,

that a summons requiring the Defendant

ROYAL INDEMNITY COMPANY, THAMES & BATRE, Agents

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 them

was served upon by the Sheriff of Mobile County, Alabama, on the 5th day of June 1937

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, Solicitor for the Complainant,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said ROYAL INDEMNITY COMPANY, Thames & Batre, Agents,

Defendant aforesaid.

This 18th day of August, 1937

R. E. Duck Register.

The State of Alabama,
Baldwin County.

No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ, Complainant

vs.

VIRGINIA-CAROLINA CHEMICAL CORP, Etal. Defendant

In this cause it appears to the Register

that a summons requiring the Defendant

VIRGINIA-CAROLINA CHEMICAL CORPORATION,

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

was served upon by the Sheriff of Mobile County, Alabama, on the 11th day of June 1937

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, Solicitor for Complainant,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said

Defendant aforesaid.

This 18th day of August 19 37

[Signature] Register.

The State of Alabama, { No. 338 CIRCUIT COURT IN EQUITY.
Baldwin County.

LOUISE LAWRENZ, Complainant

vs.

GULF COAST CITRUS EXCHANGE, ET AL., Defendant

In this cause it appears to the Register

that a summons requiring the Defendant

MCKESSON, BEDSOLE, COLVIN, CO. & BEDSOLE INVESTMENT COMPANY,

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 them

was served upon by the Sheriff of Mobile County, Alabama, on the 10th day of June 19 37

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, Solicitor for the Complainant,.....

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said

BEDSOLE INVESTMENT COMPANY & MCKESSON, BEDSOLE, COLVIN COMPANY,

Defendant aforesaid.

This 18th day of August 19 37

R. S. Durb Register.

LOUISE LAWRENZ.

THE STATE OF ALABAMA,

Baldwin. COUNTY.

vs.

GULF COAST CIGRUS EXCHANGE. a Corporation. et al.

CIRCUIT COURT, IN EQUITY.

Oct. Term, 19 37

I, R S Duck.

Register of the Circuit Court of

Baldwin.

County, of the State of Alabama, hereby certify that on the affidavit

of Lloyd A Magney.

on the 29 day of May 19 37, an order of publication was made to

Central.

Pennsylvania Railroad Co and New York Railroad Co.

who non-resident

who reside at

and was published in the Foley Onlooker.

a newspaper published in Baldwin once a week, for four

consecutive weeks, commencing on the 3 day of June 19 37, requiring

the said Pennsylvania Railroad. C. and New York Central

Railroad. Co.

to answer or demur to the Bill of Complaint in the cause on the 28th day of June.

19 37 or in thirty days therefrom a decree Pro Confesso may be taken against

Pennsylvania. Railroad Co. and New York Railroad. Co.

And that a copy of said order was forwarded by mail, on the day of

19, addressed to

at

and that one other copy of said order was posted at the Courthouse door of said County for four consecutive weeks,

commencing on the 29th day of May 19 37

R S Duck

Register.

LOUISE LAWRENZ,
Complainant,
vs.
GULF COAST CITRUS EX-
CHANGE, ET AL.,
Respondents.

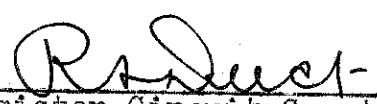
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 338.

REGISTER'S CERTIFICATE AS TO PERSONAL SERVICE:

STATE OF ALABAMA,)
(
BALDWIN COUNTY.)

I, R. S. DUCK, as Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that an Equity Summons was served on the Respondents, Thames & Batre, as Agents for the Royal Indemnity Company, a corporation, on G. Russell Ladd, as manager, on June 5, 1937; on W. T. Todd, Secretary of the Bedsole Investment Company, on June 10, 1937; on W. T. Todd, Secretary of the McKesson, Bedsole-Colvin Company, on June 10, 1937; on Joseph S. Norton, Vice-President of the Merchants' National Bank, a corporation, on June 5, 1937; all of the above respondents being served by R. L. Holcombe, Sheriff of Mobile County, Alabama: on F. M. Bell, manager of Virginia-Carolina Chemical Company, by R. L. Holcombe, Sheriff of Mobile, County, on June 11th, 1937; on A. B. Roberts, agent of the Alabama Basket Company, a corporation, by J. P. Williams, Sheriff of Barbour County, Alabama, on June 1st, 1937; and on O. F. E. Windberg, president of the Gulf Coast Citrus Exchange, by M. H. Wilkins, Sheriff of Baldwin County, Alabama, on September 21, 1937.

Given under my hand this 26th day of October, 1937.


Register Circuit Court of
Baldwin County, Alabama.

LOUISE LAWRENZ,
Complainant,

vs.

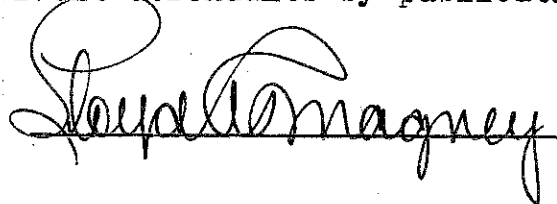
GULF COAST CITRUS EXCHANGE,
a Corporation, et al,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

AFFIDAVIT

STATE OF ALABAMA)
BALDWIN COUNTY)

Lloyd A. Magney, being first duly sworn, on his oath deposes and says; that he is solicitor for the complainant in the above entitled cause; that respondents, Pennsylvania Railroad Company and New York Central Railroad Company, are foreign corporations, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and that such respondents are non-residents of the State of Alabama and this affidavit is made for the purpose of obtaining service upon such non-resident defendants by publication.



Subscribed in my presence and sworn to before me this 29
day of May, 1937.


Notary Public

Louie Lawrenz

No.

vs.

Gulf Coast Citrus Exchange. et al.

STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

This the day of

192

In this cause it being made to appear to the Register of this Court by the affidavit of

Lloyd A Magney.

that the Defendant The Pennsylvania Railroad Co and New York Central Railroad Co

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant over the age of 21 years; it is, therefore ordered that publication be made in the Foley Onlooker

, a newspaper published in Baldwin

Baldwin County, Alabama, once a week for four consecutive weeks, requiring

the said Pennsylvania Railroad Co and New York Central Railroad Co.

to answer or demur to the Bill of Complaint in this cause by the 25th day of

June 1927, or after thirty days therefrom a decree Pro Confesso may

be taken against Them.

Lloyd A Magney.

Register.

Attorneys for Plaintiff.

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 **Royal Indemnity Co.**
Thames & Batre Agents.


of **Mobile.** 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

Louise Lawrenz.

against said **Gulf Coast Citrus Exchange. Et Al.**

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this **29th** day of **May** 193**7**.

 Register

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

The State of Alabama,
Baldwin County

Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon **Bedsole Investment Co.**

of **Mobile** 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 **Louise Lawrenz.**

against said **Gulf Coast Citrus Exchange.et al.**

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this **29th** day of **May** 193**7**

 Register

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

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Merchants National Bank.

of Mobile 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

Louise Lawrenz.

against said Gulf Coast Citrus Exchange. et al.

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 29th day of May 1937

 Register

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

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon McKesson Bedsole Wolvin. Inc.

of Mobile 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 Louise Lawrenz.

against said Gulf Coast Citrus Exchange.

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 29th day of May 193 7

Robert S. Duck Register

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

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Virginia Carolina Chemical Co.

of Mobile. 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 Louise Lawrenz.

against said Gulf Coast Citrus Exchange.

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 29th day of May 1939
Robert S. Duck Register

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

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Alabama Baskett Co.

of Barbour. 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

Louise Lawrenz.

against said Gulf Coast Citrus Exchange. et al.

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 29th day of May 1937.

R. S. Duck Register

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

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ~~Gulf Coast Citrus Exchange.~~

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 Louise Lawrenz.

against said Gulf Coast Citrus Exchange.

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 29th day of May 193 7

Robert S. Duck Register

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

The State of Alabama,
Baldwin County.

{ No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ,

Complainant

vs.

GULF COAST CITRUS EXCHANGE, ET AL.,

Defendant

In this cause it appears to the Register
that a summons requiring the Defendant Gulf Coast Citrus Exchange

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 it
was served upon it by the Sheriff of Baldwin County, Alabama, on the
21st day of September, 19 37

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, Solicitor for Complainant.

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things
taken as confessed against the said

Gulf Coast Citrus Exchange

Defendant aforesaid.

This 25 day of October 19 37

R. J. Duck Register.

INDEXED
FILED
No. 35879-338

THE STATE OF ALABAMA,

Baldwin County,

CIRCUIT COURT, IN EQUITY.

Jessie Sawyer

vs.

Welf Coast Oilms
Exchange Co. et al

CERTIFICATE OF PUBLICATION.

Filed in office this 26

day of Oct 1887

D. S. Sweet
Register.

9-319

No. 338 Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

vs.

GULF COAST CITRUS EXCHANGE

ET AL.,

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued August 18 19 37

H. S. Davis

Register.

Moore Printing Company, Bay Minette, Ala.

RECORDED
9-3-18
Wess

No. Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

vs.

GULF COAST CITRUS EXCHANGE,

ET AL.. (VIRGINIA-CAROLINA

CHEMICAL CORPORATION)
DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued August 18 19 37

H. S. Duck
Register.

Moore Printing Company, Bay Minette, Ala.

RECORDED

Wells
7-319

No. 338

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

vs.

GULF COAST CIRRUS EXCHANGE,

ET AL.,

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued August 18, 1937

W. S. Beck
Register.

Meane Printing Company, Bay Minette, Ala.

RECORDED
4-31-2

No. Page.....

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LAWRENZ

vs.

ALABAMA BASKET CO., ET AL.,

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued.....August 18 19 37

R. S. Buck

Register.

