

The State of Alabama, {
Baldwin County

CIRCUIT COURT

To ORA S. NELSON,

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine S. F. Holmes and W. D. Stapleton

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

BALDWIN COUNTY BANK, a Corp.,

and FRED COUNTRYMAN? ET ALS., Complainant

Defendant, on oath to be by you administered, upon them to take and certify the deposition s of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 29th day of July 1938

R. S. Duck

REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

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

Your Orator, the Baldwin County Bank, a Corporation, presents this bill of complaint against Fred Countryman, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson, Geraldine Hall, Hunter Hall, W. S. Alexander, Jr., Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, and thereupon your Orator complains and shows unto the Court and your Honor as follows:

1. Your Orator is a corporation organized and existing under the laws of the State of Alabama, with its principal place of business in Bay Minette, Baldwin County, Alabama. The Respondent, Fred Countryman, is over twenty-one years of age and a non-resident of the State of Alabama, whose residence and post office address is R. F. D. Hicksville, Ohio; the Respondents, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall and Aletha Davidson are each over twenty-one years of age and reside at Bay Minette, in Baldwin County, Alabama; the Respondent, Geraldine Hall, is a minor fourteen years of age and the Respondent, Hunter Hall, is a minor eleven years of age, both of whom reside with their mother, Cora B. Hall, at Bay Minette, Alabama; the Respondent, W. S. Alexander, Jr., is over twenty-one years of age and a non-resident of the State of Alabama, whose residence and post office address is C/o Newport Company, Pensacola, Florida; the Respondent, Howell Silsbee Alexander, is a minor thirteen years of age; the Respondent, Margaret Ruth Alexander, is a minor twelve years of age and the Respondent, Gerald Martin Alexander, is a minor ten years of age, all of whom reside with their grandfather, W. S. Alexander, in Bay Minette, Alabama.

2. Your Orator owns and is in the actual, quiet and peaceable possession of the following described real property situated in Baldwin County, Alabama, to-wit:

Being the West one-half ($W\frac{1}{2}$) of Section No. One (1) and also the South one-half ($S\frac{1}{2}$) of the Southeast Quarter ($SE\frac{1}{4}$) of said Section No. One and also the Northwest Quarter of the Southeast Quarter ($NW\frac{1}{4}$ of $SE\frac{1}{4}$) of said Section No. One (1) and also the Southwest Quarter of the Northeast Quarter ($SW\frac{1}{4}$ of $NE\frac{1}{4}$) of said Section No. One (1) and also the West one-fourth of the Northwest Quarter of the Northeast Quarter ($W\frac{1}{4}$ of $NW\frac{1}{4}$ of $NE\frac{1}{4}$) of said Section No. One (1), all located in Township Nine (9) South Range Four (4) East in Baldwin County in the State of Alabama and containing in all four hundred ninety (490) acres of land, more or less;

Also, the South half of the Southwest Quarter ($S\frac{1}{2}$ of $SW\frac{1}{4}$) of Section Two (2) and the Northwest Quarter ($NW\frac{1}{4}$) and North half of Northeast Quarter ($N\frac{1}{2}$ of $NE\frac{1}{4}$) of Section Eleven (11) Township Nine (9) South of Range Four (4) East, containing three hundred twenty (320) acres, more or less;

Also, from the Northeast corner of Section Four (4) Township Nine (9) South Range Five (5) East, run East on the Township line twenty-five (25) chains and fifty-one (51) links for a point of beginning, thence East on the township line twenty-three chains and seventy-two links to a stake about two chains and forty-five links West of the intersection of the township line with Bay La Launch, thence South thirty-three chains and thirty-two links to a stake on the margin of Bay Ornocor, thence by meanders of said bay south eighty-five degrees West seven chains and sixty-six links, south eighty degrees West nine chains, South seventy-two degrees West seven chains and sixty-seven links to division line between Bill's land and Dryer's, thence North thirty-seven chains and ninety-two links to beginning, containing eighty-three and one-tenth acres, lying in Section Twelve, William Kee Grant, Township Nine South Range Five East.

The Respondents claim, or are reputed to claim some right, title, or interest in or encumbrance upon the said lands or some part thereof; no suit is pending to enforce or test the validity of such title, claim or encumbrance and your Orator brings this Bill of Complaint against the said Respondents and each of them to settle its title to the said lands and to clear up all doubts and disputes concerning the same. Your Orator here and now makes call upon the said Respondents and each of them to set forth and specify their title, claim, interest or encumbrance to or upon the said land or any part thereof and how and by what instrument the same is derived and created.


PRAYER FOR PROCESS.

Your Orator prays that the said Fred Countryman,


Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson, Geraldine Hall, Hunter Hall, W. S. Alexander, Jr., Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, be made parties respondent to this Bill of Complaint and that the usual process of this Honorable Court do forthwith issue to them and each of them.

PRAYER FOR RELIEF.

Your Orator prays that upon final hearing of this cause your Honor will grant and enter a decree against the said Respondents, and each of them, quieting your Orator's title to the said lands and adjudging and decreeing that your Orator is the owner of the said land in its own right; that title to the said land is in your Orator, forever quieting your Orator's title against the said Respondents and each of them, adjudging that the said Respondents and each of them are without right, title or interest in the said lands or any part thereof and have and hold no encumbrance upon the same or any part thereof, and that they, and each of them be perpetually enjoined from asserting or attempting to assert any such claim to said property. Your Orator further prays for such other, further and general relief as it may be equitably entitled to the premises considered.


