

THE TOWN OF FOLEY,
A Municipal Corporation,

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

vs.

DECREE

LUCILLE RAPP BILL, RUDOLPH RAPP,
KENNETH RAPP and GEORGE RAPP,

Respondents.

This cause coming on to be heard on the bill of complaint, the return of the Sheriff showing personal service on each of the above named defendants and decree pro confesso against each of said defendants duly entered by the Register, and it appearing to the Court from the proof on file that the court has jurisdiction of the subject matter and, the service upon the respondents and each of them being due and regular and in all respects in conformity with the laws of the State of Alabama, that the court has jurisdiction of the persons of the respondents.

And being fully advised in the premises the court finds:

That the complainant the Town of Foley, a municipal corporation, is the owner in fee simple of and has the peaceable and undisputed possession of the following described real estate in Baldwin County, Alabama, to-wit:-

Lot number nine (9) in block fifteen (15)
in the Town of Foley.

That no suit is pending to enforce or test the validity of any title, claim or encumbrance of the respondents or any of them in and to said real estate.

That the respondents and each of them have no right, title, interest, claim or encumbrance in or to said real estate or any part thereof and that the title of the complainant in and to said real estate ought to be quieted and confirmed in said complainant against said respondents and each of them.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the title to the lands described as lot number nine (9) in block number fifteen (15) in the Town of Foley be, and the same hereby is, quieted and confirmed in the said Town of Foley; that the respondents Lucille Rapp Bill, Rudolph Rapp , Kenneth Rapp and George Rapp , and

each and all of them, have no right, title, interest, claim, demand or encumbrance whatsoever upon said land or any part thereof and said respondents, and each of them, are hereby forever enjoined from having, claiming or asserting any right, title, interest, claim, demand or encumbrance in and to said real estate or any part thereof.

It is further ordered, adjudged and decreed that the Register of this court shall, within thirty days from the date of this decree, file a certified transcript thereof for record in the Probate Court of Baldwin County, Alabama, and that the complainant pay the costs of this action taxed at\$ _____.

Dated this 24th day of May, 1934.

F. W. Hare
Judge.

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300-1101

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

THE TOWN OF FOLEY,
A Municipal Corporation,
Complainant,

-VS-

LUCILLE RAPP BILL, RUDOLPH
RAPP, KENNETH RAPP and
GEORGE RAPP,

Respondents.

DECREE

Filed & Indexed 10/19/84
L. A. Magney

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

THE TOWN OF FOLEY,
A Municipal Corporation,

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

-vs-

BILL OF COMPLAINT

LUCILLE RAPP BILL, RUDOLPH RAPP,
KENNETH RAPP and GEORGE RAPP,

Respondents.

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

PART ONE

Your complainant The Town of Foley respectfully shows to the court that it is a municipal corporation organized and existing under and by virtue of the laws of the state of Alabama; that the respondent Lucille Rapp Bill is over the age of twenty-one years and a resident of Baldwin County, Alabama, residing at Loxley therein; That the respondents Rudolph Rapp, Kenneth Rapp and George Rapp are each over the age of twenty-one years and are each residents of Baldwin County, Alabama, residing at Foley therein.

PART TWO

For complaint against the respondents your complainant alleges:

1. That it is the owner of and in the peaceable and undisputed possession of the following described real estate in Baldwin County, Alabama, to-wit:-

Lot number nine (9) in block number fifteen (15)
in the Town of Foley.

2. That the respondents and each of them is reputed to claim some right, title or interest in or encumbrance upon such lands.

3. That no suit is pending to enforce or test the validity of such title, claim or encumbrance.

PART THREE

WHEREFORE complainant calls upon the respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp to set forth and specify their title, claim, interest or encumbrance and how and by what instrument the same is derived and created.

PART FOUR

PRAYER FOR RELIEF

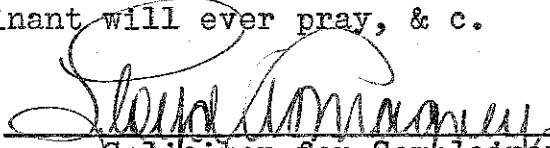
WHEREFORE your complainant prays that this Honorable Court will take jurisdiction of this its cause and proceed to a hearing

thereof; that upon such hearing a decree be entered determining the title to said real estate and adjudging and decreeing that the respondents, and each of them, have no right, title or interest in or encumbrance upon such lands or any part thereof and that the title of the complainant to said lands be quieted and confirmed in it forever.

