

Florence Richardson, a minor,  
By, H.H.Mixon, her next friend,  
Complainant,

Versus.

Collie Watts, formerly  
Collie Richardson.  
Respondent.

:  
:  
: IN THE CIRCUIT COURT  
:  
:  
: OF BALDWIN COUNTY, ALABAMA,  
:  
:  
: IN EQUITY.  
:

Comes Collie Watts, formerly Collie Richardson, the respondent in the Bill of Complaint filed in this cause on the 31<sup>st</sup> day of August 1920, for answer thereto, says, that she is the mother of the said Florence Richardson, complainant, and that the said complainant is over seventeen years of age and under eighteen years of age and resides with this respondent at Brewton, Alabama, and this respondent further answering admits all of the allegations of the said bill of complaint, set out in paragraph one, two and three, and relinquishes all of her right of occupancy of the property described in paragraph two of said bill of complaint, and prays the court to order the sale of the property described in the bill and sanction and confirm the sale made by her to the said Origen C. Hall, of all her interest in said property.

Collie Watts

The State of Alabama, :  
: :  
Baldwin County. :

Before the undersigned a Notary Public for said County in said State, personally appeared Collie Watts, formerly Collie Richardson, who being by me first duly sworn, according to law, says that the facts stated in the foregoing answer are true.

Collie Watts

Subscribed and sworn to before me this 4<sup>th</sup> day of ~~September~~ <sup>October</sup>, 1920.

Att. MacDonald  
Notary Public,

No. 257

Florence Richardson,  
Complainant,

Vs.

Collie Watts, formerly  
Collie Richardson,  
Respondent.

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In Circuit Court,  
Baldwin Co. Ala.  
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Answer of Respondent to  
Bill of Complaint.

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Filed Oct 5th 1920  
D. W. Riceman  
Register

*[Faint, illegible text from the reverse side of the page, appearing as bleed-through or ghosting.]*

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 .....Collie Watts,formerly Collie Richardson,

of .....Escambia.....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 .....

Florence Richardson,a minor by H.H.Mixon, her next friend,

against said .....

Collie Watts, formerly Collie Richardson,

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 .....31st.....day of.....August.....

.....1920.....

*T. W. Richerson*

Register.

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

Original

Copy  
Serve on on Collie Watts, formerly  
Collie Richardson.

THE STATE OF ALABAMA  
BALDWIN COUNTY.

Circuit Court of Baldwin County  
In Equity

Received in office this \_\_\_\_\_  
day of \_\_\_\_\_ 1920

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

SUMMONS

Sheriff

Florence Richardson, a  
minor by H.H. Mixon her next  
friend.

Executed this 4<sup>th</sup> day of  
September 1920  
by leaving a copy of the within summons with

Collie Watts

Defendant

R.A. Strong  
Sheriff

vs.

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

Collie Watts, formerly  
Collie Richardson.

RECORDED

Chas Hall.

Solicitor for Complainant

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

Florence Richardson, a minor,  
By, H.H.Mixon, her next friend,  
Complainant,

Versus.

Collie Watts, formerly  
Collie Richardson,  
Respondent.

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

To the Honorable John D. Leigh, Judge of the Circuit Court  
of Baldwin County, Alabama, in Equity:

Your petitioner, Florence Richardson, respectfully  
represents unto this Honorable Court and the Judge thereof, that  
she is a minor over seventeen years of age and under eighteen  
years of age, and resides with her mother, Collie Watts, formerly  
Collie Richardson at Brewton, in Escambia County, Alabama, suing  
by H.H.Mixon her next friend who is a resident of Bay Minette,  
in the County of Baldwin, State of Alabama, and shows unto this  
Honorable Court and the Judge thereof,

First.

That this petitioner is a minor and has no legal guardian and  
is the only child of Willie Lee Richardson, deceased, who departed  
this life on or about the 3rd, day of July 1905,  
while residing on the land hereinafter described with the said  
Collie Watts who was the wife of the said decedent at the time of  
his death and the mother of this petitioner.

Second.