Solicitor for Complainant.

FOOT NOTE: The Respondents, and each of them, are required to answer each and every paragraph of the foregoing Bill of Complaint numbered 1 to 3 both inclusive, but not under oath, the benefit whereof is hereby expressly waived.


Solicitor for Complainant.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

DECREE.

This cause coming on to be heard was submitted on behalf of the Complainant upon the original Bill of Complaint, Decree Pro Confesso on service by registered mail against the Respondent, Fred Countryman, Affidavit of Infancy, Nomination by the Minor, Geraldine Hall, nominating H. M. Hall, as her Guardian Ad Litem; Order appointing H. M. Hall, Guardian Ad Litem for the minor Respondents, Geraldine Hall, a minor over fourteen years of age and as Guardian Ad Litem for Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, minors under fourteen years of age, Consent in writing by H. M. Hall to act as Guardian Ad Litem for the said Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander; Answer of H. M. Hall, as Guardian Ad Litem for the said minor Respondents, Answer of Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson and W. S. Alexander, Jr., and upon the testimony as noted by the Register; and in behalf of the adult Respondents, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson and W. S. Alexander, Jr., upon their answer, and in behalf of the minor Respondents, Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, upon the Answer of H. M. Hall, as Guardian Ad Litem for the said Minor Respondents and upon consideration thereof the Court is of the opinion that the Complainant is entitled to the relief prayed for in the Bill of Complaint filed by it herein; and IT IS THEREFORE Ordered, Adjudged and Decreed by the Court as follows:

1. That Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson, W. S. Alexander, Jr., Geraldine Hall,

Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander are the heirs and all of the heirs of Howell Hall, who died intestate on February 12, 1937.

2. That the Complainant, the Baldwin County Bank, a Corporation, is, as against the Respondents, Fred Countryman, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson, W. S. Alexander, Jr., Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, the true and lawful owner in its own right of the following described lands situated in Baldwin County, Alabama, to-wit:

Being the West one-half ($W\frac{1}{2}$) of Section No. One (1) and also the South one-half ($S\frac{1}{2}$) of the Southeast Quarter ($SE\frac{1}{4}$) of said Section No. One and also the Northwest Quarter of the Southeast Quarter ($NW\frac{1}{4}$ of $SE\frac{1}{4}$) of said Section No. One (1) and also the Southwest Quarter of the Northeast Quarter ($SW\frac{1}{4}$ of $NE\frac{1}{4}$) of said Section No. One (1) and also the West one-fourth of the Northwest Quarter of the Northeast Quarter ($W\frac{1}{4}$ of $NW\frac{1}{4}$ of $NE\frac{1}{4}$) of said Section No. One (1), all located in Township Nine (9) South Range Four (4) East in Baldwin County in the State of Alabama and containing in all four hundred ninety (490) acres of land, more or less;

Also, the South half of the Southwest Quarter ($S\frac{1}{2}$ of $SW\frac{1}{4}$) of Section Two (2) and the Northwest Quarter ($NW\frac{1}{4}$) and North half of Northeast Quarter ($N\frac{1}{2}$ of $NE\frac{1}{4}$) of Section Eleven (11) Township Nine (9) South of Range Four (4) East, containing three hundred twenty (320) acres, more or less;

Also, from the Northeast corner of Section Four (4) Township Nine (9) South Range Five (5) East, run East on the Township line twenty-five (25) chains and fifty-one (51) links for a point of beginning, thence West on the township line twenty-three chains and seventy-two links to a stake about two chains and forty-five links West of the intersection of the township line with Bay La Launch, thence South thirty-three chains and thirty-two links to a stake on the margin of Bay Ornocor, thence by meanders of said bay south eighty-five degrees West seven chains and sixty-six links, south eighty degrees West nine chains, South seventy-two degrees West seven chains and sixty-seven links to division line between Bill's land and Dryer's, thence North thirty-seven chains and ninety-two links to beginning, containing eighty-three and one-tenth acres, lying in Section Twelve, William Kee Grant, Township Nine South Range Five East.

3. That title to all of the said land is in the Baldwin County Bank, a Corporation, and title thereto is forever quieted against the Respondents, Fred Countryman, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson, W. S. Alexander, Jr., Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret

Ruth Alexander and Gerald Martin Alexander, and the said Respondents and each of them are without right, title or interest in the said lands or any part thereof and have and hold no encumbrance on the property or any part thereof or any interest therein, and that they and each of them are hereby perpetually enjoined from asserting or attempting to assert any claim to the said property or any part thereof, or any interest therein or from claiming any lien on the said property or any part thereof or any interest therein.

4. IT IS FURTHER ORDERED that a copy of this Decree be filed in the office of the Judge of Probate of Baldwin County, Alabama within thirty days from the rendition hereof, and that the Complainant pay the costs of this proceeding.

Done at Bay Minette, Alabama, on this the 3rd 11 day of August, 1938.

J. W. Stare

Judge.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

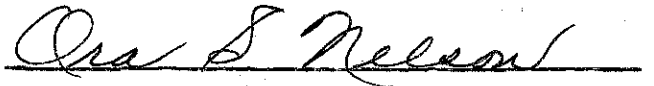
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER ____.

