

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 ~~DENNISTON & BOYKIN CO., BALDWIN LAND HOLDING CO., GAILLARD & GAILLARD, ATTYS., AND DAVIDSON & TAYLOR TURPENTINE CO.,~~

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 LILLIE COBB, MACKIE COBB, & BEN COBB

against said ~~DENNISTON & BOYKIN CO., BALDWIN LAND HOLDING COMPANY, GAILLARD & GAILLARD, ATTYS., AND DAVIDSON & TAYLOR TURPENTINE CO.,~~

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 20th day of April, 1932.

\_\_\_\_\_, Register

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

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 ~~DENNISTON & BOYKIN CO., BALD. LAND HOLDING CO., GAILLARD & GAILLARD, ATTYs., AND DAVIDSON & TAYLOR TURPENTINE CO.,~~

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 20<sup>th</sup> day of April, 1939.

\_\_\_\_\_, Register

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

Any party defendant is entitled to a copy of the bill upon application to the register.

~~Land Holding Co.,  
& Gaillard, Atty's.  
& Taylor Turpentine Co.~~  
**THE STATE OF ALABAMA,**  
Baldwin County

**IN EQUITY**

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_\_

**Summons**

**Sheriff.**

Executed this \_\_\_\_\_ day of \_\_\_\_\_

LILLIE COBB, MACKIE COBB,  
BEN COBB.,

**Complainants,**

\_\_\_\_\_ 193\_\_\_\_\_

by leaving a copy of the Summons with \_\_\_\_\_

**vs.**

DENNISTON & BOYKIN CO.,  
BALDWIN LAND HOLDING CO.,  
GAILLARD & GAILLARD, ATTYs.,  
& DAVIDSON & TAYLOR  
TURPENTINE CO.,

**Respondents.,**

ORVIS M. BROWN  
**Solicitor for Complainant**

Defendant

Sheriff

Deputy Sheriff

By \_\_\_\_\_

THE STATE OF ALABAMA,  
Baldwin County.

No. 325 CIRCUIT COURT

November 28th, 1936

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon MACK COBB, alias MACKY COBB,

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against MACK COBB,

Alias MACKY COBB, Defendant by BALDWIN LAND HOLDING COMPANY,  
a Corporation,

Plaintiff

Witness my hand this 28th day of November, 1936

*R. P. Duck*

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

RECORDED

BALDWIN LAND HOLDING  
COMPANY,

Plaintiff,

versus

MACK COBB, alias  
MACKY COBB,

Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

\*\*\*\*\*

The plaintiff sues to recover the following tract of land located in Baldwin County, Alabama, to-wit:

Approximately six acres, clear and under fence, located in the south half (S $\frac{1}{2}$ ) of the southeast quarter (SE $\frac{1}{4}$ ) of the southeast quarter (SE $\frac{1}{4}$ ) of section 22, Township 5 South, Range 5 East;

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered, and unlawfully withholds, together with \$100.00 for the detention thereof.

GATILLARD & GATILLARD  
Attorneys for the plaintiff.

RECORDED

*Handwritten notes:*  
Book 11 page 23  
11/10/1918

LILLIE COBB, MACKIE COBB, and BEN COBB, and specify his, her or its title, claim, interest or

Complainants

-10-

DENNINGTON & BOYKIN COMPANY,  
BALDWIN LAND HOLDING COMPANY,  
GAILLARD & GAILLARD, ATTORNEYS,  
AND D. VIRDEN & TAYLOR TURPENTINE  
COMPANY,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Comes your Complainants, LILLIE COBB, MACKIE COBB and BEN COBB, and shows this their Bill of Complaint against the following described respondents, DENNINGTON & BOYKIN COMPANY, BALDWIN LAND HOLDING COMPANY, GAILLARD & GAILLARD, ATTORNEYS, AND D. VIRDEN & TAYLOR TURPENTINE COMPANY, and brings this their bill of complaint against any and all persons, firms, or corporations claiming any title to, or interest in, lien or incumbrance upon the land or any part thereof of this complaint said land being described as follows: to-wit, SOUTH HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION TWENTY TWO, TOWNSHIP FIVE SOUTH OF RANGE FIVE EAST, CONTAINING TWENTY ACRES, MORE OR LESS, and Complainants further respectfully show unto your Honor as follows:

FIRST: That they are in actual, peaceable possession of the said tract of land heretofore described and have been for the past twenty years claiming to own the same in their own right by adverse possession and in fee simple by deed of gift which has not been reduced to writing.

