

-----X  
 LOUIS SWANSON <sup>and</sup> his )  
 wife, AUGUSTA SWANSON. )  
 his wife Complainants )  
 -----X

-vs-

MINA L. PETERSON. )  
 Defendant )  
 -----X

IN EQUITY  
 IN THE CIRCUIT COURT  
 STATE OF ALABAMA  
 BALDWIN COUNTY  
 No \_\_\_\_\_  
 J

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AND THE HONORABLE, A. E. GAMBLE, JUDGE THEREOF, SITTING IN EQUITY:-

Your Complainants, Louis Swanson and Augusta Swanson, his wife, bring this, their bill of complaint against Mina L. Peterson, defendant, and respectfully represent and show unto your Honor and unto this Honorable Court as follows:-

-FIRST-

That your complainants are both over the age of twenty-one years. That they both, at present, reside in the City of Chicago, County of Cook and State of Illinois. That the subject matter of this cause is real property which is situated and lies in the County of Baldwin and State of Alabama. That this complaint is exhibited against Mina L. Peterson, the defendant, and that said defendant is over the age of twenty-one years, is a non-resident of the State of Alabama, residing at 5643 Magnolia Avenue, in the City of Chicago, County of Cook and State of Illinois, her more particular address is unknown to complainants and cannot be ascertained after diligent inquiry.

-SECOND-

That your complainants are in the peaceable possession of, claiming to own the same in their own right, and hold the legal title to, the following described real property, situate, lying and being in the County of Baldwin and State of Alabama and known and described as follows, viz:-

The southeast quarter of the northeast quarter of section seventeen in township six south of range three east (SE $\frac{1}{4}$  of NE $\frac{1}{4}$  Sec. 17 Tp. 6 S. R. 3 E.).....

-THIRD-

That the defendant, Mina L. Peterson, claims, or is reputed to claim, the lands above described, or some part thereof, or some in-



terest therein or claims or is reputed to claim some right, title or interest in or encumbrance upon such lands.

-FOURTH-

That there is no suit pending to enforce or test or enforce the <sup>validity</sup> validity of such title, claim or encumbrance, or reputed title, claim or encumbrance, in, to or upon the above described lands, or any part thereof.

-FIFTH-

WHEREFORE your complainants call upon the defendant to set forth and specify her title, claim, interest in or encumbrance on, upon or to said lands or parts thereof, and how and by what instrument the same is or are derived.

PRAYER FOR PROCESS.

To the end therefore, that equity may be done in the premises, complainants pray that proper orders and decrees may be made; that a subpoena may be issued and notice given to the defendant, Mina L. Peterson, in the usual manner and form and according to the law in such cases and according to the usual practices of this honorable court, making the said defendant, Mina L. Peterson, a party respondent to this bill of complaint, requiring her to appear and plead, answer or demur to the same, within the time required by law, under the pains and penalties of this honorable court, and requiring her to set forth her title, claim, interest or encumbrance, in, to or upon said lands, or any part or parts thereof, and how and by what instrument or instruments or conveyances, or in what manner the same are derived and created.

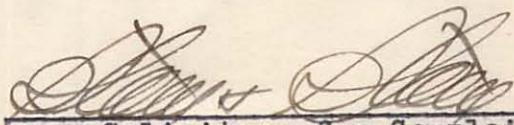
PRAYER FOR RELIEF.

Your Complainants further pray that upon a final hearing of this cause, that your Honor will render, adjudge and decree that the defendant and respondent has no title, estate, claim or interest in or to, or encumbrance upon, the above described lands, or any part or parts thereof; that the title of the complainant to said lands is absolute and in fee, free from all encumbrances, right, title, interest or claim which the said defendant, Mina L. Peterson, may have, or be reputed to have; and that your Honor will grant unto your complainants such other and further and such further and different relief as they may be, in equity and good conscience entitled, And as in duty bound, they will

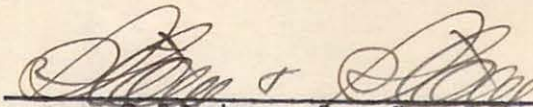


page number three.

ever pray, etc., etc.,

  
Solicitors for Complainants.

FOOT NOTE:- The defendant, Mina L. Peterson, is required to answer each and every paragraph of the foregoing bill of complaint, from "FIRST" to "FIFTH", both inclusive, not under oath, however, answer under oath being hereby expressly waived.

  
Solicitors for Complainants.

