LOUISE LAWRENZ,

Complainant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

DECREE

٧s.

GULF COAST CITRUS EXCHANGE, et al,

Respondents.

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

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		Judge		
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The State of Alabama, Baldwin County.	\ No33	38 CIRCUIT	COURT IN EQUITY.
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LOUISE LAWRENZ,	vs.	·	Complainant
ALABAMA, BASKET C	O. ET AL	ن	
In this cause it appears to the			
that a summons requiring the Defendant	ALABAMA	BASKET COM	PANY

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And the said Defendant. having failed	to demur, ples	ad to or answer	the said Bill of Complaint
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mroya A. magne	y, Solicit	or ior comp	lainant.
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No. 338 CIRCUIT COURT IN EQUITY.

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	LOUISE LAWRE	INZ,	·		Complainant
\$ 15 m	. 3	VS.	•		
GULF CO	DAST CITRUS	EXCHANGE,	ET AL.,		Defendant
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5th day of	June	~~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	19.57		
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Lloyd A. Mag	ney, Solici	tor for t	he Compla	inant,	
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taken as confessed agai	inst the said	ROYAL IND	EMNITY CO	MPANY,	Phames & Batre
Agents,	, ,			* * * * * * * * * *	
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The State of Alabama, No. 338 CIRCUIT COURT IN EQUIT
TANITOW TAMBURIO
IOUISE 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,

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to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty da
after the service of said Summons upon
was served uponby the Sheriff of MobileCounty, Alabama, on t

And the said Defendant having failed to demur, plead to or answer the said Bill of Compla
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 thin
taken as confessed against the said

Defendant_aforess
This 18th day of August 19 37
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The State of Alabama, Baldwin County.	No. 338	CIRCUIT CO	OURT IN EQUITY.
TOUTSE LAWRENZ.			Complainant
LOUISE LAWRENZ,	vs.		
GULF COAST CITRUS EXCHANGE	, ET AL.,		Defendant
In this cause it appears to the	Register	·	
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MCKESSON, BEDSOLE, COLVII	N	DSOLE. INVES	PMENT COMPANY,.
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to appear and demur, plead to or answer the	he Bill of Compla	int in this caus	e within thirty days
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was served uponby the Sheri	iff of	.le	unty, Alabama, on the
10th day of June	19	37	

And the said Defendant having failed	d to demur, plead	to or answer the	said Bill of Complaint
to this date, it is now, therefore, on motio	on of		
Lloyd A. Magn			
ordered and decreed that the said Bill of C	Complaint in this	cause be and it h	ereby is in all things
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- This 18th day of	August	19	37
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IOUISE LAWRENZ.	V. A. I.
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	THE STATE OF ALABAMA,
118.	Baldwin, COUNTY.
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GULF COAST CITRUS EXCHANGE. a Corporation	CIRCUIT COURT, IN EQUILIT.
	Oct. Term, 19 37
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I, RS Duck.	Register of the Circuit Court of
	and the state of the orthogonal
County, of the	State of Alabama, hereby certify that on the affidavit
of Lloyd A Magney.	
on the day of day	19.37., an order of publication was made to
Pennsylvania Railroad Co and New	Central.
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who reside at	
and was published in the Foley Onlooker.	
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a newspaper published in Baldwin.	once a week, for four
consecutive weeks, commencing on the	day of June. 19.37 , requiring
the said Pennsylvania Railro	•
Railraod. 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	•
Pennsylvania. Railroad Co. and New Y	ork Railroad. Co.
And that a copy of said order was forwarded by mail, on th	ieday ofday
19, addressed to	
at	<u> </u>
and that one other copy of said order was posted at the Cou	' '
commencing on the 29th day of May	
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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, BAIDWIN 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,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
IN CHANCERY

VS.

AFFIDAVIT

GULF COAST CITRUS EXCHANGE, a Corporation, et al,

Respondents.

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 foreigh 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.

Resource Charles Charles

	STATE OF ALABAMA,
Loui e Lawrenz	Baldwin County.
No	
Vs.	CIRCUIT COURT, IN EQUITY.
Gulf Coast Citrus	Exchange. et al. This theday of
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In this cause it being	ng made to appear to the Register of this Court by the affidavit of
Tlovd A Magney	· · · · · · · · · · · · · · · · · · ·
	Pennsylvania ReilRoad Co
and New York Central	Reilroad.Co
is a non-resident of the State of	Alabama
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and further, that, in the belief of	f said Affiant the Defendantsover the age of 21
years; it is, therefore ordered th	at publication be made in the
a.:	newspaper published inBaldwin
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Baldwin County, Alabama, once	a week for four consecutive weeks, requiring
the gaid Pennsyl	vania Railroad. Co and New York Central Railroa
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to answer or demur to the Bill of	of Complaint in this cause by theday of
June	1927., or after thirty days therefrom a deree Pro Confesso may
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be taken against	Register.
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Attorneys for Plaintiff.

