

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES McKINLEY, J. W.  
ABBOTT and EMMONS BROWN,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY,

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

Comes the Complainant, ORANGE BEACH LAND COMPANY, a Corporation, and humbly complaining against the Respondents, JAMES McKINLEY, J. W. ABBOTT and EMMONS BROWN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant is a corporation duly organized and existing under the laws of the State of Alabama, with its principal place of business at Robertsdale, in Baldwin County, Alabama.

2. That the Respondents, James McKinley and J. W. Abbott are both over twenty-one years of age and non-residents of the State of Alabama, their address being Pensacola, Florida; that the Respondent, Emmons Brown, is over twenty-one years of age and a resident of Baldwin County, Alabama, his Post Office address being Orange Beach.

3. That on to-wit, August 10th, 1937, the Complainant entered into a contract with the Respondent, James McKinley whereby the Complainant sold to the said Respondent certain timber in Baldwin County, Alabama; that a copy of said contract is hereto attached, marked Exhibit "A" and asked to be taken as a part hereof as though her-in fully set out.

4. That the said Respondents, J. W. Abbott and Emmons Brown are employed by and working for the Respondent, James McKinley, and committing the acts of trespass, as hereinafter set out.

5. That there was reserved by the Complainant and expressly excepted in the said contract hereinabove referred to the timber located on Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a Subdivision of the William Key Grant in Section 36, Township 3 South of Range 5 East.

6. That the said Respondents, James McKinley, J. W. Abbott and Emma Brown, are violating the terms of said contract and committing acts of trespass upon the said Blocks 1, 2, and 3.

7. That the said Complainant has notified the Respondents not to commit said acts of trespass upon said land.

8. That the said property, to-wit, Blocks 1, 2, and 3 of said subdivision is water front property and has been divided into lots and is primarily useful and used as resort property and for building houses on; that the timber thereon was expressly reserved and is to be used in beautifying the said property.

WHEREFORE, the premises considered, Complainant prays that you Honor will, by proper process, make the said James McKinley, J. W. Abbott and Emma Brown party respondents to this Bill of Complaint, requiring 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; that your Honor will immediately order a temporary injunction issued against the said Respondents, James McKinley, J. W. Abbott and Emma Brown, <sup>restraining them</sup> and each of them, from trespassing, cutting or removing any timber from said Blocks 1, 2, and 3, or in any manner changing the status quo of said property, upon the Complainant entering into such bond as your Honor may require.

Complainant further prays that your Honor will order a reference to determine the value of the timber cut and/or removed by the said Respondents, in violation of the terms of the said contract.

Complainant further prays that upon a final hearing of this cause, your Honor will make said injunction perpetual and that you will further enter a judgment and decree against the several respondents and each of them, in favor of the Complainant for the damages caused by the said Respondents to the property of the Complainant; that your Complainant prays for such other, further, different or general relief as it may be in equity and good conscience entitled to receive, and as in duty bound it will ever pray.

\_\_\_\_\_  
Solicitors for the Complainant.

NOTE: The Respondents, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 8, inclusive, but not under oath, oath being hereby expressly waived.

\_\_\_\_\_  
Solicitors for the Complainant.

WITNESSETH

of Corporation  
OSWEGO BRICK AND TILE COMPANY

Complainant

vs.

and EMMONS BROWN  
JAMES McLELLAN, J. N. ARBOLD

Respondent

IN THE CIRCUIT COURT OF  
EASTMAN COUNTY, VERMONT

IN EQUITY

*James McLeLLan  
J. N. Arbold*

TO THE HONORABLE OF THE CIRCUIT COURT, IN EQUITY, OF EASTMAN COUNTY, VERMONT:

Upon the Complaint entering into bond with security in the sum  
of \_\_\_\_\_ Dollars, payable to and approved by you,  
and conditioned according to law, let an injunction issue according to the  
prayer of the Bill.

\_\_\_\_\_

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCKINLEY, J. W.  
ABBOTT and EMMONS BROWN,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY;

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

Comes the Complainant, ORANGE BEACH LAND COMPANY, a Corporation, and humbly complaining against the Respondents, JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant is a corporation duly organized and existing under the laws of the State of Alabama, with its principal place of business at Robertsdale, in Baldwin County, Alabama.