SECOND: THAT no suit is pending to test the Complainants' title to or interest in the said land.

THIRD: Complainants further show that they claim the entire fee simple title in and to the said land having acquired the same by deed of gift which has not been reduced to writing and by having had continuous adverse possession for twenty years.

FOURTH: Complainants further show unto your Honor that the above named individuals, firms or corporations are reputed to claim some right, title or interest in or incumbrance upon said lands and hereby request that they set forth and specify their title, claim, interest or incumbrance and how and by what instrument the same has been derived and created.

FIFTH: Complainants further show unto your Honor that they know of no one other than those who have been in actual possession of the said lands and that no one is known to your Complainants to claim this land or any part thereof or any interest therein except the Complainants and the Respondents in

*Lillie Cobb*  
*Mackie Cobb*  
*Ben Cobb*

STATE OF ALABAMA )  
BALDWIN COUNTY )

Personally appeared before me, John J. Garms, a Notary Public in and for said State and County, Lillie Cobb, Mackie Cobb and Ben Cobb, who upon their oath depose and say:-

That they are the Complainants in the above styled cause and that the facts stated in the foregoing Bill of Complaint upon knowledge are true; and that upon their knowledge, information and belief they so state that the same are true.

Lillie Cobb  
Mackie Cobb  
Ben Cobb

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 15th day of April, 1943.

John J. Garms  
Notary Public, Baldwin County,  
State of Alabama.

My commission expires  
March, 17th 1943



L E A S E

The undersigned, BALDWIN LAND HOLDING COMPANY, hereby leases and rents unto MACKEY COBB the following described real property in Baldwin County, Alabama, to-wit:

South Half of the Southeast Quarter of the Southeast Quarter and the Northeast Quarter of the Southeast Quarter of the Southeast Quarter, all in Section 22, Township 5 South, Range 5 East;

for the term of one year beginning February 1st, 1937, and ending January 31st, 1938 at a rental of Ten dollars (\$10.00) per annum, Five dollars (\$5.00) payable in cash and Five dollars (\$5.00) payable six months after date.

In the event that MACKEY COBB, or his assigns, purchases this property within the term of this lease upon terms agreeable to the lessor, any sums paid for rent will be credited on the agreed purchase price.

The lessee, MACKEY COBB, agrees to hold possession of said property belonging to the lessor, BALDWIN LAND HOLDING COMPANY, in such a manner as not to commit waste on said property and shall have no power to cut the timber therefrom or to work said timber for turpentine purposes.

IN WITNESS WHEREOF, the parties have hereunto set their hands and seals this 1st day of February, 1937.

BALDWIN LAND HOLDING COMPANY,

BY \_\_\_\_\_ (SEAL)  
As its President.

\_\_\_\_\_  
(SEAL)

LAW OFFICES OF  
GAILLARD & GAILLARD  
717-21 ANNEX FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA

S. PALMER GAILLARD  
S. PALMER GAILLARD, JR.  
WALTER F. GAILLARD

November 1, 1938

Mr. Mackey Cobb  
c/o Davidson & Taylor  
Robertsdale, Alabama

Dear Sir:

You have been in possession of the South Half of the Southeast Quarter of the Southeast Quarter of Section 22, Township 5 South, Range 5 East, under a lease. You are in default in the terms of this lease. You are hereby notified that your possessive interest in and to this piece of property is terminated and you are hereby notified to vacate this property.