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

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Circuit Court of Baldwin County, In Equity

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Circuit Court of Baldwin County, In Equity

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Defendant shall in no wi	se omit, under penalty, on, to our said Court im	etc. And we further mediately upon the e	command that yo	u return this writ
nd further to do and per Defendant shall in no wis your endorsement thereo WITNESS, Robe	se omit, under penalty, o	etc. And we further mediately upon the e	command that yo	u return this writ

Circuit Court of Baldwin County, In Equity

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WITNESS,	Robert S	S. Duck, I	Register	of said	Circuit Co	ourt, this		29 th	· 25	—da

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

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Circuit Court of Baldwin County, In Equity

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Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama-GREETING:

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of Baldwin Co	unty, exerc	cising Chance	ry jurisdic	tion, within	thirty d	ays after	the service	e of Sum-
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	Louise	Lawrenz.				·		
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nd further to do	and perform	m what said J	udge shall	order and dire	ect in th	at behalf.	And this	the said
efendant shall in	1 no wise or	nit, under pen	alty, etc. A	nd we further	commar	id that yo	u return this	writ with
our endorsement	thereon, to	our said Cou	rt immediat	ely upon the	executio	n thereof.		
		<u> </u>						
WITNESS	, Robert S.	Duck, Regis	ter of said	Circuit Court,	this —	29 th		day
May		193 7 _				· \		
				(YA	X	lus	\mathcal{M}	
		- -			2		- / -	-Register

The State of Alabama, Baldwin County.	No. 338	CIRCUIT COURT IN EQUITY.
LOUISE LAWRENZ,		Complainant
	YD.	
GULF COAST CITRUS EXCHANGE	, ET AL.,	Defendant
In this cause it appears to the		
that a summons requiring the Defendant	Gulf Coast	Citrus Exchange
	* * * % \$ 9 * * 4 * * * 6 * *	*********************
* * * * * * * * * * * * * * * * * * * *		•••••••••••

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***************************************	••••••	
to appear and demur, plead to or answer the		
after the service of said Summons upon		
was served uponitby the Sheriff o		
21st day of September	er,19.3	7
***************************************	******	* * * * * * * * * * * * * * * * * * *
******************************	# # MS: g & A & Q # M M # # Q Q W	
Aug dhe wild Defendant - bening felled to		
And the said Defendant having failed to		-
to this date, it is now, therefore, on motion of Lloyd A. Magney, Solicitor		
ordered and decreed that the said Bill of Comp		-
taken as confessed against the said Gulf Coast C		
		•

		Defendant_aforesaid.
This 25 day of		
Tans uay or	y	P. J. Ducla Register.
	· · · · ·	

Filed in office this 20CERTIFICATE OF PUBLICATION. CIRCUIT COURT, IN EQUITY. THE STATE OF ALABAMA, 1 Salaka County

issued August 18 19 37 v. 338 CIRCUIT COURT, IN EQUITY The State of Alabama, DECRÉE PRO CONFESSO ON PERSONAL SERVICE GULF COAST CITRUS EXCHANGE ET AL. P. S. Deuh Register. LOUISE LAWRENZ, Baldwin County. Vs. Page....

Moore Printing Company, Bay Minette, Ala.

Раде

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

GULF COAST CITRUS EXCHANGE,

ET AL.. (VIRGINIA-CAROLINA

DECREE PRO CONFESSO ON PERSONAL SERVICE

August 18

Issued__

H. S. Juck Register.

Meore Printing Company, Bay Minette, Ala.

Meore Printing Company, Bay Minette, Ala. Issued August 18, No. 338 GULF COAST CITRUS EXCHANGE, The State of Alabama, ET AL., CIRCUIT COURT, IN EQUITY DECREE PRO CONFESSO ON PERSONAL SERVICE LOUISE LAWRENZ, Baldwin County. Register.

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY

LAWRENZ

Vs.

ALABAMA BASKET CO., ET AL.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

DECREE PRO CONFESSO ON
PERSONAL SERVICE

M. J. Ball.

Register.

Meore Printing Company, Bay Minette, Ala.

4887

LOUISE LAWRENZ,

Complainant,

\$ \delta \delta

GULF COAST CITRUS EXCHANGE, ET AL.,

Respondents.

CATE AS TO PERSONAL SERVICE.

Tround 10, 26, -37.

