

The State of Alabama, }
Baldwin County

No. 31

CIRCUIT COURT IN EQUITY

Margaret Newton Complainant
vs.

Ralph Newton Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the complainant is forever divorced from the Defendant, on account of

Cruelty

It is further ordered, that the said Margaret Newton be, and she is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Margaret Newton pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said Ralph Newton

It is further ordered, adjudged and decreed that the said Margaret Newton shall not again marry except to said Ralph Newton until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Ralph Newton

during the said pendency of appeal
That the custody, care and control of the minor child, Barbara E. Newton, be granted and hereby is granted to the Complainant, Margaret Newton, the minor's mother.

This _____ day of _____ 19____

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA }
BALDWIN COUNTY }

CIRCUIT COURT, IN EQUITY

I, N. A. Stone, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the _____ day of _____, 19____,

in the cause of Margaret Newton Complainant

vs.

Ralph Newton Defendant
as appears of record in said Court.

Witness my hand and the seal of said Court, this the _____ day of _____, 19____

Register

31

CONFIDENTIAL
2004

31

Margaret Newton

VS

Richard Newton

Complaint

Dated March 14, 1934

M. A. Stone

Register

BEEBE & HALL
LAWYERS
BAY MINETTE, ALA.

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

Comes MARGARET NEWTON, complainant, and humbly complain-
ing against RALPH NEWTON, respectfully represents and shows unto
your Honor as follows:

FIRST:

That she is a bona fide resident of Elberta, Baldwin
County, Alabama, and has been for two years next preceding the
filing of this bill of complaint; that she is over twenty-one
years of age; that the respondent, Ralph Newton, is over twenty-
one years of age and a non-resident of the State of Alabama; that
she has made and caused to be made a diligent search to ascertain
the present address of the said Ralph Newton, but has been unable
to learn the same; that his last address was Windfall, Indiana.

SECOND:

That your complainant and the respondent were married
at Williamstown, Kentucky, on September 24, 1928, and lived to-
gether as husband and wife until in June, 1932.

THIRD:

That on, to-wit, in June, 1932, respondent cursed,
abused and threatened your complainant, and on various occasions
did actual violence to her person; that the conduct of the respond-
ent was such as to cause your complainant to have reasonable ap-
prehension to believe and she did actually believe that if she
continued to live with him he would continue to do violence to
her person, which would be attended with danger to her life and
health.

FOURTH:

That there was born to your complainant and the respond-
ent one child, a girl now twenty-two months old: Barbara E. Newton;
that the said child has been with and cared for by the complain-
ant all her life, and that the complainant is able to care for

said child; that the conduct of the respondent has been such and is such that he is not a fit and proper person to have the custody, care and control of said child.

WHEREFORE, the premises considered, complainant prays that your Honor will by proper process make the said Ralph Newton party respondent to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and under the practice of this Honorable Court.

Complainant further prays that upon a final hearing of this cause your Honor will enter an order and decree forever barring the bonds of matrimony existing between her and the respondent; that your Honor will enter a further order and decree giving and granting to her the custody, care and control of the child, Barbara E. Newton.

Complainant further prays that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive. And as in duty bound she will ever pray.

Margaret Newton
Beebe & Hae
Solicitors for Complainant.

FOOT NOTE:

The respondent is required to answer each and every allegation contained in the foregoing bill of complaint, FIRST to FOURTH inclusive, but not under oath, oath being hereby expressly waived.

Margaret Newton
Beebe & Hae
Solicitors for Complainant.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, H. M. Hall, a Notary Public in and for said State and County, this day personally appeared MARGARET NEWTON, who is known to me and who, having been by me first duly sworn, deposes and says that she is the complainant in the case of Margaret Newton vs. Ralph Newton, pending in the Circuit Court of Baldwin County, Alabama, in Equity; that she has made and caused to be made a diligent search for the address of Ralph Newton; that she has been unable to ascertain the same, but knows that he is a non-resident of the State of Alabama, over twenty-one years of age; that his last known address was Windfall, Indiana; however, she has made inquiry to find out his address there, but has been unable to learn the same.

Margaret Newton

Sworn to and subscribed before
me, this the 12th day of March,
1934.

H. M. Hall

Notary Public, Baldwin County, Ala.

A. E. GAMBLE,
ATTORNEY AT LAW.
GREENVILLE, ALA.

31

July 14th 1917.

Hon. T. W. Richerson, Register,
Bay Minette, Alabama.

Dear Tom:-

I wnclose letter with please file among the papers in
the cause mentioned.

Hope you are enjoying good health and a clear conscience.

Your friend,



-Enc-

CIRCUIT COURT, BALDWIN COUNTY, ALABAMA. IN EQUITY.

To the Honorable A. E. Gamble, Judge of the Circuit Court of Baldwin County, Alabama:

Your Orator, The Bay La Launch Orchard Company, a corporation organized under the laws of the State of Iowa, and duly qualified to do business in the State of Alabama, having its principal place of business at Foley, Baldwin County, Alabama, exhibits this, its bill of complaint against the following named defendants, the Southern Plantation Development Company, a corporation, the Alabama Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland, and Ross Beckstrom if they ~~are~~ be living, or if any of them be dead, then against the heirs at law, personal representatives, legatees, devisees, assigns and successors in interest of such of them as are dead.

First

Complainant is a citizen of the State of Iowa, created and existing under the laws of the State of Iowa, but duly qualified to do business in the State of Alabama, and having its place of business at Foley in Baldwin County, Alabama, and is in the peaceable possession of the following described lands situated in Baldwin County, Alabama, to wit: the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 10, NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14. NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec. 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U. S. Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U. S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36 all in Township 8 South Range 4 East, claiming to own the same in its own right.

Second

Complainant further shows unto your Honor that the said defendants and each of them claim or are reputed to claim some right, title or interest in Or encumbrance upon said lands or some part thereof,

and Complainant now calls upon them and each of them to set out and specify his, her or its title, ~~interest~~ claim, interest or encumbrance in, to and upon said lands, and how and by what instrument the same is derived or created; and complainant further shows unto your Honor that no suit is pending to enforce or test the validity of the title, claim or encumbrance by any of the defendants on the above described land or ~~part~~ reputed by any of them.

Prayer for Process

To the end therefore that equity may be done in the premises Complainant prays that each of the above named parties, that is to say the Southern Plantation Development Company, a corporation organized under the laws of Alabama, having its principal place of business in the City of Chicago, but having a local agent in the Town of Bay Minette Baldwin County, Alabama, authorized to receive service of process, viz: J. A. Ertzinger; the Alabama Sumatra and Havana Tobacco Company, a corporation heretofore doing business in Baldwin County, Alabama, but now a non-resident of the State of Alabama, and whose Post office address is unknown to Complainant and cannot be ascertained after reasonable efforts; the Southern States Lumber Company, a corporation under the laws of Florida, having its place of business and Post Office address at Pensacola Florida, is a non-resident of the State of Alabama; John H. Stewart over the age of twenty-one years who complainant is informed died some time ago a resident of the State of Mississippi, but complainant is unable to state the names and ages of his heirs, but he states if any ~~such~~ they be, they are non-residents of the State of Alabama; Mary C. Green of full age and residing at Bay Minette, Alabama; Thomas A. Steel, of full age and residing at Bon Secour, Baldwin County, Alabama; Albert Ward, L. R. Cleveland and Ross Beckstrom all of full age and residing at Rockford ~~in~~ in the State of Illinois, may be made parties defendant to this Bill of Complaint, and that due process and subpoena may be issued to each of said defendants, whose names are given and who reside in the State of Alabama and that due process by publication or otherwise as the law prescribes may be had against each and all the other defendants, who are non-residents of the State of Alabama.

Prayer for Relief

And Complainant further prays that upon the hearing of this cause your Honor will inquire into and ascertain the true nature of the claims interest or encumbrance asserted by each of the defendants, and will decree that none of said defendants has any right, title, claim, estate or interest in or encumbrance upon said lands or any part thereof and that the title of complainant may be fully established and declared to be absolute and in fee simple, free from all right, title, interest or claim of all of said defendants, and that each of said defendants be forever enjoined from asserting any interest in, and claim to, or encumbrance upon said lands or any part thereof, as against complainant, and that the title of complainant be forever established, and declared to be perfect, and that complainant may have such other, further or different relief as it may be entitled to in the premises.