You are further notified that you will be held accountable for any damages to this property.

Yours very truly,



S. P. GAILLARD, JR.

Gjr/md



BILL OF COMPLAINT

LILLIE COBB, MACHIE COBB,  
AND BEN COBB,

Complainants

-vs-

DENNISTON & BOYKIN COMPANY,  
BALDWIN LAND HOLDING COMPANY,  
GAILLARD & GAILLARD, ATTORNEYS,  
AND DAVIDSON & TAYLOR TURPENTINE  
COMPANY,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Come your Complainants, LILLIE COBB, MACHIE COBB and BEN COBB, and show this their Bill of Complaint against the following described respondents, DENNISTON & BOYKIN COMPANY, BALDWIN LAND HOLDING COMPANY, GAILLARD & GAILLARD, ATTORNEYS, AND DAVIDSON & TAYLOR TURPENTINE COMPANY, and bring this their bill of complaint against any and all persons, firms, or corporations claiming any title to, or interest in, lien or incumbrance upon the land or any part thereof of this complaint said land being described as follows: to-wit, SOUTH HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION TWENTY TWO, TOWNSHIP FIVE SOUTH OF RANGE FIVE EAST, CONTAINING TWENTY ACRES, MORE OR LESS, and Complainants further respectfully show unto your Honor as follows:

FIRST: That they are in actual, peaceable possession of the said tract of land heretofore described and have been for the past twenty years claiming to own the same in their own right by adverse possession and in fee simple by deed of gift which has not been reduced to writing.

SECOND: THAT no suit is pending to test the Complainants' title to or interest in the said land.

THIRD: Complainants further show that they claim the entire fee simple title in and to the said land having acquired the same by deed of gift which has not been reduced to writing and by having had continuous adverse possession for twenty years.

FOURTH: Complainants further show unto your Honor that the above named individuals, firms or corporations are reputed to claim some right, title or interest in or incumbrance upon said lands and hereby request that they set forth and specify their title, claim, interest or incumbrance and how and by what instrument the same has been derived and created.

FIFTH: Complainants further show unto Your Honor that they know of no one other than those who have been in actual possession of the said lands and that no one is known to your Complainants to claim this land or any part thereof or any interest therein except the Complainants and the Respondents in

this proceeding and the Complainants herein hereby call upon the Respondents herein to set forth their title, and specify his, her or its title, claim, interest or incumbrance upon the said land and how and by what instrument or otherwise the same is derived and created.

PRAYER FOR PROCESS

To the end therefore, that equity may be had in the premises Complainants pray that your Honor will cause the usual writ of process to issue to the above named respondents in the usual form and according to the practice of this Honorable Court require them to plead, answer and demur to the same within the time required by law, and the practice of this Honorable Court, and make them parties to this bill of complaint requiring them to plead, answer or demur to the same within the time required by law.

PRAYER FOR RELIEF

And Complainants pray further that upon the hearing of this cause your Honor will be pleased to establish Complainants' right or title to and will decree that Complainants are the owners of the said lands in fee simple above described and that no other person, firm or corporation have any title to, or interest in or lien or incumbrance upon the said lands and any part thereof and in the said decree your Honor will cause a certified copy of the decree to be filed in the Probate Office of Baldwin County, Alabama and to be recorded therein and that the said decree your Honor will direct in whose name it shall be indexed in the direct indexes and in whose name it shall be indexed in the indirect indexes to the records thereof in the said Probate Office of Baldwin County, Alabama and Complainants pray further that such other, further or different and general relief be given them as in equity may seem just and meet and Complainants will ever pray and Complainants are ready to do equity herein.

Lillie Cobb  
Mattie Cobb  
Ben Cobb  
Wm. M. A. A.  
Solicitor for Complainants

FOOTNOTE: All persons claiming any title to, interest in, lien or incumbrance upon the property described in the foregoing bill of complaint or any part thereof will be required to answer to paragraphs numbered one to five to answered but answer under oath is hereby expressly waived.