That the said Willie Lee Richardson at the time of his death owned  
and occupied as his homestead the following described real property  
to-wit:-

North half of the Southeast quarter of the Northwest quarter  
and South half of the Northeast quarter of the Northwest quarter of  
Section thirty-three in Township two South, Range two East, contain-  
ing forty acres, more or less.

Which constituted all of the property owned by him at the time of

his death.

Third.

That at the time of the death of the decedent about ten acres of the land was enclosed with a good fence and had thereon a good four room dwelling house and a barn; that the fencing with which the land was enclosed has all been destroyed by fire and the barn has completely disappeared from the place so that there now remains on the land the old dwelling house which is not in a habitable condition and is decaying and deteriorating in value very fast because the covering on the dwelling is rotten and the roof leaks badly; that the premises have no rental value and is burdēned with taxes from year to year and in the present condition of same will not produce any further income; that the respondent, Collie Watts, mother of this complainant, moved away from said homestead more than ten years ago and carried this complainant with her and since removing therefrom has abandoned the premises and sold all of her claim, right, title and interest therein to Origen C. Hall /who has offered this complainant Three hundred Dollars in cash for all of her right, title, claim and interest in said property.

P R A Y E R.

Wherefore, your petitioner prays that process may issue as provided for by the rules of this Honorable Court making the said Collie Watts party respondent to this bill of complaint, and that she be duly served with notice of this proceeding. Prays further that your Honor will order a sale of the property described in the second paragraph of this bill of complaint for the investment of the proceeds of sale for the general interest and advantage of this complainant, and sanction and confirm the sale made by respondent, Collie Watts, to the said Origen C. Hall, and if

your petitioner has not asked for the proper relief she further prays that she may have such further and other relief in the premises as the nature of this case shall require, and as to this Honorable Court may seem meet, and such further and general relief as your petitioner may in equity and good conscience be entitled to, for which she will ever pray.

Chas Hall  
Solicitor for Complainant.

FOOT NOTE:

Respondent is required to answer each paragraph of the foregoing bill of complaint from one to three, both inclusive, but not under oath which is hereby waived.

Chas Hall  
Solicitor for Complainant.

## THE STATE OF ALABAMA, BALDWIN COUNTY.

## IN CIRCUIT COURT, IN EQUITY.

Florence Richardson, <sup>a minor,</sup>  
 by H.H. Mixon her next friend, Complainant  
 vs.

Collie Watts, formerly Collie Richardson,  
 Respondent. ~~Defendant~~

Oral examination before the Register of the following witnesses:

W.M. Ruple of Hurricane, ~~where~~ and J.L. Bowden, Hurricane, Ala.

who reside in Alabama, said examination being conducted in Bay Minette, Alabama,

on this the 19th, day of October, 1920, and there being present

Charles Hall, Solicitor for the Complainant,

The said W.M. Ruple being first sworn to speak the truth, the whole truth and nothing but the truth,  
 testified as follows:

My name is William M. Ruple; I am 36 years of age; I reside near Hurricane Post Office in Alabama. I live within one-fourth of a mile of N $\frac{1}{2}$  of SE $\frac{1}{4}$  of NW $\frac{1}{4}$  and S $\frac{1}{2}$  of NE $\frac{1}{4}$  of NW $\frac{1}{4}$  of Section 33, in Township 2 South, Range 2 East, in Baldwin County, Alabama. I have known the land for the last past six years. I frequently pass over and across same. It is badly cut up with old neighborhood roads. At one time there was about ten acres of the land enclosed with a good fence. The fence has all been destroyed by fire and there is now no fence around the land. The land has not been in cultivation for the last past six years. The fence and the barn on the land was destroyed before I moved in the neighborhood where this land is situated. There is an old four room dwelling house on the land which is not in an habitable condition and it is decaying and deteriorating in value very fast because the covering on the dwelling is rotten and the roof leaks badly. The premises have no rental value. I am not personally acquainted with Collie Watts, nor with Florence Richardson, the minor. I have frequently heard of them. They have never lived on the land since I moved in the neighborhood of the land which was about six years ago. I do not know anything about the age of the minor complainant ~~in this~~ mentioned in this suit. I have lived in Baldwin County about eleven years. I have never heard of Willie Lee Richardson, the decedent, named in the bill of complaint owning any real property other than the above herein described. As to the payment of the taxes on the land I am unable to say whether or not they were ever paid. From my knowledge of land in the neighborhood of the land in question I do not think it is worth exceeding \$600.00. The land is very rolling and when broken for agricultural purposes washes very badly