2. That the Respondents, James McKinley and J. W. Abbott are both over twenty-one years of age and non-residents of the State of Alabama, their address being Pensacola, Florida; that the Respondent, Emmons Brown, is over twenty-one years of age and a resident of Baldwin County, Alabama, his Post Office address being Orange Beach.

3. That on to-wit, August 10th, 1937, the Complainant entered into a contract with the Respondent, James McKinley whereby the Complainant sold to the said Respondent certain timber in Baldwin County, Alabama; that a copy of said contract is hereto attached, marked Exhibit "A" and asked to be taken as a part hereof as though herein fully set out.

4. That the said Respondents, J. W. Abbott and Emmons Brown are employed by and working for the Respondent, James McKinley, and committing the acts of trespass, as hereinafter set out.

5. That there was reserved by the Complainant and expressly excepted in the said contract hereinabove referred to the timber located on Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a Subdivision of the William Roy Grant in Section 36, Township 8 South of Range 5 East.



6. That the said Respondents, James McKinley, J. W. Abbot and Emmons Brown, are violating the terms of said contract and committing acts of trespass upon the said Blocks 1, 2, and 3.

7. That the said Complainant has notified the Respondents not to commit said acts of trespass upon said land.

8. That the said property, to-wit, Blocks 1, 2, and 3 of said Sub-division is water front property and has been divided into lots and is primarily useful and used as resort property and for building homes on; that the timber thereon was expressly reserved and is to be used in beautifying the said property.

WHEREFORE, the premises considered, Complainant prays that you Honor will, by proper process, make the said James McKinley, J. W. Abbott and Emmons Brown party respondents to this Bill of Complaint, requiring 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; that your Honor will immediately order a temporary injunction issued against the said Respondents, James McKinley, J. W. Abbott and Emmons Brown, <sup>restraining them</sup> and each of them, from trespassing, cutting or removing any timber from said Blocks 1, 2, and 3, or in any manner changing the status quo of said property, upon the Complainant entering into such bond as your Honor may require.

Complainant further prays that your Honor will order a reference to determine the value of the timber cut and/or removed by the said Respondents, in violation of the terms of the said contract.

Complainant further prays that upon a final hearing of this cause, your Honor will make said injunction perpetual and that you will further enter a judgment and decree against the several respondents and each of them, in favor of the Complainant for the damages caused by the said Respondents to the property of the Complainant; that your Complainant prays for such other, further, different or general relief as it may be in equity and good conscience entitled to receive, and as in duty bound it will ever pray.

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Solicitors for the Complainant.

FOOT NOTE: The Respondents, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 8, inclusive, but not under oath, oath being hereby expressly waived.

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Solicitors for the Complainant.

*15:00 PM*  
*10/10/1919*

BALDWIN COUNTY, ALABAMA.

IN THE CIRCUIT COURT OF

**4**  
Respondent.

and EMILIO BROWN;  
JAMES W. KIRKMAN, J. W. VANDERBILT,

As

Complainant.

vs. COLLIERSON,  
GERTNER TRUST FUND COMPANY.

BILL OF COMPLAINT

TO THE REGISTER OF THE CIRCUIT COURT, IN EQUITY, OF BALDWIN COUNTY, ALABAMA:

Upon the Complainant entering into bond with security in the sum  
of \_\_\_\_\_ Dollars, payable to and approved by you,  
and conditioned according to law, let an injunction issue according to the  
prayer of the bill.

\_\_\_\_\_  
Judge.

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCKINLEY, J. W.  
ABBOTT and EMMONS BROWN,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY:

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

Comes the Complainant, ORANGE BEACH LAND COMPANY, a Corporation, and humbly complaining against the Respondents, JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant is a corporation duly organized and existing under the laws of the State of Alabama, with its principal place of business at Robertsdale, in Baldwin County, Alabama.