PART FIVE

PRAYER FOR PROCESS

And complainant prays that Your Honor will grant to it the writ of summons of the state of Alabama to the respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp commanding them and each of them to appear before this Honorable Court within the time allowed by law to answer, demur or plead to this bill of complaint and to abide by such order and decree as to this Honorable Court shall seem meet; and your complainant will ever pray, & c.


Solicitor for Complainant.

FOOT NOTE

The respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp, and each of them, are hereby required to answer the allegations of part two of this bill of complaint from paragraph one to paragraph three, both inclusive, but not under oath, oath to answer being hereby expressly waived.


Solicitor for Complainant.

The State of Alabama, { No. 30 CIRCUIT COURT IN EQUITY.
Baldwin County.

THE TOWN OF FOLEY, A Municipal Corporation, Complainant
vs.

LUCILLE RAPP BILL, RUDOLPH RAPP, KENNETH RAPP, Defendant
and GEORGE RAPP, Register

In this cause it appears to the Register

that a summons requiring the Defendant s Lucille Rapp, Bill, Rudolph Rapp,
Kenneth Rapp and George Rapp,

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 them by the Sheriff of Baldwin County, Alabama, on the
15th day of March, and the 12th day of April, 1934.

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

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things
taken as confessed against the said Lucille Rapp Bill, Rudolph Rapp,
Kenneth Rapp and George Rapp,

Defendant s aforesaid.

This 22nd day of May

1934

L. A. Stone Register.

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

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Lucille Rapp Bill, Rudolph Rapp,
Kenneth Rapp and George Rapp

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 Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
The Town of Foley, A Municipal Corporation

against said Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp, and George
Rapp

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, M. A. Stone, Register of said Circuit Court, this 7th day of
March 1934

M. A. Stone Register

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

The Town of Foley, a Municipal Corporation,

vs.

Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp, and George Rapp,

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, _____
Summons and service of same on defendants March 15th, and April 18th,
Decree Pro Confesso on Personal Service,

and in behalf of Defendant upon ~~XXXXX~~

M. A. Stone
Register.

THE TOWN OF POLEY,
A Municipal Corporation,

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

-VS-

BILL OF COMPLAINT

LUCILLE RAPP BILL, RUDOLPH RAPP,
KENNETH RAPP and GEORGE RAPP,

Respondents.

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

PART ONE

Your complainant The Town of Foley respectfully shows to the court that it is a municipal corporation organized and existing under and by virtue of the laws of the state of Alabama; that the respondents Lucille Rapp Bill is over the age of twenty-one years and a resident of Baldwin County, Alabama, residing at Loxley therein; That the respondents Rudolph Rapp, Kenneth Rapp and George Rapp are each over the age of twenty-one years and are each residents of Baldwin County, Alabama, residing at Foley therein.

PART TWO

For complaint against the respondents your complainant alleges:

1. That it is the owner of and in the peaceable and undisputed possession of the following described real estate in Baldwin County, Alabama, to-wit:-

Lot number nine (9) in block number fifteen (15)
in the Town of Foley.

2. That the respondents and each of them is reputed to claim some right, title or interest in or encumbrance upon such lands.

3. That no suit is pending to enforce or test the validity of such title, claim or encumbrance.

PART THREE

WHEREFORE complainant calls upon the respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp to set forth and specify their title, claim, interest or encumbrance and how and by what instrument the same is derived and created.

