

1803

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS;

WE COMMAND YOU that you summons R.W. KEE, ALICE KEE, HELEN LOUISE KEE, WILLIAM RANDOLPH KEE, ROBERT KEE, CLARA AYRES WILLOCK, DOROTHY WILLOCK, BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, A CORPORATION, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, personal representatives, grantees, successors, and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising chancery jurisdiction, within thirty days after the service of summons and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by J. H. PARFITT, against the said R. W. KEE, HELEN LOUISE KEE, ROBERT KEE, CLARA AYRES, WILLOCK, DOROTHY WILLOCK BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, a corporation, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them, and each of them, separately and severally and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondents shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court immediately upon the execution thereof.

WITNESS, ALICE J. DICK, Register of said County, this the 28 day of May, 1947.

Alice J. Dick
Register

J. H. PARFITT

COMPLAINANT

VS

R. W. KEE, ET AL,

RESPONDENTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Now comes the Complainant, J. H. PARFITT, and represents this his Bill of Complainant against the following described land in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 16, Township 8 South, Range 6 East.

and also against R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George W. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors, and assigns of them and each of them, separately and severally, and any and all persons, firms or corporations, claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Perdido Beach, Baldwin County, Alabama.

2.

That R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, are over twenty-one years of age and non-residents of the State of Alabama, their address being 1557 Burton Avenue, Highland Park, Illinois; that Peoples-Pittsburgh Trust Company, a corporation, is a corporation and resident of Pittsburgh, Pennsylvania; that Clara Ayres Willock Dorothy Willock Brainerd, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd are non-residents of the State of Alabama, over twenty-one years of age, their address being 320 South Michigan Avenue, Pasadena, California; that Curtis M. Willock is over twenty-one years of age, a non-resident of the State of Alabama, his address being 1050 South Orange Grove Pasadena, California; that George M. Willock is a non-resident of the State of Alabama, over twenty-one years of age, his address being Makomis, Florida, that Helen W. Off is over twenty-one years of age, a non-resident of the State of Alabama, her address being 200 East Chestnut Street, Chicago, Illinois; that J. Douglas Ayres is a non-resident of the State of Alabama, over twenty-one years of age, his address being 803 Ward Street, Wilkesburg, Pennsylvania; that George W. Ayres is over twenty-one years of age, a non-resident of the State of Alabama, his address being 7225 Hoode Street, Pittsburgh, Pennsylvania; that J. Scott Willock is over twenty-one years of age, a non-resident of the State of Alabama, his address being 321 Belle-

more Road, Baltimore, Maryland; that the addresses of the Respondents as herein are the last known addresses; that a diligent search and inquiry has been made to determine whether or not any of them have different addresses, but from all information obtainable their addresses herein given are correct.

3.

That your Complainant is the owner in fee simple and in the actual possession of the following described real property situated in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 16, Township 8 South, Range 6 East.

4.

That there is no suit pending to test the Complainant's title to, interest in, or right of possession to said lands; that the Complainant calls upon the Respondents, each of them, to set forth and specify what right, title, interest or encumbrances they have in and to said land, and by what instrument or instruments the same is derived.

5.

That your Complainant obtained title to said land by conveyance from G. W. Robertson, Judge of Probate, Baldwin County, Alabama, by deed dated November 22, 1937, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 65 35, pages 493-4.

6.

That the title to said land claimed by your Complainant stands upon the record of Baldwin County, Alabama, in the name of your Complainant, J. H. PARFITT.

7.

That no one has at any time within ten years next preceding the filing of the Bill of Complaint paid any taxes upon or had any possession of said land or any part thereof, except J. H. Parfitt and R. W. Kee.

8.

That the only persons known by your Complainant to claim said land or any part thereof or any interest therein or any encumbrance thereon are your Complainant, J. H. Parfitt, and R. W. Kee, Alice Kee, Helen Louise Kee,

William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock.