2. That the Respondents, James McKinley and J. W. Abbott are both over twenty-one years of age and non-residents of the State of Alabama, their address being Pensacola, Florida; that the Respondent, Emmons Brown, is over twenty-one years of age and a resident of Baldwin County, Alabama, his Post Office address being Orange Beach.

3. That on to-wit, August 10th, 1937, the Complainant entered into a contract with the Respondent, James McKinley whereby the Complainant sold to the said Respondent certain timber in Baldwin County, Alabama; that a copy of said contract is hereto attached, marked Exhibit "A" and asked to be taken as a part hereof as though her-in fully set out.

4. That the said Respondents, J. W. Abbott and Emmons Brown are employed by and working for the Respondent, James McKinley, and committing the acts of trespass, as hereinafter set out.

5. That there was reserved by the Complainant and expressly accepted in the said contract hereinabove referred to the timber located on Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a Subdivision of the William Key Grant in Section 36, Township 3 South of Range 5 East.

6. That the said Respondents, James McKinley, J. W. Abbot and Emmons Brown, are violating the terms of said contract and committing acts of trespass upon the said Blocks 1, 2, and 3.

7. That the said Complainant has notified the Respondents not to commit said acts of trespass upon said land.

8. That the said property, to-wit, Blocks 1, 2, and 3 of said subdivision is water front property and has been divided into lots and is primarily useful and used as resort property and for building homes on; that the timber thereon was expressly reserved and is to be used in beautifying the said property.

WHEREFORE, the premises considered, Complainant prays that you Honor will, by proper process, make the said James McKinley, J. W. Abbott and Emmons Brown party respondents to this Bill of Complaint, requiring 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; that your Honor will immediately order a temporary injunction issued against the said Respondents, James McKinley, J. W. Abbott and Emmons Brown, <sup>restraining them</sup> and each of them, from trespassing, cutting or removing any timber from said Blocks 1, 2, and 3, or in any manner changing the status quo of said property, upon the Complainant entering into such bond as your Honor may require.

Complainant further prays that your Honor will order a reference to determine the value of the timber cut and/or removed by the said Respondents, in violation of the terms of the said contract.

Complainant further prays that upon a final hearing of this cause, your Honor will make said injunction perpetual and that you will further enter a judgment and decree against the several respondents and each of them, in favor of the Complainant for the damages caused by the said Respondents to the property of the Complainant; that your Complainant prays for such other, further, different or general relief as it may be in equity and good conscience entitled to receive, and as in duty bound it will ever pray.

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Solicitors for the Complainant.

FOOT NOTE: The Respondents, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 8, inclusive, but not under oath, oath being hereby expressly waived.

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Solicitors for the Complainant.



BILL OF COMPLAINT

Complainant,  
CHAS. B. BROWN, TRUST COMPANY

vs.  
Defendants,  
JAMES MONROE BROWN,  
JAMES MONROE, J. M. ABBOTT

AS

Plaintiff,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

*U. S. District Court  
Birmingham, Ala.  
Filed January 14, 1933*

TO THE REGISTER OF THE CIRCUIT COURT, IN EQUITY, OF BALDWIN COUNTY, ALABAMA:

Upon the Complainant entering into bond with security in the sum of \_\_\_\_\_ Dollars, payable to and approved by you, and conditioned according to law, let an injunction issue according to the prayer of the bill.

\_\_\_\_\_  
Judge.

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCKINLEY, J. W.  
ABBOTT and EMMONS BROWN,

Respondents.

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:

Comes the Complainant, ORANGE BEACH LAND COMPANY, a Corporation, and humbly complaining against the Respondents, JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant is a corporation duly organized and existing under the laws of the State of Alabama, with its principal place of business at Robertsdale, in Baldwin County, Alabama.

2. That the Respondents, James McKinley and J. W. Abbott are both over twenty-one years of age and non-residents of the State of Alabama, their address being Pensacola, Florida; that the Respondent, Emmons Brown, is over twenty-one years of age and a resident of Baldwin County, Alabama, his Post Office address being Orange Beach.

3. That on to-wit, August 10th, 1937, the Complainant entered into a contract with the Respondent, James McKinley whereby the Complainant sold to the said Respondent certain timber in Baldwin County, Alabama; that a copy of said contract is hereto attached, marked Exhibit "A" and asked to be taken as a part hereof as though herein fully set out.