HAMMER  
BOND

LOUIS SWANSON and AUGUSTA :  
SWANSON his wife, :  
Complainants, :  
vs. :  
MINA L. PETERSON, :  
Defendant. :

IN EQUITY  
IN THE CIRCUIT COURT  
STATE OF ALABAMA  
BALDWIN COUNTY

STATE OF ILLINOIS :  
: SS.  
COUNTY OF COOK. :

Personally appeared before me, George E. Q. Johnson, a Notary Public of the County and State aforesaid, said Louis Swanson, who is known to me to be one of the complainants in the above styled cause, who, after being by me first duly sworn, deposes and says under oath:

That the defendant, Mina L. Peterson, in the above styled cause, is a non-resident of the State of Alabama, residing at 5643 Magnolia Avenue, in the City of Chicago, County of Cook and State of Illinois.

Also, that the defendant, Mina L. Peterson, is over the age of twenty-one years.

Louis Swanson

Sworn to and subscribed before me  
this 15<sup>th</sup> day of August, A.D. 1919.

George E. Q. Johnson  
Notary Public, Cook County, Illinois.  
My commission expires:

January 21<sup>st</sup> 1924.





Notice to Non-Residents.

Louis Swanson and Augusta Swanson, his wife, Complainants. vs. Mina L. Peterson, Defendant. In the Circuit Court—Equity Side. State of Alabama, Baldwin County. No. 187.

ALL COUNTY ADVERTISING

CIRCULATION GUARANTEED TO BE THE LARGEST IN BALDWIN COUNTY

# THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice to Non-Residents.

Louis Swanson and Augusta Swanson, his wife, Complainants. vs. Mina L. Peterson, Defendant. In the Circuit Court—Equity Side. State of Alabama, Baldwin County. No. 187.

Was published in said Newspaper for 4 consecutive weeks

issues:

Publication	August 21st, 1919	Vol.	30	No.	27
"	August 28th, 1919	Vol.	30	No.	28
"	September 4th, 1919	Vol.	30	No.	29
" " fourth "	September 11th, 1919	Vol.	30	No.	30

Subscribed and sworn to before the undersigned

this 18th day of Sept 1919.

T. W. Richerson  
Clerk Circuit Court.

Abner J. Smith  
Publisher.

Done and ordered at Bay Minette, Baldwin County, Alabama, on this 18th day of August, 1919.  
T. W. Richerson,  
Register.  
Stone and Stone,  
Solicitors for Complainants.  
27-4t



(2)

Filed Sept 18th 1919  
D. W. Richmond  
Register

LOUIS SWANSON and )  
AUGUSTA SWANSON, )  
Complainants )  
Vs )  
MINA L. PETERSON, )  
Defendant. )

CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA.

IN EQUITY. NO. 187.

Comes the defendant in the above styled cause  
and demurs to the bill of complaint and for grounds of  
demurrer sayeth:

There is no equity in the bill.

*Richard T. Fager & Beche*  
Solicitors for Defendant.



4<sup>th</sup> car

3

or

Filed Oct 20th 1919.

8, 0'clock P.M.

J. M. Richardson

Register

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-----X  
LOUIS SWANSON, and  
AUGUSTA SWANSON, his  
wife, Complainants.

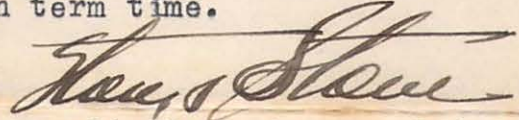
-vs-

MINA L. PETERSON,  
Defendant.  
-----X

IN THE CIRCUIT COURT-EQUITY SIDE  
STATE OF ALABAMA.  
BALDWIN COUNTY.

No. 187.

Come the complainants, by their solicitors of Record Stone & Stone, in the above styled cause, and moves the court to set down for hearing in vacation the demurrer to the complaint in this cause filed by the defendant on the 20th day of October, 1919, so that the same may be decided by the Judge of this honorable court the same as if the hearing was had in term time.



Solicitors for Complainants.



3rd 187 ~~4~~ R

Motion for hearing  
of demurrer

Jackson et al  
v. Campbell

Miss L. Peterson  
deft

Circuit Court - East  
Side of Ala  
Bellamy County

Filed January 31  
1920

J. W. Dickerson  
Registrar



-----X  
LOUIS SWANSON and )  
AUGUSTA SWANSON, his )  
wife, complainants. )  
-vs- )  
MINA L. PETERSON, )  
Defendant. )  
-----X

IN THE CIRCUIT COURT-EQUITY

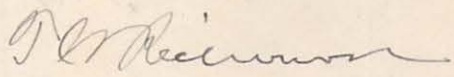
STATE OF ALABAMA.  
BALDWIN COUNTY.