WHEREFORE your Complainant prays that your Honor will by proper process make the said R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them and each of them, and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said land in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 300 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of Beginning, in Section 18, Township 8 South, Range 6 East.

or any part thereof respondents to this Bill of Complaint and by appropriate process require them and each of them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining, determining and establishing that the fee simple title, free of encumbrances, to the said land, and each and every part and parcel thereof, is vested in your Complainant, J. E. Parfitt, and that R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock, Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors, and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, Henry Willock Brainerd, Dorothy Brainerd, Clara Willock

Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock, and no other person, firm or corporation have any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and that any and all doubts and disputes concerning said land be cleared up. Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

1007
J. H. BAILEY
H. M. KEE
STATE OF ALABAMA
BALDWIN COUNTY

FILED OF COMPLAINANT

H. M. Hall
Solicitor for the Complainant

Before me, the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall, who is known to me, and who having been by me first duly sworn, deposes and says that he is solicitor of record for the Complainant in the foregoing cause; that the facts alleged therein are true to the best of his knowledge, information and belief.

H. M. Hall

Sworn to and subscribed before me on this the 28 day of May, 1947.

Notary Public, Baldwin County, Alabama

1902

J. H. PARFITT

COMPLAINANT

VS

R. W. KEE, ET AL,

RESPONDENTS

BILL OF COMPLAINT

Filed: May 28, 1947

Wesley L. Beach
Registrar

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons R. W. KEE, ALICE KEE, HELEN LOUISE KEE, WILLIAM RANDOLPH KEE, ROBERT KEE, CLARA AYRES WILLOCK, DOROTHY WILLOCK, BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, A CORPORATION, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, personal representatives, grantees, successors and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising chancery jurisdiction, within thirty days after the service of summons and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by J. H. PARFITT, against the said R. W. KEE, HELEN LOUISE KEE, ROBERT KEE, CLARA AYRES, WILLOCK, DOROTHY WILLOCK BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, a corporation, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them, and each of them, separately and severally, and further to do and perform what the said Judge shall order and direct in than behalf, and this the Respondents shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court immediately upon the execution thereof.

WITNESS, ALICE J. DUCK, Register of said Court, this the 28
day of May, 1947.

Alice J. Duck
Register

J. H. PARFITT

COMPLAINANT

VS

R. W. KEE, ET AL

RESPONDENT

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

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

Now comes the Complainant, J. H. PARFITT, and presents this hiss Bill
of Complaint against the following described land in Baldwin County, Alabama,
to-wit:

Start at corner of Baldwin Avenue and Pensacola Street,
run 200 feet West on line of Baldwin Avenue, to stake
for beginning corner, thence North 300 feet, West 100
feet, South 300 feet to stake on Baldwin Avenue, thence
East 100 feet on Baldwin Avenue to place of beginning, in
Section 18, Township 8 South, Range 6 East.

and also against R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willoc, George M. Willock, Helen W. Off, J. Douglas Ayres, George M. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them and each, of them, separately and severally, and any and all persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Perdido Beach, Baldwin County, Alabama.

2.

That R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, are over twenty-one years of age and non-residents of the State of Alabama, their address being 1837 Burton Avenue, Highland Park, Illinois; that Peoples-Pittsburgh Trust Company, a corporation is a corporation and resident of Pittsburgh, Pennsylvania; that Clara Ayres Willoc, Dorothy Willock Brainerd, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd are non-residents of the State of Alabama, over twenty-one years of age, their address being 520 South Michigan Avenue, Pasadena, California; that Curtis M. Willock is over twenty-one years of age, a non-resident of the State of Alabama, his address being 1050 South Orange Grove Pasadena, California; that George M. Willock is a non-resident of the State of Alabama, over twenty-one years of age, his address being Wakomis, Florida; that Helen W. Off is over twenty-one years of age, a non-resident of the State of Alabama, her address being 200 East Chestnut Street, Chicago, Illinois; that J. Douglas Ayres is a non-resident of the State of Alabama, over twenty-one years of age, his address being 803 Ward Street, Wilkesburg, Pennsylvania; that George M. Ayres is over twenty-one years of age, a non-resident of the State of Alabama, his address being 7225 Meade Street, Pittsburgh, Pennsylvania; that J. Scott Willock is over twenty-one years of age, a non-resident of the State of Alabama, his address being 921 Belle-

more Road, Baltimore, Maryland; that the addresses of the Respondents as herein are the last known addresses; that a diligent search and inquiry has been made to determine whether or not any of them have different addresses, but from all information obtainable their addresses herein given are correct.