4. That the said Respondents, J. W. Abbott and Emmons Brown are employed by and working for the Respondent, James McKinley, and committing the acts of trespass, as hereinafter set out.

5. That there was reserved by the Complainant and expressly excepted in the said contract hereinabove referred to the timber located on Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a Subdivision of the William Key Grant in Section 36, Township 8 South of Range 5 East.

6. That the said Respondents, James McKinley, J. W. Abbot and Emmons Brown, are violating the terms of said contract and committing acts of trespass upon the said Blocks 1, 2, and 3.

7. That the said Complainant has notified the Respondents not to commit said acts of trespass upon said land.

8. That the said property, to-wit, Blocks 1, 2, and 3 of said Sub-division is water front property and has been divided into lots and is primarily useful and used as resort property and for building homes on; that the timber thereon was expressly reserved and is to be used in beautifying the said property.

WHEREFORE, the premises considered, Complainant prays that you Honor will, by proper process, make the said James McKinley, J. W. Abbott and Emmons Brown party respondents to this Bill of Complaint, requiring 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; that your Honor will immediately order a temporary injunction issued against the said Respondents, James McKinley, J. W. Abbott and Emmons Brown, <sup>restraining them</sup> and each of them, from trespassing, cutting or removing any timber from said Blocks 1, 2, and 3, or in any manner changing the status quo of said property, upon the Complainant entering into such bond as your Honor may require.

Complainant further prays that your Honor will order a reference to determine the value of the timber cut and/or removed by the said Respondents, in violation of the terms of the said contract.

Complainant further prays that upon a final hearing of this cause, your Honor will make said injunction perpetual and that you will further enter a judgment and decree against the several respondents and each of them, in favor of the Complainant for the damages caused by the said Respondents to the property of the Complainant; that your Complainant prays for such other, further, different or general relief as it may be in equity and good conscience entitled to receive, and as in duty bound it will ever pray.

Barclay & Beebe  
Solicitors for the Complainant.

FOOT NOTE: The Respondents, and each of them, are required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 8, inclusive, but not under oath, oath being hereby expressly waived.

Barclay & Beebe  
Solicitors for the Complainant.

TO THE REGISTER OF THE CIRCUIT COURT, IN EQUITY, OF BALDWIN COUNTY, ALABAMA:

Upon the Complainant entering into bond with security in the sum  
of \$100<sup>00</sup> Dollars, payable to and approved by you,  
and conditioned according to law, let an injunction issue according to the  
prayer of the bill.

F. W. Haro  
Judge.



Contract

Made in triplicate

State of Alabama

Baldwin County

This agreement entered into this 10th day of August 1937

by Orange Beach Land Co., Inc. party of the first part and James McKinly of Tenicola, Ala. party of the second part, witnesseth:

Orange Beach Land Co. Inc. for the consideration of Five hundred dollars paid at the execution of the agreement to the hands of Secretary, sells to James McKinly the party of the second part all the pine trees, measuring Nine inches in diameter one foot above the ground in certain tract of land, property of the party of the first part, bounded as follows:

By Washington boulevard running north to the Public park way to Beach Cypress Drive running East to the South Canal Drive and Bay La Launch on the North, also in block Twenty excluding lot 16 of same, Block 20 Twenty, including lot 31 and in block Nineteen, according to plat of East Orange Beach, No trees whatever to be taken in block One from Bay to East line of Washington boulevard. <sup>Two and Three</sup> Being subdivision of Min Kee grant Sec. 36 T. 8 S. R. 5 E Lot 2 Sec. 33 T. 8 S. R. 5 E; Lots 5-6-7-8 Gulf Bay Tract in N-E 1/4 & N-E 1/4 Sec. 4 T. 9 S. R. 5 E. Baldwin Co. Ala

And the party of the second part agrees to remove pine trees of dimension mentioned between August 10th 1937 and August 10 1938 and has authority by himself or servants to fell said trees, saw them into convenient lengths for removal and shall have the right to carry off such trees in usual manner. The party of second part shall have the right of ingress and egress to, through and in said land for the purpose of removing said timber. Party of the second part agrees to fell the trees as carefully as humanly possible and will prevent damage to other trees. Party of the second part also agrees to remove the tops cut off either by sale of same for pulp wood, or other use, and to protect the property against fire during the life of this contract.

signed and sealed by parties thereto this 10th day of August 1937

Witness By J. W. Abbott

Orange Beach Land Co. Secretary Thomas D. ...