Lillie Cobb  
Mattie Cobb  
BEN COBB  
Wm. M. A. A.  
Solicitor for Complainants.

STATE OF ALABAMA }  
BALDWIN COUNTY }

Personally appeared before me, John J. Gamus, a Notary Public in and for said State and County, Lillie Cobb, Mackie Cobb and Ben Cobb, who upon their oath depose and say:-

That they are the Complainants in the above styled cause and that the facts stated in the foregoing Bill of Complaint upon knowledge are true; and that upon their knowledge, information and belief they so state that the same are true.

Lillie Cobb  
Mackie Cobb  
Ben Cobb

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 15th day of April, 1939.

John J. Gamus.  
Notary Public, Baldwin County,  
State of Alabama.

My commission expires  
March 17th 1943

RECORDED  
APR 15 1939  
NOTARY PUBLIC

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, DENNISTON & BOYKIN CO., BALD. LAND  
HOLDING CO., GAILLARD & GAILLARD, ATTYS., AND DAVIDSON & TAYLOR  
TURPENTINE CO.,

BALDWIN  
of \_\_\_\_\_ 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  
LILLIE COBB, MACKIE COBB, & BEN COBB

against said DENNISTON & BOYKIN CO., BALDWIN LAND HOLDING CO., GAILLARD &  
GAILLARD, ATTYS., AND DAVIDSON & TAYLOR TURPENTINE CO.,

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 \_\_\_\_\_ day of  
\_\_\_\_\_, 193\_\_\_\_\_.

\_\_\_\_\_, Register

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

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 DENNISTON & BOYKIN CO., BALD. LAND HOLDING CO., GAILLARD & GAILLARD, ATTYS., AND DAVIDSON & TAYLOR TURPENTINE CO.,

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

LILLIE COBB, MACKIE COBB, & BEN COBB

against said DENNISTON & BOYKIN CO., BALDWIN LAND HOLDING CO., GAILLARD & GAILLARD, ATTYS., AND DAVIDSON & TAYLOR TURPENTINE CO.,

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 20th day of April, 1939.

\_\_\_\_\_, 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

BALDWIN LAND HOLDING COMPANY,  
a Corporation,

vs. PLAINTIFF

MACK COBB, alias MACKIE COBB,

DEFENDANT

Summons and Complaint

Filed, November 23th, 1938

Defendant Lives at \_\_\_\_\_, Clerk.

6 or 7 miles east of Robertsdale, north of paved highway #10.

GAILLARD & GAILLARD  
Plaintiff's Attorney.

Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

RECEIVED IN OFFICE

1938

Sheriff

I have executed this Writ  
this \_\_\_\_\_, 1938

by leaving a copy of the within Summons and  
Complaint with \_\_\_\_\_

\_\_\_\_\_, Sheriff.  
\_\_\_\_\_, Deputy Sheriff.

RECORDED

Baldwin Land Holding Co.,  
Galliard & Galliard, Attys.  
& Davidson & Taylor, Turpentine Co.

Circuit Court of Baldwin County  
IN EQUITY

No. 541

Summons

LILLIE COBB, MACKIE COBB,  
& BEN COBB.,

Complainants,

VS.

DENNISTON & BOYKIN CO.,  
BALDWIN LAND HOLDING CO.,  
GALLIARD & GALLIARD, ATTYS.,  
& DAVIDSON & TAYLOR  
TURPENTINE CO.,

Respondents.,

ORVIS M. BROWN  
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 \_\_\_\_\_,

193\_\_ by leaving a copy of the Summons with \_\_\_\_\_

Defendant

Sheriff

By \_\_\_\_\_

Deputy Sheriff

Baldwin Land Holdings Co.,  
Galliard & Galliard, Attys.  
& Davidson & Taylor, Attys.