No. 338 Page

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ

GULF COAST CITRUS EXCHANGE

ET AL.,

DECREE PRO CONFESSO ON PERSONAL SERVICE

Issued___ October

19 37

Register.

Meore Printing Company, Bay Minette, Ala.

Recorded in Vol. Circuit Court of Baldwin County
IN EQUITY GULF COAST CITRUS EXCHANGE. TOUISE LAWRENC Lloyd A Magney. SUMMONS Solicitor for Complainant VS. Sept. 13, 1937
I hereby deputise L.A.Magney
to serve this writ.
W.H.Wilkins Sheriff day of THE by leaving a copy of the within Summons with Executed this Received in office this 200 X acount STATE OF ALABAMA, Distriction to the BALDWIN COUNTY Splice Deputy Sheriff

Defendant

SHERIFF

193_

Sheriff

of Baldwin EQUITY I MONS VS. VS. VS. Solicitor for Com	M V CLOWI		l l	E-1		The state of the s	1	TODIS I	SI	7	Circuit Court	Serve on
	MAGNEY.	i i			VS.			ZNAHWY.	MON	TO	of EQ	

Deputy Sheriff

The second of the second of		THE	
	BALDWIN COUNTY	STATE OF ALABAMA	
. 16			

red in office this ing a copy of the within Summons with Defendant Sheriff SHERIFF

Solicitor for Complainant Recorded in Vol Page		GULF COAST CITRUS EXCHANGE. BT AL.			SUMMONS		Virginia Carolina Chemical Co. Serve on
	By Mae Pacification Deputy-Sheriff	Osegunia Carolina Chameal Col Male Capill	copy of the within Summo	Executed this day of	day of, 193	Received in office this	THE STATE OF ALABAMA, BALDWIN COUNTY

McKesson Bedsole. Colvin. Inc.

Serve on

Circuit Court of Baldwin County
IN EQUITY

NO

SUMMONS

10UISE LAWRENZ

CULF COAST CITRUS EXCHANGE

ET AL

LLOYD A MAGNEY.

Solicitor for Complainant

Solicitor for Complainant

Recorded in Vol.

Page

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	B. Mose Bunstein
	Sheriff
	P. & Keleanske
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ц	by leaving a copy of the within Summons with
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	Executed this
ŭ,	The day of
i	COMPANY OF THE PROPERTY OF THE
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}	day of, 193
I.	Received in office this
ī	BALDWIN COUNTY
•	THE STATE OF ALADAMA

Werchants National Bank.

Serve on Mebile

$ m V_{o}$	Lloyd A Magney.				Gulf Coast Citrus Exchange			ZNABANVI BSIDOI	SUMMONS	Circuit Court of Baldwin County	Serve on
		Deputy Sheffin	By may Bennoten	P & Hilamke	Merchante Patienal Bank)	by leaving a copy of the within Summons with fact, Dorton with	Executed this day of	SHERIE	Received in office this, 193	BALDWIN CO	THE STATE OF ALABAMA,

Bedsole Investigate bo. 12/2 GULF COAST CITHUS EXCHANGE. Circuit Court of Baldwin County Serve on -ET AL. TOUTSE LA TREME Recorded in Vol. -SUMMONS LLOYD A MACINEY Complainant Z IN EQUITY 9-300 day of -Received in office this Bedool Investment Co Executed this a. C. Podd as Sec by leaving a copy of the within Summons with By Muc Bernstein

Deputy Sheriff

Defendant

Sheriff

THE STATE OF ALABAMA, BALDWIN COUNTY 0 SHERIFF , 193

Thames. & Batre. Agents.

RECORDED 7-300
Serve on

Circuit Court of Baldwin Count

VC OII	THE STATE OF ALABAMA,
cuit Court of Baldwin County	BALDWIN COUNTY
	Received in office this
SISONO	day of
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TOTTOR TAWRENZ	American (payring pay
	SHERIFF
To the second se	day vi
	June 1937
***	by leaving a sopy of the within Summons with
	& Russell Ladd my
VS.	Shames & Batal
OAST CIERUS EXCHANGE et al	
MASS 23 200	R. X Holoman
	Sheriff
	By more Bernstein
	Deputy Sheriff

Recorded in Vol. -

Looyd A Magney.

Solicitor for Complainant

NOTICE TO NON-RESIDENT.

the May 23 1822

Spanner in

Lloyd 4 Magney.

Respondents.

Attorney, Foley, Alabama.

