

J. C. Phillips,

vs.

Ella Robinson, et al.

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 7th day of April 1923, send to

Mary Emma Hamilton, Defendant

whose address was So. Bevillia St. Pensacola, Florida.

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 21st day of April 1924

Witness my hand, this 21st day of April 1924

M. A. Stone

Register.

J. C. Phillips,
vs.
Ella Robinson et al

CIRCUIT COURT OF
Baldwin COUNTY.
IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 7th day of April 19234, send to Ruby Dunn

Defendant.

whose address was c/o Lambert's Landscape Gardens, Shreveport La.

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 12th day of April, 1924

Witness my hand, this 16th day of April 19234

M. A. Stone
Register.

J. C. Phillips,

vs.

Ella Robinson, et al.

CIRCUIT COURT OF

Baldwin, COUNTY.

IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 7th day of April 1923⁴, send to

Carl Halladay, Defendant.

whose address was 427 West Garden Street, Pensacola, Florida.

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 10th day of April 1923⁴.

Witness my hand, this 16th day of April 1923⁴

M. A. Stone

Register.

J. C. Phillips,

vs.

Ella Robinson, et al

CIRCUIT COURT OF

Bldwin COUNTY.

IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 7th day of April 1923, send to Willie Townley

Defendant

whose address was 1011 East Gonsales St. Pensacola, Florida.

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 11th day of April 1923.

Witness my hand, this 16th day of April 1923

M. A. Stone

Register.

N. C. Phillips,

vs.

Ella Robinson,

CIRCUIT COURT OF

Baldwin COUNTY,

IN EQUITY.

I, M. A. Stone, Register of said Court. do hereby certify that I

did, on the 7th day of April 1908, send to

Dillard Thomas, Defendant

whose address was c/o Mrs. Carl Halladay 427 W. Garden St. Pensacola, Florida.

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

Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court;

and that such receipt was duly received and filed by me in this cause, on the 21st day of

April 1908

Witness my hand, this 21st day of April 1908

M. A. Stone Register.

RECORDED
084

39

ORIGINAL

J. O. PHILLIPS,
Complainant
vs
BILL ROBINSON, ET AL
Respondents

BILL OF COMPLAINT

Filed this April 7th, 1954.

W. R. Stone
Registrar

BEEBE & HALL
LAWYERS
BAY MINETTE, ALA.

J. C. Phillips,
vs.
Ella Robinson

CIRCUIT COURT OF
Baldwin COUNTY.
IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 7th day of April 1923³⁴, send to Mack Thomas

c/o Lambert Landscape Gardens, Defendant.

whose address was Shreveport, La.

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 12th day of April 1923³⁴

Witness my hand, this 16th day of April 1923³⁴

M. A. Stone
Register.

J. C. Phillips,

vs.

Ella Robinson, et al.

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 7th day of April 192, send to Jewel Hugen

Defendant.

whose address was Brent Florida

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

Letter Returned----- 4.8.34...
receipt was duly received and filed by me in this cause, on the day of 192.

Witness my hand, this 16th day of April 192 34

M. A. Stone
Register.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority in and for said County, in said State, personally appeared HUBERT 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 case of J. C. Phillips vs. Ella Robinson et al.; that as such solicitor he has made and caused to be made a diligent search and inquiry to determine the present addresses of the respondents; that the respondents, Willie Townley, Carl Halladay, Jewel Huguen, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn and Mack Thomas, are over twenty-one years of age and non-residents of the State of Alabama, their last known address being as set out in the original bill of complaint.

Hubert M. Hall

Sworn to and subscribed before
me this the 7th day of
April, 1934.

W. A. Stone-Clerk
Notary Public, Baldwin County,
Alabama.

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

Comes your complainant, J. C. PHILLIPS, and humbly com-
plaining against the respondents hereinafter named, respectfully
represents and shows unto your Honor as follows:

FIRST:

That your complainant, is over the age of twenty-one years
and a resident of Robertsdale, Baldwin County, Alabama.