Moore Printing Company, Bay Minette, Ala.

RECORDED
Duct
7-334

LOUISE LAWRENZ,
Complainant,

vs.

GULF COAST CITRUS
EXCHANGE, ET AL.,

Respondents.

REGISTER'S CERTIFI-
CATE AS TO PERSONAL
SERVICE.

Found 10-26-'37
R.S. Duct, Register -

Blues
RECORDED. 9-320

No. 338

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ

vs.

GULF COAST CITRUS EXCHANGE
ET AL.,

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued October 19 37

R. S. Duck
Register.

Meade Printing Company, Bay Minette, Ala.

RECORDED
43
4-3-37

Serve on ~~defendants~~

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

LOUISE LAWRENCE

VS.

GULF COAST OILPROS EXCHANGE.

ET AL.

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193__

SHERIFF

Executed this VI day of

September 193__

by leaving a copy of the within Summons with

*O. E. Wilberforce is the
President of Gulf Coast Oilpros
Exchange* - - - Defendant

M. H. Wilkins

Sheriff

By *L. A. Magney*
Deputy Sheriff

Sept. 13, 1937

I hereby deputise L.A. Magney
to serve this writ.

M.H. Wilkins Sheriff

BY *E. N. Anderson* D.S.

Solicitor for Complainant

Lloyd A. Magney.

Recorded in Vol. _____ Page _____

Serve on Barbour
Circuit Court of Baldwin County
IN EQUITY

No. _____
S U M M O N S

LOUIS LAWRENZ.

VS.

GULF COAST CITRUS EXCHANGE.

ET AL.

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____
day of _____, 1937

Executed this _____ day of _____
1937

James
by leaving a copy of the within Summons with

A. B. Roberts

at agent of the
plaintiff
Defendant

J. P. Williams
Sheriff

By *James Lawrence*
Deputy Sheriff

LEOYD A MAGNEY.

Solicitor for Complainant

262

RECORDED 9-30-37

Virginia Carolina Chemical Co.

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

LOUISE LAWRENZ.

VS.

GULF COAST CYPRESS EXCHANGE.

ET AL.

LLOYD A MAGNEY.
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 1937

SHERIFF

Executed this 11 day of _____

1937

by leaving a copy of the within Summons with

I. M. Hall, my self

Virginia Carolina Chemical Co
Defendant

R. S. DeLoach
Sheriff

By *Wm. Reinster*
Deputy Sheriff

262
RECORDED
7-3-20
Duck

Mokesson Bedsole. Colvin. Inc.

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

LOUIS LARENZ

VS.

GULF COAST CITRUS EXCHANGE

ET AL.

LLOYD A. MACKNEY,

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 1933

SHERIFF

Executed this 10 day of June 1933

by leaving a copy of the within Summons with

M. C. Dodd and Secy of

M. E. Hooper, Bedsole Colvin Inc

Defendant

R. L. McLeavelle

Sheriff

By M. E. Summatori

Deputy Sheriff

202
RECORDED 9-299

Merchants National Bank.

Serve on Mobile

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

LOUISE LAWRENZ

Gulf Coast Citrus Exchange

VS.

Lloyd A. Wagner,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____, 1937

SHERIFF

Executed this 5 day of

June, 1937

by leaving a copy of the within Summons with

Joseph S. Norton vice president

Merchants National Bank

Defendant

P. S. McLeavelle

Sheriff

By *Wm. S. Sematun*

Deputy Sheriff

262
Beasole Investment Co. 9-3-37
RECORDED
Duck

Serve on _____
Circuit Court of Baldwin County
IN EQUITY

No. _____
S U M M O N S

LOUISE LAWRENZ

GULF COAST CITRUS EXCHANGE.

ET AL.

VS.

FLOYD A MAGNEY
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 1937

SHERIFF

Executed this 10 day of

June 1937

by leaving a copy of the within Summons with

R. C. Dodd et al

Redevelopment Co
Defendant

R. S. Mulvanick
Sheriff

By Wm Beemster
Deputy Sheriff

Thames & Batre Agents. *Batre*

RECORDED 7-300

262

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

LOUISE LAWRENZ.

VS.

GOLF COAST CIRRUS EXCHANGE et al

Lloyd A Magney.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____

_____ 193_____

by leaving a copy of the within Summons with

L. Russell Haddaway

Thames & Batre
Defendant

R. S. McLeander
Sheriff

By *Ernest Bernhart*
Deputy Sheriff

Filed May 29, 1933
W. S. Deak,
Register

NOTICE TO NON-RESIDENT.

RECORDED
9. 173

Deak

Lloyd & Wainwright

RECORDED 7-172

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

LOUISE LAWRENZ,

Complainant,

vs.

GULF COAST CITRUS EXCHANGE,
a Corporation, et al,

Respondents.

AFFIDAVIT

Deborah 39, 1937
Deborah
Deborah

LLOYD E. MAGNEY
Attorney,
Foley, Alabama.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
No. 338 Term, 192

LOUISE LAWRENZ,

Complainant.

vs. GULF COAST CITRUS EXCHANGE ET AL.,

Defendant.

In this cause it appears to the Register R. S. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 3rd day of June, 1927, in the Foley Onlooker a newspaper published in Baldwin Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 3rd day of June 1927, and

And it now further appearing to the Register R. S. Duck, that the said

PENNSYLVANIA RAILROAD COMPANY & NEW YORK CENTRAL RAILROAD COMPANY,

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

that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said

PENNSYLVANIA RAILROAD COMPANY, and NEW YORK CENTRAL RAILROAD COMPANY,

This 18th day of August 1927

R. S. Duck Register.

LOUISE LAWRENZ,

Complainant,

vs.

GULF COAST CITRUS EXCHANGE,
a Corporation, MERCHANTS NATIONAL BANK, a Corporation,
PENNSYLVANIA RAILROAD COMPANY,
A Corporation, NEW YORK CENTRAL RAILROAD COMPANY, a Corporation,
VIRGINIA-CAROLINA CHEMICAL COMPANY, a Corporation, NOKKESON, HENSOLE, COLVIN, INC., a Corporation,
HENSOLE INVESTMENT COMPANY, a Corporation, ALABAMA BASKET COMPANY, a Corporation, ROYAL INDEMNITY COMPANY, a Corporation,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE F. E. HARRIS, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your Complainant, Louise Lawrenz, respectfully shows to the Court that she is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama; that the respondent, Gulf Coast Citrus Exchange, is an Alabama Corporation, with its principal place of business in Silverhill, Alabama; that Merchants National Bank is a national banking corporation organized under the Acts of Congress of the United States with its principal place of business in Mobile, Alabama; that the respondent, Pennsylvania Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, Virginia-Carolins Chemical Company, is a foreign corporation qualified to

and doing business in the State of Alabama with its place of business in Mobile, Alabama; that Respondent, McKeason, Bedsole, Colvin, Inc., is an Alabama corporation, with its principal place of business in Mobile, Alabama; that respondent, Bedsole Investment Company, is an Alabama corporation with its principal place of business in Mobile, Alabama; that respondent, Alabama Basket Company, is an Alabama Corporation, with its principal place of business in Bufalo, Alabama; that Respondent, Royal Indemnity Company, is a foreign corporation qualified to do business in the State of Alabama and with a designated agent for the service of process within the State of Alabama, said agent being Thomas & Hatro, Mobile, Alabama.

PART TWO

1. Your Complainant avers that she is in the actual possession of the lands hereinafter described, claiming to own the same in her own right, said lands being described as follows:

Lots one (1), Two (2) and Three (3) in Block G,
in the Town of Foley, Baldwin County, Alabama...

2. That the Respondents, and each of them, claim or is reputed to own the same or some part thereof or some interest therein, or to hold some lien or encumbrance thereon and no suit is pending to enforce or test the validity of such title, claim or encumbrance and Complainant brings this suit to settle the title to such lands and to clear up all doubts or disputes concerning the same.

3. Complainant calls upon the Respondents and each of them to set forth and specify its title, claim, interest or encumbrance and how, and by what instrument the same is derived and created.

PRAYER FOR PROCESS

The premises considered, Complainant prays that your Honor will grant to her the writ of summons of the State of Alabama directed to the Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Virginia-Carolina Chemical Company, McKeason, Bedsole, Colvin, Inc., Bedsole Investment Company, Alabama Basket

Company and Royal Indemnity Company, requiring them and each of them, within thirty days after the service of such writ, to appear, answer, demur or otherwise plead to this Bill of Complaint and to abide such order or decree as may be entered therein and your Complainant further prays that your Honor will direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondents, Pennsylvania Railroad Company, and New York Central Railroad Company, commanding them, and each of them, within thirty days after the period specified in the order of publication, to appear, answer, plead or demur to this bill of complaint and to abide such order and decree as may be entered therein; and your Complainant shall ever pray & c.

PRAYER FOR RELIEF

Your Complainant further prays that upon the final hearing of this cause, your Honor will find and decree that the Complainant is the owner of the lands hereinbefore described; that the respondents and each of them, have no right, title, interest, lien or encumbrance upon said lands or any part thereof and that the title of your Complainant in and to said lands be quieted in her and that your Complainant have such other, further and different relief in the premises as may be just and equitable.

Solicitor for Complainant

RESPONSE

Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Pennsylvania Railroad Company, New York Central Railroad Company, Virginia-Carolina Chemical Company, McKesson, Hedzole, Calvin, Inc., Hedzole Investment Company, Alabama Basket Company and Royal Indemnity Company are hereby required to answer the allegations of part two of this Bill of Complaint from Paragraph

numbered one (1) to paragraph numbered three (3) thereof, but not under oath, oath to answer being hereby expressly waived.