Solicitor for Complainant

Foot note

Each of the defendants is required to answer, but not under oath all the allegations contained in the foregoing bill of complaint from paragraph one to paragraph two, both inclusive, but answer under oath are hereby expressly waived.

Solicitor for Complainant.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Thomas A Steele,

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

Be La Launch Orchards Company, a Corporation.

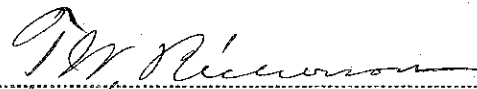
against said

Thomas A Steele et---als,

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, T. W. Richerson, Register of said Circuit Court, this 19th day of June

1917.



Register.

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

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Mary C Green

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

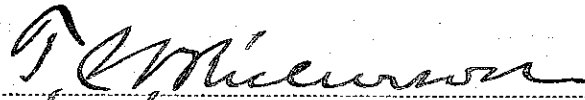
Bay La Launch Orchards Company, a Corporation.

against said Mary C Green et---als,

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, T. W. Richerson, Register of said Circuit Court, this 19th day of June

1917.


Register.

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

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Thomas A Steele,

of Baldwin County, to be and appear before the Judge of the Circuit Court of

Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to

answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Be La Launch Orchards Co., a Corporation

against said

John W Stewart et---als

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, T. W. Richerson, Register of said Circuit Court, this 19th day of June

1917

T W Richerson
Register.

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

CHANCERY NOTICE.

The Bay La Launch Orchards Company) Circuit Court of Baldwin County, Alabama.	
vs. <i>M. S. I.</i>		In Equity.
John W. Stewart, et al.		Order of Publication.

In this cause it appearing from the sworn allegations of the bill in connection with an affidavit on file, that John W. Stewart, if alive is over twenty-one years of age, and if dead, that his heirs are all non-residents of the State of Alabama, and their names, ages and residences complainant is unable to ascertain after diligent inquiry;

that the Alabama Sumatra and Havana Tobacco Company is a non-resident corporation, whose Post Office address cannot be ascertained after reasonable effort; that the Southern States Lumber Company, is a non-resident corporation ~~corporation~~ whose post office address is, Pensacola, Florida; that Albert Ward, L. R. Cleveland and Ross Beckstrom are non-residents of the State of Alabama, whose Post Office address is Rockford, Illinois.

And it further appearing that the above named defendants claim or are reputed to claim some right, title, interest in or encumbrance upon the following described lands lying in Baldwin County, Alabama, viz: the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 10; NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14; NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S. Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36, all in Township 8 South, Range 4 East.

It is ordered and decreed that they plead, answer or demur to the bill of complaint filed against them in this cause before the 19th Day of July 1917, or upon the expiration of thirty days from that date, the same will be taken as confessed against them.

It is further ordered that notice of this order be published once a week for four consecutive weeks in the Baldwin Times, a newspaper published in Baldwin County, Alabama.

This June 19th 1917.

T. W. Riccerson
Register.

THE STATE OF ALABAMA,

No. 21

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Bayla Launch Orchards Company Complainant.

vs.

John W. Stewart et al Defendant.

In this cause it appears to the Register that a Summons requiring the Defendants Mary C. Green

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 Mary C. Green was served upon her by the Sheriff of Baldwin County, Alabama, on the 5th day of July 1917, and the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Complainant it is 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

Mary C. Green

This 13th day of August 1917 Defendant aforesaid.

J. W. Rice Register.

Panola Lumber Co

vs.

John N. Stewart et al

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

In this cause it being made to appear to the Register that on the *20th* day of

June 19*17*, a copy of the Bill of Complaint filed in this cause was sent to *Southern States Lumber Co a corporation, Pensacola Fla*

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed,"

and return receipt demanded addressed to the Register of this Court; and that on the *22nd* day of

June 19*17*, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said

Southern States Lumber Co a corporation

Defendant.

This the *13th* day of *August* 19*17*

D. W. Picurson

Register.

THE STATE OF ALABAMA,

No. 71

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Bay La Lanch Orchards Company Complainant

vs.

John W. Stewart et al Defendant

In this cause it appears to the

Register

that a Summons requiring the Defendant

Thomas A. Steele

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

Thomas A. Steele

was served upon him by the Sheriff of

Baldwin

County, Alabama, on the

11th

day of July

1917

and the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of

Complainant it is

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

Thomas A. Steele

Defendant aforesaid.

This

13th

day of

August

1917

J W Reilinson

Register.

Bay La Louch Orchard Co

vs
John W Stewart et al

CIRCUIT COURT OF
Baldwin COUNTY.
IN EQUITY.

In this cause it being made to appear to the Register that on the 20th day of

June 1917, a copy of the Bill of Complaint filed in this cause was sent to
Ross Beckstrom, Rockford, Illinois

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed,"

and return receipt demanded addressed to the Register of this Court; and that on the 25th day of

June 1917, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said

Ross Beckstrom

Defendant.

This the 13th day of August 1917

D. W. McInerney

Register.

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin

County.

No. 31

Intervention

Term, 19

Ray La Sauch Orchards Company, a corporation Complainant.

vs. John W. Stewart et al Defendants.

In this cause it appears to the Register that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 21st day of June 1917, in the Baldwin Times a newspaper published in Baldwin County Alabama, that a copy of said order was posted at the Court House door in Baldwin County on the 21st day of June 1917, and that another copy was sent by mail on the day of 1917, to

And it now further appearing to the Register that the said

Albert Ward, L. R. Cleveland and John W. Stewart and The Alabama Sumatra Havana Tobacco Company, a corporation

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

Albert Ward, L. R. Cleveland and John W. Stewart and The Alabama Sumatra Havana Tobacco Company a Corporation

This 27th day of August 1917

D. W. Rice Register.

FINAL DECREE.

The State of Alabama) No. 31
Baldwin County.)

CIRCUIT COURT, IN EQUITY
TERM 1917.

Bay La Launch Orchards Company, Complainant

vs.

John W. Stewart et al.

Defendants.

This cause coming on to be heard was submitted for decree on the pleadings and decrees pro confesso, as noted, and upon consideration thereof the Court is of the opinion that the Complainant is entitled to relief.

It is therefore ordered and decreed that the defendants, the Southern Plantation Development Company, a corporation, the Alabama, Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland and Ross Beckstrom, if they be living, and if they be dead, then their heirs at law, next of kin, personal representatives, devisees and assignees or their successors in interest, have no estate or interest in or encumbrance on the following described lands or any part thereof, viz:

the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 10; the NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14; NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S. Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36, all in Township 8 South, Range 4 East in Baldwin County, Alabama.

It is further ordered that the Register of this Court, within thirty days from this date, file a certified copy of this Decree in the office of the Probate Judge of Baldwin County, Alabama, for record therein, and that the cost thereof be taxed in the costs of this cause.

This Decree is subject to the provisions of sections 3170 and 3171 of the Code of Alabama of 1907, and Complainant is directed to send a certified copy hereof to each of the defendants, who has not been personally served with process, if their residences can be ascertained.

It is further ordered that Complainant pay the costs of this cause for which let execution issue.

In Vacation, August 24th. 1917.

A. E. Gamble, Judge.

The State of Alabama)
Baldwin County.)

Circuit Court, In Equity.

I, T. W. Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the 24th day of August 1917 in the cause of Bay La Launch Orchards Company, Complainant, against John W. Stewart et al. Defendants as appears of record in said Court.

Witness my hand and the seal of said Court, this the 27th day of August 1917.



Register.

Bay La Launch Orchards Company,

a corporation,

vs.

John W. Stewart et al.

THE STATE OF ALABAMA,
Baldwin County.

IN EQUITY,
CIRCUIT COURT OF
Baldwin County, Alabama.

COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, Answer of Defendant, Southern Plantation Development Company, a corporation, Decrees pro confesso on personal service against, Mary C. Green and Thomas A. Steele; Decrees pro confesso by Registered mail against Ross Beckstrom and Southern States Lumber Co. a corporation, and Decrees pro confesso on proof of publication against Albert Ward, L. R. Cleveland and The Alabama, Sumatra & Havana Tobacco Company a corporation.

and in behalf of Defendant upon

W. McKeen
Register

No. 31

RECORDED

31

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Margaret Newton

VS

Ralph Newton

DECREE OF DIVORCE

Filed in office this 31st

day of April, 1934

Wm. D. Stone
Register.

E. O. M.

No. _____

31

THE STATE OF ALABAMA,
Baldwin County,

CIRCUIT COURT, IN EQUITY,
Baldwin County, Ala.

VS

DECREE OF DIVORCE

Filed in office this _____

day of _____, 19____

Register.

E. O. M. _____

Original

31

Serve on Mary C Green, Bay Minette, Ala. THE STATE OF ALABAMA,

CIRCUIT COURT OF BALDWIN COUNTY,

BALDWIN COUNTY.

IN EQUITY.

Received in office this.....

day of 191.....

No. 31.

SUMMONS.

Sheriff.

Bay La Leuch Orchards Co,

Executed this 4th day of

Judge

191.....

by leaving a copy of the within Summons with

Mary C Green

Defendant

W. S. Anderson

Sheriff

vs.

Mary C Green et al.

By Deputy Sheriff.

W.S. Anderson.

Solicitor for Complainant.

Recorded in Vol. Page

Original

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. 31

SUMMONS.

Be Lanneth Orchards Co., a

Corporation.

vs.

John W Stewart.

Solicitor for Complainant.

Recorded in Vol. Page

31
THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this 19th

day of January 1917

Sheriff.

Executed this 11th day of

January 1917

by leaving a copy of the within Summons with

Wesmore & Beeler

Defendant

W. E. Southard

Sheriff

By

Deputy Sheriff.

No. 31 Page.....

THE STATE OF ALABAMA,

County,

CIRCUIT COURT, IN EQUITY.

Baldard
Deane vs

John Stewart
^{vs.}
et al

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued Aug 13 1917
J. P. Rimmer
Register.

Henry B. Green

J. P.

Recorded in..... Record,

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

Register.

31

No. 31

CIRCUIT COURT OF

COUNTY,

IN EQUITY.

*Myrtle Laurel
Orchards Co.*

John W. Stearns

Southern States Lumber Co.

DECREE PRO CONFESSO AFTER
NOTICE BY REGISTERED MAIL.

Filed in office this 13th day of

Aug 1917

J. P. Williams
Register.

Entered in O. B. Page

912

31

No. 31 Page

THE STATE OF ALABAMA,

Madison County.

CIRCUIT COURT, IN EQUITY.

Wesley H. Pearce
Appellee vs

Thomas A. Steele
^{vs.}
Plaintiff

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued Aug 13 1917
W. P. Stearns
Register.

Thomas A. Steele

Recorded in Record,

Vol. Page

Register.

913

31

No. 31

CIRCUIT COURT OF
MADISON COUNTY,
IN EQUITY.

George K. Kunk
Debnus Co

John M. Steward
clerk

Ross Beckstrom

DECREE PRO CONFESSO AFTER
NOTICE BY REGISTERED MAIL.

Filed in office this 13 day of
Aug 1917

J. H. Freeman
Register.

Entered in O. B. Page

418

31

No. 31 Page

THE STATE OF ALABAMA,
Barbours County.
CIRCUIT COURT, IN EQUITY.

Barbara Lennell
Quinnell vs

vs.
John W. Lennell
et al

DECREE PRO CONFESSO ON
PUBLICATION.

Issued Aug 22 1917
W. W. Keenan
Register.

Recorded in..... Record

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

Register.....

31

Record in book
Count. 0.00

James R. ...
his private

THE STATE OF ALABAMA, } Office of the Judge of
BLADWIN COUNTY, } the Probate Court,
I, JAMES M. VOLTZ, Judge of said Court in and for
said County, do hereby certify that the within instru-
ment was filed in this office for record on the 22nd
day of April, 1917, at 11:05
o'clock A.M., and I for her certify that the
same is duly recorded in Record Book No. 2671,
Page 118, and duly examined.

Witness my hand this 22nd day of April,
1917
James M. Voltz Judge of Probate Court

J. M. ...
City 1917
April 17 11:55 AM

31

No. 31

THE STATE OF ALABAMA,

Baldwin County.

IN EQUITY,
CIRCUIT COURT OF

Baldwin COUNTY,

Bay La Lennah Orchards Co.
a corporation,

vs.

John W. Stewart et al

NOTE OF TESTIMONY.

Filed in Open Court this 23rd

day of August 1917.

Register.

31

Original

Serve on *Thomas A. Steele*

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. *31*

SUMMONS.

Be Le Lemch Orchards Co.,

vs.

Thomas A. Steele, et als.

W. S. Anderson

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 191

Sheriff.

Executed this day of

191

by leaving a copy of the within Summons with

Defendant

A. E. ...

Sheriff

By

Deputy Sheriff.

Solicitor for Complainant.

Recorded in Vol. Page

31

INFORMATION.

Receipt showing delivery, indorse the article, across its face, "Receipt desired." A check mark (✓) or (v) in the space after the words "Receipt desired," the letter "A" in the space after the words "Delivery restricted to addressee in person," or the letter "O" after the words "Delivery restricted to addressee by order," indicates that a return receipt is desired, or that delivery is restricted as stated. The absence of a check mark or of the letters "A" and "O" indicates that no return receipt is desired and that delivery is not restricted.

INFORMATION.

To obtain a receipt showing delivery, indorse the article, across its face, "Receipt desired." A check mark (✓) or (v) in the space after the words "Receipt desired," the letter "A" in the space after the words "Delivery restricted to addressee in person," or the letter "O" after the words "Delivery restricted to addressee by order," indicates that a return receipt is desired, or that delivery is restricted as stated. The absence of a check mark or of the letters "A" and "O" indicates that no return receipt is desired and that delivery is not restricted.

INFORMATION.

To obtain a receipt showing delivery, indorse the article, across its face, "Receipt desired." A check mark (✓) or (v) in the space after the words "Receipt desired," the letter "A" in the space after the words "Delivery restricted to addressee in person," or the letter "O" after the words "Delivery restricted to addressee by order," indicates that a return receipt is desired, or that delivery is restricted as stated. The absence of a check mark or of the letters "A" and "O" indicates that no return receipt is desired and that delivery is not restricted.

Letter Parcel No. 229 P. O., RAY MINNETTE, AKA
Received for registration 4/22/1917, 1917, from W. H. ...
addressed to ...

Letter Parcel No. 228 P. O., RAY MINNETTE, AKA
Received for registration 4/22/1917, 1917, from ...
addressed to ...
Receipt desired ✓ Delivery restricted ✓
(See printed information on this receipt.)
To address in person ✓
To address by order ✓
Postmaster, per ...
class postage prepaid.

Letter Parcel No. 227 P. O., RAY MINNETTE, AKA
Received for registration 4/22/1917, 1917, from ...
addressed to ...
Receipt desired ✓ Delivery restricted ✓
(See printed information on this receipt.)
To address in person ✓
To address by order ✓
Postmaster, per ...
class postage prepaid.

Attach Proof Here

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin

County.

No. 31

Spring

Term, 19 34

Margaret Newton,

Complainant.

vs.

Ralph Newton

Defendant.

Personally appeared before me,

M. A. Stone,

Register of said Court,

Frank V. Barnard

who, being duly sworn by me, deposes and says that he is the publisher of the

Foley Onlooker

a newspaper published in

Foley, Baldwin

County, Alabama, and that the Order of Publication in a cause wherein

Margaret Newton,

Complainant.

and

Ralph Newton,

Defendant.

was published for four consecutive weeks in said newspaper, commencing on the

22nd

day of

March

19 34

and ending on the

12th

day of

April

19 34

Sworn to and subscribed before me, this

19th

day of

April

19 34

Frank V. Barnard

Publisher.