PART FOUR

PRAYER FOR RELIEF

WHEREFORE your complainant prays that this Honorable Court will take jurisdiction of this its cause and proceed to a hearing

THE TOWN OF FOLEY,
A Municipal Corporation,

Complainant,

-vs-

LUCILLE RAPP BILL, RUDOLPH RAPP,
KENNETH RAPP and GEORGE RAPP,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

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THE TOWN OF FOLEY,
A Municipal Corporation,

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

-vs-

BILL OF COMPLAINT

LUCILLE RAPP BILL, RUDOLPH RAPP,
KENNETH RAPP and GEORGE RAPP,

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RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

THE TOWN OF FOLEY,
A Municipal Corporation,
Complainant,

vs-

LUCILLE RAPP, BILL, RUDOLPH
RAPP, KENNETH RAPP and
GEORGE RAPP,
Respondents

BILL OF COMPLAINT

*File at Office of State
Attorney at Law
Foley, Alabama*

Lloyd A. Magney,
Attorney at Law,
Foley, Alabama.

FOOT NOTE

The respondents Lucille Rapp, Bill, Rudolph Rapp, Kenneth Rapp and George Rapp, and each of them, are hereby required to answer the allegations of part two of this bill of complaint from paragraph one to paragraph three, both inclusive, but not under oath, said to answer being hereby expressly waived.

LLOYD A. MAGNEY
Solicitor for Complainant.

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of the complaint to said lands be related and confirmed in (1) for
encumbrance upon such lands or any part thereof and that the title
interests, and each of them, have no right, title or interest in or
title to said real estate and describing said lands and the title
thereof; that upon such hearing a decree be entered determining the

over.

thereof; that upon such hearing a decree be entered determining the title to said real estate and adjudging and decreeing that the respondents, and each of them, have no right, title or interest in or encumbrance upon such lands or any part thereof and that the title of the complainant to said lands be quieted and confirmed in it forever.

PART FIVE

PRAYER FOR PROCESS

And complainant prays that Your Honor will grant to it the writ of summons of the state of Alabama to the respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp commanding them and each of them to appear before this Honorable Court within the time allowed by law to answer, demur or plead to this bill of complaint and to abide by such order and decree as to this Honorable Court shall seem best; and your complainant will ever pray, &

LLOYD A. MAGNEY
Solicitor for Complainant.

FOOT NOTE

The respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp, and each of them, are hereby required to answer the Allegations of part two of this bill of complaint from paragraph one to paragraph three, both inclusive, but not under oath, oath to answer being hereby expressly waived.

LLOYD A. MAGNEY
Solicitor for Complainant.

LOTEA. VIAPERS.
VFOIDEA OF TFM.
HIOAG V. KESBEX.

Handwritten notes and signatures in the left margin, including a large signature that appears to be "L. A. Magney".

Vertical stamp: BILL OF COMPLAINT

Vertical stamp: RECEIVED

Vertical stamp: CLERK OF THE COURT

Vertical stamp: OFFICE OF THE CLERK

Vertical stamp: IN THE CLERK'S OFFICE

Vertical stamp: RECORDED

LLOYD A. MAGNEY
ATTORNEY AND COUNSELLOR AT LAW
FOLEY, ALABAMA

May 23, 1934

Mrs. Mary Alice Stone,
Register in Chancery,
Bay Minette, Alabama

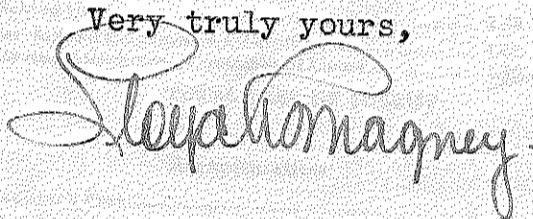
RE: Town of Foley vs. Rapp et al.

Dear Mrs. Stone:

I wish you would mail the file in
this case to Judge Hare for a decree.

I have written him about it and mailed
him a form of decree and as soon as the decree
is received by you, you will please record a
certified copy of it with the Judge of Probate
and send me the cost bill.

Very truly yours,



LAM:LP

WHEREFORE complainant calls upon the respondents Lucille
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FILED IN OFFICE OF CLERK OF DISTRICT COURT OF THE FIRST JUDICIAL CIRCUIT OF ALABAMA

Handwritten notes and signatures in the left margin.

LLOYD A. MAGNEY
Solicitor for Complainant.

FOOT NOTE

The respondents Lucille Rapp Bill, Rudolph Rapp, Kenneth Rapp and George Rapp, and each of them, are hereby required to answer the allegations of part two of this bill of complaint from paragraph one to paragraph three, both inclusive, but not under oath, oath to answer being hereby expressly waived.