TO H. M. HALL, ESQUIRE, GUARDIAN AD LITEM FOR GERALDINE HALL, HUNTER HALL, HOWELL SILSBEE ALEXANDER, MARGARET RUTH ALEXANDER AND GERALD MARTIN ALEXANDER Minors:

You are hereby notified that the Complainant has moved for and obtained an order for the oral examination of S. F. Holmes and W. D. Stapleton, witnesses for the Complainant, said examination to be held before the undersigned Commissioner at _____

10 o'clock A.M., on Tuesday, August 2, 1938.

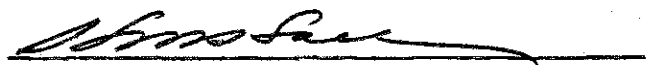
Dated this 29th day of July, 1938.



Commissioner.

I, H. M. Hall, Guardian Ad Litem for the above named minors and Solicitor for Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson and W. S. Alexander, Jr., adult defendants, do hereby accept service of the Notice for Oral Examination of the witnesses for Complainant which are named above.

Dated this 29th day of July, 1938.



BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

In this cause, upon Motion of J. B. Blackburn, Solicitor for the Complainant in the above entitled cause, it is ordered that the Commissioner named in the commission hereto attached, give three days notice of the time and place of examining the witnesses named in the said Motion to H. M. Hall, Guardian Ad Litem for Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, ^{Minors} and to H. M. Hall, as Solicitor for Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson and W. S. Alexander, Jr.

Dated this 29th day of July, 1938.



Register.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

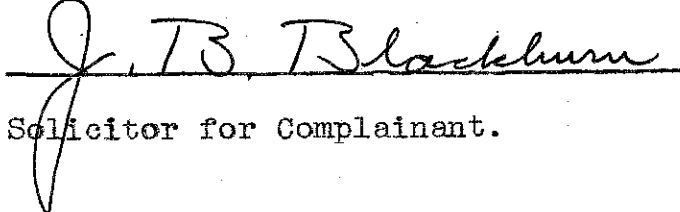
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

MOTION FOR ORAL EXAMINATION OF WITNESSES.

Now comes the Complainant in the above entitled cause,
by its solicitor, and moves for the oral examination of S. F. Holmes,
and W. D. Stapleton, witnesses for the Complainant, after such
notice as may be required, the said examination to be taken before
a suitable commissioner to be appointed by the Court and Complainant
suggests Ora S. Nelson as such commissioner.


Solicitor for Complainant.

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

BALDWIN COUNTY BANK, a

Corp., Complainant

vs. Complainant

FRED COUNTRYMAN, Et Als.,

Respondent.

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

Recd
RECORDED 7-3-35

MOTION FOR ORAL EXAMINATION OF
WITNESSES.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

Filed this 29 day July 1935

R. S. Dwyer
Clark-Register

Book
RECORDED 4-55-4

ORDER.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

Clerk-Register

_____ day _____
19__

Filed this _____ day _____
August 19, 35
P. S. Rust
Clerk-Register

Revised
RECORDED
7:55 PM
NOTICE OF TIME SET FOR TAKING
TESTIMONY.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

Filed this 4 day August 1938

R. S. Duvall

Clerk-Register

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

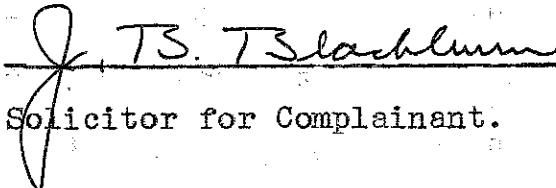
Respondents.

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

MOTION FOR DECREE PRO CONFESSO.

Motion is hereby made for a Decree Pro Confesso against the Respondent, Fred Countryman, on the ground that a copy of the Bill of Complaint in this cause, together with a summons, was mailed to the Respondent, Fred Countryman, by registered mail, postage prepaid, marked "For Delivery Only to the Person to Whom Addressed. Return Receipt Requested," and more than thirty days have elapsed since the return receipt was received and filed by the Register of this Court, and that the said Respondent has failed to plead, answer or demur to the Bill of Complaint to the date hereof.

Dated this 25th day of July, 1938.


Solicitor for Complainant.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER ____.

NOTE OF TESTIMONY.

This cause is submitted on behalf of the Complainant upon the following:

1. Original Bill of Complaint.
2. Decree Pro Confesso on service by registered mail against the Respondent, Fred Countryman.
3. Affidavit of Infancy.
4. Nomination by the Minor, Geraldine Hall, nominating H. M. Hall, as her Guardian Ad Litem.
5. Order appointing H. M. Hall, Guardian Ad Litem for the minor Respondents, Geraldine Hall, a minor over fourteen years of age and as Guardian Ad Litem for Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, minors under fourteen years of age.
6. Consent in writing by H. M. Hall to act as Guardian Ad Litem for the said Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander.
7. Answer of H. M. Hall, as Guardian Ad Litem for the said minor Respondents.
8. Answer of Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson and W. S. Alexander, Jr.
9. Testimony of S. F. Holmes.
10. Testimony of W. D. Stapleton.
11. Complainant's Exhibits "1" to "9" both inclusive.

In behalf of the Respondents, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson and W. S. Alexander, Jr., upon their Answer.

In behalf of the Minor Respondents, Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander upon the Answer of H. M. Hall, as Guardian Ad Litem for the said Minor Respondents.



Register.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

ANSWER.