THE STATE OF ALABAMA,

Circuit Court of Baldwin County  
IN EQUITY

Baldwin County

No. 541

Received in office this

day of \_\_\_\_\_ 193

Summons

Sheriff.

Executed this \_\_\_\_\_ day of

193

by leaving a copy of the Summons with

WILLIE COBB, WACHTER COBB,  
& BEN COBB,

Complainants,

Defendant

VS.

DENNISTON A. ROYCE CO.,  
BALDWIN LAND HOLDING CO.,  
GALLIARD & GALLIARD, ATYS.,  
& DAVIDSON & TAYLOR  
TRUSTEES CO.,

Deputy Sheriff

Respondents,

ORVIG H. BROWN  
Solicitor for Complainant



Baldwin Land Holding Co.,  
Gaillard & Gaillard, Attys.,  
& Davidson & Taylor, Turpentiner Co.,

Circuit Court of Baldwin County  
IN EQUITY

THE STATE OF ALABAMA,  
Baldwin County

No. 541

Received in office this \_\_\_\_\_

Summons

day of \_\_\_\_\_, 193\_\_

Sheriff.

LILLIE COBB, MACKIE COBB,  
& BEN COBB.,

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 193\_\_

Complainants,

by leaving a copy of the Summons with \_\_\_\_\_

VS.  
DENNISFON & BOYKIN CO.,  
BALDWIN LAND HOLDING CO.,  
GAILLARD & GAILLARD, ATTYS.,  
& DAVIDSON & TAYLOR  
TURPENTINER CO.,

Defendant

Sheriff

Respondents,

By \_\_\_\_\_  
Deputy Sheriff

ORVIS M. BROWN  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

Serve On Denniston & Boykin co.

**Circuit Court of Baldwin County  
IN ECQUITY**

No. 541

**Summons**

LILLIE COBB, MACKIE COBB,  
& BEN COBB,

Complainants,

VS.

DENNISTON & BOYKIN CO.,  
ET AL.,

Respondents.

ORVIS W. BROWN  
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 Summons with \_\_\_\_\_, 193\_\_\_\_\_

Defendant

Sheriff

By \_\_\_\_\_  
Deputy Sheriff

Serve On \_\_\_\_\_

~~Denniston & Boykin Co.,~~  
Circuit Court of Baldwin County  
IN EQUITY

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

~~541~~

Summons

~~WILLIS COBB, MACKIE COBB,~~  
~~& BEN COBB,~~

Complainants,

VS.

~~DENNISTON & BOYKIN CO.,~~  
~~ET AL.,~~

Respondents.

~~ORVIS H. SIMMONS~~ for Complainant

Recorded in Vol. \_\_\_\_\_

Page \_\_\_\_\_

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 Summons with \_\_\_\_\_

Defendant

Sheriff

By \_\_\_\_\_

Deputy Sheriff

State of Alabama  
Baldwin County

Know All Men By These Presents, that I, A. Boyington, of  
Said State and County, for and in consideration of the sum of Five  
Dollars (\$5.00) and other valuable consideration, in hand paid to me  
by Mackie Cobb, the receipt of which is hereby acknowledged, do  
hereby remise, release, quitclaim and convey unto the said Mackie  
Cobb, all my right, title, interest and claim in and to the  
following described real estate, situate in the County of Baldwin  
and State of Alabama, to-wit:

South Half of the Southeast Quarter of the Southeast  
Quarter, ( $\frac{1}{2}$  of  $\frac{1}{4}$  of  $\frac{1}{4}$ ) of Section Twenty Two (22)  
Township Five (5) South of Range Five (5) East, containing  
Twenty Acres more or less.

To Have and To Hold the same unto the said Mackie Cobb,  
his heirs and assigns, in fee simple.

Seal.

State of Alabama  
Baldwin County;

I, Orvis M. Brown, a Notary Public, in and for said State and  
County, do hereby certify that A. Boyington, whose name is signed to the  
foregoing conveyance, and who is known to me, acknowledged before me  
on this day that being informed of the contents of the conveyance  
he executed the same voluntarily on the day the same bears date.