Solicitor for Complainant

JOSEPH W. WILSON

Attorney

FLOYD A. WILSON

[Handwritten signature]
FLOYD A. WILSON
55-1421

BILL OF COMPLAINT

C O B A

Respondeents:
a Corporation, of st,
GUTH CORP. CLINE RICHMOND

as:

Complainant

JOSEPH WILSON

IN CHANCERY
FEDERAL COURT, VIRGINIA
IN THE CIRCUIT COURT OF

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To EDITH HOWELL

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 Max Lawrenz

as witnesses in behalf of Complainant, in a cause pending in our Circuit Court of Baldwin County, of said State, wherein LOUISE LAWRENZ

Complainant

and GULF COAST CITRUS EXCHANGE, et al.,

Defendant,

on oath to be by you administered, upon them to take and certify the deposition^s of the witness^{es} and return the same to our Court, with all convenient speed, under your hand.

Witness 21st day of October 19 37

R. J. Duck

REGISTER

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

LOUISE LAWRENZ,

Complainant,

vs.

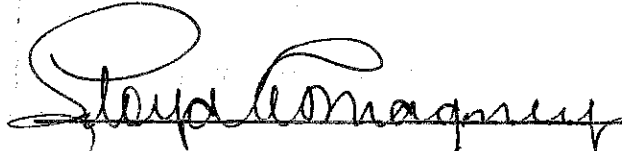
GULF COAST CITRUS EXCHANGE,
et al,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

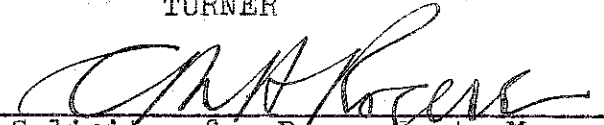
STIPULATION

It is hereby stipulated and agreed by and between the Complainant and Merchants National Bank of Mobile, Respondent herein, by their respective solicitors, that the testimony for the Complainant may be taken before Edith Howell, Commissioner, at her office in Foley, Alabama, on the ____ day of October, 1937.


Solicitor for Complainant

STEVENS, MCCORVEY, McLEOD, GOODE &
TURNER

By


Solicitor for Respondent, Mer-
chants National Bank of Mobile.

LOUISE LAWRENZ,
Complainant,

vs.

GULF COAST CITRUS EXCHANGE,
et al,
Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

DEPOSITION

TESTIMONY OF MAX LAWRENZ

Max Lawrenz, being first duly sworn, on his oath deposes and says:-

My name is Max Lawrenz, I reside in Foley, Alabama, where I operate the Foley Hardware Company.

I am the son of Louise Lawrenz, the Complainant in this action and I have charge of and do all of her business for her.

With reference to the land involved in this case which is described as Lots One (1), Two (2) and Three (3), in Block 0 in the Town of Foley, Baldwin County, Alabama, my father, Herman Lawrenz, purchased this land from the State of Alabama and received from the State Land Commissioner of Alabama, a deed of conveyance to said land for which he paid the sum of FOUR HUNDRED EIGHTY & 00/100 (\$480.00) DOLLARS. The title of the state was based upon a tax sale held July 31st, 1933, whereby the land was sold for the non-payment of the 1932 taxes and the purchase price of FOUR HUNDRED EIGHTY & 00/100 (\$480.00) DOLLARS was in payment of the 1932 and subsequent taxes and the cost of sale. This tax deed is dated April 1st, 1937, and recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 62 N. S. page 51 and is attached hereto marked Exhibit A and by reference made a part of this deposition.

Immediately upon obtaining said deed my father, the said Herman Lawrenz, took possession of said lands which consist of three town lots on a part of which is erected a one story frame building and my father made some repairs to said building and stored in it some goods, placed locks upon the doors and

THE STATE OF ALABAMA

KNOW ALL MEN BY THESE PRESENTS:

THAT WHEREAS, on 31st day of July, A. D. 1933, the Probate Court of Baldwin County rendered a decree for the sale of lands hereinafter described and conveyed, for the payment of State and County taxes then due from Gulf Coast Citrus Exchange #2, the owner of said lands, and for the payment of the fees, costs, and expenses of and under said decree, and the sale had in execution thereof.

AND WHEREAS, thereafter, to-wit, on the 1st day of September, 1933, under and in pursuance of said decree, said lands were regularly offered for sale by the Tax Collector of Baldwin County for said taxes, fees, costs, and expenses, and no person having bid a sufficient sum for said lands to pay the same, said lands were bid in for the State for the sum of said taxes, fees, costs, and expenses.

AND WHEREAS, the time allowed by law for the redemption of said lands has elapsed since said sale, and the same not having been redeemed, the title thereto under said sale is still in the State.

AND WHEREAS, said lands having been entered upon the books of the State Land Commissioner, and the State Land Commissioner of the State of Alabama, with the approval of the Governor, has fixed the price of said land, and ascertained that the sum of Four Hundred Eighty & No/100 (\$480.00) Dollars is sufficient to cover and satisfy all claims of the State and County against said lands for or on account of taxes, interest, fees, and costs, and officers' fees which were due upon or have accrued against said lands, as provided for by law.

AND WHEREAS, application has been made to the State Land Commissioner of the State of Alabama by Herman Lawrenz to purchase said lands, and said sum of Four Hundred Eighty & No/100 (\$480.00) Dollars therefor has been paid into the State Treasury.

NOW THEREFORE, The State Land Commissioner of the State of Alabama, by virtue of and in accordance with the authority in him vested by law, with the approval of the Governor of Alabama, and in consideration of the premises above set out, has this day granted, bargained, sold, and conveyed, and by these presents does grant, bargain, sell, and convey unto the said Herman Lawrenz, without warranty or covenant of any kind on the part of the State, express or implied, all right and title of the State of Alabama in and to said lands, described as follows:

Lots 1-2-3, Blk. "0", Town of Foley.

lying and being situate in said County and State, to have and to hold the same, the said right and title of the State in the lands aforesaid, unto Herman Lawrenz

and his heirs and assigns forever.

In testimony whereof I have hereunto set my hand and seal this the 1st day of April, 1937. Approved: [Signature] Governor. STATE LAND COMMISSIONER OF ALABAMA. By: [Signature] State Land Commissioner.

THE STATE OF ALABAMA, MONTGOMERY COUNTY.

I, Mrs. Clay Willingham, a Notary Public in and for said County, in said State, hereby certify that Henry S. Long, whose name is signed to the foregoing conveyance as State Land Commissioner, and who is known to me, acknowledged before me on this day that, being informed of the contents of this conveyance, he, in his capacity as such State Land Commissioner, executed the same voluntarily on the day the same bears date.

Given under my hand this the 1st day of April, 1937. [Signature] Notary Public.

QUIT-CLAIM DEED

THIS DEED made the 24th day of April 19 37

between Louise Lawrenz, a widow; M.K. Lawrenz and Ruby Lawrenz, husband and wife; and Margaret Lawrenz, single parties being all of mature age and the only heirs at law and next of kin of Herman Lawrenz, deceased, and Louise Lawrenz

party of the second part,

WITNESSETH, That the parties of the first part, in consideration of

****One**** DOLLARS,

and other valuable considerations

to them in hand paid by the party of the second part, the receipt of which is hereby acknowledged, have

remised, released and quit-claimed and by these presents do remise, release and forever quit-claim unto the said

part Y of the second part her heirs and assigns forever, all our right, title and interest in

Baldwin

County, Alabama, described as follows, to-wit:

*****Lots One (1), Two (2), and Three (3) in Block "C"

of the Town of Foley, Alabama.*****

TO HAVE AND TO HOLD the said released premises unto the said Louise Lawrenz

her heirs and assigns forever: So that neither the said party of

the first part their heirs or assigns, nor any other person in trust for them or in

their

name shall or will, can or may, by any ways or means whatsoever, hereafter have or

claim any right or title thereto; BUT THAT the said parties of the first part their heirs and assigns, each and

every one of them from all estate, right, title, interest or claim, and demand whatsoever, in or to the said premises,

or any part thereof, are, is, and shall be, by these presents, FOREVER EXCLUDED AND DEBARRED.

IN WITNESS WHEREOF, the party of the first part have hereunto set their hand and seal the

day and year first above written.

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF

Handwritten signatures of Louise Lawrenz, Ruby Lawrenz, and Margaret Lawrenz with seals.

CERTIFICATE OF COMMISSIONER

STATE OF ALABAMA }
BALDWIN COUNTY }

I, Edith Howell, by virtue of the attached commission, the commissioner to take the testimony of Max Lawrenz, a witness in behalf of the complainant, do hereby certify that in accordance with said commission and the annexed stipulation, I did call the said Max Lawrenz before me at my office at Foley, Alabama, on the 25th day of October, 1937, and said witness being first duly sworn, I took down his testimony in shorthand and later reduced the same to typewriting as hereinbefore set forth. That said testimony was then read over by the witness and by him duly signed.

I further certify that I have personal knowledge of the identity of the witness, that I am not of counsel or of kin to any of the parties to this cause nor in any manner interested in the result of the same.

IN TESTIMONY WHEREOF: I have hereunto set my hand this 25th day of October, 1937.

Edith Howell

Commissioner

LOUISE LAWRENCE,

Complainant,

vs.

GULF COAST CITRUS EXCHANGE,
a Corporation, MERCHANTS NATIONAL BANK, a Corporation,
PENNSYLVANIA RAILROAD COMPANY, a Corporation, NEW YORK CENTRAL RAILROAD COMPANY, a Corporation,
VIRGINIA-CAROLINA CHEMICAL COMPANY, a Corporation, HARRISON, BROSOLS, COLVIN, INC., a Corporation, BRUCE INVESTMENT COMPANY, a Corporation, ALABAMA BANKING COMPANY, a Corporation, FIDELITY INVESTMENT COMPANY, a Corporation,

Respondents.