The State of Alabama, Baldwin County.	CIRCUIT COURT, I	N EQUITY. Term, 192
LOUISE LAWRENZ,	•	
ATTE MARCHE ATTAINED BUZA		Complainant.
		Defendant_
In this cause it appears to the Register		
cation heretofore made in this cause, was pub	lished for four consecutive	weeks, commencing on the
3rdday ofJune	1937, in the Foley	Onlooker
a newspaper published in Baldwin	Alabama, that a cop	y of said order was posted
at the Court House door in Baldwin		
June ###1937 and		
	*	
And it now further appearing to the Re		ouck , that the said
PENSYLVANIA RAILROAD COMPANY	••€ •••••••••••••••••••••••••••••••••••	*****************
***************************************	· · · · · · · · · · · · · · · · · · ·	•
	•••	
*******************************	• • • • • • • • • • • • • • • • •	*********
having to the date hereof failed to demur, plea		
is now, therefore, on motion of Complainant that the Bill of Compl		
taken as confessed against the said	•	
PENSYLVANIA RAILROAD COMPAN COMPANY,	Y, and NEW YORK CE	ENTRAL RAILROAD
This 18th day of Augu		and the second
	R 5	Dec- a 5

Marian Language

Complete in

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Gorman Constant Const

Iour Compleinant, Louise Lavrens, respectfully alone to the Court that she is ever the ore of treaty-one years and a bonn fide resident of Foler, Baldwin County, Alabamas that the respondent, bull Count Cityun Fuerenge, is an Alabama Componention, with its principal place of business in Silverbill, Liabana; that Seremonts fational Dank is a national benefity exporation organized under the Acts of Congress of the United States with its principal place of Durinees in Mobile, Alabams; that the respondent, Femneylvania halirond Company, in a foreign corresponding, not qualified to do business in the State of Alabama and naving no designated agent for the service of process in the State of Alebana and is a nonresident of the State of Liebrary that the respondent, now York Cantral Estatous Company, is a foreign corporation, not qualified to do business in the State of Alabama and having no designated ngont for the service of process in the State of Alabama and is a non-resident of the State of Alabama; that the Despendent, Virginia-Carelias Chesical Company, is a foreign corporation qualifies to

and doing business in the State of Alabama with its plots of business in Nobile, 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 Sasket Company, is an Alabama Corporation, with its principal place of business is Eufala, Alabama; that Respondent, Royal Indonnity 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 Thamas & Batro,
Mobile, Alabama.

1. Your Completeent every that she is in the actual possession of the lands hereinsteer described, cialming to our the same
in her can right, said lands being described as follows:

Lots one (1), Two (2) and Three (8) in Block O. in the lown of Foley, Saldwin County, Alabama...

- 2. That his despendents, and each of them, this or is reputed to own the game or some part thereof or some interest therein,
 or to hold some lies or encumbrance thereon and no suit is pending
 to enforce or test the validity of such title, sixim or encumbrance and Complainent brings this suit to pentle the title to
 each lands on to element as all combin or disputes concerning the
- 3. Complainent calls upon the Respondents and each of them to set forth and specify its title, claim, interest or encombrance and how, and by what instrument the same is derived and greated.

Andrea Annes Annes Company (Annes (An

The promises Considered, Considered prays that your Noner will great to her the writ of memors of the State of Alabam d.rected to the Despondents, Gulf Const Citrus Probance, Merchants
Hetionel Maxis, Virginia-Carolina Chamical Company, Makesson, 200sole, Colvin, Inc., Medacia I westmant Company, Makesson, 200-

Company and Royal Indemnity Company, requiring them and each of those, within thirty days after the service of such arit, to appear, answer, desur or otherwise placed to this Bill of Complaint and to abide such order or decree as may be entored therein and your Complainant further prays that your Essay will direct the Begister of this Court to make out and superintend the appropriate order of publication to the non-resident respondents, Pennsylvania Bailroad Company, and Sex York Control Bailroad Company, seemending them, and each of them, within thirty days after the period epocified in the order of publication, to appear, assemn, please or desure to this bill of complaint sadto abide such order and decree as may be entered therein; and your Complainant shall ever pray &

PRATER A ROLLING

That Complains further rays that upon the final hearing of this bases, your Home: "ill find and decree that the Complainant is the coner of the lands have no right, title, interest, lies or encombrance upon said lands or my part thereof and that the
title of your Complainant in and to paid lands be juicted in her
and that your Complainant have men other, further and different
policy in the premises as may be just and equipale.

