

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA: SITTING IN EQUITY:

Your petitioner,, JENNIE M. RUSSELL a resident of the town of Fairhope, Baldwin County, Alabama and over the age of twenty one years respectfully shows:-

FIRST:- That she is the widow of Albert. T. Russell she died June 19, 1919 leaving his widow, your petitioner and three children, two of whom are of age and the third Mildred Russell who was born October 23, 1901, over the age of eighteen years.

SECOND:- That the said Albert T. Russell at the time of his death was possessed of sixty acres of land in Baldwin County of the value of approximately Five Thousand Dollars and dying intestate said property passed to petitioner and her three children and is substantially all property in which the said minor has an interest.

THIRD:- That Mildred Russell is well educated, intelligent and capable of managing her own affairs. She is a resident of Baldwin County but at present is at 122 Main Street, Three Rivers, Michigan to which city she recently went to take a course in special training the better to fit her for the profession of instructor.

FOURTH:- That the condition of the estate in which the minor is interested makes it desirable that said minor should be freed of the disabilities of non-age that she may join with petitioner and her adult brother and sister in disposing of the realty above described which since the death of the father can not be managed and cultivated by the heirs to advantage.

THE PREMISES CONSIDERED, the petitioner prays that notice of the hearing of this petition be given the minor by registered mail, that an order be made forthwith prescribing the manner in which proof of the minor's competency shall be

made and setting a date for hearing, and that upon said hearing a decree be rendered removing minor's disabilities of non-age and granting her the right to contract and conduct her own affairs as fully as she might do if offfull age.

Rickards + Beebe
Solicitor for Petitioner

Jessie M. Russell
PETITIONER.

RETURN RECEIPT.

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

David Det
Heta
H. J. Russell
Mildred J. Russell.

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery, **OCT -1 1920**, 19

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 280

INSURED PARCEL

No. _____

Return to

W. R. Stewart

(NAME OF SENDER)

Street and Number, }
or Post Office Box, }

Post Office at

Bay Minette,
Ala

State _____

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

POSTMARK OF DELIVERING
OFFICE



322

STATE OF ALABAMA |
 |
COUNTY OF BALDWIN |

Before me, the undersigned notary public, in and for Baldwin County, Alabama, personally appeared this day Mrs. Jennie M. Russell, who is known to me, and being by me first duly sworn, deposes as follows:

"I am the mother of Mildred Russell and recently in her behalf filed a petition to have her disabilities of non-age removed. My daughter will be nineteen years of age on the twenty-third day of next month, is well educated, and is capable of looking after her own affairs. She recently went to Three Rivers, Michigan, there to take a special course in music to fit herself to teach it. My husband died last summer, leaving but little property other than a sixty acre farm out from Fairhope. My two older children are married and I cannot look after and operate this to advantage. We have recently had a chance to sell it at a figure that we are advised by responsible parties is an advantageous one and I am advised by my lawyer that the children and myself cannot make an acceptable deed until my youngest daughter, Mildred, is of age unless we go to expensive and tedious court proceedings. It is desirable that we should accept this offer promptly for fear of losing it and my two older children agree with me that it would be to the advantage of all of us to sell at this time as I cannot manage the place alone. My daughter, Mildred, agrees with me on this and, as she has always shown a good head for business, I am of the opinion that it would be to her interest to have her made of age as she is as capable in a business way now as she will be a year from now. My older children agree with me about this."

Jennie M. Russell

Sworn to and subscribed before me
this the 29th day of September, 1920
Gladys Lowell
Notary Public, Baldwin County, Ala.

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned notary public, in and for Baldwin County, Alabama, personally appeared this day A. H. Mershon, who being by me first duly sworn, deposes as follows:

"I am a resident of the town of Fairhope and have lived there for many years. I am a merchant and in active business there. I have been personally acquainted with the Russell family for a number of years and know Miss Mildred Russell personally. She is a well educated, intelligent girl and, in my opinion, has as good judgment on business matters as the average woman of twenty-five. I think her thoroughly capable of managing her own affairs. Her mother is a widow and lives in Fairhope though Miss Mildred is at present away at a technical school taking a special course of training."

A. H. Mershon

Sworn to and subscribed before me
this the 29th day of September, 1920.

Gladys Lowell
Notary Public, Baldwin County, Ala.