Witness my hand and official seal this 15th day of April, 1943.

Notary Public, Baldwin County, Ala.  
My Commission Expires, April 2nd, 1945.

AFFIDAVIT

STATE OF ALABAMA)  
BALDWIN COUNTY )

Personally appeared before me, Orvis M. Brown, a Notary Public in and for said State and County, one A. Boyington, a resident citizen of Baldwin County, Alabama who first being duly sworn doth state upon his oath that A. B. Christner owned twenty acres of land in Baldwin County described as South Half ( $S\frac{1}{2}$ ) of Southeast Quarter ( $SE\frac{1}{4}$ ) of Southeast Quarter ( $SE\frac{1}{4}$ ) of Section Twenty two (22) Township Five (5) South of Range Five (5) East, containing Twenty acres, more or less and that when he left Baldwin County he placed me in possession of this property and left the same in my care, and when he departed he told me that he did not intend to spend any more money on this property and that as far as he was concerned I could have the same and that if he ever returned then we would adjust the matter later and to my personal knowledge Mr. Christner has not returned and I lived on the place for about three years and turned the property over then to Mr. Mackie Cobb and his mother and they still remain in the possession of the same and have ever since. The date that the property was turned into my possession was about the year 1915.

*A. Boyington*

Sworn to and subscribed to before me, Orvis M. Brown, a Notary Public, Baldwin County, Alabama, this 15th day of April, 1939.

*Orvis M. Brown*

NOTARY PUBLIC

BALDWIN COUNTY, ALABAMA.

My commission expires April 2nd 1943.

AFFIDAVIT

STATE OF ALABAMA )  
BALDWIN COUNTY )

Personally appeared before me, Orvis M. Brown, a Notary Public in and for said State and County, one A. Boyington, a resident citizen of Baldwin County, Alabama who first being duly sworn doth state upon his oath that A. B. Christner owned twenty acres of land in Baldwin County described as South Half (S $\frac{1}{2}$ ) of Southeast Quarter (SE $\frac{1}{4}$ ) of Southeast Quarter (SE $\frac{1}{4}$ ) of Section Twenty two (22) Township Five (5) South of Range Five (5) East, containing Twenty acres, more or less and that when he left Baldwin County he placed me in possession of this property and left the same in my care, and when he departed he told me that he did not intend to spend any more money on this property and that as far as he was concerned I could have the same and that if he ever returned then we would adjust the matter later and to my personal knowledge Mr. Christner has not returned and I lived on the place for about three years and turned the property over then to Mr. Mackie Cobb and his mother and they still remain in the possession of the same and have ever since. The date that the property was turned into my possession was about the year 1915.

A Boyington

Sworn to and subscribed to before me, Orvis M. Brown, a Notary Public, Baldwin County, Alabama, this 15th day of April, 1939.

Orvis M. Brown  
NOTARY PUBLIC

BALDWIN COUNTY, ALABAMA.  
My commission expires April 2nd 1943.

State of Alabama  
Baldwin County

Know All Men By These Presents, that I, A. Boyington, of Said State and County, for and in consideration of the sum of Five Dollars (\$5.00) and other valuable consideration, in hand paid to me by Mackie Cobb, the receipt of which is hereby acknowledged, do hereby remise, release, quitclaim and convey unto the said Mackie Cobb, all my right, title, interest and claim in and to the following described real estate, situate in the County of Baldwin and State of Alabama, to-wit:

South Half of the Southeast Quarter of the Southeast Quarter, ( $\frac{1}{2}$  of  $\frac{1}{4}$  of  $\frac{1}{4}$ ) of Section Twenty Two (22) Township Five (5) South of Range Five (5) East, containing Twenty Acres more or less.

To Have and To Hold the same unto the said Mackie Cobb, his heirs and assigns, in fee simple.