Emperators, July Coast Citres Exchange, November 2 october 2 octob

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

The Christian County of Allendary allegant, al

The State of Alabama, Baldwin County

CIRCUIT COURT

To EDITH H	OWELL		
The second secon		·	
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KNOW YE: That	we, having full faith in your	prudence and competency,	have appointed you Com-
	sents do authorize you, at suc		•
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and evanue	JUNIO TO SELECTION OF THE PROPERTY OF THE PROP		
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	7		
as witnesses in behalf of	Complainant,	in a d	ause pending in our Circuit
Court of Baldwin County, o	of said State, wherein	DUISE LAWRENZ	
	· · · · · · · · · · · · · · · · · · ·		
·			Complainant
. CHT	F COAST CITRUS EXCE	,	,
andGOI			
			Defendant.
•			
	nistered, upon		
* •	sition ^S of the witness es a	and return the same to our	Court, with all convenient
speed, under your hand.			
		י.	
Witness 21st	day ofOctober	19 37	
		RSDu	1
			REGISTER
COMMISSIONER'S FEE, \$			
WITNESS' FEES, \$			

LOUISE LAWRENZ,

Complainant,

IN THE CIRCUIT COURT OF

VS.

STIPULATION

GULF COAST CITRUS EXCHANGE, et al,

Respondent.

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 &

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

LOUISE LAWRENZ,

Complainant,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

VS.

DEPOSITION

GULF COAST CITRUS EXCHANGE, et al,

Respondents.

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 O 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 lst 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)

O.O.) 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. "O", 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 A STATE LAND COMMISSIONER OF ALABAMA

STATE LAND COMMISSIONER OF ALABAMA,

By Jeany Jany State Land Commissioner.

THE STATE OF ALABAMA, MONTGOMERY COUNTY.

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

QUIT-CLAIM DEED

nz, de	ceased, and	Lo	ouise Lawn	renz			n of Herman
		:		party			of the second par
			WITNESSETI	H, That the pa	rt ie s	of the first part	, in consideration o
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toth	em in hand p	aid by the pa		r valuable e second part, th			icknowledged, ha
remised,	released and quit	-claimed and	by these prese	nts do remi	se, release an	d forever quit-	claim unto the sai
part	y of the second p	oart	her	heirs and a	our signs forever,	right ti	tle and int
	Baldwin	County,	ıma, descr			, d	
				•			Block #0"
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		OI ·	tne Town	or Foley,	.⊥abama.*	****	*****
Berkennen				. ,		• • ••••••••••••••••••••••••••••••••••	

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TO HAV	E AND TO HOLD	the said rele	eased premises u	nto the said	Lou1	se Lawrer	lZ
			her	heirs and ass	igns forever:	So that neithe	r the said party of
the first p	part theirs	or assigns, n	or any other per	son in trust for	rth	em	or in
	their	name sha	ll or will, can	or may, by any	ways or me	ans whatsoever,	hereafter have or
claim any	y right or title then	reto; BUT T	HAT the said pa	art i∈ gof the	first part th	EIT heirs and	assigns, each and
every one	e of them from all	l estate, right	t, title, interest	or claim, and d	lemand whats	oever, in or to	the said premises
or any pa	art thereof, are, is,	and shall be	, by these prese	nts, FOREVER	EXCLUDED	AND DEBAR	RED.
IN WITN	ESS WHEREOF,	the part y	of the first part	have hereun	to set thei	r han	d and seal the
day and	year first above w	ritten.					
SICNED	SEVIED YNG 1		IN MILIT DOTO	Malor of			
SIGNED,	SEALED AND I	elivered	IN THE PRES	ENCE OF	A		

Exhibit B

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.

lough House

Commissioner

LATER LANGUAGE.

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Name of the second seco

Tour Completeent, Louise Levens, respectfully above to the Court that see is ever the ere of tweety-one years had a buse fire resident of Folog, belowin County, Alabama, that the respondent, Dull Coest Citrus Inducase, is an Alabama Corporation, with the privations asset of business in dispersis, alshaus that dependance bettenel Bunk is a nectional bunkley correction organized under the Acts of Congress of the Delted States with its principal place of Collinson in Souther, Archeolog Cont Che Personales, Paragricula followed Company, is a foreign corporation, not qualified to do business in the State of Alebaua and having no designated agent for the service of propess in the State of Alabam and is a nonresident of the State of Alebeno, that the respondent, New York Control Dellroad Company, is a foreign corporation, and qualified to do business in the state of alabase and having no designated adout for the approper of propose in the State of Alebera, and is n non-ranidant of the State of Alabamas that the Separadoms, Tiralate. Carolion Chamical Company, is a foreign corporation qualified to

> Late one (1), 100 (2) and Three (3) in Block C. In the lowe of Poley, Buldwin County, Blockets.

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TOTAL CONTRACTOR

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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.

- 12124 Paureney

Company of the set .