LLOYD A. MAGNEY
Solicitor for Complainant.

FILED IN OFFICE OF CLERK OF DISTRICT COURT OF THE FIRST JUDICIAL CIRCUIT OF ALABAMA

LLOYD A. MAGNEY
ATTORNEY AND COUNSELLOR AT LAW
FOLEY, ALABAMA

May 23, 1934

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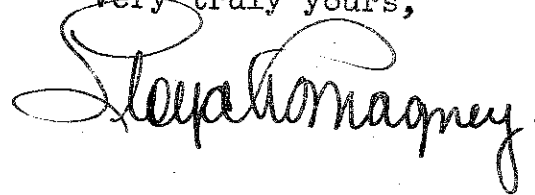
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I have written him about it and mailed
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and send me the cost bill.

Very truly yours,



LAM:LP

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

#30

The Town of Foley, a municipal corp.
vs.
Lucille Ross Bill

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD		
Filing each bill and other papers	3	30	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.	6	05
Issuing each Subpoena	1	50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof	4	20	Each Notice Sent by Mail to Creditors	15	
Entering each return thereof	2	30	Filing, Receipting for and Docketing each Claim, etc	25	
For each Order of Publication			For all entries on Subpoena Docket, etc.	50	
Issuing Writ of Injunction			For all entries on Commission Docket, etc.	50	
For each Copy thereof			Making Final Record, per hundred words	15	
Entering each return thereof			Certified Copy of Decree	1 00	
Issuing Writ of Attachment			Report of Divorce to State Health Office Acts 1915	50	
Entering each return thereof			Total Fees of Register	<u>8 55</u>	
Docketing each case	1	00	FEEs OF SHERIFF		
Entering each Appearance			Serving and Returning Subpoena on Deft.	4	\$1 50
Issuing each Decree Pro Confesso on personal service			Serving and Returning Subpoena for Witness		65
Issuing each Decree Pro Confesso on publication			Levying Attachment		3 00
Each Order Appointing Guardian			Entering and Returning same		25
Any other order by Register			Entering and Returning Execution		25
Issuing Commission to Take Testimony			Selling Property Attached		25
Receiving and Filing			Impanelling Jury		75
Endorsing each package			Executing Writ of Possession		2.50
Entering Order Submitting Cause			Collecting Execution for Costs		1.50
Entering any other Order of Court			Serving and Returning Sci. Fa., each		65
Noting all Testimony			Serving and Returning Notice		65
Abstract of Cause, etc.			Serving and Returning Writ of Injunction		1.50
Entering each Decree			Serving and Returning Writ of Exeat		1.50
For Every Hundred Words Over Five Hundred			Taking and Approving Bonds, each		1.00
Taking Account on Reference			Collecting Money on Execution		
Taking Testimony, etc.			Making Deed		2.50
Each Report, Five Hundred Words or less			Serving and Returning Application		1.00
For every Hundred Words Over Five Hundred			Serving Attachment, Contempt of Court		1.50
Amount Claimed, Less than Five Hundred Dollars, etc.			TOTAL FEES OF SHERIFF	<u>6 00</u>	
Issuing each Subpoena			Recapitulation		
Witness Certificate, each			Register's Fees		8 55
Issuing Execution, each			Sheriff's Fees		6 00
Entering each Return			Commissioner's Fees		
Taking and Approving Bond, each			Solicitor's Fees		
Making Copy of Bill, etc.			Witness Fees		
Each notice not otherwise provided for			Guardian Ad Litem		
Each Certificate or Affidavit, with Seal			Printer's Fees		
Each Certificate or Affidavit, no Seal			Trial Tax		3 00
Hearing and passing on application for Receiver or Trustee			Recording Decree in Probate Court		
Each Settlement with Receiver or Trustee			Total		<u>17 55</u>
Examining each Voucher of Receiver or Trustee					<u>18 45</u>
Examining each Answer on Exception					
Recording Resignation or Suggestion of Death of Trustee					
Entering each Certificate to Supreme Court					
Taking Questions and Answers, etc.					
For all other service relating to such proceedings					
For service in proceeding to relieve minors, etc. same fee as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward	6	05			

certified copy to Probate Office

Received payment this _____ day of _____ 193_____

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

Register.