IN THE CIRCUIT COURT OF
DAKOTA COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

IN THE HONORABLE P. T. BARK, JUDGE OF THE CIRCUIT COURT OF
DAKOTA COUNTY, ALABAMA, IN CHANCERY SITTING:

PAGE ONE

Your Complainant, Louise Lawrence, respectfully shows to the Court that she is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama; that the respondent, Gulf Coast Citrus Exchange, is an Alabama Corporation, with its principal place of business in Silverhill, Alabama; that Merchants National Bank is a national banking corporation organized under the Acts of Congress of the United States with its principal place of business in Mobile, Alabama; that the respondent, Pennsylvania Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Virginia-Carolina Chemical Company, is a foreign corporation qualified to

and doing business in the State of Alabama with its place of business in Mobile, Alabama; that Respondent, McKeen, Baldwin, Calvin, Inc., is an Alabama corporation, with its principal place of business in Mobile, Alabama; that Respondent, Redco Investment Company, is an Alabama corporation with its principal place of business in Mobile, Alabama; that Respondent, Alabama Basket Company, is an Alabama Corporation, with its principal place of business in Eufaula, Alabama; that Respondent, Royal Indemnity Company, is a foreign corporation qualified to do business in the State of Alabama and with a designated agent for the service of process within the State of Alabama, said agent being Thomas S. Hatre, Mobile, Alabama.

FACTS

1. Your Complainant avers that she is in the actual possession of the lands hereinafter described, claiming to own the same in her own right, said lands being described as follows:

Lots one (1), Two (2) and Three (3) in Block G,
in the Town of Foley, Baldwin County, Alabama...

2. That the Respondents, and each of them, claim or is reputed to own the same or some part thereof or some interest therein, or to hold some lien or encumbrance thereon and no suit is pending to enforce or assert the validity of such title, claim or encumbrance and Complainant brings this suit to settle the title to such lands and to clear up all doubts or disputes concerning the same.

3. Complainant calls upon the Respondents and each of them to set forth and specify its title, claim, interest or encumbrance and how, and by what instrument the same is derived and created.

PRAYER FOR PROCESS

The premises considered, Complainant prays that your Honor will grant to her the writ of summons of the State of Alabama directed to the Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Virginia-Carolina Chemical Company, McKeen, Baldwin, Calvin, Inc., Redco Investment Company, Alabama Basket

Company and Royal Indemnity Company, requiring them and each of them, within thirty days after the service of such writ, to appear, answer, demur or otherwise plead to this Bill of Complaint and to abide such order or decree as may be entered therein and your Complainant further prays that your Honor will direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondents, Pennsylvania Railroad Company, and New York Central Railroad Company, commanding them, and each of them, within thirty days after the period specified in the order of publication, to appear, answer, plead or demur to this bill of complaint and to abide such order and decree as may be entered therein; and your Complainant shall ever pray & c.

PRAYER FOR RELIEF

Your Complainant further prays that upon the final hearing of this cause, your Honor will find and decree that the Complainant is the owner of the lands hereinbefore described; that the respondents and each of them, have no right, title, interest, lien or encumbrance upon said lands or any part thereof and that the title of your Complainant in and to said lands be quieted in her and that your Complainant have such other, further and different relief in the premises as may be just and equitable.

Solicitor for Complainant

EXHIBIT

Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Pennsylvania Railroad Company, New York Central Railroad Company, Virginia-Carolina Chemical Company, McKeen, Bedale, Colvin, Inc., Bedale Investment Company, Alabama Basket Company and Royal Indemnity Company are hereby required to answer the allegations of part two of this Bill of Complaint from Paragraph

numbered one (1) to paragraph numbered three (3) thereof, but not under oath, oath to answer being hereby expressly waived.

Minister for Transport

Attorney General
FRANK A. WAGNER

Handwritten signature and date:
D. J. [unclear]
September 22, 1937

UNIT OF CONSTITUTION

1937

Memorandum

to the Honorable Mr. [unclear]
and Honorable Mr. [unclear]

AS*

Complaints

UNITED STATES

IN THE CIRCUIT COURT OF

remained in the exclusive possession up to the time of his death which occurred on the 3rd day of April, 1937. He died intestate and left as his only heirs at law, a widow, my mother, the complainant in this action, myself and my sister, Margaret.

My sister, my wife and myself thereupon deeded this property to my mother by deed recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Deed Book 62 N. S. Page 115, which said deed is attached hereto marked Exhibit B and by reference made a part of this deposition.

Ever since receiving said tax deed as aforesaid, we have been in the peaceable and actual possession of this land and still are.

The lots were originally owned by the Gulf Coast Citrus Exchange and were by it mortgaged to Merchants National Bank of Mobile. The other respondents are the holders of judgments against Gulf Coast Citrus Exchange obtained by the various respondents after the mortgage above mentioned. No suit, other than this, to enforce or test complainant's title, is pending.

Max R. Rouse

LOUISE LAWRENZ,

Complainant,

vs.

GULF COAST CITRUS EXCHANGE,
a Corporation, MERCHANTS NATIONAL BANK, a Corporation,
PENNSYLVANIA RAILROAD COMPANY,
a Corporation, NEW YORK CENTRAL RAILROAD COMPANY, a Corporation,
VIRGINIA-CAROLINA CHEMICAL COMPANY, a Corporation, KENNESAW, WENDELL COLVIN, INC., a Corporation, KENNESAW INVESTMENT COMPANY, a Corporation, ALABAMA BASKET COMPANY, a Corporation, ROYAL INSURANCE COMPANY, a Corporation,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

BILL OF COMPLAINT

TO THE HONORABLE J. B. BARK, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your Complainant, Louise Lawrence, respectfully shows to the Court that she is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama; that the respondent, Gulf Coast Citrus Exchange, is an Alabama Corporation, with its principal place of business in Silverhill, Alabama; that Merchants National Bank is a national banking corporation organized under the Acts of Congress of the United States with its principal place of business in Mobile, Alabama; that the respondent, Pennsylvania Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, Virginia-Carolina Chemical Company, is a foreign corporation qualified to

and doing business in the State of Alabama with its place of business in Mobile, Alabama; that Respondent, McKeason, Bedsole, Colvin, Inc., is an Alabama corporation, with its principal place of business in Mobile, Alabama; that Respondent, Bedsole Investment Company, is an Alabama corporation with its principal place of business in Mobile, Alabama; that Respondent, Alabama Basket Company, is an Alabama Corporation, with its principal place of business in Eufala, Alabama; that Respondent, Royal Indemnity Company, is a foreign corporation qualified to do business in the State of Alabama and with a designated agent for the service of process within the State of Alabama, said agent being Thomas S. Batre, Mobile, Alabama.

PART III

1. Your Complainant avers that she is in the actual possession of the lands hereinafter described, claiming to own the same in her own right, said lands being described as follows:

Lots one (1), Two (2) and Three (3) in Block G,
in the Town of Foley, Baldwin County, Alabama...

2. That the Respondents, and each of them, claim or is reputed to own the same or some part thereof or some interest therein, or to hold some lien or encumbrance thereon and no suit is pending to enforce or test the validity of such title, claim or encumbrance and Complainant brings this suit to settle the title to such lands and to clear up all doubts or disputes concerning the same.

3. Complainant calls upon the Respondents and each of them to set forth and specify its title, claim, interest or encumbrance and how, and by what instrument the same is derived and created.

PRAYER FOR PROCESS

The premises considered, Complainant prays that your Honor will grant to her the writ of summons of the State of Alabama directed to the Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Virginia-Carolina Chemical Company, McKeason, Bedsole, Colvin, Inc., Bedsole Investment Company, Alabama Basket

Company and Royal Indemnity Company, requiring them and each of them, within thirty days after the service of such writ, to appear, answer, demur or otherwise plead to this Bill of Complaint and to abide such order or decree as may be entered therein and your Complainant further prays that your Honor will direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondents, Pennsylvania Railroad Company, and New York Central Railroad Company, commanding them, and each of them, within thirty days after the period specified in the order of publication, to appear, answer, plead or demur to this bill of complaint and to abide such order and decree as may be entered therein; and your Complainant shall ever pray & c.

PRAYER FOR RELIEF

Your Complainant further prays that upon the final hearing of this cause, your Honor will find and decree that the Complainant is the owner of the lands hereinbefore described; that the respondents and each of them, have no right, title, interest, lien or encumbrance upon said lands or any part thereof and that the title of your Complainant in and to said lands be quieted in her and that your Complainant have such other, further and different relief in the premises as may be just and equitable.

Solicitor for Complainant

RESPONSE

Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Pennsylvania Railroad Company, New York Central Railroad Company, Virginia-Carolina Chemical Company, McKessens, Bedsole, Calvin, Inc., Bedsole Investment Company, Alabama Basket Company and Royal Indemnity Company are hereby required to answer the allegations of part two of this Bill of Complaint from Paragraph

numbered one (1) to paragraph numbered three (3) thereof, but not under oath, such to answer being hereby expressly waived.

Solicitor for Complainant

JOHN J. HARRIS
Solicitor
1000 N. 10th St.
Tulsa, Oklahoma

*Robert J. [unclear]
Solicitor for [unclear]*

NAME OF COMPLAINANT

DOB

Residence No.

Organization of [unclear]
Sole Owner of [unclear]

Age

Complaint No.

Witness Name

IN WITNESS WHEREOF
I, the undersigned, Attorney
at Law, have hereunto set my hand and
the seal of my office this [unclear] day of
[unclear] 19[unclear].