SECOND:

That the respondents, ~~Lula Waters, Ivy Dean Johnson, Leah~~
C. W. Hamilton
~~Waters~~, Ella Robinson, Pearl Townley and Leslie Thomas, are over
twenty-one years of age and residents of Baldwin County, Alabama;

That the respondent, Willie Townley, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-
office address being 1011 East Gonzalez Street, Pensacola, Florida;

That the respondent, Carl Halladay, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being 427 West Garden Street, Pensacola, Florida;

That the respondent, Jewel Hughsen, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being Brent, Florida;

That the respondent, Mary Emma Hamilton, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-of-
fice address being South Devilla Street, Pensacola, Florida;

That the respondent, Dillard Thomas, is over twenty-one
years of age, a non-resident of the State of Alabama, his address
being care of Mrs. Carl Halladay, 427 West Garden Street, Pensacola,
Florida;

That the respondents, Ruby Dunn and Mack Thomas, are over
twenty-one years of age, non-residents of the State of Alabama,
their address being care of Lambert Landscape Gardens, Shreveport,

Louisiana;

~~That the respondent, W. D. Waters, is a resident of Baldwin County, Alabama, seventeen years of age;~~

~~That the respondent, Jessie Waters, is a resident of Baldwin County, Alabama, eleven years of age;~~

~~Both of said minors reside with their mother, Mrs. Lula Waters, at Robertsdale, Alabama.~~

THIRD:

That your complainant is in the quiet and peaceable possession of certain lands in Baldwin County, Alabama, claiming to own the same in fee simple, said lands being described as South half of Northwest quarter of Section 30, Township 4 South, Range 3 East.

FOURTH:

Complainant further shows unto your Honor that the respondents hereinabove named claim or are reputed to claim some right, title or interest in or incumbrance on said lands.

FIFTH:

Complainant further shows unto your Honor that no suit is pending to question or test the validity of said claim, right, title or interest in or incumbrance of the said respondents, and the complainant therefore calls upon the respondents and each of them to set forth and specify his or her right, title or interest in or incumbrance upon said lands, and to show how and by what instrument the same is derived or created.

WHEREFORE, the premises considered, complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process make the said ~~Lula Waters, My Dear Johnson, Leon Waters, Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Halliday, Jewel Hughes, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, W. D. Waters and Jessie Waters~~ party respondents to this bill of complaint, requiring them to plead, answer or demur to the same within the time and under the

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penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a hearing of this cause this Honorable Court will establish the title of the complainant in and to the lands herein described, and further find and decree that the said ~~Lula Waters, Eva Dean Johnson, Leon Waters, Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Halladay, Jewel Hitchen, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, W. D. Waters and Jessie Waters~~, ^{*C.W. Hamilton*} nor either of them, have any claim, right, title or interest in or incumbrance upon the said lands herein described, or any part thereof.

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

Beck & Hall
Solicitors for Complainant.

FOOT NOTE:

The respondents and each of them are required to answer each and every allegation of the foregoing bill of complaint, Paragraphs FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Beck & Hall
Solicitors for Complainant.

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

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon ~~XXXXXXXXXX, CIVY BERRY JOHNSON, LEAN NAIGH~~
C. W. Hamilton, Ella Robinson, Pearly Townley, and Leslie Thomas,
are Residents of Baldwin County. Willie Townley, Carl Halladay,
Jewel Hughen, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn,
Mack Thomas,

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
J. C. Phillips

against said Willie Townley, Carl Halladay, Jewel Hughen,
Mary Emma Hamilton, Dillard Thomas, Ruby Dunn and Mack Thomas
C. W. Hamilton, Ella Robinson, Pearly Townley, and Leslie Thomas,
Baldwin County,

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, M. A. Stone, Register of said Circuit Court, this 7th day of
April 1934
M. A. Stone Register

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

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

Comes your complainant, J. C. PHILLIPS, and humbly com-
plaining against the respondents hereinafter named, respectfully
represents and shows unto your Honor as follows:

FIRST:

That your complainant, is over the age of twenty-one years
and a resident of Robertsdale, Baldwin County, Alabama.