and I think the sale of the land at this time would be to the interest and advantage of the minor, Florence Richardson.

*W. M. Ruple*

The witness, J.L. Bowden, who resides at Hurricane, Alabama, being first sworn to speak the truth, the whole truth and nothing but the truth, testifies as follows:

My name is James L. Bowden;

I am 35 years of age and reside in Baldwin County, near Hurricane Post Office in Alabama; I am acquainted with the land described as N $\frac{1}{2}$  of S.E. $\frac{1}{4}$  of N.W. $\frac{1}{4}$  and S $\frac{1}{2}$  of NE $\frac{1}{4}$  of NW $\frac{1}{4}$  of Section 33, in Township two South, Range two East, in Baldwin County, Alabama.

I have lived within four or five hundred yards of the land above described for the last past six years and during that time I have often passed over and across the land. There are several old neighborhood roads running across it and the land is badly cut up with these old roads. It's very rolling and washes badly. There is an old dwelling house on it which is in a delapidated condition, in fact, it is not in an habitable condition as the roof on the house is very rotten and the building thereon is decaying very fast.

The premises have no rental value because of the bad condition of the house. There is no fence nor out buildings on the land. There appears to have been in the past about ten acres of the land under fence. Collie Watts and Florence Richardson, the parties named in the bill of complaint filed in this cause have not lived on the land at any time during the last past six years. \$600.00 would be a good price for the land and the old house thereon. I do not

believe that the land and the old dwelling would sell for more than \$600.00 and I believe it would be to the interest of the minor to have the land sold at this time. As to whether or not Willie Lee Richardson owned any other real estate other than that described above, I am unable to say, but I have never heard of him owning any other. I do not know anything about the payment of the taxes and do not know the age of the minor.

*J. L. Bowden*

I, T.W. Richerson, as Register,

hereby certify that the foregoing depositions on oral examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself, at the time and place herein mentioned; that I have personal knowledge of the personal identity of the said witness es, ~~or had proof made before me of the identity of said witness~~; that I am not of counsel or of kin to any of the parties to said cause; or in any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court, and placed the same on file in my office.

Given under my hand and seal this the 19th day of October, 1920, 19

T.W. Richerson (L. S.)

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

<u>W.M. Ruple</u>	..... days' attendance at \$1.50 per day	\$ <u>1.50</u>
<u>J.L. Bowden</u>	..... days' attendance at \$1.50 per day	\$ <u>1.50</u>
.....	..... days' attendance at \$1.50 per day	\$ .....
.....	..... days' attendance at \$1.50 per day	\$ .....
.....	..... days' attendance at \$1.50 per day	\$ .....
.....	..... days' attendance at \$1.50 per day	\$ .....
.....	..... days' attendance at \$1.50 per day	\$ .....
.....	..... days' attendance at \$1.50 per day	\$ .....
.....	..... days' attendance at \$1.50 per day	\$ .....

REGISTER'S FEES.

.....	days at \$1.50 per day	\$ .....
.....	words at 20 cents per hundred	.....

**The State of Alabama,**

..... Baldwin ..... COUNTY.

**IN CIRCUIT COURT, IN EQUITY.**

..... Florence Richardson .....

..... vs. Complainant, .....

..... Collie Watts formery .....

..... Collie Richardson .....

..... Defendant. .....

**Deposition Taken Before Register on Oral Examination.**

Deposition of Witnesses - 1 - .....

for Complainant. .....

Filed 19th day of Oct 1920, 49 .....

Published by order of the Court, .....

day of ....., 19 .....