James M. McKinly

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

We command you, that without delay you execute this writ and due return thereof make to us instantly at a term of the Circuit Court, in Equity, to be held at Bay Minette, Alabama, on the 31 day of Jan, 1938.

TO JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN, GREETINGS:

WHEREAS, the ORANGE BEACH LAND COMPANY, a Corporation, has exhibited its bill of complaint in the said Circuit Court, in Equity, and has obtained from the Honorable F. W. Hare, Judge of said Circuit Court, an order for the issuance of an injunction to restrain and enjoin you and each of you, as hereinafter mentioned; and

WHEREAS, the said ORANGE BEACH LAND COMPANY, a Corporation, has, in accordance with said order, entered into bond with security in the sum of 100 00 Dollars, payable to and approved by the Register of said Circuit Court, and conditioned according to law;

NOW, THEREFORE, you, the said JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN are hereby committed and strictly enjoined from trespassing, cutting or removing any timber from Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a Subdivision of the William Key Grant in Section 36, Township 8 South of Range 5 East, Baldwin County, Alabama, or in any manner changing the status quo of said property, until further orders of this Court.

WITNESS the hand of the Register and seal of said Circuit Court, in Equity, this 31 day of January, 1938.

[Signature]  
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

JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN

*W. J. Brown*

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

ORANGE BEACH LAND COMPANY, a Corp.,

against said JAMES MCKINLEY, J. W. ABBOTT and EMMONS BROWN,

*W. J. Brown*

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

WITNESS, Robert S. Duck, Register of said Circuit Court, this 24th day

of January 1938

*Robert S. Duck* Register

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

STATE OF ALABAMA  
BALDWIN COUNTY

ORANGE BEACH LAND COMPANY

Complainant

vs.

JAMES MCKINLEY, J. W. ALBERT and EMMETT BROWN

Respondents

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

*James McKimley & J. W. Albert*

TO ANY SHERIFF OF THE STATE OF ALABAMA, CHRISTIAN:

We command you, that without delay you execute this writ and due return thereof made to us instantly at a term of the Circuit Court, in Equity, to be held at Bay Minette, Alabama, on the 24 day of January, 1933.

TO JAMES MCKINLEY, J. W. ALBERT and EMMETT BROWN, CHRISTIAN:

WHEREAS, the ORANGE BEACH LAND COMPANY, a Corporation, has exhibited its bill of complaint in the said Circuit Court, in Equity, and has obtained from the Honorable F. H. Ware, Judge of said Circuit Court, an order for the issuance of an injunction to restrain and enjoin you and each of you, as hereinafter mentioned; and

WHEREAS, the said ORANGE BEACH LAND COMPANY, a Corporation, has, in accordance with said order, entered into bond with security in the sum of \$1,000.00 Dollars, payable to and approved by the Register of said Circuit Court, and conditioned according to law;

NOW, THEREFORE, you, the said JAMES MCKINLEY, J. W. ALBERT and EMMETT BROWN are hereby committed and strictly enjoined from trespassing, cutting or removing any timber from Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a subdivision of the William Key tract in section 33, Township 3 South of Range 6 East, Baldwin County, Alabama, or in any manner changing the status quo of said property, until further orders of this Court.

WITNESS the hand of the Register and seal of said Circuit Court, in Equity, this 24 day of January, 1933.

*Register*  
Register



STATE OF ALABAMA, )  
BALDWIN COUNTY. )

KNOW ALL MEN BY THESE PRESENTS, That the ORANGE BEACH LAND COMPANY, a Corporation, as Principal, and GEORGE MACH and JOSEPH KOHOUT, as Sureties, are held and firmly bound unto the Register of the Circuit Court, in Equity, for Baldwin County, Alabama, in the sum of One Hundred Dollars, for the payment of which to the said Register, or his successors, we bind ourselves, our executors and administrators, jointly and severally.