No. 187.

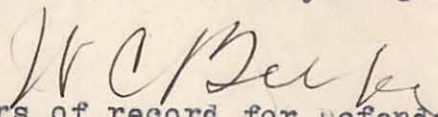
TO;-Messrs Rickarby, Frazer & Beebe, Solicitors of Record  
for the Defendant.

You are hereby notified that the complainants in the above  
stated cause have applied to the Court to have set down for  
hearing in vacation the demurrer filed by the defendant to the  
Original bill in this cause on October 29th, 1919, and that said  
demurrer will be submitted to the judge of said court of Baldwin  
County, Alabama, on the 10th day of February, 1920, being ten  
days after the service of this notice on you.

Done at office in Bay Minette, Baldwin County, Alabama,  
this 31st, day of January, 1920.

  
Register of Circuit Court-Equity  
Side, State of Alabama. Baldwin  
County.

Service of the above notice is hereby accepted by the under-  
signed solicitors of record for the defendant and further written  
notice is hereby expressly waived. This 31st day of January, 1920

  
Solicitors of record for Defendant.



2<sup>nd</sup> 187

R

Notice of Learning  
Remuner

Samson et al  
Compt

Mar & Peterson  
1871

Compt Court Equity  
State of Ill  
Bellevue, Cook

Filed Jan 31 1872

J. M. Peterson  
Register



-----X  
LOUIS SWANSON and )  
AUGUSTA SWANSON, his wife. )  
Complainants. )  
-vs- )  
MINA D. PETERSON. )  
Defendant. )  
-----X

IN THE CIRCUIT COURT-EQUITY SIDE.  
STATE OF ALABAMA.  
BALDWIN COUNTY.

No. 187.

This cause coming on to be heard in vacation upon the original bill of complaint and demurrer thereto filed by the defendant, and upon due consideration of the said demurrer the court is of the opinion that it is without merit or ground,

THEREFORE, it is ordered, adjudged and decreed that the said demurrer be and the same is hereby overruled and the complaint stands as originally filed.

IT is further order, adjudged and decreed that the defendant have and she is hereby given 20 days from the date of this decree to appear and plead, answer or demur to the said complaint.

Done at Chambers this 29<sup>th</sup> day of March, 1920.

John D. Leigh  
judge.



L

*Faint handwritten text, possibly "The ..."*

*1870*

Decree overruling  
demurrer.

Filed Mar 30<sup>th</sup> 1870  
D. W. Keenan  
Register

Decree recorded on  
minutes



Motion for decree "pro confesso."

-----X  
LOUIS SWANSON AND  
AUGUSTA SWANSON, his wife,  
Complainants.

-vs-

MINA L. PETERSON.  
-----X

IN THE CIRCUIT COURT-EQUITY.  
STATE OF ALABAMA.  
BALDWIN COUNTY.

No. 187.

Comes the Complainants in the above style, cause and show unto the court that the original bill of complainants was filed on Aug. the 18th, 1919; that service upon the defendant was had by publication: that demurrer was interposed to original bill on Oct. 20, 1919: that said demurrer was duly heard upon motion on the 29th day of Mar. 1920. Upon hearing of demurrer the same was over ruled and the defendant was given 20 days from the date of the decree in which to appear and plead, answer or demur to the said complaint.

That the said defendant has to this day, which is morethan 20 days from the date of said decree, failed to appear and plead, answer or demur to said complaint.

THEREFORE the complainants move that a decree "Pro confesso" be rendered against the defendant.

This the 3rd day of May 1920, being Monday.

*Stamps Stone*  
-----

Solicitor for Complainants.











~~Over~~ 187. ~~P~~ R  
Decree "pro confesso"

Augusta & Louis  
Swanson.

v.s.  
Mena K Peterson

Circuit Court - Equity  
State of Alabama  
Baldwin County

Filed May 3, 1920

D W Riceman  
Register



FINAL DECREE.

-----X  
LOUIS SWANSON and  
AUGUSTASWANSON  
his wife, Complainants.