M. A. Stone

Register.

~~RECORDED~~

31

No. 51 Page.....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Margaret Newton
Complainant.....
vs.

Ralph Newton

Defendant.....

PUBLISHER'S CERTIFICATE OF PUBLICATION.

Issued March 14th 19 34.

M. A. Stone
Register.

Recorded in.....Record

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

Register.

Margaret Newton

vs.

Ralph Newton

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, _____
Notice of Publication, Proof of Publication, Publishers Certificate
as to Publication, and Oral Deposition of Margaret Newton, and
Jack Schlayer,

and in behalf of Defendant upon _____

W. A. Stone

Register.

31
RECORDED

No. 31

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Margaret Newton

VS.

Ralph Newton,

NOTE OF TESTIMONY

Filed in Open Court this 28th

day of May 1934

Mr. A. Stone
REGISTER

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

#31

Margaret Newton
vs.
Ralph Newton

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD		
Filing each bill and other papers	5	50	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.	4	35
Issuing each Subpoena			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof			Each Notice Sent by Mail to Creditors	15	
Entering each return thereof			Filing, Receipting for and Docketing each Claim, etc	25	
For each Order of Publication		1 00	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	13	
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	7 60	
Docketing each case		1 00	FEEES OF SHERIFF		
Entering each Appearance			Serving and Returning Subpoena on Deft.	\$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		10	Impaneling Jury	75	
Endorsing each package		10	Executing Writ of Possession	2.50	
Entering Order Submitting Cause		50	Collecting Execution for Costs	1.50	
Entering any other Order of Court		25	Serving and Returning Sci. Fa., each	65	
Noting all Testimony		50	Serving and Returning Notice	65	
Abstract of Cause, etc.		1 00	Serving and Returning Writ of Injunction	1.50	
Entering each Decree		75	Serving and Returning Writ of Exeat	1.50	
For Every Hundred Words Over Five Hundred		15	Taking and Approving Bonds, each	1.00	
Taking Account on Reference		3 00	Collecting Money on Execution		
Taking Testimony, etc.		15	Making Deed	2.50	
Each Report, Five Hundred Words or less		2 50	Serving and Returning Application	1.00	
For every Hundred Words Over Five Hundred		15	Serving Attachment, Contempt of Court	1.50	
Amount Claimed, Less than Five Hundred Dollars, etc.		2 00	TOTAL FEES OF SHERIFF		
Issuing each Subpoena		25	Recapitulation		
Witness Certificate, each		25	Register's Fees	7 60	
Issuing Execution, each		75	Sheriff's Fees	5 00	
Entering each Return		15	Commissioner's Fees	47 45	
Taking and Approving Bond, each		1 00	Solicitor's Fees		
Making Copy of Bill, etc.		15	Witness Fees		
Each notice not otherwise provided for		50	Guardian Ad Litem		
Each Certificate or Affidavit, with Seal		50	Printer's Fees	7 00	
Each Certificate or Affidavit, no Seal		25	Trial Tax	3 00	
Hearing and passing on application for Receiver or Trustee		3 00	Recording Decree in Probate Court		
Each Settlement with Receiver or Trustee		3 00	Total	22 60	
Examining each Voucher of Receiver or Trustee		10			
Examining each Answer on Exception		3 00			
Recording Resignation or Suggestion of Death of Trustee		75			
Entering each Certificate to Supreme Court		50			
Taking Questions and Answers, etc.		25			
For all other service relating to such proceedings		1 00			
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					
	4	35			

Page 183

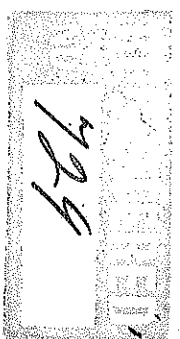
Received payment this _____ day of _____ 193_____

Register.

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.

After five days return to
J. W. Richerson
Clerk of the Circuit Court and
Register in Chancery
Bay Minette, Ala.

31

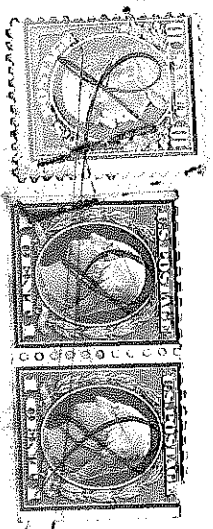


- (Deliver to Addressee only)
- (Return card demanded.)

RETURNED TO WRITER

I. R. Cleveland

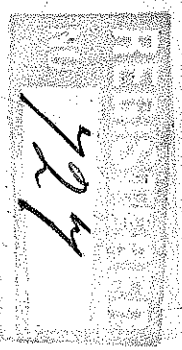
~~Rockford, Ill.~~



UNCLAIMED

After five days return to
J. W. Richerson
Clerk of the Circuit Court and
Register in Chancery
Bay Minette, Ala.

229

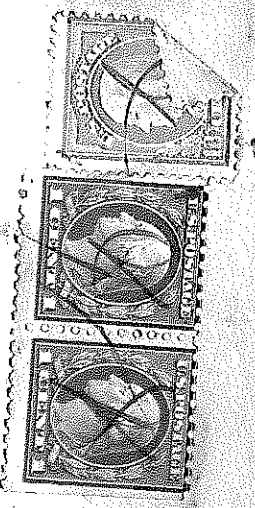


31

- (Return Card demanded)
- (Deliver to Addressee only)

Albert Ward

~~Rockford, Ill.~~



UNCLAIMED

Balance to

THE STATE OF ALABAMA,

Baldwin

County.

No. *31*

CIRCUIT COURT IN EQUITY.

Bay La Launch Orchards Company

Complainant

vs.

John W Stewart et al

Defendants

Motion is hereby made for a Decree Pro Confesso against

Mary C. Green and

Thomas A. Steele

Defendants

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant..... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This *13th* day of *August* 1917

W. S. Anderson

Solicitor.

THE STATE OF ALABAMA,

Madison County,

CIRCUIT COURT, IN EQUITY.

Bay Laurel Orchard Co.

vs.

John Stewart et al

MOTION FOR DECREE
PRO CONFESSO ON
PERSONAL SERVICE.

Filed Sept 13th 1917

D. W. Riccerson
Register.

Recorded in.....Record

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

Register.

INFORMATION.

To obtain a receipt showing delivery, indorse the *office*, across its face, "Receipt desired." A check mark (✓) or (V) in the space after the words "Receipt desired," the letter "A" in the space after the words "Delivery restricted to addressee in person," or the letter "O" after the words "Delivery restricted to addressee or order," indicates that a return receipt is desired, or that delivery is restricted as stated. The absence of a check mark or of the letters "A" and "O" indicates that no return receipt is desired and that delivery is not restricted.

Letter Parcel } No. 430 31 P. O., BAY MINETTE, ALA.

Received for registration 4/20, 1917, from T. W. Richardson

addressed to Southern States Shredder
Pensacola Fla

Receipt desired yes Delivery restricted To addressee in person ✓
(See printed information on this receipt.) To addressee or order

✓ class postage prepaid. ✓ r. per

8550 REQUEST FOR DECREE IN VACATION.

FOR SALE BY GEO. D. BARNARD & CO., ST. LOUIS. 5

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 31 Fall Term, 1917

Bay La Launch Orchards Company, a corporation Complainant

vs.

John W. Stewart et al Defendants

To T. W. Richardson, Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendants and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Wm. S. Anderson, its

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Wm. S. Anderson
Solicitors for Complainant.

No 51 Page

THE STATE OF ALABAMA,

Baldwin County,

CIRCUIT COURT, IN EQUITY.

Bay Le Lenneth Orchards Company,

a corporation,

vs.

John W. Stewart et al.

REQUEST FOR DECREE IN
VACATION.

Filed August 23rd 1917.

W. W. Bevin
Register.

Recorded in Record

Vol Page

Register.

31

THE STATE OF ALABAMA,

Walker

County.

No.

CIRCUIT COURT IN EQUITY.

Day-La Lurch Orchards Co.

Complainant.

vs.

John M. Stewart et al

Defendant.