SECOND:

That the respondents, ~~Lula Waters, My Dean Johnson, Lee~~
C. Hamilton
~~Waters~~, Ella Robinson, Pearl Townley and Leslie Thomas, are over
twenty-one years of age and residents of Baldwin County, Alabama;

That the respondent, Willie Townley, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-
office address being 1011 East Gonzales Street, Pensacola, Florida;

That the respondent, Carl Halladay, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being 427 West Garden Street, Pensacola, Florida;

That the respondent, Jewel Hughson, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being Brent, Florida;

That the respondent, Mary Emma Hamilton, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-of-
fice address being South Devilla Street, Pensacola, Florida;

That the respondent, Dillard Thomas, is over twenty-one
years of age, a non-resident of the State of Alabama, his address
being care of Mrs. Carl Halladay, 427 West Garden Street, Pensacola,
Florida;

That the respondents, Ruby Dunn and Mack Thomas, are over
twenty-one years of age, non-residents of the State of Alabama,
their address being care of Lambert Landscape Gardens, Shreveport,

Louisiana;

~~That the respondent, M. D. Waters, is a resident of Baldwin County, Alabama, seventeen years of age;~~

~~That the respondent, Jessie Waters, is a resident of Baldwin County, Alabama, eleven years of age;~~

~~Both of said minors reside with their mother, Mrs. Lula Waters, at Robertsdale, Alabama.~~

THIRD:

That your complainant is in the quiet and peaceable possession of certain lands in Baldwin County, Alabama, claiming to own the same in fee simple, said lands being described as South half of Northwest quarter of Section 30, Township 4 South, Range 5 East.

FOURTH:

Complainant further shows unto your Honor that the respondents hereinabove named claim or are reputed to claim some right, title or interest in or incumbrance on said lands.

FIFTH:

Complainant further shows unto your Honor that no suit is pending to question or test the validity of said claim, right, title or interest in or incumbrance of the said respondents, and the complainant therefore calls upon the respondents and each of them to set forth and specify his or her right, title or interest in or incumbrance upon said lands, and to show how and by what instrument the same is derived or created.

WHEREFORE, the premises considered, complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process make the said ~~Lula Waters, Ely Dean Johnson, Leon Waters,~~ ^{Crosby Hamilton} Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Halliday, Jewel HUGHEN, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, ~~M. D. Waters and Jessie Waters~~ party respondents to this bill of complaint, requiring them to plead, answer or demur to the same within the time and under the

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penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a hearing of this cause this Honorable Court will establish the title of the complainant in and to the lands herein described, and further find and decree that the said ~~Lula Waters, Ivy Dean Johnson, Lena Waters, Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Halladay, Jewel Hughs, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, W. D. Waters and Jessie Waters~~, ^{*C. W. Hamilton*} nor either of them, have any claim, right, title or interest in or incumbrance upon the said lands herein described, or any part thereof.

Handwritten initials 'F. J.' and other marks on the left side of the page.

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

Becker & Dece
Solicitors for Complainant.

FOOT NOTE:

The respondents and each of them are required to answer each and every allegation of the foregoing bill of complaint, Paragraphs FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Becker & Dece
Solicitors for Complainant.

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

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon ~~WILLIE TOWNLEY, CARL HALLADAY, JEWEL HUGHEN, MARY EMMA HAMILTON, DILLARD THOMAS, RUBY DUNN, MACK THOMAS,~~
C. W. Hamilton, Ella Robinson, Pearly Townley, and Leslie Thomas,
are Residents of Baldwin County. Willie Townley, Carl Halladay,
Jewel Hughen, Mary Emma Hamilton, Dillard Thomas, Rudy Dunn,
Mack Thomas,

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
J. C. Phillips

against said Willie Townley, Carl Halladay, Jewel Hughen,
Mary Emma Hamilton, Dillard Thomas, Ruby Dunn and Mack Thomas
C.W. Haminton, Ella Robinson, Pearly Townley, and Leslie Thomas,
Baldwin County,

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, M. A. Stone, Register of said Circuit Court, this 7th day of
April 1934

M. A. Stone Register

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

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

Comes your complainant, J. C. PHILLIPS, and humbly com-
plaining against the respondents hereinafter named, respectfully
represents and shows unto your Honor as follows:

FIRST:

That your complainant, is over the age of twenty-one years
and a resident of Robertsdale, Baldwin County, Alabama.