Now come Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall and Aletha Davidson, Respondents in the above entitled cause, by their Solicitor, and for answer to the Bill of Complaint filed herein say:

1. These Respondents admit the allegations of paragraph numbered 1 of the Bill of Complaint.
2. These Respondents admit that the Complainant is the owner of the property described in paragraph Numbered 2 of the Bill of Complaint and that it is in the peaceable possession thereof; and for further answer to paragraph Numbered 2 of the said Bill of Complaint, these Respondents and each of them disclaim any right, title or interest in and to the property described in the said Bill of Complaint, or any part thereof.
3. Having fully answered the Bill of Complaint in this cause Respondents pray that they be discharged with their reasonable costs in this behalf expended.



Solicitor for Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall and Aletha Davidson.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,


Respondents.

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

DECREE PRO CONFESSO.

In this cause it being made to appear to the Register that a copy of the Bill of Complaint in this cause, together with a summons requiring him to plead, answer or demur to the said Bill of Complaint within thirty days from the service thereof, was mailed to the Respondent, Fred Countryman, by registered mail, postage prepaid, marked "For Delivery Only to the Person to Whom Addressed. Return Receipt Requested", and that said return receipt was received and filed by me on June 20, 1938, and said Respondent having failed to plead, answer or demur to the said Bill of Complaint to the date hereof; it is now, therefore, on motion of the Complainant, ORDERED AND DECREED that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said Fred Countryman, Respondent aforesaid.

Witness my hand this 25th day of July, 1938.



Register.

BALDWIN COUNTY BANK, a
Corporation,
Complainant,


VS.

FRED COUNTRYMAN, et als,
Respondents.

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

ANSWER TO BILL BY GUARDIAN AD LITEM.

Now comes Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, by H. M. Hall, as their Guardian Ad Litem, and for answer to the Bill of Complaint filed in this cause deny each and every allegation thereof and demand strict proof of same.


Guardian Ad Litem for Geraldine Hall,
Hunter Hall, Howell Silsbee Alexander,
Margaret Ruth Alexander and Gerald
Martin Alexander, Minors.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

ORDER APPOINTING GUARDIAN AD LITEM.

In this cause it being made to appear to the Register by the Bill of Complaint and by the Affidavit of Infancy filed herein that the Defendant, Hunter Hall is a minor eleven years of age, the Defendant, Howell Silsbee Alexander is a minor thirteen but under fourteen years of age, the Defendant, Margaret Ruth Alexander, is a minor twelve years of age and the Defendant Gerald Martin Alexander is a minor ten years of age, and that no one has been nominated to act as Guardian for the said minors or either of them.

It further appearing to the Register that the Defendant, Geraldine Hall, a minor fourteen years of age, has been regularly served with process and that she has nominated H. M. Hall as a Guardian Ad Litem to act in the said cause for her.

It further appearing from proof made before the Register that the said H. M. Hall is also Solicitor for W. S. Alexander, Jr., who is the father of Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, and it further appearing that the said H. M. Hall is an attorney at law and solicitor in chancery practicing at Bay Minette, Alabama; that he is not related by blood or marriage to the Complainant, the attorney for the Complainant, the Judge or Register of this Court, or in any way connected with the Complainant or its solicitor, and that he is in all respects a suitable person to act as Guardian Ad Litem for the said infants, Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, and the said

H. M. Hall having filed his consent in writing to act as such, it is now therefore, ordered by the Register that the said H. M. Hall be and he is hereby appointed Guardian Ad Litem in this cause for the said infant defendants, Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander.

Witness my hand this 29th day of July, 1938.



Register.

BALDWIN COUNTY BANK, a
Corporation,
Complainant,
VS.
FRED COUNTRYMAN, et als,
Respondents.

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

ACCEPTANCE OF APPOINTMENT AS GUARDIAN AD LITEM
AND CONSENT TO ACT.

Pursuant to an order of this Court in the above entitled cause dated July 29, 1938, I, H. M. Hall, do hereby accept the said appointment and consent in writing to act as Guardian Ad Litem for Geraldine Hall, Hunter Hall, Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, Minors.



Duck
RECORDED 7-6-32

DECREE PRO CONFESSO.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 426

Filed this 25 day July 1935
R. S. Duck,
Register.

Book
RECORDED 7:551

ANSWER.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

Filed this 29 day July 1955
R. S. Dault
Clerk-Register

RECORDED. 2:393

D. Wolfe

NOTE OF TESTIMONY.

BALDWIN COUNTY BANK, a Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____

Filed August 3, 1935

R. S. Duck, Register

RECORDED *Duck*
7.553

MOTION FOR DECREE PRO CONFESSO

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

Filed this *25* day *July* 19*35*
R. S. Duck
Clark-Register

Duck
RECORDED 7:553

ANSWER TO BILL BY GUARDIAN AD
LITM.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

Filed this 23 day July 1935
R. S. Duck
Clerk-Register

RECORDED *Dube*
7.5522

ORDER APPOINTING GUARDIAN AD
LITEM and
ACCEPTANCE OF APPOINTMENT AND
CONSENT TO ACT.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

Filed this 19 day July 1935

R. S. Dwell
.....
Clark-Register

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

BALDWIN COUNTY BANK, a Corporation, COMPLAINANT

VS.

FRED COUNTRYMAN, et als, RESPONDENTS

I, Ora S. Nelson

as ~~Register and~~ Commissioner

have called and caused to come before me S. F. Holmes and W. D. Stapleton

witnesses named in the requirement for Oral Examination, on the 2nd day of August

1938, at the office of J. B. Blackburn

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

truth, the whole truth, and nothing but the truth, the said S. F. Holmes and W. D.