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Security of the property of the security of th

Your Complainmet, Louise Lourens, respectfully shows to the Court that she is something against trouts was guard and a bone flog resident of Follow, Paldets County, Alabama, that the respondent, rall Court Citrus Sections, is an Alexand Corporation, with its ringing; i.e. of business in divertil, Liebers; that Merchants retional Bank is a mailtant bounts, corresponding organized and a ton acts of Compress of the Collect States with its princape, place of builtimes in School although that the propensions, Properties religend Company, is a comism correspondence, and quittied to do realisements. In this literal of Almbour and having no declarated against top the mervice of process in the limits of Alabana and is a nonrealdest of the State of Aleksan; that the responsess, New York estral Pallroad Company, is a foreign corporation, not qualified and the transfer in the State of Alabama and having an existanted Apple for the service of process in the state of Alabera and in a un-regional di tie State of Alebene; that the Seasoniest, Tightileareline Consider Company, is a farely corporation qualified to

and doing besiness in the Sate of Alabama size to size of business in Nobile, Alabama; that Respondent, Monagema, Relative, Colwin, Inc., is an Alabama corporation, with the principal place of
business in Sabile, Alabama; that respondent, Redacts investment
Company, is an Alabama Corporation with the principal place of
business in Rabile, Alabama; that respondent, Alabama Rentes Company, is an Alabama Corporation, with its principal place of business is for all and a corporation consists of business in the state of
independent of Company that Respondent, Pank Indepently Company
is a foreign corporation consists of a business in the state of
independent one state of Alabama, paid agent being Thomas a date.

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Ends, Pomorelyonis Sallreed Company, New York Control Sallreed

Company, Marginia-Corollas Comming, Company, Schooling, Dedacto,

Colvin, Lot., Samala Investment Company, Alabama Samana Company

and Sayal Indomnity Company are largely required to accomm the ale-

LOUISN LENDUZ.

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TONIEL LAMBINZ,	Acc.	OULT COAST CITRUR EXCHANGE,	Respondents.				

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L Section of a majority and section of Lat their activities are disco Your Compleinant, Louise Levrens, respectfully shows to the Court that the is ever the use of twenty-one years and a seas fine resident of Foley, Baldwin County, Alabamas that the respondent, Gulf Cosat Citrus Exchenge, is an Alabama Corporation, with its orincipal piece of business in Cliverbill, Aleberg that Merchants National Bank is a national banking corporation organized under the Asts of Congress of the United States with its principal place of business in Sobile, Alabams; that the respondent, Pennsylvania Dallroad Company, is a foreign corporation, not qualified to do business in the State of Alabams and having no designated agent for the service of process in the State of Alabama and is a nonresident of the State of Alabema, that the respondent, her York Control Sellroad Company, is a foreign correspondent pot qualified to so business in the State of Alabama and having no designated egent for the service of process in the State of Alabama and in a non-realdent of the State of Alabama; that the Dearwidest, Pircinia. Carolina Commical Company, to a fareign comparation conlisted to

Company and Servi Indemnity Company, restrict the and each of these, within thirty days after the service of and arit, to arriver, entered, decor or otherwise ploud to this Hill of Complaint and to abide such order or occree as any be entered therein and your Gomplainant further preys that your Economistic direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondents. Pennsylvenic Ballroad Company, and How York Control Dailroad Company, and How York Control Dailroad Company, becauseding them, and make of them, eithin thirty days after the period specified in the order of publication, to appear, assume placed or decour to this bill of complaint and to blice such order and decree as may be entered therein; and your Complaint make and

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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,

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, ING., 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 nonresident of the State of Alabama; that the respondent, New York Central Railroad Company, is a foreigh 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 foreigh 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

I. 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 attest 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 andto 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 hereinbeforedescribed; 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.

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

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Iour Complainant, Louise Leurens, respectfully shows to the ing the second Court that she is over the age of treaty-one years and a bone fice resident of Poloy, Daldwin County, Alabama; that the respondent, Gulf Goast Citrus Exchenge, 1s am Alabama Corporation, with its principal place of business in Silverbill, Alabams, that Merchants National Bank is a mational banking corporation organized under the Acts of Congress of the United States with its principal place of business in Sodile, Alabame, that the respondent, Foresylvania Reilroed Company, is a foreign corporation, not qualified to go pusiness in the State of Alabama and having no designated agent or the service of process in the State of Alsonn and is a nonesticant of the State of Alabame; that the respondent, New York leatral Blirons Company, is a foreign corporation, not qualified o do bulinosa in the State of Alabana and having no designated gent for the service of process in the State of Alabama and is a on-redient of the State of Alabama, that the hospedant, Virginiaaroline Commical Company, is a foreign corporation qualified to

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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 consecutive weeks, com-
mencing with the issue dated June 3, 19 37, and
ending with the issue dated June 24, 1937
Subscribed and sworn to before me this day
of July 193 loye agner Notary Public.

