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W. T. ROBINSON and C. W.
 HALL,
 Complainants,
 VS.
 ARTEMELIA HARRIS, JONAS
 HARRIS and J. W. EARLE.
 Respondents.

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA,
 IN EQUITY,
 NUMBER 110.

REPORT OF SALE OF LAND FOR CONFIRMATION

And now comes ROBERT S. DUCK, Register of the Circuit Court of Baldwin County, Alabama, and respectfully reports that in pursuance of an order of this court, on to-wit, March 23rd, 1935, authorizing the undersigned to sell certain realty belonging to Artemelia Harris and Jonas Harris, after having given due and legal notice by advertising the same in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, for thirty (30) days previous to the day of sale, setting forth the time, place and terms of sale, on Monday, the 3rd day of June, 1935, the day, and at the place appointed for said sale, between the legal hours of sale, did offer said realty for sale at public outcry, in front of the Courthouse door of Baldwin County, Alabama, to the highest bidder, for cash; and at said sale W. T. Robinson and C. W. Hall, being the highest, best and last bidder therefor, became the purchaser of the South half of the Southeast quarter and the Northeast quarter of the Southeast quarter, less 7 acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East, in Baldwin County, Alabama, at the price of Three Hundred Ten and 00/100) Dollars.

The said Register further reports that said W. T. Robinson and C. W. Hall have complied with the terms of said sale, and have, in cash, paid the entire amount of said purchase money; that said sale was fairly conducted, and that said realty was sold for an amount not

greatly disproportionate to its real value.

WHEREFORE, the undersigned, as Register of this Court, respectfully prays that said sale be in all things confirmed and made good; and that an order be granted authorizing him, as such Register, to execute title to the said W. T. Robinson and C. W. Hall for said real estate purchased by them as aforesaid. All of which is respectfully submitted.

Robert S. Duck
Register of the Circuit Court of
Baldwin County, Alabama.

Sworn to and subscribed before me
on this 8th day of June, 1935.

J. M. Trautman
Notary Public, Baldwin County,
Alabama.
E. H. G. P.

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W. T. ROBINSON and C. W.
HALL,
Complainant,
VS.
ARTEMELIA HARRIS, JONAS
HARRIS, and J. W. EARLE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY,
NUMBER 110.

ORDER OF CONFIRMATION OF SALE

This day comes ROBERT S. DUCK, Register of the Circuit court of Baldwin County, Alabama, and files his report in writing, and under oath, setting forth among other things that on Monday, the 3rd day of June, 1935, within the hours provided by law, and in strict accordance with all and singular, the terms and requirements of the former order and decree of this court granted and entered in the premises on the 23rd day of March, 1935, he proceeded and sold at public outcry, in front of the court house in this county, the lands set forth and particularly described in said former order and decree, and that said land was purchased, at said sale, by W. T. Robinson and C. W. Hall for the sum of Three Hundred Ten and 00/100 (\$310.00) Dollars.

And it appearing to the satisfaction of the court, from said report, and the evidence now therewith submitted, that said amount, so bid for said land, by said W. T. Robinson and C. W. Hall, was the highest and best bid for the same; that said sum so bid, was not greatly less or disproportionate to its real value; that said sale was legally and fairly made, and that the purchase money so bid has been duly paid.

IT IS ORDERED, ADJUDGED AND DECREED, that said sale be, and the same hereby is approved, and in all things ratified and confirmed by the order and authority of this court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the said ROBERT S. DUCK, as such Register as aforesaid, be authorized and he is hereby ordered to convey by proper deed to the said W. T. Robinson and

C. W. Hall, all right, title and interest which Artemelia Harris and Jonas Harris have in such lands.

IT IS FURTHER ORDERED that said report and all other papers on file relating to this proceeding be recorded.

IT IS FURTHER ORDERED that W. T. Robinson and C. W. Hall pay the costs in this proceeding to be allowed to them against any claim of the said Artemelia Harris and Jonas Harris.

Done at Monroeville, Monroe County, Alabama, on this the 17th day of June, 1935.

J. W. Hare
Judge of the Circuit Court of
Baldwin County, Alabama.

W. T. ROBINSON and
C. W. HALL,

Complainants,

VS.

ARTEMELIA HARRIS, JONAS
HARRIS and J. W. EARLE,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 110.

This cause coming on to be heard was submitted upon the original Bill of Complaint, Decree Pro Confesso, and pleadings as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainants are entitled to the relief prayed for in said bill.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the indebtedness of One Hundred and Fifty (\$150.00) Dollars, together with interest from March 28th, 1928, as evidenced by mortgage, are still due and unpaid.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said mortgage from Artemelia Harris and Jonas Harris to J. W. Earle, dated March 28th, 1928, and of record in the office of the Probate Judge of Baldwin County, Alabama, in Mortgage Book 43, pages 12-13, and which, together with the indebtedness secured thereby, is now the property of the Complainants, be and the same hereby is reformed so that the description shall read as follows:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter, less seven acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East, in Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainants have a lien against the following described lands in Baldwin County, Alabama, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter, less seven acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East,

to secure the payment of said indebtedness.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the said lands, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter, less seven acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East, in Baldwin County, Alabama,

be sold and subjected to the payment of the indebtedness of the Complainants in the principal sum of One Hundred and Fifty (\$150.00) Dollars, and interest from March 28th, 1928, together with the costs of this proceeding and the costs of sale, including a reasonable attorney's fee; that the indebtedness of the Complainants is ascertained and fixed at \$ _____, and the attorney's fee at \$60⁰⁰.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondents be and they are hereby given thirty days in which to pay the indebtedness as herein, and if they shall fail or refuse to pay the same in said time, then the Register of this court is hereby ordered, after giving thirty days notice in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, to sell the said property, at public outcry, in front of the courthouse door in Baldwin County, Alabama, during the legal hours of sale, to the highest bidder, for cash, and to make, execute and deliver to the purchaser a deed conveying all the right, title and interest of the said Respondents in and to the said property, and make return to this court within thirty days from the sale.