3.

That your Complainant is the owner in fee simple and in the actual possession of the following described real property situated in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 18, Township 8 South, Range 6 East.

4.

That there is no suit pending to test the Complainant's title to, interest in, or rights of possession to said lands; that the Complainant calls upon the Respondents, each of them, to set forth and specify what right, title, interest or encumbrances they have in and to said land, and by what instrument or instruments the same is derived.

5.

That your Complainant obtained title to said land by conveyance from G. W. Robertson, Judge of Probate, Baldwin County, Alabama, by deed dated November 22, 1937, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 63 NS, pages 493-4.

6.

That the title to said land claimed by your Complainant stands upon the record of Baldwin County, Alabama, in the name of your Complainant, J. H. PARFITT.

7.

That no one has at any time within ten years next preceding the filing of the Bill of Complaint paid any taxes upon or had any possession of said land or any part thereof, except J. H. Parfitt and R. W. Kee.

8.

That the only persons known by your Complainant to claim said land or any part thereof or any interest therein or any encumbrance thereon are your Complainant, J. H. Parfitt, and R. W. Kee, Alice Kee, Helen Louise Kee,

William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock.

WHEREFORE your Complainant prays that your Honor will by proper process make the said R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them and each of them, and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said land in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 18, Township 8 South, Range 6 East.

or any part thereof respondents to this Bill of Complaint and by appropriate process require them and each of them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining, determining and establishing that the fee simple title, free of encumbrances, to the said land, and each and every part and parcel thereof, is vested in your Complainant, J. H. Parfitt, and that R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock, Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, Henry Willock Brainerd, Dorothy Brainerd, Clara Willock

Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, and no other person, firm or corporation has any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and that any and all doubts and disputes concerning said land be cleared up. Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

H. M. Hall
Solicitor for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall, who is known to me, and who having been by me first duly sworn deposes and says that he is solicitor of record for the Complainant in the foregoing cause; that the facts alleged therein are true to the best of his knowledge, information and belief.

H. M. Hall

Sworn to and subscribed before me on this the 28 day of May, 1947.

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons R. W. KEE, ALICE KEE, HELEN LOUISE KEE, WILLIAM RANDOLPH KEE, ROBERT KEE, CLARA AYRES WILLOCK, DOROTHY WILLOCK, BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, A CORPORATION, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, personal representatives, grantees, successors and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising chancery jurisdiction, within thirty days after the service of summons and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by J. E. PARFITT, against the said R. W. KEE, HELEN LOUISE KEE, ROBERT KEE, CLARA AYRES, WILLOCK, DOROTHY WILLOCK BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, a corporation, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them, and each of them, separately and severally, and further to do and perform what the said Judge shall order and direct in their behalf, and this the Respondents shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court immediately upon the execution thereof.

WITNESS, ALICE J. DUCK, Register of said Court, this the 28
day of May, 1947.

Alice J. Duck
Register

J. E. PARFITT

COMPLAINANT

VS

R. W. KEE, ET AL

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

no 1902

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

Now comes the Complainant, J. E. PARFITT, and presents this his Bill
of Complaint against the following described land in Baldwin County, Alabama,
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run 200 feet West on line of Baldwin Avenue, to stake
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more Road, Baltimore, Maryland; that the addresses of the Respondents as herein are the last known addresses; that a diligent search and inquiry has been made to determine whether or not any of them have different addresses, but from all information obtainable their addresses herein given are correct.

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4.

That there is no suit pending to test the Complainant's title to, interest in, or rights of possession to said lands; that the Complainant calls upon the Respondents, each of them, to set forth and specify what right, title, interest or encumbrances they have in and to said land, and by what instrument or instruments the same is derived.

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That no one has at any time within ten years next preceding the filing of the Bill of Complaint paid any taxes upon or had any possession of said land or any part thereof, except J. H. Parfitt and R. W. Kee.

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William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock.