Stapleton doth depose and say as follows:

TESTIMONY OF S. F. HOLMES.

(Examination by J. B. Blackburn, Esq.)

Mr. Holmes, I'll ask you to examine this description in the Bill of Complaint.

Q. Mr. Holmes, what is your present connection with the Baldwin County Bank?

A. President.

Q. Are you familiar with those lands?

A. I know where they are.

Q. Who owns them?

A. Baldwin County Bank.

Q. Who has been in possession of those lands since you have been connected with the Baldwin County Bank?

A. We have.

Q. When did you become connected with the Baldwin County Bank?

A. On November 1, 1932.

Q. Since November 1, 1932, the Baldwin County Bank has regularly assessed and paid taxes on these lands?

A. Yes.

Q. Been in possession of them?

ORAL EXAMINATION

I, Ora S. Nelson as ~~Register and~~ Commissioner hereby certify that the foregoing deposition s 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 _____ 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 2nd day of August 19 38.

Ora S. Nelson (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Baldwin County Bank, a

Corporation, COMPLAINANT

vs.

Fred Countryman, et als,

RESPONDENTS

ORAL DEPOSITION

Filed August 4, 1938

O. S. Nelson, Register.

RECORDED IN

Record

Vol. _____ Page _____

_____, Register

A. Yes.

Q. The Baldwin County Bank is, of course, a corporation?

A. Yes.

Q. No suit is pending to enforce or test the validity of the Bank's title?

A. No.

(Cross examination by H. M. Hall, Esq.)

Q. Mr. Holmes, since you have been there as an official of the Bank, have you found a conveyance from Mr. Stapleton, as Trustee, to the Baldwin County Bank?

A. Yes.

Q. Do the records of the Baldwin County Bank show any indebtedness owing by W. D. Stapleton, as Trustee, or Howell Hall, Agent, in connection with the purchase or borrowing of money in connection with the purchase of these lands?

A. There is an indebtedness for them.

Q. As against this land?

A. The old notes are there.

Q. This deed was accepted in full payment and complete satisfaction of the amount of money advanced to W. D. Stapleton, Howell Hall and Fred Countryman? In other words, this deed was accepted in full payment of the indebtedness due by those three men in connection with the purchase of this land?

A. Yes.

Q. Then, Mr. Holmes, the Baldwin County Bank is making no claim against W. D. Stapleton, Howell Hall or Fred Countryman on any notes made to the Bank in connection with the purchase of this property?

A. No.



THE FOLLOWING INSTRUMENTS ARE INTRODUCED IN EVIDENCE BY
EXHIBITS THE COMPLAINANT:

1. Deed from Walter Busack, et al, to Howell Hall, dated August 6, 1925, recorded in Deed Book 36 N. S. Page 505.
2. Deed from Effie Dryer to Howell Hall, dated June 19, 1925, and recorded in Deed Book 37 N. S. Page 39.
3. Deed from Howell Hall and wife to W. D. Stapleton, Trustee, dated September 17, 1926, recorded in Deed Book 40 N. S. Page 586.
4. Deed from Dencie R. Planson, a Widow, to Frank B. Nihart, dated June 10, 1926, recorded in Deed Book 38 N. S. Page 92.
5. Deed from Frank B. Nihart and wife to W. D. Stapleton, Trustee, dated September 17, 1926, recorded in Deed Book 40 N. S. Page 587.
6. Contract of Ownership between W. D. Stapleton, Howell, Hall, and Fred Countryman, dated September 17, 1926, recorded in Deed Book 40 N. S. at Pages 583-84.
7. Sheriff's Deed, Fred Countryman by W. R. Stuart, as Sheriff of Baldwin County, Alabama, to W. D. Stapleton, dated October 3, 1931, recorded in Deed Book 51 N. S. Pages 333-34.
8. Affidavit of Hubert M. Hall relative to the heirs of Howell Hall, dated November 24, 1937 and recorded in Deed Book 65 N. S. Page 317.
9. Certified copy of Deed from W. D. Stapleton, as Trustee, and Weila Stapleton, his wife, to Baldwin County Bank, dated November 18, 1931, recorded in Deed Book 53 N. S. at Pages 299-300.

A. Well, part of it came from the Bank.

Q. That money was not repaid until a conveyance of the property was made to the Bank?

A. No.

Q. Did you, or did you not, pay the money that was advanced by the bank by a conveyance to the Baldwin County Bank?

A. Yes.

Q. I will hand you a certified copy of a deed from you as Trustee and Mrs. Leila Stapleton, dated November 18, 1931. Did you make that deed as Trustee for the purpose of conveying all outstanding interest in that land to the Baldwin County Bank?

A. Yes sir.

Q. That was in satisfaction of the indebtedness due the bank?

A. Yes.

Q. That was with the consent of Mr. Howell Hall?

A. Yes sir.

Q. Mr. Stapleton, do you know this boy, W. S. Alexander, Jr.

A. I know the Alexander boys.

Q. Do you know what relation this one is to Howell Hall?

A. One married Howell Hall's daughter.

Q. Then he is his son-in-law?

A. Yes.

Q. While you held that ^{property} as Trustee, you assessed and paid taxes on it?

A. Yes.

(Cross examination by H. M. Hall, Esq. Guardian Ad Litem)

Q. Mr. Stapleton, what was the agreement between you and Howell Hall with reference to the handling of these lands.

A. I had absolute control of it. Of course if I sold anything I would consult him about it.

Q. You mean you had authority to execute conveyances to the property by agreement?

A. Yes.

Q. At the time you executed this deed to the Baldwin County Bank what was the balance due the Baldwin County Bank in round figures?