LOUISE LAURENZ,

Complainant,

vs. Gulf Coast Citrus Exchange,
Merchants National Bank,
Pennsylvania Railroad Company,
New York Central Railroad Company,
Virginia-Carolina Chemical Company,
Helsola, Colvin, Inc.,
Hindsale Investment Company,
Alabama Harvest Company,
Royal Investment Company,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE J. P. HOFF, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PAGE ONE

Your Complainant, Louise Laurenz, respectfully shews to the Court that she is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama; that the respondent, Gulf Coast Citrus Exchange, is an Alabama Corporation, with its principal place of business in Silverhill, Alabama; that Merchants National Bank is a national banking corporation organized under the Acts of Congress of the United States with its principal place of business in Mobile, Alabama; that the respondent, Pennsylvania Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Virginia-Carolina Chemical Company, is a foreign corporation qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Helsola, Colvin, Inc., is a foreign corporation qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Hindsale Investment Company, is a foreign corporation qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Alabama Harvest Company, is a foreign corporation qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Royal Investment Company, is a foreign corporation qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama.

numbered one (1) to paragraph numbered three (3) thereof, but not otherwise, with the exception being hereby expressly waived.

Notice for Complainant

Defendant's Attorney
THOMAS A. WARDEN

Thomas A. Warden
Joseph W. Smith (28183)

BILL OF COMPLAINT

c o b y

Respondent's

is Corporation, of its
ONLY COVER CITIES EXCHANGE,

vs.

Complainant's

LOUISE LAWRENCE,

IN CHANCERY

DAKOTA COUNTY, VERMONT
IN THE CIRCUIT COURT OF

not doing business in the State of Alabama with its place of business

LOUISE LAWRENCE, Plaintiff, that she is

Inc., is Complainant,

business in Mobile, Alabama; that she is

Company, is an Alabama corporation

GULF COAST CITRUS EXCHANGE, a Corporation,

MERCHANTS NATIONAL BANK, a Corporation,

PENNSYLVANIA RAILROAD COMPANY, a Corporation,

RAILROAD COMPANY, a Corporation,

VIRGINIA-CAROLINA CHEMICAL COMPANY, a Corporation,

BRISBANE, COLVER, INC., a Corporation,

BRISBANE INVESTMENT COMPANY, a Corporation,

ALABAMA BASKET COMPANY, a Corporation,

ROYAL INDEMNITY COMPANY, a Corporation,

Respondents.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

BILL OF COMPLAINT

1. Your Complainant avers that she is in the actual possession

TO THE HONORABLE F. W. HARRIS, JUDGE OF THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING AT

PART ONE

Your Complainant, Louise Lawrence, respectfully shows to the Court that she is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama; that the respondent, Gulf Coast Citrus Exchange, is an Alabama Corporation, with its principal place of business in Silverhill, Alabama; that Merchants National Bank is a national banking corporation organized under the Acts of Congress of the United States with its principal place of business in Mobile, Alabama; that the respondent, Pennsylvania Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Virginia-Carolina Chemical Company, is a foreign corporation qualified to

Company and Royal Indemnity Company, requiring them and each of them, within thirty days after the service of such writ, to appear, answer, demur or otherwise plead to this Bill of Complaint and to abide such order or decree as may be entered therein and your Complainant further prays that your Honor will direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondents, Pennsylvania Railroad Company, and New York Central Railroad Company, commanding them, and each of them, within thirty days after the period specified in the order of publication, to appear, answer, plead or demur to this bill of complaint and to abide such order and decree as may be entered therein; and your Complainant shall ever pray & c.

PRAYER FOR RELIEF

Your Complainant further prays that upon the final hearing of this cause, your Honor will find and decree that the Complainant is the owner of the lands hereinbefore described; that the respondents and each of them, have no right, title, interest, lien or encumbrance upon said lands or any part thereof and that the title of your Complainant in and to said lands be quieted in her and that your Complainant have such other, further and different relief in the premises as may be just and equitable.

Solicitor for Complainant

POSTSCRIPT

Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Pennsylvania Railroad Company, New York Central Railroad Company, Virginia-Carolina Chemical Company, McKesson, Bodeole, Calvin, Inc., Bodeole Investment Company, Alabama Basket Company and Royal Indemnity Company are hereby required to answer the allegations of part two of this Bill of Complaint from Paragraph

numbered one (1) to paragraph numbered three (3) thereof, but not under oath, such to answer being hereby expressly waived.

NOTICE OF COMPLAINT

STATE OF TEXAS
COUNTY OF DALLAS

Handwritten:
Docket
2
Filed June 29 1937

NAME OF COMPLAINANT

Handwritten: J. P. ...

RESIDENCE

**A COMPLAINANT OF AT
THE BOARD OF COUNTY COMMISSIONERS**

AS:

COMPLAINANT

WITNESSETH

**NOTICE OF COMPLAINT
IN THE CIRCUIT COURT OF
THE COUNTY OF DALLAS**

LOUISE LAWRENZ,

Complainant,

Vs.

GULF COAST CITRUS EXCHANGE, a Corporation, MERCHANTS NATIONAL BANK, a corporation, PENNSYLVANIA RAILROAD COMPANY, a Corporation, NEW YORK CENTRAL RAILROAD COMPANY, a Corporation, VIRGINIA-CAROLINA CHEMICAL COMPANY, a Corporation, MCKESSON, BEDSOLE, COLVIN, INC., a Corporation, BEDSOLE INVESTMENT COMPANY, a Corporation, ALABAMA BASKET COMPANY, a Corporation, ROYAL INDEMNITY COMPANY, a Corporation,

Respondents.

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

Comes the Respondent, The Merchants National Bank of Mobile, one of the Respondents in the above entitled cause, and files this its answer to the bill of complaint of Louise Lawrenz, and shows unto your Honor as follows:

1. This respondent admits so much of the allegation of the first paragraph of the bill of complaint alleging that the Respondent is a National Banking Association organized under the laws of the United States of America with its principal place of business in Mobile, Alabama, but this respondent neither admits nor denies any other allegation of the first paragraph of the bill of complaint, but demands strict proof thereof.

2. This respondent denies the allegations set out in the second paragraph of the bill of complaint and alleges that the property described in the second paragraph of the bill of complaint was conveyed to your respondent as Trustee, and that title to the said property is well vested in your respondent.

And now having answered the bill of complaint as fully as it is possible for it to do, this respondent, The Merchants National Bank of Mobile, acting by and through its Solicitors, prays that it be hence dismissed with its costs most unjustly incurred.

STEVENS, McCORVEY, McLEOD, GOODE & TURNER,

By 
Solicitors for The Merchants National Bank
of Mobile, a National Banking Association.

LOUISE LAWRENZ,

Complainant,

vs.

GULF COAST CITRUS EXCHANGE,
a Corporation, MERCHANTS NATIONAL BANK, a Corporation,
PENNSYLVANIA RAILROAD COMPANY,
A Corporation, NEW YORK CENTRAL RAILROAD COMPANY, a Corporation,
VIRGINIA-CAROLINA CHEMICAL COMPANY, a Corporation, McKESSON, BEDSOLE, COLVIN, INC., a Corporation, BEDSOLE INVESTMENT COMPANY, a Corporation, ALABAMA BASKET COMPANY, a Corporation, ROYAL INDEMNITY COMPANY, a Corporation,

Respondents.

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, Louise Lawrenz, respectfully shows to the Court that she is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama; that the respondent, Gulf Coast Citrus Exchange, is an Alabama Corporation, with its principal place of business in Silverhill, Alabama; that Merchants National Bank is a national banking corporation organized under the Acts of Congress of the United States with its principal place of business in Mobile, Alabama; that the respondent, Pennsylvania Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated agent for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Respondent, Virginia-Carolina Chemical Company, is a foreign corporation qualified to

and doing business in the State of Alabama with its place of business in Mobile, Alabama; that Respondent, McKesson, Bedsole, Colvin, Inc., is an Alabama corporation, with its principal place of business in Mobile, Alabama; that respondent, Bedsole Investment Company, is an Alabama corporation with its principal place of business in Mobile, Alabama; that respondent, Alabama Basket Company, is an Alabama Corporation, with its principal place of business in Eufala, Alabama; that Respondent, Royal Indemnity Company, is a foreign corporation qualified to do business in the State of Alabama and with a designated agent for the service of process within the State of Alabama, said agent being Thames & Batre, Mobile, Alabama.

PART TWO

1. Your Complainant avers that she is in the actual possession of the lands hereinafter described, claiming to own the same in her own right, said lands being described as follows:

Lots one (1), Two (2) and Three (3) in Block O,
in the Town of Foley, Baldwin County, Alabama...

2. That the Respondents, and each of them, claim or is reputed to own the same or some part thereof or some interest therein, or to hold some lien or encumbrance thereon and no suit is pending to enforce or contest the validity of such title, claim or encumbrance and Complainant brings this suit to settle the title to such lands and to clear up all doubts or disputes concerning the same.

3. Complainant calls upon the Respondents and each of them to set forth and specify its title, claim, interest or encumbrance and how, and by what instrument the same is derived and created.


PRAYER FOR PROCESS

The premises considered, Complainant prays that your Honor will grant to her the writ of summons of the State of Alabama directed to the Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Virginia-Carolina Chemical Company, McKesson, Bedsole, Colvin, Inc., Bedsole Investment Company, Alabama Basket

Company and Royal Indemnity Company, requiring them and each of them, within thirty days after the service of such writ, to appear, answer, demur or otherwise plead to this Bill of Complaint and to abide such order or decree as may be entered therein and your Complainant further prays that your Honor will direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondents, Pennsylvania Railroad Company, and New York Central Railroad Company, commanding them, and each of them, within thirty days after the period specified in the order of publication, to appear, answer, plead or demur to this bill of complaint and to abide such order and decree as may be entered therein; and your Complainant shall ever pray & c.