Motion is hereby made for a Decree Pro Confesso against

Southern States Lumber Co.

a corporation, and Ross Beckstrom

Defendants.

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon
by Registered Mail
said Defendant; and that said summons was duly served according to law, and that said Defendant have failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This *13th* day of *August* 19*17*

W. S. Anderson

Solicitor.

No 51 Page

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Bay Le Lenneth Orchards Company,

a corporation,

vs.

John W. Stewart et al

REQUEST FOR DECREE IN
VACATION.

Filed August 23rd 1917.

W. W. Bevin

Register.

Recorded in Record

Vol Page

Register.

31

CIRCUIT COURT, IN EQUITY.

THE STATE OF ALABAMA,
Baldwin County.

No. 31 Fall Term, 1917

Bay La Launch Orchards Company, a corporation Complainant

vs.

John W. Stewart et al Defendants.

To T. W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendants and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Wm. S. Anderson, its

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Wm. S. Anderson
Solicitors for Complainant.

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 31 M. Veatini Term, 1917

Bay La Launch Orchards Company a corporation Complainants
vs.

John W Stewart et al Defendants

Motion is hereby made for a Decree Pro Confesso against The Alabama Sumatra & Havana Tobacco Company a corporation, Albert Ward, L. R. Cleveland and John W Stewart Defendant in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 22nd day of August 1917

W. L. Anderson Solicitor.

No. **31** Page.....

THE STATE OF ALABAMA,

County.....

CIRCUIT COURT, IN EQUITY.

Complainants.

vs.

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

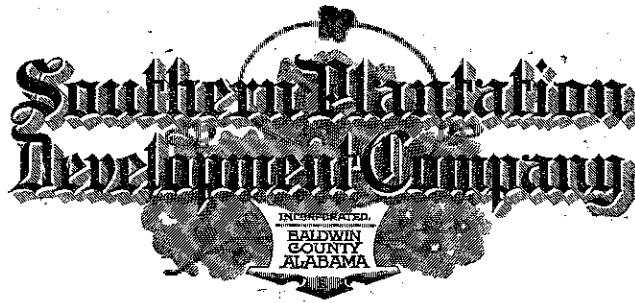
Filed **8/24** 1917

W. W. Williams
Register.

Recorded in..... Record,

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

Register.



GENERAL OFFICES:
SUITE 1007 MALLERS BUILDING
5 SOUTH WABASH AVENUE
PHONE CENTRAL 1613

Chicago, July 9th, 1917.

Judge A. E. Gamble,
Circuit Court Baldwin County,
Bay Minette, Ala.

Dear Sir:-

In reply to a copy of the bill which we have received from our representative and in which the Bay LaLaunch Orchard Company exhibits a complaint against those interested in the lands as itemized, all in Township 8, South, Range 4, East, will say, we have no claim on the land mentioned since we sold same during the year 1910, either deeded it away or sold it under a contract.

Trusting that this is the information desired, we remain

Very truly yours,

SOUTHERN PLANTATION DEVELOPMENT CO.

A handwritten signature in cursive script, appearing to read "P. G. Baker", written over a horizontal line.

SEC'Y.

PGB:CRR

FINAL DECREE.

The State of Alabama) No 31 Circuit Court, In Equity
Baldwin County.) Term 1917

Bay La Launch Orchards Company, Complainant,

vs.

John W. Stewart et al. Defendants.

This cause coming on to be heard was submitted for decree on the pleadings and decrees pro confesso, as noted, and upon consideration thereof the Court is of the opinion that the Complainant is entitled to relief.

It is therefore ordered and decreed that the defendants, the Southern Plantation Development Company, a corporation, the Alabama, Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary O. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland and Ross Beckstrom, if they be living, and if they be dead, then their heirs at law, next of kin, personal representatives, devisees and assignees or their successors in interest, have no estate or interest in or encumbrance on the following described lands or any part thereof, viz:

the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 10, the NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 14, the NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of sec 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S. Government Survey) of sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36, all in Township 8 South, Range 4 East in Baldwin County, Alabama.

It is further ordered that the Register of this Court, within thirty days from this date, file a certified copy of this Decree in the office of the Probate Judge of Baldwin County, Alabama, for record therein, and that the cost thereof be taxed in the costs of this cause.

This Decree is subject to the provisions of sections 3170 and 3171 of the Code of Alabama of 1907, and Complainant is hereby directed to send a certified copy hereof to each of the defendants, who has not been personally served with process, if their residences can be ascertained.

It is further ordered that Complainant pay the costs of this cause for which let execution issue.

In Vacation, August 24th 1917.

Al. Gamble
Judge.

FINAL DECREE.

31

FINAL DECREE.

The State of Alabama) No. 31
Baldwin County.)

CIRCUIT COURT, IN EQUITY
_____ TERM 1917.

Bay La Launch Orchards Company, Complainant

vs.

John W. Stewart et al. Defendants.

This cause coming on to be heard was submitted for decree on the pleadings and decrees pro confesso, as noted, and upon consideration thereof the Court is of the opinion that the Complainant is entitled to relief.

It is therefore ordered and decreed that the defendants, the Southern Plantation Development Company, a corporation, the Alabama Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland and Ross Beckstrom, if they be living, and if they be dead then their heirs at law, next of kin, personal representatives, devisees and assignees or their successors in interest, have no estate or interest in or encumbrance on the following described lands or any part thereof, viz:

the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 10; the NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14; NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 25; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S. Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36, all in Township 8 South, Range 4 East in Baldwin County, Alabama.

It is further ordered that the Register of this Court, within thirty days from this date, file a certified copy of this Decree in the office of the Probate Judge of Baldwin County, Alabama, for record therein, and that the cost thereof be taxed in the costs of this cause.

This Decree is subject to the provisions of sections 3170 and 3171 of the Code of Alabama of 1907, and Complainant is hereby directed to send a certified copy hereof to each of the defendants, who has not been personally served with process, if their residences can be ascertained.

It is further ordered that Complainant pay the costs of this cause for which let execution issue.

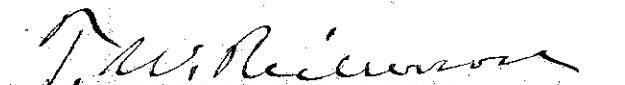
In Vacation, August 24th 1917.

A. E. Gamble, Judge.

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

I, T. W. Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the 24th day of August 1917 in the cause of Bay La Launch Orchards Company, Complainant, against John W. Stewart et al. Defendants, as appears of record in said Court.

Witness my hand and the Seal of said Court, this the 27th day of August 1917.



Register.

CIRCUIT COURT, BALDWIN COUNTY, ALABAMA. IN EQUITY.

To the Honorable A. E. Gamble, Judge of the Circuit Court
of Baldwin County, Alabama:

Your Orator, the Bay La Launch Orchards Company, a corporation organized under the laws of the State of Iowa, and duly qualified to do business in the State of Alabama, having its principal place of business at Foley, Baldwin County, Alabama, exhibits this, its bill of complaint against the following named defendants, the Southern Plantation Development Company, a corporation, the Alabama Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland, ^{and} Ross Beckstrom ~~and Anna Hegenbring~~, if they be living, or if any of them be dead, then against the heirs at law, personal representatives, legatees, devisees, assigns and successors in interest of such of them as are dead.

First.

Complainant is a citizen of the State of Iowa, created and existing under the laws of the State of Iowa, but duly qualified to do business in the State of Alabama, and having its place of business at Foley, in Baldwin County, Alabama, and is in the peaceable possession of the following described lands situated in Baldwin County, Alabama, to wit:

the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 10, NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14, NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec. 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36 all in Township 8 South Range 4 East, claiming to own the same in its own right.

Second.

Complainant further shows unto your Honor that the said defendants and each of them claim or are reputed to claim some right, title or interest in or encumbrance upon said lands or some part thereof, and

Complainant now calls upon them and each of them to set out and specify his, her or its or their title, claim, interest or encumbrance in, to and upon said lands, and how and by what instrument the same is derived or created; and complainant further shows unto your Honor that no suit is pending to enforce or test the validity of the title, claim or encumbrance asserted by any of the defendants on the above described land, or reputed to be asserted by any of them.