SECOND:

That the respondents, ~~Ella Waters, Ivy Dean Johnson, Leon
Waters, Ella Robinson, Pearl Townley and Leslie Thomas~~, are over
twenty-one years of age and residents of Baldwin County, Alabama;

That the respondent, Willie Townley, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-
office address being 1011 East Gonzales Street, Pensacola, Florida;

That the respondent, Carl Halladay, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being 427 West Garden Street, Pensacola, Florida;

That the respondent, Jewel Hughen, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being Brent, Florida;

That the respondent, Mary Emma Hamilton, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-of-
fice address being South Devilla Street, Pensacola, Florida;

That the respondent, Dillard Thomas, is over twenty-one
years of age, a non-resident of the State of Alabama, his address
being care of Mrs. Carl Halladay, 427 West Garden Street, Pensacola,
Florida;

That the respondents, Ruby Dunn and Mack Thomas, are over
twenty-one years of age, non-residents of the State of Alabama,
their address being care of Lambert Landscape Gardens, Shreveport,

Louisiana;

~~That the respondent, W. D. Waters, is a resident of Baldwin County, Alabama, seventeen years of age;~~

~~That the respondent, Jessie Waters, is a resident of Baldwin County, Alabama, eleven years of age;~~

~~Both of said minors reside with their mother, Mrs. Lula Waters, at Robertsdale, Alabama.~~

THIRD:

That your complainant is in the quiet and peaceable possession of certain lands in Baldwin County, Alabama, claiming to own the same in fee simple, said lands being described as South half of Northwest quarter of Section 50, Township 4 South, Range 5 East.

FOURTH:

Complainant further shows unto your Honor that the respondents hereinabove named claim or are reputed to claim some right, title or interest in or incumbrance on said lands.

FIFTH:

Complainant further shows unto your Honor that no suit is pending to question or test the validity of said claim, right, title or interest in or incumbrance of the said respondents, and the complainant therefore calls upon the respondents and each of them to set forth and specify his or her right, title or interest in or incumbrance upon said lands, and to show how and by what instrument the same is derived or created.

WHEREFORE, the premises considered, complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process make the said Lula Waters, Ivy Dean ^{Arbuckle} Johnson, Leon Waters, Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Hallday, Jewel Hughen, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, W. D. Waters and Jessie Waters party respondents to this bill of complaint, requiring them to plead, answer or demur to the same within the time and under the

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 C.W. Hamilton, Ella Robinson, Pearly Townly
and Leslie Thomas, and Residents of Baldwin County,

Willie Townly, Carl Halladay, Jewel Hughen, Mary Emma Hamilton, Dillard??
Thomas, Ruby Dunn, Mack Thomas,

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

J. C. Phillips,

against said Willie Townly, Carl Halladay, Jewel Hughen, Mary
Emma Hamilton, Dillard Thomas, Ruby Dunn and Mack Thomas, ****

C.W. Hamilton, Ella Robinson, Pearly Townly, and Leslie Thomas,
Residents of Baldwin County,

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, M. A. Stone, Register of said Circuit Court, this 7th day of
April, 1934 193

M. A. Stone Register

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

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

Comes your complainant, J. C. PHILLIPS, and humbly com-
plaining against the respondents hereinafter named, respectfully
represents and shows unto your Honor as follows:

FIRST:

That your complainant is over the age of twenty-one years
and a resident of Robertsedale, Baldwin County, Alabama.

SECOND:

That the respondents, ~~Lula Waters, Ery Dean Johnson, Leon~~
C. W. Hamilton,
~~Waters,~~ Ella Robinson, Pearl Townley and Leslie Thomas, are over
twenty-one years of age and residents of Baldwin County, Alabama.

