

ALICE THOMAS, p. p. ami. Complainant,)	IN EQUITY
)	
-Vs-)	IN THE CIRCUIT COURT OF
)	
C. L. THOMAS, et al, Respondents,)	BALDWIN COUNTY, ALABAMA.

Comes C. L. THOMAS, individually and as executor of the estate of Josephine Thomas, deceased, LLOYD GALE THOMAS, IONE E. THOMAS LANE and GEORGE LANE, her husband, and CATHERINE J. THOMAS, respondents in the above entitled cause, and for answer to the bill of complaint heretofore filed say;

FIRST: Respondents admit the several allegations of the bill of complaint.

SECOND: Respondents concur in the prayer of petitioner for relief by sale of the property to Harvey E. Wood, whose bid for same in the only bid that respondents have been able to obtain and further show that it will be to the interest of the minor complainant as well as to the defendants that the bid of said Wood be accepted and the property sold; respondents agreeing to execute deed jointly with the Register, should the Court, upon proper proof, find that it is to the minor's interest that such sale be made.

Wm M Mercer
Solicitors for Respondents.

2nd

No.

E Q U I T Y

Circuit Court of Baldwin
County, Alabama.

ALICE THOMAS, p. p. ami.
Complainant,

-Vs-

C. L. THOMAS, et al,
Respondents,

ANSWER.

Filed Nov 23/920
J. W. Rimmer
Register

RECORDED
RECORDED

Wm. M. Mercer,
Solicitor.

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

Comes ALICE THOMAS, a minor over the age of fourteen years, who appears by her next friend, W. C. BEEBE, and by this, her bill of complaint presented against C. L. THOMAS, individually and as administrator of the estate of JOSEPHINE THOMAS, deceased, LLOYD GALE THOMAS, IONE E. THOMAS LANE and GEORGE LANE, her husband, and CATHERINE J. THOMAS, shows unto your Honor:

FIRST: That she and the Defendants above named are all residents of Aurora, Illinois; that all of said Defendants are over the age of twenty-one years.

SECOND: That Mrs. Josephine Thomas, wife of the Defendant C. L. THOMAS, and mother of complainant and the other Defendants, departed this life a number of months ago, leaving, among other property, twenty acres of land in Baldwin County, Alabama, known and described as the East half of the North-west quarter of the North-east quarter of Section 16, Township 5 South of Range 3 East. That letters of administration have been taken out on the estate of the decedent by C. L. THOMAS and all of the debts of said estate have been paid.

THIRD: Complainant further shows that the twenty acres above described lies several miles from the village of Loxley; is ordinary piney-woods land; uncleared and unproductive; and that taxes on same for the years 1917 to 1920, inclusive, are still due and unpaid, aggregating with penalties at this time about twenty-five dollars.

FOURTH: That under the laws of the State of Alabama, the Defendant, C. L. THOMAS, father of complainant, has a courtesy title to said land during his life time, so

that minor's one-fourth interest in same in its present condition is of but little value.

FIFTH: Complainant further shows that a proposition has recently been received from one HARVEY E. WOOD, a party owning adjoining land, to purchase this tract at the price of Fifty Dollars, which, she is informed by her father and others, is an advantageous figure and to the interest of all concerned to accept; that this offer is cash, includes the payment of arrears of taxes and the expense of Court proceedings to perfect title; that this is the only bid for the land which the complainant has been able to obtain; and that the other heirs and parties in interest favor acceptance of the proposition, but that the sale cannot be made because of complainant's minority.

THE PREMISES CONSIDERED, Complainant prays that C. L. THOMAS, individually and as administrator of the estate of Josephine Thomas, deceased, Lloyd Gale Thomas, Ione E. Thomas Lane and George Lane, her husband, and Catherine J. Thomas be made parties to this cause and by due process of law be required to answer same according to the rules and practice of this Honorable Court.