-vs-

MINA L. PETERSON.  
Defendant.  
-----X

IN EQUITY  
IN THE CIRCUIT COURT  
STATE OF ALABAMA  
BALDWIN COUNTY

147  
No-----

This cause is submitted in term time for final decree upon pleadings, decree pro confesso and proof as noted by the Register; and, upon the consideration of the cause the court is of the opinion that the complainants are entitled to the relief prayed for in their said bill: it is therefore:

ORDERED, ADJUDGED AND DECREED by the court that the Defendant MINA L. PETERSON, has <sup>no</sup> claim or interest in, or to or encumbrance upon, the following described lands, namely:

The southeast <sup>2</sup>quarter of the northeast quarter of section seventeen in township six south of range three east (SE $\frac{1}{4}$  of NE $\frac{1}{4}$  Sec. 17 Tp. 6 S. R. 3 E.).....

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the court that the title of the complainants, Louis Swanson and Augusta Swanson, his wife, is good and perfect as against the Defendant and that the title of the complainants to said lands is absolute and in fee, free from all encumbrances, right, title, interest or claim which the said Defendant Mina L. Peterson, may have had or was reputed to have in the same: that a certified copy of this decree be recorded in the office of the Judge of Probate of Baldwin County, State of Alabama: that a certified copy of this decree be mailed by the Register to the Defendant: and that the complainants do pay the cost of this cause, for which let execution issue.

This 2<sup>nd</sup> day of June, 1920.

John D. Leigh  
Judge.

BOND

HOW - LEFT



-187-  
Final Decree

Swanson, et al

-vs- 9

Mina L. Peterson  
Heft.

Circuit Court-Equity  
State of Alabama  
Baldwin County

Filed ~~May~~ June 2<sup>nd</sup>  
1970

J. M. Peterson

Plaintiff

Decree recorded on  
minutes.

*John A. Smith*

RECORDED

FILED



TWENTY-FIRST JUDICIAL CIRCUIT  
OF ALABAMA  
JOHN D. LEIGH, JUDGE  
BREWTON, ALA

June 18, 1920.

Hon. T. W. Richerson,  
Bay Minette, Alabama.

Dear Sir:-

IN RE: Louis Swanson et. al. vs.  
Mina L. Peterson.

I am just in receipt of a letter from Messrs. Stone & Stone requesting me to send them the decree in this matter, which you will find herewith enclosed together with all other papers in the case.

It is my recollection that they made a motion while court was in session June 2nd. for final decree which I granted, so I have accordingly dated the decree "June 2nd."

I think you will find all papers enclosed and if not, let me know and I will forward any other I may have.

With regards and best wishes, I am,

Yours sincerely,

*John D. Leigh*

C. C.

Stone & Stone,  
Bay Minette, Ala.



After five days return to  
James M. Voltz  
Probate Judge, Baldwin County  
Bay Minette, Ala.

Hon. J. W. Richerson

Richardson  
Miss L. Pelton



FINAL DECREE.

Louis Swanson and Augusta Swanson, )  
his wife, Complainant. )

-vs-

Mina L Peterson. Defendant. )  
----- )

IN EQUITY. In the Circuit

Court State of Alabama,

Baldwin County.

No. 187.

This cause is submitted in term time for final decree upon pleadings, decree pro confesso and proof as noted by the Register; and upon the consideration of the cause the Court is of the opinion that the complainants are entitled to the relief prayed for in their said bill: it is therefore :

Ordered, <sup>by the Court</sup> adjudged and decreed that the Defendant Mina L Peterson has no claim or interest in, or to or encumbrance upon, the following described lands, namely:

The Southeast quarter of the northeast quarter of Section seventeen in township six south of range three east ( S.E.  $\frac{1}{4}$  of N.E.  $\frac{1}{4}$  Sec 17 Tp 6 S.R. 5.E.)

It is further ordered , adjudged and decreed by the Court that the title to the complainants, Louis Swanson and Augusta Swanson, his wife, is good and perfect as against the Defendant and that the title of the complainants to said lands is absolute and in fee, free # from all incumbrances, right, title, interest or claim which the said Defenant Mina L Peterson , may have had or was reputed to have in the same: that a certified copy of this decree be recorded in the office of the Judge of Probate of Baldwin County, State of Alabama; that a certified copy of this decree be mailed by the Register to the Defendant : and that the Complainants pay the costs of this cause, for which let execution issue.

This 2nd, day of June, 1920.

John D Leigh, Judge.

-----  
State of Alabama,  
Baldwin County,

Circuit Court, In E-quity.

I.T.W. Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full , true and correct copy of the decree rendered by said Court on the 2nd, day of June, 1920, in the cause of Louis Swanson, and Augusta Swanson, Complainants, --vs-- Mina L Paterson, Defendant, as appears of record in said Court.

Witness my hand and the seal of said Court, this the 21st day of June, 1920.

*I.T.W. Richerson*  
----- Register.