Prayer for Process.

To the end therefore that equity may be done in the premises, Complainant prays that each of the above named parties, that is to say, the Southern Plantation Development Company, a corporation organized under the laws of Alabama, having its principal place of business in the City of Chicago, but having a local agent in the Town of Bay Minette, Baldwin County, Alabama, authorized to receive service of process, viz: J. A. Ertzinger; the Alabama Sumatra and Havana Tobacco Company, a corporation heretofore doing business in Baldwin County, Alabama, but now a non-resident of the State of Alabama, and whose Post office address is unknown to Complainant and cannot be ascertained after reasonable effort; the Southern States Lumber Company, a corporation under the laws of Florida, having its place of business and Post Office address at Pensacola, Florida, is a non-resident of the State of Alabama; John W. Stewart, ^{over the age of twenty-one years} who complainant is informed ~~was~~ died some time ago ^{resident of} ~~at~~ the State of Mississippi, but complainant is unable to state the names and ages of his heirs, but he states if any such they be, they are non-residents of the State of Alabama; ^{of full age and} Mary C. Green, /residing at Bay Minette, Alabama; ^{of full age and} Thomas A. Steel, /residing at Bon Secour, Baldwin County, Alabama; Albert Ward, L. R. Cleveland and Ross Beckstrom ~~all~~ of full age and residing at Rockford in the State of Illinois, may be made parties defendant to this Bill of Complaint, and that due process and subpoena may be issued to each of said defendants, whose names are given and who reside in the State of Alabama, and that due process by publication or otherwise as the law prescribes may be had against each and all the other defendants, who are non-residents of the State of Alabama.

Prayer for Relief.

And Complainant further prays that upon the hearing of this cause your Honor will inquire into and ascertain the true nature of the claim interest or encumbrance asserted by each of the defendants, and will decree that none of said defendants has any right, title, claim, estate or interest in or encumbrance upon said lands or any part thereof, and that the title of complainant may be fully established and declared to be absolute and in fee simple, free from all right, title, interest or claim of all of said defendants, and that each of said defendants be forever enjoined from asserting any interest in, and claim to, or encumbrance upon said lands or any part thereof, as against complainant, and that the title of complainant be forever established, and declared to be perfect, and that complainant may have such other, further or different relief as it may be entitled to in the premises.



Solicitor for Complainant.

Foot note:

Each of the defendants is required to answer, but not under oath all the allegations contained in the foregoing bill of complaint from paragraph one to paragraph two, both inclusive, but answers under oath are hereby expressly waived.



Solicitor for Complainant.

FINAL DECREE.

The State of Alabama) No. 31
Baldwin County.)

CIRCUIT COURT, IN EQUITY
TERM 1917.

Bay La Launch Orchards Company, Complainant

vs.

John W. Stewart et al.

Defendants.

This cause coming on to be heard was submitted for decree on the pleadings and decrees pro confesso, as noted, and upon consideration thereof the Court is of the opinion that the Complainant is entitled to relief.

It is therefore ordered and decreed that the defendants, the Southern Plantation Development Company, a corporation, the Alabama Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland and Ross Beckstrom, if they be living, and if they be dead then their heirs at law, next of kin, personal representatives, devisees and assignees or their successors in interest, have no estate or interest in or encumbrance on the following described lands or any part thereof, viz:

the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 10; the NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14; NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S. Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36, all in Township 8 South, Range 4 East in Baldwin County, Alabama.

It is further ordered that the Register of this Court, within thirty days from this date, file a certified copy of this Decree in the office of the Probate Judge of Baldwin County, Alabama, for record therein, and that the cost thereof be taxed in the costs of this cause.

This Decree is subject to the provisions of sections 3170 and 3171 of the Code of Alabama of 1907, and Complainant is hereby directed to send a certified copy hereof to each of the defendants, who has not been personally served with process, if their residences can be ascertained.

It is further ordered that Complainant pay the costs of this cause for which let execution issue.

In Vacation, August 24th 1917.

A. E. Gamble, Judge.

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

I, T. W. Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the 24th day of August 1917 in the cause of Bay La Launch Orchards Company, Complainant, against John W. Stewart et al. Defendants, as appears of record in said Court.

Witness my hand and the Seal of said Court, this the 27th day of August 1917.

T. W. Richerson
Register.

State of Alabama)
 Baldwin County.)

Before me, T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, and Register ~~tax collector~~ of said Court, Wm. S. Anderson, Solicitor for Complainant in the foregoing Bill of Complaint, personally appeared, and after being by me first duly sworn deposes and says, that he is the solicitor for complainant in the foregoing bill of complaint, that he has read the allegations in the foregoing bill; that the investigation as to the names, ages and places of residence of the several defendants to the bill was made by affiant, and that the facts set out in the bill of complaint are true to the best of his knowledge, information and belief.

Subscribed and sworn to before me)
 this 19th day of June 1917.)

T. W. Richerson
 Clerk Circuit Court.

Wm. S. Anderson

The Bay La Launch Orchards Company, vs. John W. Stewart et al. No. 31.
Circuit Court of Baldwin County, Alabama. In Equity. Order of publication.

In this cause it appearing from the sworn allegations of the bill in connection with an affidavit on file, that John W. Stewart, if alive is over twenty-one years of age, and if dead, that his heirs are all non-residents of the State of Alabama, and their names, ages and residences complainant is unable to ascertain after diligent inquiry; that the Alabama Sumatra and Havana Tobacco Company is a non-resident corporation, whose post office address cannot be ascertained after reasonable effort; that the Southern States Lumber Company is a non-resident corporation whose post office address is, Pensacola, Florida; that Albert Ward, L. R. Cleveland and Ross Beckstrom are non-residents of the State of Alabama, whose post office address is Rockford, Illinois.

And it further appearing that the above named defendants claim or are reputed to claim some right, title, interest in or encumbrance upon the following described lands lying in Baldwin County, Alabama, viz: The SW $\frac{1}{4}$ or SE $\frac{1}{4}$ of Sec 10; NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 14; NW $\frac{1}{4}$ of NW $\frac{1}{4}$; SE $\frac{1}{4}$ of NW $\frac{1}{4}$; NE $\frac{1}{4}$ of SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 23; SW $\frac{1}{4}$ of Sec 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$; E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U. S. Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13 and 14 of U. S. Government Survey) of Sec 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$; NW $\frac{1}{4}$ of SE $\frac{1}{4}$; S $\frac{1}{2}$ of SE $\frac{1}{4}$ of Sec 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec 36, all in Township 8 South, Range 4 East.

It is ordered and decreed that they plead, answer or demur to the bill of complaint filed against them in this cause before the 19th day of July, 1917, or upon the expiration of thirty days from that date, the same will be taken as confessed against them.

It is further ordered that notice of this order be published once a week for four weeks in the Baldwin County Green Coffee (not a black bean) for the purpose of publishing the same.

fourth

Subscribed and sworn to before the undersigned

this 30th day of July 1917.

J. N. McQuinn
Clerk Circuit Court
Baldwin County, Ala.

Abner J. Smith
Publisher.

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

The Bay LaLaunch Orchard Company,

vs

John W. Stewart, et al

Circuit Court of Baldwin County, Ala.

Notice #31, in Equity

Was published in said Newspaper for 4 consecutive weeks

issues:

June 21st, 1917	Vol. 28	No. 18
June 28th, 1917	Vol. 28	No. 19
July 5th, 1917	Vol. 28	No. 20
July 12th, 1917	Vol. 28	No. 21

Subscribed and sworn to before the undersigned

this 30th day of July 1917.

J. N. McQuinn
Clerk Circuit Court
Baldwin County, Ala.

Abner J. Smith
Publisher.

Copy for
L. R. Cleveland
Rockford, Ill.

CIRCUIT COURT, BALDWIN COUNTY, ALABAMA. IN EQUITY.