PRAYER FOR RELIEF


Your Complainant further prays that upon the final hearing of this cause, your Honor will find and decree that the Complainant is the owner of the lands hereinbefore described; that the respondents and each of them, have no right, title, interest, lien or encumbrance upon said lands or any part thereof and that the title of your Complainant in and to said lands be quieted in her and that your Complainant have such other, further and different relief in the premises as may be just and equitable.


Solicitor for Complainant

FOOTNOTE

Respondents, Gulf Coast Citrus Exchange, Merchants National Bank, Pennsylvania Railroad Company, New York Central Railroad Company, Virginia-Carolina Chemical Company, McKesson, Bedsole, Colvin, Inc., Bedsole Investment Company, Alabama Basket Company and Royal Indemnity Company are hereby required to answer the allegations of part two of this Bill of Complaint from Paragraph

numbered one (1) to paragraph numbered three (3) thereof, but
not under oath, oath to answer being hereby expressly waived.


Solicitor for Complainant

and doing business in the State of Alabama with its place of busi-

LOUISE LAWRENZ, Alabama; that Respondent

Inc., is an Complainant,

business in Mobile, Alabama; that Respondent, Mobile Investment
vs.

Company, is an Alabama corporation with

Respondent, Alabama Bank Com-

a Corporation, MERCHANTS NAT-

IONAL BANK, a Corporation, with its principal place of busi-

PENNSYLVANIA RAILROAD COMPANY, Respondent, Royal Indemnity Company,

a Corporation, NEW YORK CENTRAL Respondent, do do business in the State of

RAILROAD COMPANY, a Corporation, do do the service of process

VIRGINIA-CAROLINA CHEMICAL COM- do do being Thomas & Baker,

PANY, a Corporation, MCKESSON,

BEDSOLE, COLVIN, INC., a Corpor-

ation, BEDSOLE INVESTMENT COMPANY,

a Corporation, ALABAMA BASKET COM-

PANY, a Corporation, ROYAL INDEM-

NITY COMPANY, a Corporation,

Respondents.

1. Your Complainant avers that she is in the actual possession

TO THE HONORABLE P. W. HARRIS, JUDGE OF THE CIRCUIT COURT OF

in her own BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

Let it now be, Part One

Your Complainant, Louise Lawrenz, respectfully shows to the

Court that she is over the age of twenty-one years and a bona fide

resident of Foley, Baldwin County, Alabama; that the respondent,

Gulf Coast Citrus Exchange, is an Alabama Corporation, with its

principal place of business in Silverhill, Alabama; that Merchants

National Bank is a national banking corporation organized under

the Acts of Congress of the United States with its principal place

of business in Mobile, Alabama; that the respondent, Pennsylvania

Railroad Company, is a foreign corporation, not qualified to do

business in the State of Alabama and having no designated agent

for the service of process in the State of Alabama and is a non-

resident of the State of Alabama; that the respondent, New York

Central Railroad Company, is a foreign corporation, not qualified

to do business in the State of Alabama and having no designated

agent for the service of process in the State of Alabama and is a

non-resident of the State of Alabama; that the Respondent, Virginia-

Carolina Chemical Company, is a foreign corporation qualified to

numbered one (1) to paragraph numbered three (3) thereof, but not under oath, oath to answer being hereby expressly waived.

Solicitor for Complainant

1820
P.S. [Signature]
[Signature]

WITNESSED BY ME

1900

Commissioner of the
Department of
Health

1900

SECRETARY

Complainant

TO THE COMMISSIONER OF THE
DEPARTMENT OF HEALTH
STATE OF NEW YORK

NOTICE TO NON-RESIDENT

Louise Lawrenz
vs.
Gulf Coast Citrus
Exchange et al.
State of Alabama,
Baldwin County.

Circuit Court, In Equity.
This the 31st day of May, 1937.

In this cause it being made to appear to the Register of this Court by the affidavit of Lloyd A. Magney that the Defendant, the Pennsylvania Railroad Company, a corporation, and New York Central Railroad Company, a corporation, are non-residents of the State of Alabama, it is, therefore ordered that publication be made in The Foley Onlooker, a newspaper published in Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Pennsylvania Railroad Company and New York Central Railroad Company to answer or demur to the Bill of Complaint in this cause by the 28th day of June, 1937, or after thirty days therefrom a decree Pro Confesso may be taken against them.

R. S. DUCK,
Register.

LLOYD A. MAGNEY,
Attorney for Plaintiff.

3-10-17-24

AFFIDAVIT OF PUBLICATION

I, Frank V. Barchard

Editor of The Onlooker, published at
Foley, Ala., do solemnly swear that a copy of the above notice,
as per clipping attached, was published once each week in the
regular and entire edition of said newspaper, and not in any
supplement thereof, for 4 consecutive weeks, com-
mencing with the issue dated June 3, 1937, and
ending with the issue dated June 24, 1937.

Frank V. Barchard

Subscribed and sworn to before me this 70 day
of July, 1937

Steph...
Notary Public.

Foley, Ala., June 24, 1937
BARCHARD PUBLISHING CO.
The Foley Onlooker
Robertsdale News-Herald

Lloyd A. Magney
Foley, Ala.

HIGH QUALITY JOB PRINTING

Brought Forward

Legal

7 02

NOTICE TO NON-RESIDENT

Louise Lawrenz
vs.
Gulf Coast Citrus
Exchange et al.
State of Alabama,
Baldwin County.

Circuit Court, In Equity.
This the 31st day of May, 1937.

In this cause it being made to appear to the Register of this Court by the affidavit of Lloyd A. Magney that the Defendant, the Pennsylvania Railroad Company, a corporation, and New York Central Railroad Company, a corporation, are non-residents of the State of Alabama, it is, therefore ordered that publication be made in The Foley Onlooker, a newspaper published in Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Pennsylvania Railroad Company and New York Central Railroad Company to answer or demur to the Bill of Complaint in this cause by the 28th day of June, 1937, or after thirty days therefrom a decree Pro Confesso may be taken against them.

R. S. DUCK,
Register.

LLOYD A. MAGNEY,
Attorney for Plaintiff.

3-10-17-24

AFFIDAVIT OF PUBLICATION

I, Frank V. Barchard

Editor of The Onlooker, published at Foley, Ala., do solemnly swear that a copy of the above notice, as per clipping attached, was published once each week in the regular and entire edition of said newspaper, and not in any supplement thereof, for 4 consecutive weeks, commencing with the issue dated June 3, 1937, and ending with the issue dated June 24, 1937.

Frank V. Barchard

Subscribed and sworn to before me this June 30 day of June, 1937.

My Commission Expires Oct 17, 1938

Notary Public

Foley, Ala., July 1, 1937
BARCHARD PUBLISHING CO.
The Foley Onlooker
Robertsdale News-Herald

Lloyd A. Magney,
Foley, Ala.

HIGH QUALITY JOB PRINTING

Brought Forward
Legal
Lawrenz vs Gulf Coast
Citrus Exchange
7 02

The State of Alabama,
Baldwin County.

{ No. 338 CIRCUIT COURT IN EQUITY.

----- LOUISE LAWRENZ, ----- Complainant -----

vs.

----- GULF COAST CITRUS EXCHANGE, ALABAMA BASKET CO., ET AL., ----- Defendant -----

Motion is hereby made for a Decree Pro Confesso against -----

----- ALABAMA BASKET 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...ha...failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 18th day of August 1937

----- LLOYD A. MAGNEY ----- Solicitor.

The State of Alabama,
Baldwin County.

{ No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ, Complainant

vs.

GULF COAST CITRUS EXCHANGE, ET AL., Defendant

Motion is hereby made for a Decree Pro Confesso against THAMES & BATTRE, Agents

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 18th day of August 1937

LLOYD A. MAGNEY Solicitor.

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 338 Term, 1937

LOUISE LAWRENZ,

Complainant..

Vs.

GULF COAST CITRUS EXCHANGE, ET AL.,

Defendant..

Motion is hereby made for a Decree Pro Confesso against

VIRGINIA-CAROLINA CHEMICAL CORPORATION,

Defendant..

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

This 18th day of August 1937

LLOYD A. MAGNEY

Solicitor.

THE STATE OF ALABAMA, }
Baldwin County. }

CIRCUIT COURT, IN EQUITY.

No. 338 , Term, 193..

LOUISE LAWRENZ, , Complainant..

Vs.

GULF COAST CITRUS EXCHANGE, ET AL., Defendant..

Motion is hereby made for a Decree Pro Confesso against PENSYLVANIA RAILROAD CO., &

NEW YORK CENTRAL RAILROAD CO., Defendant..

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

This 18th day of August 193 7

LLOYD A. MAGNEY

Solicitor.

The State of Alabama,
Baldwin County.

{ No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ,

..... Complainant

vs.

GULF COAST CITRUS EXCHANGE, BEDSOLE INVESTMENT CO., et al.,

..... Defendant

Motion is hereby made for a Decree Pro Confesso against

BEDSOLE INVESTMENT COMPANY, & McKESSON, BEDSOLE, COLVIN CO.,

..... 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^s have failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 18th day of August 19 37

LLOYD A. MAGNEY

..... Solicitor,

The State of Alabama,
Baldwin County.

{ No. 338 CIRCUIT COURT IN EQUITY.

LOUISE LAWRENZ,

..... Complainant

vs.

GULF COAST CITRUS EXCHANGE, ET AL.,

..... Defendant

Motion is hereby made for a Decree Pro Confesso against GULF COAST CITRUS

EXCAHNGE, et al.,

..... 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^s failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 21st day of October 19 37

LLOYD A. MAGNEY,

..... Solicitor.