A. Between eight and nine thousand dollars.

Q. At the time the property was conveyed by you as Trustee to the Baldwin County Bank, what was a fair and reasonable market value of the property?

A. It was not worth more than the amount due on it. The consideration for the conveyance was a fair and reasonable market value for the property in my opinion at that time.

Q. Mr. Stapleton, this Trustee's Deed was executed before Howell Hall died?

A. Yes, sure.

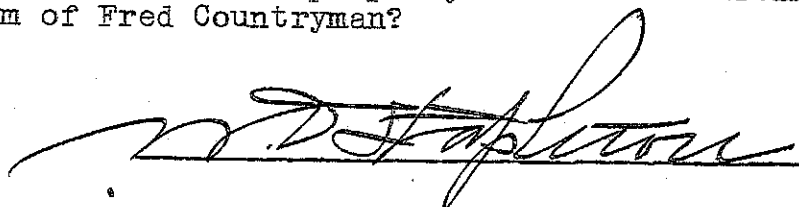
Q. Did you consult him before the execution of the deed to the Baldwin County Bank?

A. Yes.

(Re-direct examination by J. B. Blackburn, Esq. attorney for Complainant.)

Q. That deed from you as Trustee to the Baldwin County Bank, a Corporation, dated November 18, 1931 and recorded in Deed Book 53-N. S. at Pages 299-300 conveyed all of your interest as Trustee, all of your interest individually and all of the interest of Howell Hall, individually in the said property described therein, also any interest or claim of Fred Countryman?

A. Yes.



NOMINATION BY MINOR OF GUARDIAN AD LITEM.

TO THE HONORABLE ROBERT S. DUCK, REGISTER IN CHANCERY, BALDWIN COUNTY, ALABAMA:

Your Petitioner, Geraldine Hall, a minor over the age of fourteen years and a resident of Baldwin County, Alabama, respectfully represents unto the Court and your Honor that she is or will be interested in the proceedings of Baldwin County Bank, a Corporation, Complainant, vs. Fred Countryman, et als, Respondents, being Case Number _____, in the Circuit Court of Baldwin County, Alabama, and is advised that it is necessary that she choose a Guardian Ad Litem to represent her in the said proceedings. Your Petitioner, therefore, begs leave to nominate to your Honor as her Guardian Ad Litem in said proceedings H. M. Hall, of Bay Minette, Alabama, and respectfully requests that he may be duly appointed.

Geraldine Hall

STATE OF ALABAMA

BALDWIN COUNTY

I, W. Byrnes Jones, a Notary Public, in and for said County in said State, do hereby certify that Geraldine Hall, a minor over fourteen years of age and who is known to me, appeared before me on this day and having heard the foregoing Petition by her subscribed carefully read over, she acknowledged to me that she voluntarily signed and preferred the said Petition to the Register in Chancery of said County.

Given under my hand and official seal on this the 28th day of July, 1938.

W. Byrnes Jones

Notary Public, Baldwin County, Alabama.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

TO WHOM IT MAY CONCERN:

Notice is hereby given that the Baldwin County Bank, a Corporation, did on June 4, 1938, file in the Circuit Court of Baldwin County, Alabama, in Equity, its Bill of Complaint against Fred Countryman, Cora B. Hall, Cybele Hall Owen, Hamilton Hall, Wilson Hall, Aletha Davidson, Geraldine Hall, Hunter Hall, W. S. Alexander, Jr., Howell Silsbee Alexander, Margaret Ruth Alexander and Gerald Martin Alexander, for the purpose of quieting title to the following described property in Baldwin County, Alabama, to-wit:

Being the West one-half ($W\frac{1}{2}$) of Section No. One (1) and also the South one-half ($S\frac{1}{2}$) of the Southeast Quarter ($SE\frac{1}{4}$) of said Section No. One and also the Northwest Quarter of the Southeast Quarter ($NW\frac{1}{4}$ of $SE\frac{1}{4}$) of said Section No. One (1) and also the Southwest Quarter of the Northeast Quarter ($SW\frac{1}{4}$ of $NE\frac{1}{4}$) of said Section No. One (1) and also the West one-fourth of the Northwest Quarter of the Northeast Quarter ($W\frac{1}{4}$ of $NW\frac{1}{4}$ of $NE\frac{1}{4}$) of said Section No. One (1), all located in Township Nine (9) South Range Four (4) East in Baldwin County in the State of Alabama and containing in all four hundred ninety (490) acres of land, more or less;

Also, the South half of the Southwest Quarter ($S\frac{1}{2}$ of $SW\frac{1}{4}$) of Section Two (2) and the Northwest Quarter ($NW\frac{1}{4}$) and North Half of Northeast Quarter ($N\frac{1}{2}$ of $NE\frac{1}{4}$) of Section Eleven (11) Township Nine (9) South of Range Four (4) East, containing three hundred twenty (320) acres, more or less;

Also, from the Northeast corner of Section Four (4) Township Nine (9) South Range Five (5) East, run East on the Township line twenty-five (25) chains and fifty-one (51) links for a point of beginning, thence East on the township line twenty-three chains and seventy-two links to a stake about two chains and forty-five links West of the intersection of the Township line with Bay La Launch, thence South thirty-three chains and thirty-two links to a stake on the margin of Bay Ornocor, thence by meanders of said bay south eighty-five degrees West seven chains and sixty-six links, south eighty degrees West nine chains, South Seventy-two degrees West seven chains and sixty-seven links to divisions line between Bill's land and Dryer's, thence North thirty-seven chains and ninety-two links to beginning, containing eighty-three and one-tenth acres, lying in Section Twelve, William Kee Grant, Township Nine South Range Five East.

