

G. H. Baber and R. L. Williams,  
Complainants.

vs

Marion C. Sprehn.  
Defendants.

IN THE CIRCUIT COURT,  
BALDWIN COUNTY, ALA.

In Equity.

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

Your petitioners, G. H. Baber and R. L. Williams, respectfully represents and shows unto Your Honor as follows:

1. That your petitioners are over the age of twenty-one years and residents of Graysville, Tenn.

That the defendant, *Marion C. Sprehn*, is over the age of twenty-one years and her place of residence is unknown.

2nd. That your petitioners are in peaceable possession of the following described lands, located in Baldwin County, Alabama, claiming to own the same in their own right, to-wit:

The Southeast quarter of Southeast quarter, Section Twenty-eight, Township Six South, Range Three East, Baldwin County, Alabama.

3rd. That the defendant, Marion C. Sprehn, against whom this bill of complaint is exhibited, claims, or is reputed to claim, some right, title or interest in, or encumbrance upon, the said above described lands; that no suit is pending to test or enforce the validity of such title, claim or encumbrance; and that your petitioners calls upon the defendant, Marion C. Sprehn, to set forth and specify her title, claim, interest in, or encumbrance upon, the said lands above described, and how and by what instrument the same was derived and created.

PRAYER FOR PROCESS.

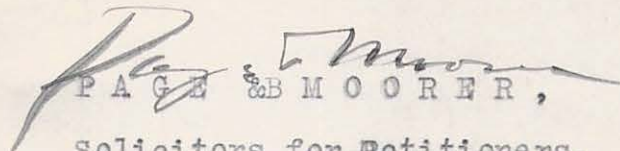
The premises considered your petitioners pray that the said Marion C. Sprehn, Defendant, be made party respondent to this bill of complaint by the usual process of this

Honorable Court, and that she be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

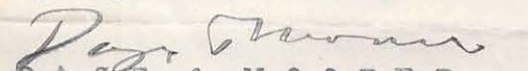
Petitioners pray that upon the hearing of this cause Your Honor will be please to decree that the said Marion C. Sprehn, the defendant, has no interest, right, title or claim in, or encumbrance upon the property described in this bill of complaint, or any part thereof, and that the title of petitioners is good to the said property.

Petitioners further pray that if they are mistaken in the relief prayed then your Honor will grant unto them such other, different and general relief as they may in justice and equity be entitled, they will ever pray, etc.

  
PAGE & MOORE,  
Solicitors for Petitioners.

FOOT NOTE:

The respondent, Marion C. Sprehn, is required to answer each and every allegation in full of the foregoing bill of complaint from paragraph numbered 1 to paragraph numbered ~~three~~ 3, both inclusive, but not under oath, answer under oath being hereby expressly waived.

  
PAGE & MOORE,  
Solicitors for Petitioners.



G. H. Baber and R. L. Williams

Complainants.

No.

vs.

Marion C. Sprehn.

THE STATE OF ALABAMA,

COUNTY.

Baldwin

CIRCUIT COURT, IN EQUITY.

This the 7th day of

June,

19 22.

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Henry D. Moorer, agent,

that the Defendant

Marion C. Sprehn's place of residence is unknown

and cannot be ascertained after reasonable effort

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said

her

Marion

C. Sprehn

to answer or demur to the Bill of Complaint in this cause by the 10th day of June, 19 22

or after thirty days therefrom a decree Pro Confesso may be taken against

D. W. Richardson

Register.



# THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

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.

Mrs. ABNER J. SMITH, being duly sworn, deposes and says that she 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-RESIDENT

No. 345

G. R. Barber & R. L. Williams, Complainants

vs

Marion C. Sprehn

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<u>June 8th, 1922</u>	Vol. <u>33</u>	No. <u>17</u>
“ “ second “	<u>" 15th, 1922</u>	Vol. <u>33</u>	No. <u>18</u>
“ “ third “	<u>" 22nd, 1922</u>	Vol. <u>33</u>	No. <u>19</u>
“ “ fourth “	<u>" 29th, 1922</u>	Vol. <u>33</u>	No. <u>20</u>

Subscribed and sworn to before the undersigned

this 25<sup>th</sup> day of July 1922.