BARCHARD PUBLISHING CO. The Foley Onlooker Lloyd A. Hagney Foley, Ale.

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NOTICE TO NON-RESIDENT

Louise Lawrenz vs. Gulf Coast Citrus

Exchange et al. I 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,

R. S. DUCK Register. LLOYD A. MAGNEY, Attorney for Plaintiff.

Robertsdale News-Herald

BARCHARD PUBLISHING CO

Foley, Ala.,..

3-10-17-24

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Lloyd A. Magney, Foley, Ala.

AFFIDAVIT OF PUBLICATION

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ending with the issue dated June 24 , 19 37 .
Subscribed and sworn to before me this day of , 193
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The State of Alabama, Baldwin County.	o. 338 CIRCUIT COURT IN EQUITY.
LOUISE LAWRENZ,	Complainant
vs.	
GULF COAST CITRUS EXCHANGE, ALABA	MA BASKET CO., ET AL.,
Motion is hereby made for a Decree Pre Confessor	o againstDefendant
in the above stated cause, on the ground that more	
summons upon said Defendant; and that said s	ummons was duly served according to law, and
that said Defendanthafailed to demur, plead to this date.	to or answer the Bill of Complaint in this cause
This 18th day of	ugust 19 ³⁷
	LLOYD A. MAGNEY Solicitor.

The State of Alabama, No. 338 CIRCUIT COURT IN EQUITY, Baldwin County.
baidwin Gounty.
LOUISE LAWRENZ, Complainant
vs.
GULF COAST CITRUS EXCHANGE, ET AL., Defendant
Motion is hereby made for a Decree Pro Confesso against THAMES & BATRE, 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 Defendantha_S_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, C	
) No3	38, Term, 193
LOUISE LAWRENZ,	,Complainant_
Vs.	
GULF COAST CITRUS EXCHANGE	, ET AL., Defendant
Motion is hereby made for a Decree Pro Confesso aga	
VIRGINIA-COROLINA CHEMICAL CO	RPORATION, Defendant.
in the annexed stated cause, on the ground that more than the	hirty 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	a, 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
746 Code	Solicitor.

THE STATE OF ALABAMA, CIRCUIT COURT, IN Ed Baldwin County.	
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 RA	
NEW YORK CENTRAL RAILROAD CO.,	Defendant
in the annexed stated cause, on the ground that more than thirty days have elapsed since th	
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	l or demur to
the Bill in this cause, to the date hereof,	į.
This 18th day of August 193 7	
LLOYD A. MAGNEY	
746 Code	Solicitor.

The State of Alabama, Baldwin County.	No. 338	CIRCUIT COI	URT IN EQUITY
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LOUISE LAWRENZ,			
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	v s.	:	
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GULF COAST CITRUS EXCHANGE, I	BEDSOLE INVEST	MENT CO.,e	t al.,
Motion is hereby made for a Decree Pro Co	McKESSON. BEDS	SOLE, COLVI	N GO-
in the above stated cause, on the ground that	more than thirty da		
summons upon said Defendant; and that s			
that said Defendants have failed to demur, to this date.			
This 18th day of A	ugust	<u> </u>	·

LLOYD A. MAGNEY Solicitor,

Solicitor,

The State of Alabama,	No. 338	CIRCU	JIT COURT	T IN EQUITY.
LOUISE LAWRENZ,				
	٧s.			omplainant
GULF COAST CITRUS EXC	CHANGE, ET	7 AL.,		Defendant
Motion is hereby made for a Decree Pro Co	onfesso agains			
EXCAHNGE. et al.				Defendant
in the above stated cause, on the ground that				
summons upon said Defendant; and that	said summons	was duly ser	ved accordi	ng to law and
that said DefendanthaSfailed to demur, to this date.	plead to or an	iswer the Bill	of Complain	t in this cause
This 21st day of 0	ctober		1937	

LLOYD A. MAGNEY,

Register.

Louise Lawrenz.	
	THE STATE OF ALABAMA Baldwin County
Vs.	
Gulf Coast Citrus Exchange. et al.	IN EQUITY
	Circuit Court of Baldwin County
This cause is submitted in behalf of Complainant up Decree Pro ConfessoOn Gulf Confesso.	
Pennsylvania Railroad. Co. New Yo	rk Ratt Central Railroad Co.
Virginia Carolina Chemical. Co.	Mc Kesson Bedsole. Colvin. Inc.
edsole Investment. Co. Alabama. and The Testomony of Max Lawrenz	Basket Co. and Moyal Indemnity Co
and in behalf of Defendant upon XXXXXX Answe	er. of Merchants National. Bank.
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The State of Alabama
BALDWIN COUNTY

IN EQUITY

Circuit Court of Baldwin County

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CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ,

vs.