A brief statement of the suit is as follows: The Complainant alleges that it owns and is in peaceable possession of the above described property and alleges that the Respondents claim or are reputed to claim some right, title or interest in the said property. The said bill calls on the Respondents to set up their title and is filed for the purpose of quieting Complainant's title to the said property and clear up all doubts and disputes concerning the same.

Dated this 4th day of June, 1938.

BALDWIN COUNTY BANK, a Corporation,

By J. B. Blackburn
As its Solicitor of Record.

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon

W. S. ALEXANDER, JR. o/o NEWPORT COMPANY,
PENSACOLA, FLORIDA.

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

BALDWIN COUNTY BANK, A CORPORATION,

against said W. S. ALEXANDER, JR., ET AL.

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 JUNE 1938

Rs Duck

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

GERALDINE HALL, a minor over fourteen years
of age.

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

BALDWIN COUNTY BANK, a Corporation,

against said GERALDINE HALL, a minor over fourteen years
of age, 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, R. S. Duck, Register of said Circuit Court, this 27th day of
July, 1938.

R. S. Duck, 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 _____

FRED COUNTRYMAN of

R.F.D., Hicksville, Ohio;

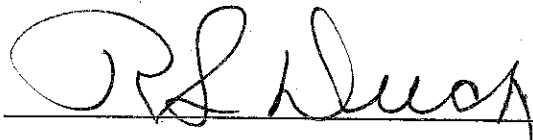
~~##~~ _____ ~~Country~~, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

BALDWIN COUNTY BANK, a Corporation,

against said _____ FRED COUNTRYMAN

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 15th day of June 1938.



Register

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

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER _____.

AFFIDAVIT OF INFANCY.

Before me, Ora Sirmon, a Notary Public, within and for said County in said State, personally appeared J. B. Blackburn, who, being duly sworn, deposes and says that he is Solicitor for the Complainant in the foregoing cause, and that he has been informed and believes and upon such information and belief states that the ages of the minor respondents in said cause are as follows: Geraldine Hall, fourteen years of age; Hunter Hall, eleven years of age; Howell Silsbee Alexander, thirteen years of age; Margaret Ruth Alexander, twelve years of age and Gerald Martin Alexander, ten years of age; and further that said minors have not a general guardian in this State.

J. B. Blackburn

Sworn to and subscribed before me on
this the 27th day of July, 1938.

Ora Sirmon

Notary Public, Baldwin County, Alabama.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

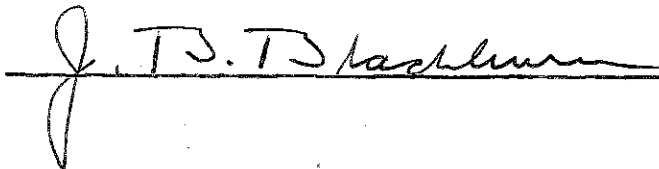
IN EQUITY. NUMBER ____.

AFFIDAVIT.

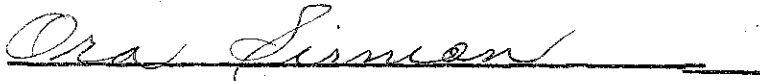
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says: That he is attorney for the Baldwin County Bank, a Corporation, the Complainant in the above entitled cause; that the Respondent, Fred Countryman, is, in the belief of affiant, a non-resident of the State of Alabama, whose residence and post office address is R. F. D. Hicksville, Ohio; the Respondent, W. S. Alexander, Jr., is, in the belief of your affiant, a non-resident of the State of Alabama, whose residence and post office address is in care of Newport Company, Pensacola, Florida.



Sworn to and subscribed before me
on this the 4th day of June, 1938.



Notary Public, Baldwin County, Alabama.

RECORDED *Duck*
9-487

AFFIDAVIT.

BALDWIN COUNTY BANK, a Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

Filed June 4, 1938.

R. Duck

Register.

RECORDED *Book*
7:551

AFFIDAVIT OF INFANCY.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

*Filed July 27, 1935.
R. S. Dool, Register.*

CERTIFICATE:

STATE OF ALABAMA,)
BALDWIN COUNTY.)

I, Robert S. Duck, Register in Chancery, Baldwin County, Alabama, do hereby certify that I mailed a copy of this Summons, together with a copy of the original Bill of Complaint filed in this cause, to the defendant, Fred Countryman, at the address mentioned therein, by registered mail, marked "for delivery to person to whom addressed only", postage prepaid, return receipt requested, on this date.

DATED this 15th day of June, 1938.

R. S. Duck
Register in Chancery,
Baldwin County, Alabama.

RECORDED
7-450

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____
day of _____, 193

SHERIFF

Executed this _____ day of _____, 193

by leaving a copy of the within Summons with

Defendant

Sheriff

By _____
Deputy Sheriff

Circuit Court of Baldwin County
IN EQUITY

No. 426

SUMMONS

BALDWIN COUNTY BANK,

a Corp.,
Complainant,

vs.