A. Boyington Seal.

State of Alabama  
Baldwin County;

I, Orvie M. Brown, a Notary Public, in and for said State and County, do hereby certify that A. Boyington, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Witness my hand and official seal this 15th day of April, 1939.

Orvie M. Brown  
Notary Public, Baldwin County, Ala.  
My Commission Expires, April 2nd, 1943.

BILL OF COMPLAINT

LILLIE COBB, MACKIE COBB,  
AND BEN COBB,

Complainants

-vs-

DENNISTON & BOYKIN COMPANY,  
BALDWIN LAND HOLDING COMPANY,  
GAILLARD & GAILLARD, ATTORNEYS,  
AND DAVIDSON & TAYLOR TURPEN-  
TINE COMPANY,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Comes your Complainants, LILLIE COBB, MACKIE COBB and BEN COBB, and shows this their Bill of Complaint against the following described respondents, DENNISTON & BOYKIN COMPANY, BALDWIN LAND HOLDING COMPANY, GAILLARD & GAILLARD, ATTORNEYS, AND DAVIDSON & TAYLOR TURPENTINE COMPANY, and brings this their bill of complaint against any and all persons, firms, or corporations claiming any title to, or interest in, lien or incumbrance upon the land or any part thereof of this complaint said land being described as follows: to-wit, SOUTH HALF OF THE SOUTHWEST QUARTER OF THE SOUTHWEST QUARTER OF SECTION TWENTY TWO, TOWNSHIP FIVE SOUTH OF RANGE FIVE EAST, CONTAINING TWENTY ACRES, MORE OR LESS, and Complainants further respectfully show unto your Honor as follows:

FIRST: That they are in actual, peaceable possession of the said tract of land heretofore described and have been for the past twenty years claiming to own the same in their own right by adverse possession and in fee simple by deed of gift which has not been reduced to writing.

SECOND: THAT no suit is pending to test the Complainants' title to or interest in the said land.

THIRD: Complainants further show that they claim the entire fee simple title in and to the said land having acquired the same by deed of gift which has not been reduced to writing and by having had continuous adverse possession for twenty years.

FOURTH: Complainants further show unto your Honor that the above named individuals, firms or corporations are reputed to claim some right, title or interest in or incumbrance upon said lands and hereby request that they set forth and specify their title, claim, interest or incumbrance and how and by what instrument the same has been derived and created.

FIFTH: Complainants further show unto Your Honor that they know of no one other than those who have been in actual possession of the said lands and that no one is known to your Complainants to claim this land or any part thereof or any interest therein except the Complainants and the Respondents in



this proceeding and the Complainants herein hereby call upon the Respondents herein to set forth their title, and specify his, her or its title, claim, interest or incumbrance upon the said land and how and by what instrument or otherwise the same is derived and created.

PRAYER FOR PROCESS

To the end therefore, that equity may be had in the premises Complainants pray that your Honor will cause the usual writ of process to issue to the above named respondents in the usual form and according to the practice of this Honorable Court require them to plead, answer and demur to the same within the time required by law, and the practice of this Honorable Court, and make them parties to this bill of complaint requiring them to plead, answer or demur to the same within the time required by law.

PRAYER FOR RELIEF

And Complainants pray further that upon the hearing of this cause your Honor will be pleased to establish Complainants' right or title to and and will decree that Complainants are the owners of the said lands in fee simple above described and that no other person, firm or corporation have any title to, or interest in or lien or incumbrance upon the said lands and any part thereof and in the said decree your Honor will cause a certified copy of the decree to be filed in the Probate Office of Baldwin County, Alabama and to be recorded therein and that the said decree your Honor will direct in whose name it shall be indexed in the direct indexes and in whose name it shall be indexed in the indirect indexes to the records thereof in the said Probate Office of Baldwin County, Alabama and Complainants pray further that such other, further or different and general relief be given them as in equity may seem just and meet and Complainants will ever pray and Complainants are ready to do equity herein.