Complainant further prays that upon the hearing of this cause that your Honor decree that it is to the interest of the minor that the land above described be sold to Harvey E. Wood, the proposed purchaser, for the sum of Fifty Dollars, to be paid to the administrator of the estate of Josephine Thomas, deceased; that upon payment of this sum and of the costs of this proceeding to the Register of this Honorable Court; that said Register be authorized to execute deed conveying complainant's interest to said Wood or such person as he may designate and that such

other, further or different relief may be granted as to
your Honor may seem meet.

Complainant as in duty bound will ever pray,
etc.

Riskaby & Beebe
Solicitors for Complainant.

The defendants are required to answer each
paragraph of the foregoing bill, but not under oath.

Riskaby & Beebe
Solicitors for Complainant.

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

Now comes your complainant, D.O. Bryant, and files this his bill of complaint against Y.C. Earle, as Administrator of the estate of ~~May~~ ^{Y.C. Earle} Bryant Earle, and ^{Y.C. Earle} as Guardian of Mae Bryant Earle, a minor, and respectfully shows unto your Honor as follows:

That your complainant and the said Y.C. Earle, as administrator of the estate of May Bryant Earle, and as Guardian of Mae Bryant Earle, a minor, are both over the age of twenty-one years and are both bona fide residents of the County of Baldwin, State of Alabama; that the said Y.C. Earle was duly appointed as administrator of the estate of May Bryant Earle by the Probate Judge of Baldwin County, State of Alabama, the said May Bryant Earle, deceased, being the wife of the said Y.C. Earle at the time of her death, she having died September 8th, 1919, and leaving as her only child and heir Mae Bryant Earle, a minor of the age of about fourteen months. That said respondent was appointed Guardian of Mae Bryant Earle on 27th day of April 1920.

Your complainant further shows unto your Honor that May Bryant Earle during her life time owned an undivided one half interest in and to the following described real estate, to-wit:

Northeast quarter of Southeast quarter of Section twenty-two in Township one North, Range two East, located in Baldwin County, State of Alabama, and that your complainant owned the other undivided half interest in said real estate, having acquired title to same from Maggie B. Key, a sister of the said May Bryant Earle, and that during her life time the said May Bryant Earle entered into a verbal agreement with your complainant to sell him her undivided half interest in the above described property; that pursuant to said agreement she and the said Maggie B. Key placed your complainant in possession of said property; that complainant paid to the said May Bryant Earle during her life time the sum of

Three hundred sixty-four Dollars, as part payment on the purchase price for said half interest in said property, the agreement being that he was to pay her the total sum of \$1000.00 for her undivided half interest in said property; your complainant further shows unto your Honor that the said May Bryant Earle died without having executed to him a deed, although she intended to execute a deed to him to her undivided half interest in and to the said property; your complainant further shows unto your Honor that he is able, ready and willing to pay the balance due upon the purchase price, to-wit: \$636.00, but there is none who is authorized to execute a deed to him for said half interest in the property in carrying out said agreement.

The premises considered, your petitioner prays that notice will be served upon Y.C.Earle, as administrator of the estate of May Bryant Earle, deceased, and as Guardian of the said Mae Bryant Earle, a minor, making him, as such administrator and as such Guardian, a party respondent to this bill of complaint, and requiring him to answer, plead or demur to same within the time allowed by law; and complainant further prays that upon a final hearing of this bill of complaint, that your Honor will enter a decree, directing and commanding the said Y.C.Earle, as administrator of the estate of May Bryant Earle, deceased, and as Guardian of Mae Bryant Earle, a minor, upon the payment to him of the balance due on the purchase price of said lands, to execute to your complainant a deed, conveying to him all of the right, title and interest which the said May Bryant Earle had during her life and at the time of her death. And your complainant prays for such other and further relief as he may be entitled to, the premises considered. And your complainant will ever pray, etc.

Charles Hall
Gordon Edington
Solicitors for Complainant.

FOOT NOTE: The respondent is required to answer each and every

paragraph of the foregoing bill of complaint, but not under oath,
his oath thereto being hereby expressly waived.

Charles Hall
Gordon & Edwinton
Solicitors for Complainant.