That the respondent, Willie Townley, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-
office address being 1011 East Gonzales Street, Pensacola, Florida;

That the respondent, Carl Halladay, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being 427 West Garden Street, Pensacola, Florida;

That the respondent, Jewel Hughen, is over twenty-one years
of age, a non-resident of the State of Alabama, her post-office ad-
dress being Brent, Florida;

That the respondent, Mary Emma Hamilton, is over twenty-one
years of age, a non-resident of the State of Alabama, her post-of-
fice address being South Devilla Street, Pensacola, Florida;

That the respondent, Dillard Thomas, is over twenty-one
years of age, a non-resident of the State of Alabama, his address
being care of Mrs. Carl Halladay, 427 West Garden Street, Pensacola,
Florida;

That the respondents, Ruby Dunn and Mack Thomas, are over
twenty-one years of age, non-residents of the State of Alabama,
their address being care of Lambert Landscape Gardens, Shreveport,

Louisiana;

~~That the respondent, W. D. Waters, is a resident of Baldwin County, Alabama, seventeen years of age;~~

~~That the respondent, Jessie Waters, is a resident of Baldwin County, Alabama, eleven years of age;~~

~~Both of said minors reside with their mother, Mrs. Lula Waters, at Robertsdale, Alabama.~~

THIRD:

That your complainant is in the quiet and peaceable possession of certain lands in Baldwin County, Alabama, claiming to own the same in fee simple, said lands being described as South half of Northwest quarter of Section 30, Township 4 South, Range 5 East.

FOURTH:

Complainant further shows unto your Honor that the respondents hereinabove named claim or are reputed to claim some right, title or interest in or incumbrance on said lands.

FIFTH:

Complainant further shows unto your Honor that no suit is pending to question or test the validity of said claim, right, title or interest in or incumbrance of the said respondents, and the complainant therefore calls upon the respondents and each of them to set forth and specify his or her right, title or interest in or incumbrance upon said lands, and to show how and by what instrument the same is derived or created.

WHEREFORE, the premises considered, complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process make the said ~~Lula Waters, W. D. Waters, Jessie Waters, Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Halladay, Jewel Huguen, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, and C. W. Hamilton~~ 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.

Complainant further prays that upon a hearing of this cause this Honorable Court will establish the title of the complainant in and to the lands herein described, and further find and decree that the said ~~Lula Waters, Ery Dean Johnson, Leon Waters,~~ Ella Robinson, Pearl Townley, Leslie Thomas, Willie Townley, Carl Halladay, Jewel Hughs, Mary Emma Hamilton, Dillard Thomas, Ruby Dunn, Mack Thomas, ^{and C. W. Hamilton} ~~W. B. Waters and Jessie Waters,~~ nor either of them, have any claim, right, title or interest in or incumbrance upon the said lands herein described, or any part thereof.

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

Beebe & Hall
Solicitors for Complainant.

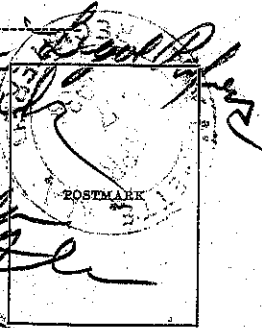
FOOT NOTE:

The respondents and each of them are required to answer each and every allegation of the foregoing bill of complaint, Paragraphs FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe & Hall
Solicitors for Complainant.

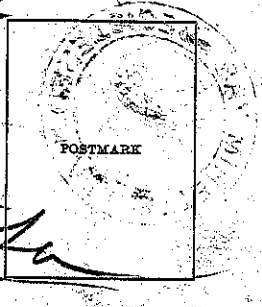
RECEIPT FOR REGISTERED ARTICLE NO. 596

15 fee paid, 1 class postage paid. 4-7-1934
From Mary Alvestone Clerk
Addressed to Chad Halliday
427 W. Garden St. Pensacola Fla



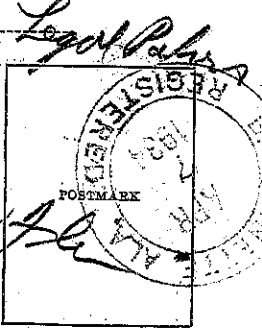
RECEIPT FOR REGISTERED ARTICLE NO. 600

15 fee paid, 1 class postage paid. 4-7-1934
From Mary Alvestone Clerk
Addressed to Robert D. ...
1011 East ... Pensacola Fla