FRED COUNTRYMAN, ET ALS.
Respondents.

J. B. BLACKBURN,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

(Original)

Serve On _____

Circuit Court of Baldwin County
IN EQUITY

No. 426

Summons

BAIDWIN COUNTY BANK,

a Corp.,

Complainant,

VS.

FRED COUNTRYMAN, ET ALs.,

Respondents.

J. B. BLACKBURN

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
Baldwin County

Received in office this 27th

day of July, 1938

W. H. Williams

Sheriff.

Executed this 28th day of

July, 1938

by leaving a copy of the Summons with

Genevieve Stull

Defendant

M. W. Williams

Sheriff

By John P. Dennis

Deputy Sheriff

Serve on _____

**Circuit Court of Baldwin County
IN EQUITY**

No. _____

S U M M O N S

Baldwin County Bank, a
corporation,

vs.
Fred Countryman, W. S. Alexander,
et al.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____

by leaving a copy of the within Summons with _____ 193_____

Defendant

Sheriff

By _____
Deputy Sheriff

Copy of Summons and copy of bill of complaint mailed to defendant W. S. Alexander, Jr. c/o Newport Company, Pensacola, Florida, by registered mail, postage prepaid, return receipt requested, marked for delivery only to person to whom addressed, on this the 24th day of June, 1938.

R. Duck

Register.

LIS PENDENS NOTICE.

BALDWIN COUNTY BANK, a Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

6-4-38

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

State of Alabama
County of Baldwin

39. Woodland Jones
Apr 1 1938

W. J. Jones

1938

W. J. Jones 100

Book
RECORDED 7:55:22

NOMINATION BY MINOR OF GUARDIAN
AD LITEM.

BALDWIN COUNTY BANK, a
Corporation,

Complainant,

VS.

FRED COUNTRYMAN, et als,

Respondents.

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

Filed this 29 day July 1935
R. S. Oued
Clerk-Register

Bay Minette, Ala.

6/17 1938

RS Duck

IN ACCOUNT WITH

G. W. ROBERTSON

Judge of Probate, Baldwin County

Please Return Bill With Remittance

Recording

from

to

Privilege Tax

Rec. Fee

Total

Recording	from	to	Privilege Tax	Rec. Fee	Total
9P.	Bob	vs. Fred Countryman			1.00

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature of name on address)

(Signature of addressee's person)

Date of delivery _____ 19__

Form 3872

U.S. POSTAL SERVICE

6 Fee 5-18-56

Post Office Department

OFFICIAL BUSINESS

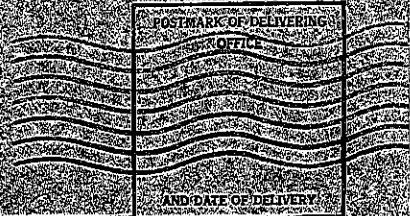
REGISTERED ARTICLE

No. 734

INSURED PARCEL

No. _____

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$350



Returned to ROBERT S. DICK, REGISTRAR

(NAME OF SENDER)

Street and Number or Post Office Box _____

Post Office at Bay Tennet, Alabama

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature of addressee)

(Signature of addressee's agent)

Date of delivery: March 11, 1938

Form 3871

U.S. GOVERNMENT PRINTING OFFICE

16-5115

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 173

INSURED PARCEL

No. _____

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$200

POSTMARK OF DELIVERING

OFFICE

AND DATE OF DELIVERY

Returned to: ROBERT S. DICK, REGISTER

(NAME OF SENDER)

Street and Number
or Post Office Box

Post Office at BAKERSFIELD, CALIFORNIA

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

W. S. Alexander Jr
(Signature or name of addressee)

(Signature of addressee's agent)

Date of delivery _____, 19____

Form 3511

U. S. GOVERNMENT PRINTING OFFICE: 1937

16-4135

*Filed July 1, 1938
R. S. Duck, Register*

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. *688*

INSURED PARCEL

No. _____



PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, 100%

POSTMARK OF DELIVERING OFFICE

Return to R. S. DUCK, Register in Charge

(NAME OF SENDER)

Street and Number, }
or Post Office Box, }

Post Office at Bay Minette.

*Filed July 20, 1938
R. S. Duck, Register*

RECEIPT FOR REGISTERED ARTICLE No. 734

15 fee paid. 100 class postage paid. 6-24, 1938

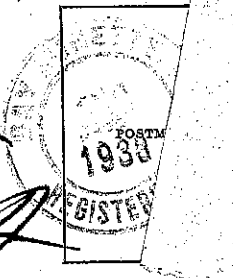
Declared value, \$ _____ Surcharge paid, \$ _____
From R. S. Duch, C. C.

(Street and number) (Post office and State)
Addressed to W. S. Alexander Jr.

(Street and number) (Post office and State)
Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee 3 (in person ✓ or order _____) Special delivery fee _____
Delivery restricted to addressee _____ Fee paid 10 Postmaster, per MA

5-6869



RECEIPT FOR REGISTERED ARTICLE No. 689

15 fee paid. 100 class postage paid. 6-15, 1938

Declared value, \$ _____ Surcharge paid, \$ _____
From R. S. Duch, C. Clark

(Street and number) (Post office and State)
Addressed to Fred Countryman

(Street and number) (Post office and State)
Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee 3 (in person ✓ or order _____) Special delivery fee _____
Delivery restricted to addressee _____ Fee paid 10 Postmaster, per MA

5-6869