STATE OF ALABAMA
COUNTY OF BALDWIN

Before me, the undersigned notary, personally appeared this day William McIntosh, who is known to me, and being by me first duly sworn, deposes as follows:

"I am a resident of the town of Fairhope, Alabama, and have been living here for several years. Prior to that time I lived at *Robinsdale* in Baldwin County. My occupation is banker, and I am cashier of the Bank of Fairhope and President of the Daphne State Bank. I am also the present mayor of the town of Fairhope. I have been personally acquainted with Miss Mildred Russell for a number of years and know her mother and was acquainted with her father up to the time of his death. Her father died last June, leaving a widow and three children, of whom Miss Mildred is the youngest. She is over the age of eighteen years. Mr. Russell at the time of his death left sixty acres of land in Baldwin County and no will. Miss Mildred Russell is well educated, intelligent, and capable of managing her own affairs. She has been living in this place with her parents up to this summer when she went to take a special course of training in music and in my opinion she is amply capable of looking after her own interests and, from what I know of her parent's affairs, it would be to her interest to have her disabilities of non-age removed."

William McIntosh

Sworn to and subscribed before me this the 29th day of September, 1920.

Gladys Lowell
Notary Public, Baldwin County, Ala.

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin County, }

No. 265 Fall Term, 1920

In the Matter of the Petition of Jennie M Russell

To Be Relieved from the Disabilities of Non-Age.

This cause coming on to be heard in term time

having been submitted for Decree on the Petition and ex-parte affidavits of A. H. Merchan

Jennie M Russell and William M. ...

thereupon, upon consideration thereof, it is ordered, adjudged and decreed by the Court

that Maud Russell a minor who is over the age of eighteen years, be and he is relieved from the Disabilities of Non-Age, and he is vested with the right to sue and be sued, contract and be contracted with, to buy, sell and convey Real Estate, and generally to do and perform all acts which such minor could lawfully do if he were twenty-one years of age, except

It is further decreed that the said Jennie M Russell

pay the cost of this proceeding, for which execution may issue

833 Code.

This October 18th 1920.

John D. Leigh

Judge.

THE STATE OF ALABAMA,

Baldwin, County.

CIRCUIT COURT, IN EQUITY.

PETITION OF

Jennie M Russell to remove disabilities of non-age of

Milared Russell.

DECREE RELIEVING MINORS FROM DISABILITIES OF NON-AGE.

THE STATE OF ALABAMA,

Baldwin County.

I hereby certify that the within Decree was received in this office for record

19

at o'clock M., and re-

corded in Record

Vol. Page

19

and examined.

Judge of Probate.

Register Fee, \$

Recorded on

Filed
J. M. Russell
Oct 21/922

Jennie M Russell
Pl Petitioner decedent
of Medred Russell
vs.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Petition

This cause is submitted in behalf of Complainant upon the original ~~Bill of Complaint~~

of Jennie M Russell and Affidavit
in support of Petition.

and in behalf of Defendant upon

J W McQueen

Register

Att R

No.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

vs.

NOTE OF TESTIMONY.

Filed in Open Court this *Oct*

day of *7th* 191.....

D. M. ...

Register

In the Matter of

MILDRED RUSSELL,

A Minor

IN EQUITY

IN THE CIRCUIT COURT OF

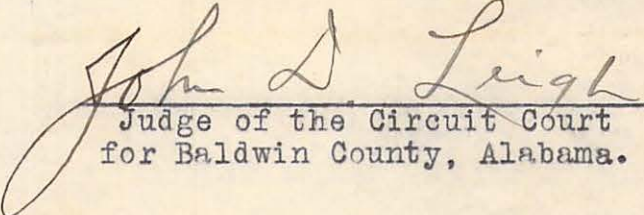
BALDWIN COUNTY

This matter coming on to be heard upon the petition of Jennie M. Russell for the removal of the disabilities of non-age of her daughter, Mildred Russell, a minor over the age of eighteen years, and said petition praying that a day be set for hearing same upon the merits and that a further order be made prescribing the manner in which proof may be made of the allegations thereof:

IT IS HEREBY ORDERED that said petition be set down for hearing upon its merits on Saturday, October 2nd, 1920, at 2 P. M., in the office of the Circuit Clerk of Escambia County at Brewton, Alabama, and that testimony in support of said petition may be adduced in the form of affidavits of two or more responsible parties personally acquainted with said minor.

IT IS FURTHER ORDERED that as said minor is at present a non-resident, notice of the time and place of hearing and a copy of the petition be served upon her by the Sheriff of Baldwin County by registered mail, he to make return forthwith of his action in the premises to the Register of the Circuit Court of Baldwin County.

Ordered out of term time, but in open court, this the 25th day of September, 1920.


Judge of the Circuit Court
for Baldwin County, Alabama.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

IN RE: MILDRED RUSSELL, MINOR.

O R D E R

Fixing Hearing and ^{name} Date of Proof.

Filed Sept 27th 1920
D. M. Rimmer
Register.

Rickarby & Beebe,
Lawyers.