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Circuit Court, Baldwin County, Ala.
In Equity.

No.

VS.

Cost Bill

Paid _____, 193

Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

RECORDED
25/2

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No. 30 Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

The Town of Foley, a

Municipal Corporation,

vs.

Lucille Rapp Bill

et al.

DECREE PRO CONFESSO ON
PERSONAL SERVICE

Issued May 22nd, 1934
[Signature]
Register.

Meade Printing Company, Bay Minette, Ala.

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of the complaint to said lands be quieted and confirmed in it for
encumbrance upon such lands or any part thereof and that the title
ponents, and each of them, have no right, title or interest in or
title to said real estate and adjoining and abutting and bounding the res-

ever.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

THE TOWN OF FOLEY,
Municipal Corporation,
Complainant,

-vs-

LUCILLE RAPP, BILL, RUDOLPH RAPP,
KENNETH RAPP and GEORGE RAPP,
Respondents.

BILL OF COMPLAINT

*Filed for record 11/19/94
Lloyd A. Magney
Attorney*

Lloyd A. Magney,
Attorney at Law,
Foley, Alabama.

FOOTNOTES

The respondents Lucille Rapp, Bill, Rudolph Rapp, Kenneth
Rapp and George Rapp, and each of them, are hereby requested to answer
the allegations of part two of this bill of complaint from paragraph
one to paragraph three, both inclusive, but not under oath, with to
answer being hereby expressly waived.

LLOYD A. MAGNEY
Solicitor for Complainant.

ORIGIN A. E.

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2-21-34
3-21-34

SEVERE ON
Circuit Court of Baldwin County
IN EQUITY

No. 30

SUMMONS

The Town of Foley,
A Municipal Corporation

VS.

Lucille Rapp Bill,
Rudolph Rapp P.,
Kenneth Rapp,
George Rapp.

LLOYD A. WAGNER,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 193 _____

SHERIFF

Executed this 15-22 day of

by leaving a copy of the within Summons with

Rudolph Rapp
Kenneth Rapp

Defendant

W. R. Stewart

Sheriff

By John L. Davis
Deputy Sheriff

Lucille Rapp Bill 4/17/34
Geo Rapp 4/17/34

W. R. Stewart

Stewart

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

THE TOWN OF FOLEY,
A Municipals Corporation,
Complainant,

LUCILLE RAPP BELL, RUDOLPH
RAPP, KENNETH RAPP and
GEORGE RAPP,
Respondents.

BILL OF COMPLAINT

*Filed March 1st 1994
Wm. D. Stone
By letter.*

Lloyd A. Madney,
Attorney at Law,
Foley, Alabama.

FOOT NOTE

The respondents Lucille Rapp Bell, Rudolph Rapp, Kenneth Rapp and George Rapp, and each of them, are hereby required to answer the allegations of part two of this bill of complaint from paragraph one to paragraph three, both inclusive, but not under each, each to answer being hereby expressly waived.

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LLOYD A. MADNEY
Attorney for Complainant.

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THE TOWNS OF FOLEY,
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-vs-

LUCILLE RAPP, BILLIE RUDOLPH
RAPP, KENNETH RAPP and
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Respondents.

BILL OF COMPLAINT

LLOYD A. MAGNEY
Solicitor for Complainant.

*Filed & Entered 7-24-93
L. A. Magney*

Lloyd A. Magney,
Attorney at Law,
Foley, Alabama.

FOOT NOTE

The respondents Lucille Rapp, Billie Rudolph Rapp, Kenneth Rapp and George Rapp, and each of them, are hereby required to answer the allegations of part two of this bill of complaint from paragraph one to paragraph three, both inclusive, but not under oath, oath to answer being hereby expressly waived.

LLOYD A. MAGNEY
Solicitor for Complainant.

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RECORDED

to. 30

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

The Town of Foley,

a Municipal Corporation,

vs.

Lucille Rapp Bill,

Rudolph Rapp, Kenneth Rapp,

and George Rapp,

NOTE OF TESTIMONY

Filed in Open Court this 24th

day of May 1934

M. A. Stone

REGISTER