*T. W. [Signature]* .....

Register.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Florence Richardson, a minor  
by H. H. Nixon, her next friend  
Complainant.....

vs.

Collie Watts formerly  
Leollie Richardson  
Defendant.....

No. 257

Now comes the Complainant by Charles Haece

Solicitor of Record, and makes application to the Register of said Court to issue a Commission to take the testimony in said cause, or oral examination, of the following named witness<sup>es</sup>, who reside within the State of Alabama:

NAME OF WITNESS.

RESIDENCE OF WITNESS.

J. L. Bowden  
W. M. Ruple

Harriman, Ala.  
" "

And I suggests the name of J. W. Richardson  
who resides at Bay Minette Ala. as a suitable person to be appointed Commissioner to take the testimony of said witness<sup>es</sup>.

This 5<sup>th</sup> day of October 19 20

Charles Haece  
Solicitor for Complainant

The Applicant for said Oral Examination is hereby required to give in writing Three days notice thereof, before the examination is taken, to the adverse party, or to his Solicitor of Record, if either reside in this District, but if neither reside therein, the notice may be given by entry on the Order Book of the Clerk.

J. W. Richardson  
Register.

No. 257

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL  
EXAMINATION.

Thomas Reardon

vs.

Carrie Watts

Filed in office this

5th

day of

October

19

20

J. W. Rimmer

Register.

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

*Barlow* County. }

No. *207*

Term, 19

*Thomas Richardson* Complainant

vs.

*Collie Watts formerly Collie Richardson Respondent*

To *Collie Watts, formerly Collie*

*Richardson,* Solicitors of Record.

You are hereby notified that, *application made to me* having been appointed Commissioner to take the deposition of

*J. C. Bowden and W. M. Ruple, both of Mericane, Ala.*

witness *as* for the *Complainant* in the above stated cause, I will commence

to take said deposition at *10 o'clock A.M. at my office in the Court House at Birmingham, Ala.* on the *19th* day of *October* 19*20*

Witness my hand, this *5th* day of *October* 19*20*

*J. W. Richardson*  
*Register*

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

TO.

Collie Watts

or.....  
Solicitors.

NOTICE OF TIME AND PLACE TO  
TAKE DEPOSITION.

Issued Oct 5, 1920

W. Pickens  
Commissioner.

I hereby certify that a copy of this  
Notice was.....

to.....

on the..... day of..... 19.....

.....  
Commissioner.

I hereby accept  
service of this notice  
this October 5, 1920.

Collie Watts

GE, STALLWORTH & INGE

ATTORNEYS AT LAW

309-13 VAN ANTWERP BUILDING

MOBILE, ALABAMA



Mr T W Richerson  
Register in Chancery  
Bay Minette Alabama



INGE, STALLWORTH & INGE

ATTORNEYS AT LAW  
309-13 VAN ANTWERP BUILDING  
MOBILE, ALABAMA  
Dec. 3, 1929.

FRANCIS J. INGE  
NICHOLAS E. STALLWORTH  
FRANCIS H. INGE  
HARRY SEALE

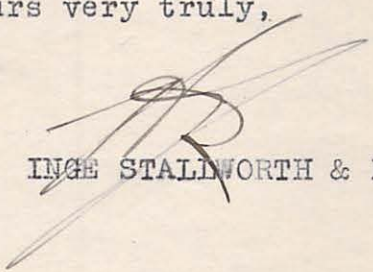
Mr. T. W. Richerson,  
Register in Chancery,  
Bay Minette, Alabama.

Dear Sir:

You will please forgive us for not acknowledging receipt of your check in the sum of \$151.34 in the Hegedus case earlier. The rush of fall business has kept us from properly caring for our correspondence. We have ~~made~~ our deductions and forwarded the balance to Mrs. Hegedus.

If you find time soon, please remind Judge Hare of his failure to complete the performance of the hydraulic problem involved in this case. Are we right in our assumption that the case is now under submission?

Yours very truly,



INGE STALLWORTH & INGE

HS-1