WHEREFORE your Complainant prays that your Honor will by proper process make the said R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them and each of them, and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said land in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 18, Township 8 South, Range 6 East.

or any part thereof respondents to this Bill of Complaint and by appropriate process require them and each of them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining, determining and establishing that the fee simple title, free of encumbrances, to the said land, and each and every part and parcel thereof, is vested in your Complainant, J. H. Parfitt, and that R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George H. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, Henry Willock Brainerd, Dorothy Brainerd, Clara Willock

Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George M. Ayres, J. Scott Willock, and no other person, firm or corporation has any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and that any and all doubts and disputes concerning said land be cleared up. Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

H. M. Hall
Solicitor for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall, who is known to me, and who having been by me first duly sworn deposes and says that he is solicitor of record for the Complainant in the foregoing cause; that the facts alleged therein are true to the best of his knowledge, information and belief.

Sworn to and subscribed before me on this the 28 day of May, 1917.

Notary Public, Baldwin County, Alabama

I have been thinking of you very much lately, and wondering how you are getting on. I hope you are well and happy. I have been very busy lately, but I have managed to find some time to write to you. I have been thinking of you very much lately, and wondering how you are getting on. I hope you are well and happy. I have been very busy lately, but I have managed to find some time to write to you.

7-10-68

BILL OF COMPLAINT

J. H. PARFITT
VS
R. W. KEE, JR., AL.

RESPONDENTS

Wied. J. week
Register

Filed: May 28, 1947

COMPLAINTANT
 RESPONDENTS
 ALL
 PLAINT
 28/1047

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1902

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons R. W. KEE, ALICE KEE, HELEN LOUISE KEE, WILLIAM RANDOLPH KEE, ROBERT KEE, CLARA AYRES WILLOCK, DOROTHY WILLOCK, BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, A CORPORATION, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, personal representatives, grantees, successors and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising chancery jurisdiction, within thirty days after the service of summons and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by J. E. PARFITT, against the said R. W. KEE, HELEN LOUISE KEE, ROBERT KEE, CLARA AYRES, WILLOCK, DOROTHY WILLOCK BRAINERD, PEOPLES-PITTSBURGH TRUST COMPANY, a corporation, HENRY WILLOCK BRAINERD, DOROTHY WILLOCK BRAINERD, CLARA WILLOCK BRAINERD, CURTIS M. WILLOCK, GEORGE M. WILLOCK, HELEN W. OFF, J. DOUGLAS AYRES, GEORGE N. AYRES, J. SCOTT WILLOCK, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them, and each of them, separately and severally, and further to do and perform what the said Judge shall order and direct in their behalf, and this the Respondents shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court immediately upon the execution thereof.

WITNESS, ALICE J. DUCK, Register of said Court, this the 28 day of May, 1947.

Alice J. Duck
Register

J. E. PARFITT

COMPLAINANT

VS

R. W. KEE, ET AL

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Now comes the Complainant, J. E. PARFITT, and presents this his Bill of Complaint against the following described land in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue, to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 13, Township 3 South, Range 6 East.

and also against R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George M. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them and each of them, separately and severally, and any and all persons, firms or corporations claiming any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Perdido Beach, Baldwin County, Alabama.

2.

That R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, are over twenty-one years of age and non-residents of the State of Alabama, their address being 1337 Burton Avenue, Highland Park, Illinois; that Peoples-Pittsburgh Trust Company, a corporation is a corporation and resident of Pittsburgh, Pennsylvania; that Clara Ayres Willock, Dorothy Willock Brainerd, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd are non-residents of the State of Alabama, over twenty-one years of age, their address being 320 South Michigan Avenue, Pasadena, California; that Curtis M. Willock is over twenty-one years of age, a non-resident of the State of Alabama, his address being 1050 South Orange Grove Pasadena, California; that George M. Willock is a non-resident of the State of Alabama, over twenty-one years of age, his address being Wakemiss, Florida; that Helen W. Off is over twenty-one years of age, a non-resident of the State of Alabama, her address being 200 East Chestnut Street, Chicago, Illinois; that J. Douglas Ayres is a non-resident of the State of Alabama, over twenty-one years of age, his address being 303 Ward Street, Wilkesburg, Pennsylvania; that George M. Ayres is over twenty-one years of age, a non-resident of the State of Alabama, his address being 7225 Meade Street, Pittsburgh, Pennsylvania; that J. Scott Willock is over twenty-one years of age, a non-resident of the State of Alabama, his address being 921 Belle-

more Road, Baltimore, Maryland; that the addresses of the Respondents as herein are the last known addresses; that a diligent search and inquiry has been made to determine whether or not any of them have different addresses, but from all information obtainable their addresses herein given are correct.