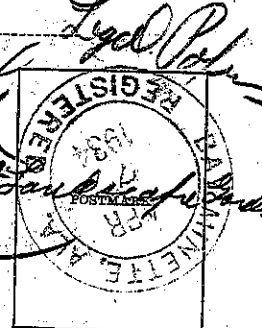
RECEIPT FOR REGISTERED ARTICLE NO. 597

15 fee paid, 1 class postage paid. 4-7-1934
From Mary Alvestone Clerk
Addressed to ...
1011 East ... Pensacola Fla



RECEIPT FOR REGISTERED ARTICLE NO. 592

15 fee paid, 1 class postage paid. 4-7-1934
From Mary Alvestone Clerk
Addressed to ...
Shreveport La



RECEIPT FOR REGISTERED ARTICLE NO. 593

15 fee paid, 1 class postage paid. 4-7-1934
From Mary Alvestone Clerk
Addressed to ...
Seattle Wash



RECEIPT FOR REGISTERED ARTICLE NO.

From: Mary Catherine Clark
Addressed to: Mrs. W. J. [unclear]
1111 East [unclear] St.
[unclear] [unclear] [unclear]
Delivery restricted to addressee
Return receipt for [unclear]
Postmaster, pay [unclear]
39

RECEIPT FOR REGISTERED ARTICLE NO.

From: Mary Catherine Clark
Addressed to: Mrs. W. J. [unclear]
1111 East [unclear] St.
[unclear] [unclear] [unclear]
Delivery restricted to addressee
Return receipt for [unclear]
Postmaster, pay [unclear]
39

RECEIPT FOR REGISTERED ARTICLE NO.

From: Mary Catherine Clark
Addressed to: Mrs. W. J. [unclear]
1111 East [unclear] St.
[unclear] [unclear] [unclear]
Delivery restricted to addressee
Return receipt for [unclear]
Postmaster, pay [unclear]
39

RECEIPT FOR REGISTERED ARTICLE NO.

From: Mary Catherine Clark
Addressed to: Mrs. W. J. [unclear]
1111 East [unclear] St.
[unclear] [unclear] [unclear]
Delivery restricted to addressee
Return receipt for [unclear]
Postmaster, pay [unclear]
39

RECEIPT FOR REGISTERED ARTICLE NO.

From: Mary Catherine Clark
Addressed to: Mrs. W. J. [unclear]
1111 East [unclear] St.
[unclear] [unclear] [unclear]
Delivery restricted to addressee
Return receipt for [unclear]
Postmaster, pay [unclear]
9

Post Office Requirement
OFFICIAL BUSINESS
REGISTERED ARTICLE
No. 596
INSURED PARCEL

PERMIT FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, AND
POSTMARK OFFICE
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone
Street and Number or Post Office Box
Post Office at Mobile Ala.
State

Post Office Requirement
OFFICIAL BUSINESS
REGISTERED ARTICLE
No. 600
INSURED PARCEL

PERMIT FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, AND
POSTMARK OFFICE
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone
Street and Number or Post Office Box
Post Office at Mobile Ala.
State

Post Office Requirement
OFFICIAL BUSINESS
REGISTERED ARTICLE
No. 595
INSURED PARCEL

PERMIT FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, AND
POSTMARK OFFICE
1934
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone
Street and Number or Post Office Box
Post Office at Mobile Ala.
State

Post Office Department

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$300

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 597

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone

Street and Number (or Post Office Box) Clark Bay Winnetta Ala

Post Office at _____

Rev. 2-24 06-010 State _____

Post Office Department

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$300

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 594 39

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone

Street and Number (or Post Office Box) Clark Bay Winnetta Ala

Post Office at _____

Rev. 2-24 06-010 State _____

Post Office Department

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$300

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 596 39

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone

Street and Number (or Post Office Box) Clark Bay Winnetta Ala

Post Office at _____

Rev. 2-24 06-010 State _____

Post Office Department

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$300

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 599 39

INSURED PARCEL

No. _____

POSTMARK OF DELIVERING OFFICE
AND DATE OF DELIVERY

Return to Mrs Mary Alice Stone

Street and Number (or Post Office Box) _____

Post Office at _____

Rev. 2-24 06-010 State _____

RECEIPT FOR REGISTERED ARTICLE NO. 597 39

19 fee paid. 1 class postage paid. 4-7-1934 (Date)