To the Honorable A. E. Gamble, Judge of the Circuit Court
of Baldwin County, Alabama:

Your Orator, the Bay La Launch Orchards Company, a corporation organized under the laws of the State of Iowa, and duly qualified to do business in the State of Alabama, having its principal place of business at Foley, Baldwin County, Alabama, exhibits this, its bill of complaint against the following named defendants, the Southern Plantation Development Company, a corporation, the Alabama Sumatra and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L. R. Cleveland ^{and} Ross Beckstrom ~~and James Hagenberg~~, if they be living, or if any of them be dead, then against the heirs at law, personal representatives, legatees, devisees, assigns and successors in interest of such of them as are dead.

First.

Complainant is a citizen of the State of Iowa, created and existing under the laws of the State of Iowa, but duly qualified to do business in the State of Alabama, and having its place of business at Foley, in Baldwin County, Alabama, and is in the peaceable possession of the following described lands situated in Baldwin County, Alabama, to wit:

the SW $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec. 10, NW $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec 14, NW $\frac{1}{2}$ of NW $\frac{1}{2}$, SE $\frac{1}{2}$ of NW $\frac{1}{2}$, NE $\frac{1}{2}$ of SW $\frac{1}{2}$ and S $\frac{1}{2}$ of NW $\frac{1}{2}$ of SW $\frac{1}{2}$ of Sec 23; SW $\frac{1}{2}$ of Sec 25; SE $\frac{1}{2}$ of NE $\frac{1}{2}$ and S $\frac{1}{2}$ of SW $\frac{1}{2}$ of Sec. 26; N $\frac{1}{2}$ of SE $\frac{1}{2}$, E $\frac{1}{2}$ of SW $\frac{1}{2}$ and SW $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec. 27; SW $\frac{1}{2}$ and S $\frac{1}{2}$ of NW $\frac{1}{2}$ of Sec 28; N $\frac{1}{2}$ of SE $\frac{1}{2}$ (and being lots numbered 2 and 3 of U.S Government Survey) of Sec 31; E $\frac{1}{2}$ of NE $\frac{1}{2}$ and S $\frac{1}{2}$ of SW $\frac{1}{2}$ (and being lots 1, 8, 13 & 14 of U.S. Government Survey) of Sec 32; SE $\frac{1}{2}$ of NE $\frac{1}{2}$, NW $\frac{1}{2}$ of SE $\frac{1}{2}$, S $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec 34; SW $\frac{1}{2}$ of SW $\frac{1}{2}$ of Sec 35; SE $\frac{1}{2}$ of SW $\frac{1}{2}$ and E $\frac{1}{2}$ of Sec 36 all in Township 8 South Range 4 East, claiming to own the same in its own right.

Second.

Complainant further shows unto your Honor that the said defendants and each of them claim or are reputed to claim some right, title or interest in or encumbrance upon said lands or some part thereof, and

Complainant now calls upon them and each of them to set out and specify his, her or its or their title, claim, interest or encumbrance in, to and upon said lands, and how and by what instrument the same is derived or created; and complainant further shows unto your Honor that no suit is pending to enforce or test the validity of the title, claim or encumbrance asserted by any of the defendants on the above described land, or reputed to be asserted by any of them.

Prayer for Process.

To the end therefore that equity may be done in the premises, Complainant prays that each of the above named parties, that is to say, the Southern Plantation Development Company, a corporation organized under the laws of Alabama, having its principal place of business in the City of Chicago, but having a local agent in the Town of Bay Minette Baldwin County, Alabama, authorized to receive service of process, viz: J. A. Ertzinger; the Alabama Sumatra and Havana Tobacco Company, a corporation heretofore doing business in Baldwin County, Alabama, but now a non-resident of the State of Alabama, and whose Post office address is unknown to Complainant and cannot be ascertained after reasonable effort; the Southern States Lumber Company, a corporation under the laws of Florida, having its place of business and Post Office address at Pensacola, Florida, is a non-resident of the State of Alabama; John W. Stewart, ^{over the age of twenty one years} who complainant is informed ~~that he~~ died some time ago ^{resident of} ~~at~~ the State of Mississippi, but complainant is unable to state the names and ages of his heirs, but he states if any such they be, they are non-residents of the State of Alabama; Mary C. Green, ^{of full age and} residing at Bay Minette, Alabama; Thomas A. Steel, ^{of full age and} residing at Bon Secour, Baldwin County, Alabama; Albert Ward, L. R. Cleveland and Ross Beckstrom all of full age and residing at Rockford in the State of Illinois, may be made parties defendant to this Bill of Complaint, and that due process and subpoena may be issued to each of said defendants, whose names are given and who reside in the State of Alabama, and that due process by publication or otherwise as the law prescribes may be had against each and all the other defendants, who are non-residents of the State of Alabama.

Prayer for Relief.

And Complainant further prays that upon the hearing of this cause your Honor will inquire into and ascertain the true nature of the claim interest or encumbrance asserted by each of the defendants, and will decree that none of said defendants has any right, title, claim, estate or interest in or encumbrance upon said lands or any part thereof, and that the title of complainant may be fully established and declared to be absolute and in fee simple, free from all right, title, interest or claim of all of said defendants, and that each of said defendants be forever enjoined from asserting any interest in, and claim to, or encumbrance upon said lands or any part thereof, as against complainant, and that the title of complainant be forever established, and declared to be perfect, and that complainant may have such other, further or different relief as it may be entitled to in the premises.



Solicitor for Complainant.

Foot note:

Each of the defendants is required to answer, but not under oath all the allegations contained in the foregoing bill of complaint from paragraph one to paragraph two, both inclusive, but answers under oath are hereby expressly waived.



Solicitor for Complainant.

State of Alabama)
Baldwin County.)

Before me, T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, and Register ~~in~~ of said Court, Wm. S. Anderson, Solicitor for Complainant in the foregoing Bill of Complaint, personally appeared, and after being by me first duly sworn deposes and says, that he is the solicitor for complainant in the foregoing bill of complaint, that he has read the allegations in the foregoing bill; that the investigation as to the names, ages and places of residence of the several defendants to the bill was made by affiant, and that the facts set out in the bill of complaint are true to the best of his knowledge, information and belief.

Subscribed and sworn to before me)
this 14 day of June 1917.

T. W. Richerson
Register

Wm. S. Anderson

Copy for
Albert Ward
Richmond, Ill.

CIRCUIT COURT, BALDWIN COUNTY, ALABAMA. IN EQUITY.

To the Honorable A. E. Gamble, Judge of the Circuit Court of Baldwin County, Alabama:

Your Orator, the Bay La Launch Orchards Company, a corporation organized under the laws of the State of Iowa, and duly qualified to do business in the State of Alabama, having its principal place of business at Foley, Baldwin County, Alabama, exhibits this, its bill of complaint against the following named defendants, the Southern Plantation Development Company, a corporation, the Alabama Sumatra, and Havana Tobacco Company, a corporation, the Southern States Lumber Company, a corporation, John W. Stewart, Mary C. Green, Thomas A. Steel, Albert Ward, L.R. Cleveland, and Ross Beckstrom if they be living, or if any of them be dead, then against the heirs at law, personal representatives, legatees, devisees, assigns, and successors in interest of such of them as are dead.

First.

Complainant is a citizen of the State of Iowa, created and existing under the laws of the State of Iowa, but duly qualified to do business in the State of Alabama, and having its place of business at Foley, in Baldwin County, Alabama, and is in the peaceable possession of the following described lands situated in Baldwin County, Alabama, to wit: the SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 10, NW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 14, NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NE $\frac{1}{4}$ of SW $\frac{1}{4}$, and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec. 23; SW $\frac{1}{4}$ of Sec. 25; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, and S $\frac{1}{2}$ of SW $\frac{1}{4}$ of Sec. 26; N $\frac{1}{2}$ of SE $\frac{1}{4}$, E $\frac{1}{2}$ of SW $\frac{1}{4}$ and SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Sec. 27; SW $\frac{1}{4}$ and S $\frac{1}{2}$ of NW $\frac{1}{4}$ of Sec. 28; N $\frac{1}{2}$ of SE $\frac{1}{4}$ (and being lots numbered 2 and 3 of U.S. Government Survey) of Sec. 31; E $\frac{1}{2}$ of NE $\frac{1}{4}$ and S $\frac{1}{2}$ of SW $\frac{1}{4}$ (and being lots 1, 8, 13, and 14 of U.S. Government Survey) of Sec. 32; SE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of SE $\frac{1}{4}$, S $\frac{1}{2}$ of SE $\frac{1}{4}$, of Sec. 34; SW $\frac{1}{4}$ of SW $\frac{1}{4}$ of Sec. 35; SE $\frac{1}{4}$ of SW $\frac{1}{4}$ and E $\frac{1}{2}$ of Sec. 36 all in Township 8 South Range 4 East, claiming to own the same in its own right.

