

TO THE HONORABLE A.E. GAMBLE, JUDGE OF CIRCUIT COURT,  
BALDWIN COUNTY, ALABAMA, IN CHANCERY.

Isaac King, a resident of Baldwin County, Alabama, over the age of Twenty-one years, brings this his bill of complaint against R.F. Powell, Laura Powell, his wife, A.M. <sup>Kimme</sup> ~~Marie~~ and George Herbert Bourges, and thereupon your Orator complains and says:

First, That the said R.F. Powell, Laura Powell, and A.M. <sup>Kimme</sup> ~~Marie~~ are each over the age of Twenty-one years and reside in Baldwin County, Alabama; that the said George Herbert Gourges is over the age of Twenty-one years and resided at Pensacola, Florida, that his post office address is <sup>21 N Devillier St</sup> Pensacola, Florida/

Second, Your Orator claims to own in his own right and is in peaceable possession of the following described lands, always claiming to own them, namely, the Southwest Quarter of the Northwest Quarter of Section Thirty, Township Six South of Range Three East, in Baldwin County, Alabama.

Third, That each of the defendants claim or is reputed to claim some right, title or interest in or incumbrance upon the said lands and your Orator hereby calls upon each of said Defendants to set forth and specify all his title, claim, interest or incumbrance upon the said lands or any part thereof, and how and by what instrument or instruments the same is derived.

Fourth: That no suit is pending to test the validity of such title, claim, lien or incumbrance asserted by the Defendants or either of them or anyone else, there being no pending litigation involving

in any way the title to said lands.

WHEREFORE, premises considered your Orator respectfully prays that this Honorable Court take jurisdiction of this cause, that each of said defendants be made defendants to this bill of complaint and that each be served with appropriate process and be required to plead, answer or demur to this bill of complaint within the time and under the penalties prescribed by law and the practice of this Honorable Court; that upon final hearing of this cause it be adjudged and decreed that the defendants and none of them have any right, title or interest in ~~and~~ hold or have any lien upon the lands hereinabove described, or any part thereof; and that <sup>as</sup> against said defendants and each of them, your Orator has a good and perfect title to all of said lands and that his said title to said lands be forever quieted as against defendants and each of them. Your Orator prays for such <sup>or different</sup> further <sup>other</sup> relief as he may be equitably entitled to receive in the premises and your Orator will forever pray, etc.

*Richard Austin Beebe*  
Solicitors for Complainant.

Each of the defendants ~~are~~ required to answer each paragraph of the foregoing bill of complaint numbered from one to four, inclusive, but not under oath, oath is hereby expressly waived.

*Richard Austin Beebe*  
Solicitors for Complainant.

STATE OF ALABAMA

BALDWIN COUNTY.

Before me, Connelia Hall, a Notary Public in and for said State and County, this day personally appeared W.C. Beebe, who being by me duly sworn deposes and says that he is one of the attorneys in the above styled cause and that he knows the contents of such bill of complaint and that the facts therein stated are true to the best of his knowledge and belief.

W.C. Beebe

Sworn to and subscribed before me on this the 24th day of June, 1918.

Connelia Hall  
Notary Public, Baldwin County,  
Alabama.

Isaac King )  
vs. )  
R.F.Powell, et al, )

In the Circuit Court of Baldwin County,  
Alabama, in equity. Case Number 101.

It is agreed in the above style cause by and between Rickarby, Frazer and Beebe, counsel for Isaac King and R.F.Powell, that the said R.F.Powell will acquire the title of George Bourges, defendant in said cause, to the lands involved in said suit and other lands and will quitclaim to the said Isaac King the following described property to-wit:

Southwest Quarter of the Northwest Quarter of Section Thirty, Township Six South of Range Three East, and Four acres described as follows: commencing at the Southwest Corner of the Southeast Quarter of the North west Quarter of Section Thirty, Township Six South, of Range Three East, running thence North Seventy yards; thence East Two hundred and eighty yards; thence South Seventy yards; thence West Two hundred and Eighty yards; to the place of beginning, being in the Southeast Quarter of the Northwest Quarter of Section Thirty, Township Six South of Range Three East,

The said Isaac King will pay the said R.F.Powell for quitclaim deed to the above described lands the amount of Fifty Dollars cash upon the delivery of deed and will pay all court cost in the above style cause.

This agreement shall be filed and become a part of the Records in the above style cause.

*Rickarby, Frazer & Beebe*  
Attorneys for Isaac King.  
*R.F. Powell*

Filed 5/16/919  
T. W. Kinnear  
Register

10/10/19  
10/10/19

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 R.F. Powell, Laura Powell, and A.M. Kinne,

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

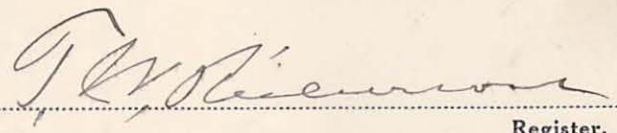
Isaac King,

against said R.F. Powell, Laura Powell and A.M. Kinne,

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, T. W. Richerson, Register of said Circuit Court, this 24th day of June

1918.

  
Register.

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

*Original*

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No. 101.

SUMMONS.

Isaac King

vs.

R. F. Powell,

Rickaby Austill and Beebe.

Solicitor for Complainant.

Recorded in Vol..... Page.....

*None is at  
Sumnerdale  
or near there*

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this 24th

day of June 1918

Sheriff.

Executed this 2 day of

October 1918

by leaving a copy of the within Summons with

*R. F. Powell and  
Laura Powell*

Defendant

*C. E. Edwards*

Sheriff

By *S. J. Andrews*

Deputy Sheriff.

*Ann Skinn's  
copy returned  
not found*

*O. B. Richerson - D*

Post Office Department

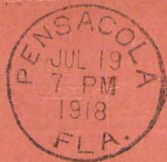
OFFICIAL BUSINESS

REGISTERED ARTICLE

No. *1519*

INSURED PARCEL

No. \_\_\_\_\_



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

POSTMARK OF DELIVERING  
OFFICE

AND DATE OF DELIVERY

Return to *T. M. Richerson*

(NAME OF SENDER)

Street and Number, }  
or Post Office Box, }

Post Office at

*T. M. Richerson  
1201 S  
Pine  
Bay*

*Florida*  
State *Fla*



# RETURN RECEIPT.

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

*Geo H Brunge*

(Signature or name of addressee.)

*212 Deville St*

(Signature of addressee's agent.)

Date of delivery, *JUL 19 1918*, 191