GULF COAST CITRUS EXCHANGE

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MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE

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The State of Alabama,

CIRCUIT COURT, IN EQUITY

LOUISE LAWRENZ

GULF COAST CITRUS EXCAENGE

ET AL.,

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE

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The State of Alabama, Baldwin County. CIRCUIT COURT, IN EQUITY LOUISE LAWRENZ. GULF COAST CITRUS EXCHANGE ET AL., MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE Filed August 18, P. S. Duck Register. Recorded in.... Vol. Page Register.

Moore Printing Company, Bay Minette, Ala.

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The State of Alabama,
CIRCUIT COURT, IN EQUITY
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vs.
ALABAMA BASKET COMPANY, et al
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MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE
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Moore Printing Company, Bay Minette, Ala.

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CIRCUIT COURT, BALDWIN COUNTY, ALA. IN EQUITY

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The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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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 Bomplaint:

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.

Respondent, Evelyn Wighstrom.

EVELYN	WIGSTROM,	IN THE CIRCUIT COURT OF
	Complainant,	DAT DESCRIPTION AT A DANK
	vs ₊	BALDWIN COUNTY, ALABAMA,
ERNEST	O. WIGSTROM,	IN EQUITY.
	Respondent.	

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 filofing/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 Complaintant'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.

Solicitors for the Respondent and Cross-Complainant.

EVELYN WIGSTROM, Complainant,

۷s,

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 . Wigstrom, and shows unto your Henor as fellows:-

One:

That your complainant and the said Earnest O. Wigstrom, are both over the age of twenty-one years, and are both tona 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 resideing 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 Juma namely June 1st, 1933, and lived to-gether as man and wife for a long period of time, till about May 2nd,1937; that there has been born to the said compalinant and the said respondent two childern, 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 childern, 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

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 accasions he committed actual violence upon her.

Four:

And your complainant further shows unto your Honor that the said Respondent Earnest O. Wigstrom, in an ablebodied man, able to work and able to provide for your complainant and said childern, and that she is without funds with which to pay her selicitors or to support herself and said childern, 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 Respendent 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, sarns 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 Oscar Wigstrem be granted to your complainant and that she be allowed to bave 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 reasomable and just and further such equity as this Honorable Court shall deem just, and your Complainant will ever pray, etc.

Euclem Wightrom.

Solicitor for Complainant.

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

Euclin Wigstrom.

Solicitor for Complainant.

\$. v.

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 ent 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 WIG-STROM 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 hoth day of August,

Judge of the Circuit Court of Baldwin County, Alabama.

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person and is not then proper person to have the care, custody, and control of these two minor children due to their tander 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 on 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 monorable 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 monor will grant her the decree dissolving the bonds of matrimony now existing between your complainant and the said Ernest 0. 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 monor will decree that this respondent will be required and compelled to pay such amount as shall be ascertained to be reasonable and that your monor will further decree that the care, custody, and control of these two children, William Ernest Wigstrom

·Complainant,

Respondent.

ERMEST O. WIGSTROM,

VS.

IN THE CIRCUIT COURT OF

BALIDWIN COUNTY, ALABAMA,

IN EQUIPY.

ernest o. Wigstrom,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

Till July 9, 1837 D.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.	
	and Commissioner	
have called	and caused to come before me <u>Evelyn</u> W	igstrom and George Skelton
witness_ es 1	named in the requirement for Oral Examina	tion, on the day ofAugust
193 <u>7</u> , at t	he office ofClerk of the Circuit	Court of Baldwin County, Alabama,
in <u>Bay Min</u>	ette, Alabama, and hav	ing first sworn said witness to speak the
truth, the wl	hole truth, and nothing but the truth, the	said <u>EVELYN WIGSTROM</u>
	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.

Erelyn Wigstrom.

I, R. S. DUCK	as. Regi	ister and Commis	ssioner hereby certify
that the foregoing depositions on Oral Exami			
of the witness_es and read over tothem_	and they	signed the sar	ne in the presence of
myself and			
at the time and place herein mentioned; that	l have personal	knowledge of per	sonal identity of said
witnesses or had proof made before me of	the identity of	said witness es	; that I am not of
counsel or of kin to any of the parties to said	rause, or any mai	nner interested in	n the result thereof.
I enclose the said Oral Examination in a	n envelope to the	e Register of said	l Court.
Given under my hand and seal, this	day ofA	ugust	19 <u>37_</u> .
			. (L. S.)
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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 Sketters