3.

That your Complainant is the owner in fee simple and in the actual possession of the following described real property situated in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 18, Township 8 South, Range 6 East.

4.

That there is no suit pending to test the Complainant's title to, interest in, or rights of possession to said lands; that the Complainant calls upon the Respondents, each of them, to set forth and specify what right, title, interest or encumbrances they have in and to said land, and by what instrument or instruments the same is derived.

5.

That your Complainant obtained title to said land by conveyance from G. W. Robertson, Judge of Probate, Baldwin County, Alabama, by deed dated November 22, 1937, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 63 BS, pages 493-4.

6.

That the title to said land claimed by your Complainant stands upon the record of Baldwin County, Alabama, in the name of your Complainant, J. E. PARFITT.

7.

That no one has at any time within ten years next preceding the filing of the Bill of Complaint paid any taxes upon or had any possession of said land or any part thereof, except J. E. Parfitt and R. W. Kee.

8.

That the only persons known by your Complainant to claim said land or any part thereof or any interest therein or any encumbrance thereon are your Complainant, J. E. Parfitt, and R. W. Kee, Alice Kee, Helen Louise Kee,

William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock.

WHEREFORE your Complainant prays that your Honor will by proper process make the said R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of them and each of them, and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said land in Baldwin County, Alabama, to-wit:

Start at corner of Baldwin Avenue and Pensacola Street, run 200 feet West on line of Baldwin Avenue to stake for beginning corner, thence North 300 feet, West 100 feet, South 300 feet to stake on Baldwin Avenue, thence East 100 feet on Baldwin Avenue to place of beginning, in Section 18, Township 8 South, Range 6 East.

or any part thereof respondents to this Bill of Complaint and by appropriate process require them and each of them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree ascertaining, determining and establishing that the fee simple title, free of encumbrances, to the said land, and each and every part and parcel thereof, is vested in your Complainant, J. H. Perfitt, and that R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock, Brainerd, Peoples-Pittsburgh Trust Company, a corporation, Henry Willock Brainerd, Dorothy Willock Brainerd, Clara Willock Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George N. Ayres, J. Scott Willock, the unknown heirs, devisees, grantees, personal representatives, successors and assigns of R. W. Kee, Alice Kee, Helen Louise Kee, William Randolph Kee, Robert Kee, Clara Ayres Willock, Dorothy Willock Brainerd, Peoples-Pittsburgh Trust Company, Henry Willock Brainerd, Dorothy Brainerd, Clara Willock

Brainerd, Curtis M. Willock, George M. Willock, Helen W. Off, J. Douglas Ayres, George W. Ayres, J. Scott Willock, and no other person, firm or corporation has any right, title to, interest in, lien or encumbrance upon the said land, or any part or parcel thereof, and that any and all doubts and disputes concerning said land be cleared up. Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

STATE OF ALABAMA
BALDWIN COUNTY

H. M. Hall
Solicitor for the Complainant

Before me, the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall, who is known to me, and who having been by me first duly sworn deposes and says that he is solicitor of record for the Complainant in the foregoing cause; that the facts alleged therein are true to the best of his knowledge, information and belief.

H. M. Hall

Sworn to and subscribed before me on this the 28 day of May, 1947.

Notary Public, Baldwin County, Alabama

RECEIVED BY THE COURT

FILED IN CASE NO. 100-100000

THE COURT OF THE STATE OF NEW YORK
IN SENATE CHAMBER
JANUARY 10, 1947

J. H. PARFITT
COMPLAINANT
VS
R. W. KUE, ET AL,
RESPONDENTS

BILL OF COMPLAINT

Filed: May 28, 1947
Alice J. Leach
Deputy

1803
The Court of the State of New York
In Senate Chamber
January 10, 1947
J. H. Parfitt
Complainant
vs
R. W. Kue, et al,
Respondents
The Court of the State of New York
In Senate Chamber
January 10, 1947
J. H. Parfitt
Complainant
vs
R. W. Kue, et al,
Respondents

Wm. R. S. Duck Circuit Clerk

BALDWIN COUNTY

BAY MINETTE, ALA.