Second.

Complainant further shows unto your Honor that the said defendants and each of them claim or are reputed to claim some right, title or interest in or encumbrance upon said lands or some part thereof, and

Complainant now calls upon them and each of them to set out and specify his, her, or its or their title, claim, interest or encumbrance in, to and upon said lands, and how and by what instrument the same is derived or created; and complainant further shows unto your Honor that no suit is pending to enforce or test the validity of the title, claim or encumbrance asserted by any of the defendants on the above described land, or reputed to be asserted by any of them.

Prayer for Process.

To the end therefore that equity may be done in the premises, Complainant prays that each of the above named parties, that is to say, the Southern Plantation Development Company, a corporation organized under the laws of Alabama, having its principal place of business in the City of Chicago,,but having a local agent in the Town of Bay Minette Baldwin County, Alabama, authorized to receive service of process,viz; J. A. Ertzinger; the Alabama Sumatra and Havana Tobacco Company, a corporation heretofore doing business in Baldwin County, Alabama, but now a non-resident of the State of Alabama, and whose Post office address is unknown to Complainant and cannot be ascertained after reasonable effort; the Southern States Lumber Company, a corporation under the laws of Florida, having its place of business and Post Office address at Pensacola, Florida, is a non-resident of the State of Alabama; John W. Stewart ^{over the age of twenty one years} who complainant is informed ~~was~~, died some time ago ^{resident of} ~~in~~ the State of Mississippi, but complainant is unable to state the names and ages of his heirs, but he states if any such they be, they are non-residents of the State of Alabama; Mary C. Green, of full age, and residing at Bay Minette, Alabama; Thomas A. Steel, of full age and residing at Boh Secour, Baldwin County, Alabama; Albert Ward, L.R. Cleveland, and Ross Beckstrom all of full age and residing at Rockford in the State of Illinois, may be made parties defendant to this Bill of Complaint, and that due process and subpoena may be issued to each of said defendants, whose names are given and who reside in the State of Alabama, and that due process by publication or otherwise as the law prescribes may be had against each and all the other defendants, who are non-residents of the State of Alabama.

Prayer for Relief.

And Complainant further prays that upon hearing of this cause your Honor will inquire into and ascertain the true nature of the claim interest or encumbrance asserted by each of the defendants, and will decree that none of said defendants has any right, title, claim, estate or interest in or encumbrance upon said lands or any part thereof, and that the title of complainant may be fully established and declared to be absolute and in fee simple, free from all right, title, interest or claim of all of said defendants, and that each of said defendants be forever enjoined from asserting any interest in, and claim to, or encumbrance upon said lands or any part thereof, as against complainant, and the title of complainant be forever established, and declared to be perfect, and that complainant may have such other, further or different relief as it may be entitled to in the premises.

Wm. S. Anderson

Solicitor for Complainant.

Foot note:

Each of the defendants is required to answer, but not under oath, all the allegations contained in the foregoing bill of complaint from paragraph one to paragraph two, both inclusive, but answers under oath are hereby expressly waived.

Wm. S. Anderson

Solicitor for Complainant.

State of Alabama)
 Baldwin County.)

Before me, T. W. Richardson, Clerk of the Circuit Court of Baldwin County, Alabama, and Register of said Court, Wm S. Anderson, Solicitor for Complainant in the foregoing bill of complaint, personally appeared, and after being by me first duly sworn deposes and says, that he is the solicitor for complainant in the foregoing bill of complaint, that he has read the allegations in the foregoing bill; that the investigation as to the names, ages and places of residence of the several defendants to the bill was made by affiant, and that the facts set out in the bill of complaint are true to the best of his knowledge, information and belief.

Subscribed and sworn to before me)
 this 19th day of June 1917.)

T. W. Richardson
 Register

Wm S. Anderson

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Southern Plantation Development Company
a Corporation.

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

Be La Launch Orchards Company, a Corporation.

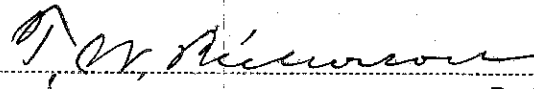
against said

Southern Plantation Development Company, et --als.

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, T. W. Richerson, Register of said Circuit Court, this 19th day of June

1917.


Register.

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

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Southern Plantation Development Company
a Corporation.

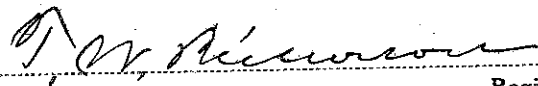
of Baldwin County, to be and appear before the Judge of the Circuit Court of
Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to
answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
Be La Launch Orchards Company, a Corporation.

against said Southern Plantation Development Company, et --als.

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, T. W. Richerson, Register of said Circuit Court, this 19th day of June

191 7.


Register.

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

ORAL EXAMINATION

I, M. A. Stone as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ~~es~~ and read over to them and they signed the same in the presence of myself and H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ~~es~~ 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 cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 28th day of May 1934.

M. A. Stone (L. S.)

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No. 31 Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Margaret Pearson
COMPLAINANT

VS.

Walter Pearson
RESPONDENT

ORAL DEPOSITION

Filed May 28, 1934

M. A. Stone, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

The State of Alabama }
Baldwin County

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

Margaret Newton

COMPLAINANT

VS.

Ralph Newton

RESPONDENT

I, W. A. Stone

as Register and Commissioner of Chancery Court

have called and caused to come before me Margaret Newton

and Jack Schleyer

witnesses named in the requirement for Oral Examination, on the 28 day of May

1934, at the office of W. A. Stone

in Bay Minette, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said W. A. Stone

doth depose and say as follows:

My name is Margaret Newton. I am a bona fide resident of Elberta, Baldwin County, Alabama, and have been for more than two years next preceding the filing of this bill of complaint in this cause. I am over twenty-one years of age.

Ralph Newton is over twenty-one years of age and a non-resident of the State of Alabama. The last I heard from him he was living at Winfall, Indiana. I have made and had other people for me inquire to find out his present address, but have been unable to find out where he lives at the present time.

Ralph Newton and I were married at Williamstown, Kentucky, on September 24, 1928, and lived together as husband and wife until in June, 1932.

On the day that I left the respondent and on various occasions prior thereto, he cursed, abused and threatened me, and the last time I saw and was with him he hit me several times with his fist and threatened to do further violence to me. His conduct was such during practically the entire time that I lived with him that I was at all times under a dread that he would carry out his threats. I was afraid that he would continue to do violence to me, and for that reason had to leave him.

We have one child, a girl now twenty-four months old, Barbara E. Newton, who is now and has been all of her life living with me.

The respondent, on account of the way he has treated me and the child, is not capable of caring for her. Since June, 1932, he has made no effort to see and provide for the child. She is now with me and I am able and willing to care and provide for her.

Margaret Newton

JACK SCHLAYER, a witness for the complainant, being first duly sworn, deposes and says as follows:

I live at Elberta, in Baldwin County, Alabama. I know and have known Margaret Newton for practically the past two years. She has been living at Elberta, in Baldwin County, Alabama. She has one child, a little girl about two years old, who is now and has been since I have known her living with her mother. I have seen the complainant on an average of two or three times every week since I have known her, and have had occasion to talk with her from time to time. I know that Ralph Newton has not provided for the maintenance and support of the complainant, Margaret Newton, and her child, Barbara E. Newton, during the time I have known them. In fact, so far as I know and am able to learn, he has not even been near them.

Jack Schlager