D. W. Richardson  
Clerk Circuit Court

Mrs. Abner Smith  
Publisher.

The State of Alabama, }  
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. August 12th Term, 1922.

G. H. Baber and R. H. Williams, Complainants

vs.

Marion C. Sprehn, Defendants

Motion is hereby made for a Decree Pro Confesso against Marion C. Sprehn

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 12th day of August, 1922.

746 Code.

*Peggy Moore*  
Solicitor.



4

No. .... Page .....

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Complainants.

Vs.

Defendants.

MOTION FOR DECREE PRO  
CONFESSO ON PUBLICATION.

Filed Aug 29 1922

J. M. Wilson  
Register.

Recorded in ..... Record,

Vol. .... Page .....

Register.

Baldwin Times Print, Bay Minette. 14

RECORDED

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. .... Aug. 13th, Term, 1922.

..... G. H. Baber and R. H. Williams ..... Complainant S.  
vs. .... Marion C. Sprehn ..... Defendant.....

In this cause it appears to the Register T. W. Richerson.....that the order of publication here-  
tofore made in this cause, was published for four consecutive weeks, commencing on the ~~June~~ 8th ..... day of  
June, ....., 19 22, in the Baldwin Times .....  
a newspaper published in Bay Minette, ..... Alabama, that a copy of said order was posted at the Court  
House door in Baldwin ..... County, on the 8th ..... day of  
June, ..... 19 22, and ..... published in issues of the said paper .....  
on June 15th, June 22n and June 29th, 1922 respectively

And it now further appearing to the Register T. W. Richerson....., that the said  
..... Marion C. Sprehn .....

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, there-  
fore, on motion of Complainant S., ordered and decreed by the Register T. W. Richerson..... that the  
Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said.....

..... Marion C. Sprehn .....

This 13th ..... day of August, ..... 19 22.

*T. W. Richerson*  
.....  
Register.



No. 345

5-

Page .....

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY

*G H Reber*  
*it or*

vs.

*Marion C. Spiker*

DECREE PRO CONFESSO ON  
PUBLICATION.

Issued Aug 13 1922

*M W Reamer*  
Register.

Recorded in ..... Record

Vol. .... Page .....

Register.

RECORDED



## Notice To Non-Resident.

G. H. Baber and R. L. Williams,  
Complainants, vs. Marion C.  
Sprehn.

No. 345.

The State of Alabama. Baldwin  
County. Circuit Court, In Equity.

This the 7th day of June, 1922.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Henry D. Moorer, Agent, that the Defendant Marion C. Sprehn's place of residence is unknown and cannot be ascertained after reasonable effort, and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in The Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring her, the said Marion C. Sprehn, to answer or demur to the Bill of Complaint in this cause by the 10th day of July, 1922, or after thirty days therefrom a decree Pro Confesso may be taken against Marion C. Sprehn.

T. W. Richerson,  
Register.

Page and Moorer, Attys for Plff.

*Bay Minette, Ala.,*

July 15th, 1922

*M*

G. H. Baber & R. L. Williams, Complainant

vs  
Marion C. Sprehn,

NOTICE TO NON-RESIDENT  
Page & Moore,  
Attys for Plaintiffs

**THE BALDWIN TIMES**

**FINE JOB PRINTING. BEST ADVERTISING MEDIUM**

**PROMPT SERVICE. LOWEST PRICES.**

**LOCAL AND LONG DISTANCE TELEPHONE**

**All Bills Must Be Paid Within 30 Days**

To publishing Non-Resident Notice in issues  
June 8th, June 15th, June 22nd and June 29th, 1922:  
171 words @ 4<sup>1</sup>/<sub>2</sub>¢ per word..... \$7.69





the Complainants named herein.

In vacation this 29<sup>th</sup> day of August, 1922.

*John D. Leigh*  
Judge of the 21st Judicial Circuit,  
Baldwin County, Alabama.