Louise Lawrenz.

vs.

Gulf Coast Citrus Exchange, et al.

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 Gulf Coast Citrus Exchange.

Pennsylvania Railroad, Co. New York ~~Rail~~ Central Railroad Co.

Virginia Carolina Chemical. Co. Mc Kesson Bedsole. Colvin. Inc.

Bedsole Investment. Co. Alabama. Basket Co. and Royal Indemnity Co.
and The Testimony of Max Lawrenz

and in behalf of Defendant upon ~~Answer~~ Answer. of Merchants National. Bank.

R. J. Duch

Register.

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Duch

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No. 339

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Louise Laurin

vs.

Wulf Coast Petrus
Charge Coal

NOTE OF TESTIMONY

Filed in Open Court this 26

day of Oct 1937

Res Duch

REGISTER

RECORDED *Duch*
7-319

No. 338 Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

vs.

GULF COAST CITRUS EXCHANGE
ET AL.,

**MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE**

Filed Oct. 21, 19 37

R. S. Duch
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Recorded in Record,

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No. 338 Page.....

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ

vs.

GULF COAST CITRUS EXCHANGE

ET AL.,

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed August 18, 19 37

R. S. Duck

Register.

Recorded in..... Record,

Vol..... Page.....

Register.

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**State of Alabama,
Baldwin County.**

CIRCUIT COURT, IN EQUITY.

LOUISE LAWRENZ

Complainant

Vs.

GULF COAST CITRUS

EXCHANGE, ET AL.,

Defendant

**Motion for Decree Pro Confesso
On Publication.**

Filed August 18, _____, 193⁷

R. S. Duch

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**State of Alabama,
Baldwin County.**

CIRCUIT COURT, IN EQUITY.

LOUISE LAWRENZ,

Complainant

Vs.

VIRGINIA-CAROLINA CHEMICAL CORP.

Defendant

**Motion for Decree Pro Confesso
On Publication.**

Filed August 18, 1937

R. S. Deek

Register.

Recorded in Record,

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No. _____ Page _____

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

vs.

GULF COAST CITRUS EXCHANGE

ET AL.,

**MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE**

Filed August 18, 19 37

R. S. Duch

Register.

Recorded in _____ Record.

Vol. _____ Page _____

Register.

Over
RECORDED *9-315*

No. _____ Page _____

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LAWRENZ

vs.

ALABAMA BASKET COMPANY, et al.

LEONARD'S NATIONAL

LOAN

**MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE**

Filed August 18 19 37

R. S. Over

Register.

Recorded in _____ Record.

Vol. _____ Page _____

Register.

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

339
No. 330

Register

vs. *Wegman*

PLAINTIFF
DEFENDANT

BILL OF COSTS

FEES OF REGISTER		Dollars	Cents	Brought Forward	
Filing each bill and other papers	\$ 10	1	00	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%.	\$ 355
Issuing each subpoena	50		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof	40		40	Each notice sent by mail to creditor	15
Entering each return thereof	15		15	Filing receipting for and docketing each claim, etc.	25
For each order of publication	1 00		15	For all entries on subpoena docket, etc.	50
Issuing Writ of injunction	1 50		15	For all entries on commission docket, etc.	50
For each copy thereof	50		100	Making final record, per 100 words	15
Entering each return thereof	15		50	Certified copy of decree	1 00
Issuing Writ of Attachment	1 00		50	Report of divorce to State Health Office (Acts 1915)	50
Entering each return thereof	15		50	TOTAL FEES OF REGISTER	
Docketing each case	1 00		50	FEES OF SHERIFF	1275
Entering each appearance	25		75	Serving and returning subpoena on deft.	\$ 1 50
Issuing each decree pro confesso on per ser.	1 00		15	Serving and returning subpoena for witness	65
Issuing each decree pro confesso on publica	1 00		15	Levyng attachment	1 50
Each order appointing guardian	1 00		30	Entering and returning same	25
Any other order by Register	50		10	Selling property attached	
Issuing Commission to take testimony	50		50	Impaneling Jury	75
Receiving and filing	10		10	Executing Writ of possession	2 50
Endorsing each package	10		10	Collecting execution for costs	1 50
Entering order submitting cause	50		50	Serving and returning sci. fa., each	65
Entering any other order of court	25		50	Serving and returning notice	65
Noting all testimony	50		75	Serving and returning writ of injunction	1 50
Abstract of cause, etc.	1 00		75	Serving and returning writ of exeat	1 50
Entering each decree	75		75	Taking and approving bonds, each	75
For every 100 words over 500	15		15	Collecting money on execution	
Taking account, etc.	3 00		15	Making Deed	2 50
Taking testimony, etc.	15		15	Serving and returning application, etc.	1 00
Each report, 500 words or less	2 50		15	Serving attachment, contempt of court	1 50
For every 100 words over 500	15		15	TOTAL FEES OF SHERIFF	
Amount claimed less than \$500, etc.	2 00		15	RECAPITULATION	150
Issuing each subpoena	25		25	Register's Fees	1275
Witness certificate, each	25		25	Sheriff's Fees	150
Issuing execution, each	75		25	Commissioner's Fees	500
Entering each return	15		25	Solicitor's Fees	
Taking and approving bond, each	1 00		25	Witness Fees	
Making copy of bill, etc.	15		25	Guardian Ad Litem	
Each notice not otherwise provided for	50		25	Printer's Fees	
Each certificate or affidavit, with seal	50		25	Trial Tax	3 00
Each certificate or affidavit, no seal	25		25	Recording Decree in Probate Court	
Hearing and passing on application, etc.	3 00		25	TOTAL	2225
Each settlement with Receiver, etc.	3 00		25		
Examining each voucher of Receiver, etc.	10		25		
Examining each answer, etc.	3 00		25		
Recording resignation, etc.	75		25		
Entering each certificate to Supreme Court	50		25		
Taking questions and answers, etc.	25		25		
For all other ser relating to such proceedings	1 00		25		
For services in proceeding to relieve minors, etc., same fee as in similar cases.			25		
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.			25		
Sub Total Carried Forward					

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 Earnest O Wigstrom.

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

Evelyn Wigstrom.

against said Earnest O Wigstrom.

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 1st day of June. 1937

RS Duck Register

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

EVELYN WIGSTROM,)
Complainant,)
VS)
ERNEST O. WIGSTROM,)
Respondent.)

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

And now comes the Complainant-Cross-Respondent and for answer to the Respondent's cross bill and to each count thereof separately and severally says:

FIRST: That she denies each and every allegation contained in said Cross Bill of Complaint not herein specifically admitted, and demands strict proof of the same:

SECOND: That she denies each and every allegation contained in Paragraph A of the Respondent's Cross Bill of Complaint:

THIRD: That Complainant-Cross-Respondent denies each and every allegation contained in Paragraph B of the Respondent's Cross Bill of Complaint and demands strict proof of each and every allegation therein contained.

FOURTH: Complainant-Cross-Respondent denies each and every allegation contained in Paragraph C of the Respondent's Cross Bill and demands strict proof of each and every allegation therein:

FIFTH: The Complainant-Cross-Respondent denies each and every allegation contained in Paragraph D of the Respondent's Cross Bill and demands strict proof of each and every allegation contained in said Paragraph D.

SIXTH: The Complainant-Cross Respondent denies each and every allegation contained in Paragraph E of the Respondent's Cross Bill and demands strict proof of the same.


Solicitor for Complainant-Cross-Respondent, Evelyn Wigstrom.

EVELYN WIGSTROM,

Complainant,

VS.

ERNEST O. WIGSTROM,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

And now comes the Respondent and for answer to the Complainant's Bill of Complaint, and to each count thereof, separately and severally, says:

1. That he denies each and every allegation contained in said Bill of Complaint not herein specifically admitted, and demands strict proof of the same.

2. That he admits that both the Complainant and the Respondent are over the age of twenty-one years, and that the Respondent is a bona fide resident of the State of Alabama, but specifically denies that he has been such a resident for a period of more than three year next prior to the filing^{of} the Bill of Complaint. He further denies that the Complainant is a resident of the State of Alabama, residing at Silverhill, in Baldwin County, but on the contrary is a non-resident of the State of Alabama, her address being Basic City, Mississippi; that she has been a resident of Basic City, Mississippi, since in April, 1937.

3. That he admits that he and the Complainant were married at Meridian, Mississippi, in June, 1933, and that they lived together as husband and wife, in Baldwin County, for a short time; that he admits that there has been born to the Complainant and Respondent two children: Oliver Oscar Wigstrom and William Ernest Wigstrom.

4. The Respondent specifically denies the allegation contained in Paragraph Three of the Complainant's Bill of Complaint, and demands strict proof of the same.

5. The Respondent specifically denies the allegation contained in Paragraph Four, and demands strict proof of the same.

AND FURTHER ANSWERING the Complainant's Bill of Complaint, the Respondent says:

(a) That he is ready, able and capable of caring for the said

minor children; that he has at all times provided for them in the best manner possible.

(b) That the Complainant is a woman of vile temper and of low moral character; that while living in Baldwin County, Alabama, she, on many occasions while the Respondent was away, slipped out and ran around on parties with men, and that on one particular occasions she went with a party, whose name is to the Respondent unknown, to a place near Lillian, in the State of Florida, and while there committed acts of adultery with parties to the Respondent unknown.

(c) That she has, on various other occasions, conducted herself in such a manner as to be very detrimental to the morals and teachings of said minor children.

(d) That she is not capable, either physically, mentally or morally, to have the custody, care and control of the said children.

(e) That said acts on the part of the Complainant were without the consent or approval of the Respondent and that the Respondent has not condoned the said acts.