NOT AT SENECA

Case 1804
RETURNED TO SENDER
from Chicago, Ill.

Deliver to Addressee Only

RETURN RECEIPT REQUESTED

Registered

For Delivery Only
To Person To Whom Addressed

Return Receipt Requested

REGISTERED
NO. 5371

HELEN W. OFF,
200 East Chestnut Street,
Chicago, Ill



NOT THERE Z-425

1802
Mrs. R. S. Duck Circuit Clerk

BALDWIN COUNTY

RAY MINETTE, ALA.

REASON CHECKED
Unclaimed
Unknown
For better address
Moved, tell us address
No such office in place covered

J. M. Garrison
Deliver to Addressee Only

RETURN RECEIPT REQUESTED

Registered

For Delivery Only
To Person To Whom Addressed

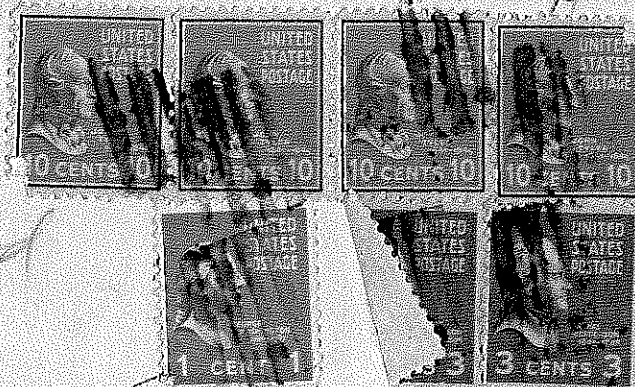
Return Receipt Requested



J. DOUGLAS AYRES,

803 WARD STREET,

WILKINSBURGH, PA.



R. S. Duck

Circuit Clerk

BALDWIN COUNTY

BAY MINETTE, ALA.

1802

REASON FOR
NON-DELIVERY
CHECKED
UNCLAIMED
MOVED LEFT NO ADDRESS
NO SUCH OFFICE IN
UNKNOWN
FOR BETTER ADDRESS
COURT IS REFUSED
NAME

Deliver to Addressee Only

Registered

For Delivery Only

To Person To Whom Addressed

Return Receipt Requested

RETURN RECEIPT REQUESTED

WILLOCK,

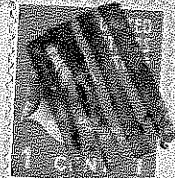
1050 South Orange Grove,

PASADENA CALIF.

REGISTERED

NO.

5315



JUN 3 1947

not
EW 74

Mr. R. S. Duck Circuit Clerk

BALDWIN COUNTY

BAY MINETTE, ALA.

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unable to sign
notice left to call

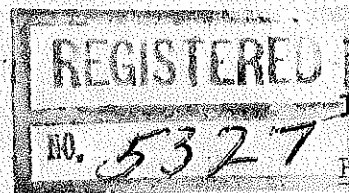
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RETURN RECEIPT REQUESTED

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For Delivery Only
To Person To Whom Addressed

Return Receipt Requested

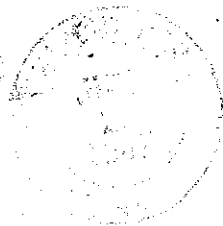
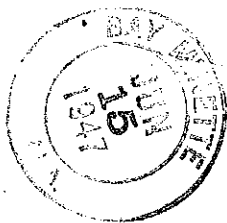
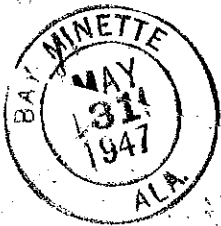


ROBERT KEE,

1837 Burton Ave.,

Highland Park, Ill.





Post Office Department
OFFICIAL BUSINESS

Return to: Alice J. Duck
Street and Number
(If known, please print)

Post Office Bay Minette, Ala.
INSURED PARCEL
No. 5327

State

POSTAL INSURANCE OFFICE

Date of delivery _____
 (Signature of addressee) _____
Delivery Address Only
 (Signature of addressee) _____
 Received from the Postmaster the Registered or Insured Article, the original
 number of which appears on the face of this Card.
RETURN RECEIPT
 (Signature of addressee) _____

