

ROSS BEMIS ET AL.	Ø	IN THE CIRCUIT COURT OF
PLAINTIFFS	Ø	BALDWIN COUNTY, ALABAMA
VS.	Ø	AT LAW
T. A. YEEND ET AL.	Ø	NO. 1380
DEFENDANTS	Ø	

Now come Eddie Bemis, Evelyn Johnson, Harry Bemis, Earl Bemis, Ross Bemis, Kathleen Benton, Walter Bemis, Fred Bemis, Rosa Ewing, Irma Allen and Carol Bemis, and pray leave of the court for permission to intervene in the above styled cause and for the right to establish their interest in, claim to, and rights of possession to the property involved in the above styled cause, to-wit:

House and lot known as the old Brown Place, in Baldwin County, Alabama, more particularly described as follows:

Commencing at a point on the North line of Section 35, Township 8 South, Range 3 East, at a point where said North section line intersects with the Northeast corner of the William F. Kennedy Grant, thence Eastwardly along said section line 13.07 chains to the center line of Canal Bayou (a tributary of Bon Secour River), thence down the middle of said Bayou to Bon Secour River, thence Southwardly along the West bank of said River to the Southeast corner of said Kennedy Grant, thence North twenty-five degrees West 48 chains, more or less, along the East line of said William E. Kennedy Grant, to the place of beginning

The Intervenorors show that suit was filed by the Defendants and against the Plaintiffs Ross Bemis and Fred Bemis, in the Justice Court of M. R. Howell, Justice of the Peace, Beat 14, Foley, Baldwin County, Alabama, seeking possession of the land herein above described; that judgment was rendered in said court for the Defendants and against the Plaintiffs and in favor of the Defendants from which judgment the Plaintiffs have perfected and appealed to this court.

The Intervenorors further show that they are the owners as tenants in common of the land involved in said suit claiming to own the same as children of Carrie Bemis and as such entitled to intervene and ascertain and protect their rights in and to the said land.

The Intervenorors further represent and show that the Defendants, nor any of them have ever been in actual possession of the lands described herein; that the Plaintiffs have been in the actual and adverse possession of the said lands for more than twenty years ever

claiming to own the same; that they are now, as tenants in common the owners of said land by adverse possession, and as such entitled to possession thereof;

The Intervenorors further represent and show that any title that the Defendants might have had to said land are now barred by the statute of limitations of twenty years.

The Intervenorors further show that they have exercised the uninterrupted occupation of the premises herein involved for the space of three entire years preceding the commencement of this cause of action.

WHEREFORE the premises considered, the Intervenorors files this petition of intervention and pray that they be allowed to intervene and upon their petition for intervention being allowed, that this petition be considered by the court and that such orders may be made for the protection of the Intervenorors rights as herein above set out and Intervenorors pray for such other relief as they may have shown themselves entitled.

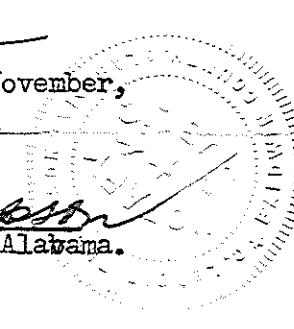
*Stinson*  
As attorney for the Intervenorors.

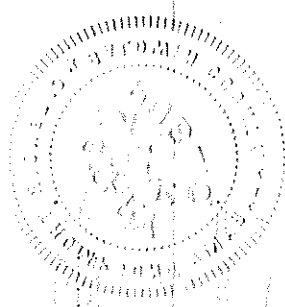
STATE OF ALABAMA §  
BALDWIN COUNTY §

Personally appeared before me the undersigned officer in and for said County, in said State, H. M. Hall, who being first duly sworn, deposes and says; that he is the attorney and agent of the above named Intervenorors; that he has knowledge of all the facts set forth in the above petition and that they are true; and that he is authorized to make this affidavit.

Sworn to and subscribed before me on this the 14 day of November, 1949.

*Stinson*  
*C. L. Stinson*  
Notary Public, Baldwin County, Alabama.





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FILED  
NOV 14 1949  
ALICE J. DUCK, Clerk