WHEREFORE, the premises considered, Respondent prays that this Honorable Court will take this as his answer and cross-bill and that the Complainant, Evelyn Wigstrom, by proper process, be made party respondent hereto and required 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.

Respondent and Cross-Complainant further prays that upon a final hearing of this cause, this Honorable Court will give and grant unto him a decree of divorce, forever barring the bonds of matrimony existing between him and the Complainant-Cross-Respondent, Evelyn Wigstrom, and that this Honorable Court will make and enter a further decree awarding to him the care, custody and control of said minor children: Oliver Oscar Wigstrom and William Ernest Wigstrom. The Respondent and Cross-Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.


Solicitors for Respondent and Cross-Complainant.

FOOT NOTE:

The Complainant and Cross-Respondent, Evelyn Wigstrom, is required to answer each and every allegation contained in the foregoing Cross-Bill, in paragraphs (a) to (e), inclusive, but not under oath, oath being hereby expressly waived.

Richard A. Bube
Solicitors for the Respondent and
Cross-Complainant.

EVELYN WIGSTROM,
Complainant,

Vs,

EARNEST O. WIGSTROM,
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA,

IN EQUITY NO. _____

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

Now comes your Complainant, Evelyn Wigstrom, and presents this her Bill of Complaint, against Earnest O. Wigstrom, and shows unto your Honor as follows:-

One:

That your complainant and the said Earnest O. Wigstrom, are both over the age of twenty-one years, and are both bona fide residents of the State of Alabama, and have been for a period of more than three years next prior to the filing of this complaint, your respondent now residing at Silverhill, in Baldwin County, Alabama.

Two:

Your Complainant and the said Earnest O. Wigstrom were lawfully married at Meridian Mississippi, during the month of June namely June 1st, 1933, and lived together as man and wife for a long period of time, till about May 2nd, 1937; that there has been born to the said complainant and the said respondent two children, the oldest William Earnest Wigstrom age three being born about April 9th, 1934, and the youngest Oliver Oscar Wigstrom age 2, being born about September 18th, 1935, both being boys, one of the said children, Oliver Oscar being now with your complainant, and the other, William Ernest now being with your respondent Earnest O. Wigstrom.

Three:

Your Complainant further shows unto your Honor that during the month of May, 1937, and while your complainant and the respondent were living together as man and wife in Baldwin

- County, Alabama, that the said Respondent Earnest O. Wigstrom committed actual violence on your complainant by striking her in the face, and which violence was attended with danger to her life or health; and your complainant further avers that since said assault and battery she has not lived with the said respondent as his wife and that she cannot and will not condone said assault, and that previous there to on several occasions he committed actual violence upon her.

Four:

And your complainant further shows unto your Honor that the said Respondent Earnest O. Wigstrom, is an able-bodied man, able to work and able to provide for your complainant and said children, and that she is without funds with which to pay her solicitors or to support herself and said children, and that she has been ill and encountered doctor bills which she is unable to pay and which said doctor bills and medicine bills the Respondent has sufficient funds with which to pay same, and that her health is bad and will not permit her to work and earn money with which to provide for herself and the children. And your Complainant further shows unto this Honorable Court that the Respondent, Ernest O. Wigstrom is a able-bodied man and able to work and does work at all times, earns a large amount of money and that he is the owner of a twenty acre tract of land located in Baldwin County, Alabama near Silverhill and located thereon is a four room house which is new, that he has in his possession one hundred and fifty chickens or more, is the owner of a truck of recent model and he is possessed of all the furniture and fixtures, and he also possesses a new tractor and all equipment necessary for the operation of a farm with tractor equipment, and that he has other miscellaneous properties and cash funds all of which he is able to provide for the support and maintenance of your Complainant and these two children.

And your Complainant shows further unto this Honorable Court that the Respondent Ernest O. Wigstrom is an unfit

and Oliver Osear Wigstrom be granted to your complainant and that she be allowed to have the absolute full custody and control of these two children until they become of legal age and that the respondent be required to support and maintain these two children and whatever amount this Honorable Court shall deem reasonable and just and further such equity as this Honorable Court shall deem just, and your Complainant will ever pray, etc.

Evelyn Wigstrom.
Complainant.

Chris M. Brown
Solicitor for Complainant.

FOOT NOTE: The Respondent is required to answer each and every paragraph of the foregoing Bill of Complaint but not under oath, his oath thereto being hereby expressly waived.

Evelyn Wigstrom.
Complainant.

Chris M. Brown
Solicitor for Complainant.

EVELYN WIGSTROM,
Complainant,
VS.
ERNEST O. WIGSTROM,
Respondent.

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

This cause coming on to be heard was submitted upon the original Bill of Complaint of the Complainant, Answer of the Respondent, and testimony as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to relief.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant and the Respondent be and they are hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Respondent pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said EVELYN WIGSTROM shall not again marry, except to the said ERNEST O. WIGSTROM, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said ERNEST O. WIGSTROM during the pendency of the appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant is restored her maiden name: Evelyn Skelton.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant, EVELYN WIGSTROM shall have the care, custody and control of the minor child, Oliver Oscar Wigstrom, and that the said ERNEST O. WIGSTROM shall have the care, custody and control of the said child, WILLIAM ERNEST WIGSTROM, with the right of each to visit the respective children at reasonable times; that the custody, care and control of said children shall remain within the jurisdiction, and be subject to the further orders of this Court.

Dated at Bay Minette, Baldwin County, Alabama, this 16th day of August, 1937.


Judge of the Circuit Court of Baldwin
County, Alabama.

person and is not the proper person to have the care, custody, and control of these two minor children due to their tender age and that they need the guidance and care of a mother in order that they may have proper training and education and that Your Complainant is the proper person to have the care, custody and control of these children.

THE PREMISES CONSIDERED, your Complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint or cause notice thereof to be served on the Respondent, Ernest O. Wigstrom whose address is Silverhill, Alabama, according to the rules of this Honorable Court and the laws of this State in such matters pertaining and make him respondent to the said bill of complaint requiring him to answer, plead or demur within the time allowed by law.

And your Complainant prays further that your Honor will order a reference to be held by this Honorable Court to ascertain what will be a reasonable amount of alimony to be allowed her pendente lite, and also what solicitors fees she should be allowed and that the said report when filed be confirmed by this Court and the Respondent make payment of such alimony and solicitors fees.

And your Complainant further prays that upon the final hearing of this cause your Honor will grant her the decree dissolving the bonds of matrimony now existing between your Complainant and the said Ernest O. Wigstrom granting her the absolute divorce, granting her the right to marry again and granting her the right of the use of her maiden name Evelyn Skelton, and will also enter a decree ordering the Register to hold a reference to ascertain what would be a reasonable amount of alimony to be allowed your complaint permanently, and that upon the report of the said Register your Honor will decree that this respondent will be required and compelled to pay such amount as shall be ascertained to be reasonable and that your Honor will further decree that the care, custody, and control of these two children, William Ernest Wigstrom

Book
RECORDED 2-29-3-

FINAL DECREE OF DIVORCE

EVELYN WIGSTROM,

Complainant,

VS,

ERNEST O. WIGSTROM,

Respondent.

IN THE CIRCUIT COURT OF

BALTIMORE COUNTY, ALABAMA,

IN EQUITY.

*Final Decree 1/4, 1934.
Book 3, Decd, Register*

RECORDED
7-226

ANSWER AND CROSS BILL

EVELYN WIGSTROM,

Complainant,

VS.

ERNEST O. WIGSTROM,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed July 9, 1937

W.S. Duck, Register

The State of Alabama }
Baldwin County

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

EVELYN WIGSTROM

COMPLAINANT

VS.

ERNEST O. WIGSTROM

RESPONDENT

I, R. S. DUCK,

as Register and Commissioner

have called and caused to come before me Evelyn Wigstrom and George Skelton

witnesses named in the requirement for Oral Examination, on the _____ day of August
1937, at the office of Clerk of the Circuit Court of Baldwin County, Alabama,
in Bay Minette, Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said EVELYN WIGSTROM

doth depose and say as follows:

My name is Evelyn Wigstrom. I am a resident of Baldwin County, Alabama, and have been for more than three years next prior to the filing of this Bill of Complaint. I am over twenty-one years of age.

The Respondent, Ernest O. Wigstrom is over twenty-one years of age and a resident of Silverhill, in Baldwin County, Alabama.

The Respondent, Ernest O. Wigstrom and I were married at Meridian, Mississippi, on June 1st, 1933, and we lived together as husband and wife until on to-wit, May 2nd, 1937.

On to-wit, May 2nd, 1937, and various times prior thereto the Respondent, Ernest Wigstrom abused and threatened me and from his conduct I had reasonable apprehension to believe and did believe that he would carry out his threats and do actual violence to my person which would necessarily be attended with danger to my life and health.

Evelyn Wigstrom

ORAL EXAMINATION

I, R. S. DUCK as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing by me in the words of the witnesses and read over to them and they signed the same in the presence of myself and _____

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof made before me of the identity of said witnesses; 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 _____ day of August 1937.

_____(L. S.)

No. 339

Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EVELYN WIGSTROM,

COMPLAINANT

vs.

ERNEST O. WIGSTROM

RESPONDENT

ORAL DEPOSITION

Filed August 12, 1937

R. S. Duck, Register.

RECORDED IN

Record _____

Vol. _____ Page _____

_____, Register

GEORGE SKELTON, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is George Skelton. I am a brother to Evelyn Wigstrom. I lived in the home with Evelyn Wigstrom and Ernest O. Wigstrom from Easter Sunday, 1937, until May 2nd, 1937.

I know that while I was living in the home with them, the said Ernest O. Wigstrom threatened and abused my sister and his conduct was such that she had every reason to believe that he would carry out his threats and do actual violence to her person.

George Skelton