From Mary Alice Stone, Clerk (Sender)

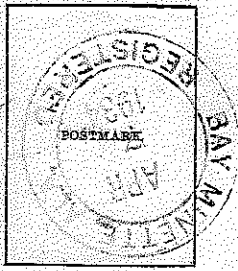
Addressed to Jewel Hughen (Street and number) Brent, Fla. (Post office and State)

Brent, Fla. (Address)

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee 3 in person Special delivery fee

Delivery restricted to addressee or order Postmaster, per as



After Five Days Return to
MRS. MARY ALICE STONE
REGISTER AND CLERK OF THE CIRCUIT
COURT, BALDWIN COUNTY
BAY MINETTE, ALABAMA

39



597

Deliver to addressee only.

REGISTERED

~~155~~ Jewel Hughen
Brent, Florida

597

Mitre



4/8/34

39

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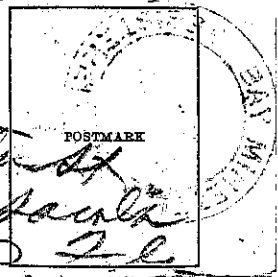
RECEIPT FOR REGISTERED ARTICLE NO.

15 fee paid. *1* class postage paid. *4-7*, 19*34*
From *Mary Alice Stout Clark* (Date)
(Sender)

Addressed to *Richard Thompson* (Street and number) (Post office and State)
Mrs Carl Halleday 2901 Gault St (Address)
(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee *3* (in person) Special delivery fee *1.00*
Delivery restricted to addressee (or order) Postmaster, per *W. L.*



Mitre



4/8/34

39

*Ma Stone
ast.*

RECEIPT FOR REGISTERED ARTICLE NO.

1/5 fee paid. *1* class postage paid. *4-7*, 1934 (Date)

From *Marceline Stone Clark* (Sender)

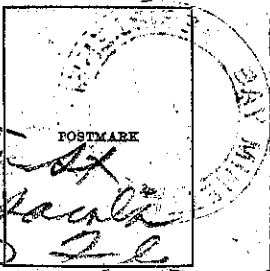
Addressed to *Edward Thorne* (Post office and State)

Miss Carl Halle (Address)

(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee *3* in person *4* Special delivery fee *10*
Delivery restricted to addressee or order Postmaster, per *OT 2c*



39.

No. 39

CIRCUIT COURT OF
BALDWIN COUNTY,
IN EQUITY.

J. C. Phillips

vs.

Ella Robinson, et al.

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 16

day of April 192 34

Register.

391

No. 39

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

J. C. Phillips,

vs.

Ella Robinson, et al.

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 16th

day of April 192 34

M. A. Stone

Register.

No. 39

CIRCUIT COURT OF

Baldwin COUNTY,
IN EQUITY.

J. C. Phillips,

vs.

Ella Robinson, et al.

CERTIFICATE OF REGISTER AS TO
NOTICE BY REGISTERED MAIL.

Filed in office on this

21

day of

April

1934

M. A. Stone

Register.

RECORDED

39 U

No. 39

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

J. C. Phillips,

vs.

Ella Robinson, et al.

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 16th

day of April 1954

M. R. Stone
Register.

~~RECORDED~~

391

No. 39

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

~~RECORDED~~

J.C. Phillips,

vs.

Ella Robinson, et al.

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 16th

day of April 192 34

Register.

No. 39

139

CIRCUIT COURT OF
BALDWIN COUNTY,
IN EQUITY.

J. C. Phillips,

vs.

Ella Robinson et al.

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 16th

day of April 1924

M. R. Stone

Register.

~~CONFIDENTIAL~~

39

No. 39

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

J. C. Phillips,

vs.

Ella Robinson, et al.

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this

21

day of

April

1924

M. A. Stone

Register.