Sealed with our seals and dated this 24 day of January, 1938.

WHEREAS, the said ORANGE BEACH LAND COMPANY, a Corporation, has filed its Bill of Complaint in the said Circuit Court, in Equity, and has obtained thereon an order for the issuance of injunction from the Honorable F. W. Hare, Judge, restraining and enjoining James McKinley, J. W. Abbott and Emmons Brown from trespassing, cutting or removing timber from Blocks 1, 2, and 3, according to plat of East Orange Beach, Baldwin County, Alabama, being a Subdivision of the William Key Grant in Section 36, Township 8 South of Range 5 East, or in any manner changing the status quo of said property.

NOW, THEREFORE, the condition of the above obligation is such that if the said ORANGE BEACH LAND COMPANY, a Corporation, its successors or assigns, shall pay or cause to be paid all damages which any person may sustain by the suing out of said injunction, if the same is dissolved by the Circuit Court, in Equity, on the bill filed by the said ORANGE BEACH LAND COMPANY, a Corporation, as aforesaid, then the above obligation to be void, otherwise to remain in full force and effect.

WITNESS our hands and seals on the day and year first above written.

ORANGE BEACH LAND COMPANY, a Corporation

By: George Mach (SEAL)

George Mach (SEAL)

Joseph Kohout (SEAL)

Taken and approved this  
24 day of January,  
1938.

Register  
Register.

BILL OF COMPLAINT

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCINNEY, J. W. ABBOTT,  
and EMMONS BROWN,

Respondents.



IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed January 24/1935  
R. S. Oswald, Register*

2011

BILL OF COMPLAINT

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCKINLEY, J. W. ABBOTT,  
and EMMONS BROWN,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

*Filed January 24, 1938  
R.S. Duck, Register*

TO THE REGISTER OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:  
Upon the Complaint entering into bond with security in the sum  
of \_\_\_\_\_ Dollars, payable to and approved by you,  
and conditioned according to law, for an injunction issue according to the  
prayer of the bill.

\_\_\_\_\_  
Judge.

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BILL OF COMPLAINT

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCINLEY, J. W. ABBOTT,  
and EMMONS BROWN,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed January 24, 1938  
R. S. Cook, Register*

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

That the complainant herein is the owner of the land described in the exhibit attached to this bill of complaint.

That the respondents herein are in possession of the land described in the exhibit attached to this bill of complaint.

That the respondents herein are in possession of the land described in the exhibit attached to this bill of complaint.

Very truly yours,  
James McInley

James McInley  
Attorney for Complainant



393

RECORDED  
7-389

5-1-12  
J. J. J.

INJUNCTION BOND:

Filed January 24, 1935  
R. S. Owen, Register

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCKINLEY, J. W. ABBOTT,  
and ~~EMERSON~~

Respondents.

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

*Filed January 24, 1935  
R. S. Dorell, Register*

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*[Handwritten signature]*

*1000*

ORIGINAL

393

Serve on \_\_\_\_\_

**Circuit Court of Baldwin County  
IN EQUITY**

No. 393

**S U M M O N S**

ORANGE BEACH LAND CO.,  
a CORP.,

Complainant,

vs.

JAMES MCKINLEY, J. W.  
ABBOTT and EMMONS BROWN,

Defendant

Sheriff

By \_\_\_\_\_  
Deputy Sheriff

BEEBE, HALL & BEEBE,

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA,**

**BALDWIN COUNTY**

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_

SHERIFF

Executed this 4<sup>th</sup> day of April  
1938

by leaving a copy of the within Summons with

3-14-38

RECORDED *Duck*  
7-5-62

343

ORANGE BEACH LAND COMPANY,  
a Corporation,

Complainant,

VS.

JAMES MCINNEY, J. W. ABBOTT,  
and EMMONS BROWN,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

*Filed January 24, 1935*  
*R. S. Duck, Register*



BILL OF COMPLAINT:

ORANGE BEACH LAND COMPANY,  
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