Menee Beards
Page 85

In the Matter of

MILDRED RUSSELL,

a Minor

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY

Received September 27th, 1920, from the Register of the Circuit Court of Baldwin County certified copy of petition filed in the above styled matter and pursuant to the order made by the Honorable the Judge of the said court I sent said certified copy together with notice of the date of hearing of the original petition on October 2nd, 1920 to Miss Mildred Russell by registered mail enclosed in an envelope addressed to her at 122 Main Street, Three Rivers, Michigan, with postage and a registry fee fully prepaid. *Return* receipt for the papers thus sent is attached hereto.

H.H. WITNESS my hand at Bay Minette, Alabama, this the
day of October, 1920.

W.R. Street
Sheriff Baldwin County, Ala.

2nd R

IN EQUITY
CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

In re
MILDRED RUSSELL,
Minor.

Sheriff's return of
service

Filed Oct
4th 1920
D. W. Merwin
Recorder

Louis B Davis

vs.

Lizzie Davis

CIRCUIT COURT OF

COUNTY,

IN EQUITY.

I, W. McCumson

Register of said Court, do hereby certify that I

did, on the 27th day of Sept 1920, send to

Lizzie Davis Defendant

whose address was Louis B Davis

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 1st day of

Oct 1920

Witness my hand, this 1st day of Oct 1920

W. McCumson Register.

267

No. 267

CIRCUIT COURT OF

Baldwin COUNTY,
IN EQUITY.

Louis B Davis

vs.

Lizzie Davis

CERTIFICATE OF REGISTER AS TO
NOTICE BY REGISTERED MAIL.

Filed in office on this 1st
day of Oct 1920

W. H. Wilson
Register.

RETURN RECEIPT.

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

[Faint signature]

(Signature or name of addressee.)

(Signature of addressee's agent)

Date of delivery, *9/30* -----

Form 3811

05-6116

*Friend
O'Brien
1920
The Postmaster
Boston*

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 273

INSURED PARCEL

No. _____

Return to

T. W. Richardson

(NAME OF SENDER)

Street and Number, }
or Post Office Box, }

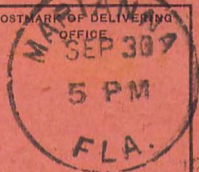
Post Office at

Bay Minette

State _____

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

POSTMARK OF DELIVERING
OFFICE



AND DATE OF DELIVERY

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 Lizzie Davis

of Mariana, Fla. Route, T. A. Box, 50.
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

Louis B Davis,

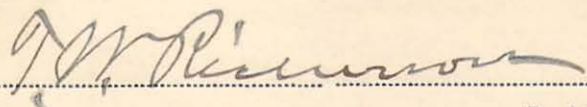
against said

Lizzie Davis,

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 27th day of October

1920.



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. _____

SUMMONS

Louis B Davis

vs.

Lezzie Davis

Page M. Moore
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192_____

Sheriff

Executed this _____ day of
_____ 192_____

by leaving a copy of the within summons with

Defendant

Sheriff

By _____
Deputy Sheriff

*Copy sent by Reg -
Mail to Dept
Sept 27th 1920 -*

RECORDED

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.

TO THE HONORABLE, JOHN D. LEIGH, JUDGE OF THE CIRCUIT
COURT, BALDWIN COUNTY, ALA.--In equity.

Your Orator, Louis B. Davis, respectfully repre-
sents and shows unto your Honor as follows:

1. That he has been a bona fide resident citizen of
the County of Baldwin, State of Alabama, for a period of
more than the last twelve months, next preceeding the fil-
ing of this bill, residing at Rabon, in said County and
that he is over the age of twenty-one years.

2. That Lizzie Davis is a non-resident of the State
of Alabama, residing at Mariana. Fla., Route TA, Box 50,
and is the wife of the said Lous B. Davis.

3. That your Orator and the said Lizzie Davis were
lawfully married about June 20th, 1920, and lived together
until a short time ago, at which time your Orator discover-
ed that the said Lizzie Davis was pregnant at the time of
marriage, and that this was without his knowledge or agency.

PRAYER FOR PROCESS.

The premises considered, your Oratrix respectfully
prays that the said Lizzie Davis be made party respondent
to this bill of complaint by the usual process of this Hon-
orable Court, and that she be required to demur, plead to
or answer the same within the time allowed by law, or that
the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your
Honor will grant unto your Orator an absolute divorce from
the said Lizzie Davis.

That if your Orator is mistken in the relief pray-
ed then Your Honor will grant unto him such other, differ-
ent and general relief as ~~she may~~ he may in justice and
equity be entitled, he will ever pray.

FOOT NOTE:

The Respondent, Lizzie Davis, is required to answer each and every paragraph of the foregoing bill of complaint from 1 to 2, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORER,
Solicitors for Complainant.