Lillie Cobb  
Mackie Cobb  
Ben Cobb  
Wm. M. Brown  
Solicitor for Complainants

FOOTNOTE: All persons claiming any title to, interest in, lien or incumbrance upon the property described in the foregoing bill of complaint or any part thereof will be required to answer to paragraphs numbered one to five be answered but answer under oath is hereby expressly waived.

Lillie Cobb  
Mackie Cobb  
Ben Cobb  
Wm. M. Brown  
Solicitor for Complainants.

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, John J. Canus, a Notary Public in and for said State and County, Lillie Cobb, Mackie Cobb and Ben Cobb, who upon their oath depose and say:-

That they are the Complainants in the above styled cause and that the facts stated in the foregoing Bill of Complaint upon knowledge are true; and that upon their knowledge, information and belief they do state that the same are true.

Lillie Cobb  
Mackie Cobb  
Ben Cobb

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 15th day of April, 1939.

John J. Canus  
Notary Public, Baldwin County,  
State of Alabama.

My commission expires

March 17th 1943

BILL OF COMPLAINT

LILLIE COBB, MACKIE COBB,  
AND BEN COBB,

Complainants

-vs-

DENNISTON & BOYKIN COMPANY,  
BALDWIN LAND HOLDING COMPANY,  
GAILLARD & GAILLARD, ATTORNEYS,  
AND DAVIDSON & TAYLOR TURPEN-  
TINE COMPANY,

Respondents.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

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FOURTH: Complainants further show unto your Honor that the above named individuals, firms or corporations are reputed to claim some right, title or interest in or incumbrance upon said lands and hereby request that they set forth and specify their title, claim, interest or incumbrance and how and by what instrument the same has been derived and created.

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this proceeding and the Complainants herein hereby call upon the Respondents herein to set forth their title, and specify his, her or its title, claim, interest or incumbrance upon the said land and how and by what instrument or otherwise the same is derived and created.

PRAYER FOR PROCESS

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Wokie Cobb  
Ben Cobb  
Wm. A. Am  
Solicitor for Complainants

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Lillie Cobb  
Wokie Cobb  
Ben Cobb  
Wm. A. Am  
Solicitor for Complainants.

STATE OF ALABAMA )  
BALDWIN COUNTY )

Personally appeared before me, John J. Ganus, a Notary Public in and for said State and County, Lillie Cobb, Mackie Cobb and Ben Cobb, who upon their oath depose and say:-

That they are the Complainants in the above styled cause and that the facts stated in the foregoing Bill of Complaint upon knowledge are true; and that upon their knowledge, information and belief they so state that the same are true.

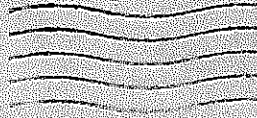
Lillie Cobb  
Mackie Cobb  
Ben Cobb

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 15th day of April, 1939.

John J. Ganus  
Notary Public, Baldwin County,  
State of Alabama.

My commission expires  
March 17th 1943

LAW OFFICES OF  
**GAILLARD & GAILLARD**  
717-21 ANNEX FIRST NATIONAL BANK BUILDING  
MOBILE, ALABAMA

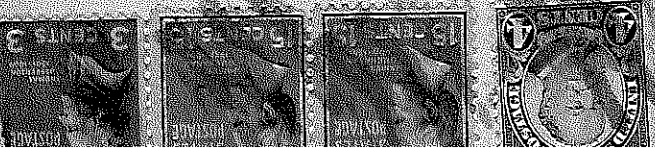


*check but fill in by*

Mr. Mackey Cobb  
c/o Davidson & Taylor  
Robertsdale, Alabama

*MAY 12 1938*  
RETURN TO WRITER  
Karl Schwarz  
Deliver to addressee only  
Return Receipt Requested  
Postage paid

REGISTERED  
NO 821



REGISTERED MAIL  
RETURN RECEIPT REQUESTED

DUCK  
and Clerk Of The  
Baldwin County  
Inette, Ala.