IT IS FURTHER ORDERED, that the Complainants pay the costs herein to be taxed for which execution may issue, unless such cost is realized out of the sale of said property.

IT IS FURTHER ORDERED by the court that should the property ordered sold, for the satisfaction of the indebtedness herein, bring more than the amount herein established, together with the costs of this proceeding, then the Register is hereby ordered to deliver

the said surplus over to the Respondents herein.

Done at Monroeville, Monroe County, Alabama, on this
the 23rd day of March, 1935.

J. W. Karl
Judge of the 21st Judicial
Circuit of Alabama.

The State of Alabama,
Baldwin County.

No. 110 CIRCUIT COURT IN EQUITY.

W. T. Robinson and C. W. Hall

Complainant

vs.

Artemelia Harris, Jonas Harris and J. W. Earle

Defendant

In this cause it appears to the Register

that a summons requiring the Defendant Artemelia Harris, Jonas Harris and J. W. Earle

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon them

was served upon them by the Sheriff of Baldwin County, Alabama, on the 14th day of February 19 35

And the said DefendantS having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Beebe & Hall, Solicitors for the Complainants

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Artemelia Harris, Jonas Harris and J. W. Earle

DefendantS aforesaid.

This 18th day of March 19 35

Robert S. Duck

Register.

TO HONORABLE F. W. HARRIS, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY:

Come your Complainants, W. T. ROBINSON and C. W.
HALL, and respectfully represent and show unto your Honor
and this Honorable Court as follows:

FIRST:

That they are residents of Atmore, Escambia County,
Alabama, over twenty-one years of age.

SECOND:

That the Respondents, ARTEMELIA HARRIS and JONAS
HARRIS, are bona fide residents of Baldwin County, Alabama,
over twenty-one years of age.

THIRD:

That on March 28th, 1928, Artemelia Harris and Jonas
Harris made, executed and delivered to J. W. Earle a mortgage
on certain lands in Baldwin County, Alabama, to secure an in-
debtedness of one Hundred and Fifty (\$150.00) dollars; that
said mortgage is of record in the office of the Probate Judge
of Baldwin County, Alabama, in Mortgage Book 45, pages 12-13;
that a copy of said mortgage is hereto attached marked Exhibit
"A", and asked to be taken a part hereof as though herein fully
set out.

FOURTH:

That the said mortgage and the indebtedness secured
thereby were transferred, assigned and delivered over by the
said J. W. Earle to the Complainants.

FIFTH:

That the Respondents were the owners, and in the pos-

cession of an interest in the following described lands in Baldwin County, Alabama, to-wit:

The south half of the Southeast quarter and the Northeast quarter of the Southeast quarter of Section 17, Township 3 North of Range 3 East, less 7 acres to Dick Reese;

that this was the only land owned by the said Respondents, and it was the intention and agreement of the Respondents and the said J. W. Earle that this land should be described in the said mortgage, however, the party drafting the mortgage incorrectly described the lands as set out in the copy of mortgage hereto attached, marked Exhibit "A".

SIXTH:

That the indebtedness secured by said mortgage, to-wit, One Hundred and Fifty (\$150.00) Dollars, is still due and unpaid, together with interest thereon from March 28th, 1928.

WHEREFORE the premises considered, Complainants pray that your Honor will, by proper process, make the said Artemelia Harris and Jonas Harris and J. W. Earle, parties respondent to this Bill of Complaint, requiring them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further pray that upon a final hearing of this cause Your Honor will make and enter an order and decree reforming the said mortgage of Artemelia Harris and Jonas Harris to J. W. Earle, which is now the property of your Complainants, so that the same shall describe the land as follows:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter, less 7 acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East, in Baldwin County, Alabama,

and establishing the indebtedness of the Complainants against the said Respondents, Artemelia Harris and Jonas Harris, including a reasonable attorney's fee as provided in said mortgage, and further establishing a lien of the Complainants against the

said property, in Baldwin County, Alabama, described as follows, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter less 7 acres to Dick Neese, all in Section 17, Township 3 North of Range 3 East;

and ordering the Register of the Circuit Court of Baldwin County, Alabama, to sell the said land in satisfaction of the said indebtedness and to make proper deed to the purchaser.

Complainants pray for such other, further, different or general relief as they may be in equity and good conscience entitled to receive. And as in duty bound they will ever pray.

Beche & Hall
Attorneys for Complainants.

FOOT NOTE:

The Respondents and each of them are required to answer each and every allegation contained in paragraphs FIRST to SIXTH, but not under oath, oath being hereby expressly waived.

Beche & Hall
Solicitors for Complainants.

EXHIBIT "A"

THE STATE OF ALABAMA

BALDWIN COUNTY

Know all men by these presents that we Jonas & Artemelia Harris in consideration of the sum of one hundred & fifty dollars, to us in hand paid by J W Earle, the receipt whereof is hereby acknowledged, do grant, bargain, sell and convey unto J W Earle, heirs and assigns forever, all S $\frac{1}{2}$ of SE $\frac{1}{4}$, NE $\frac{1}{4}$ less 7 to all in Sec 17 Dock Reese, also one Maria Mule, Black Rome Babby.

To have and to hold, the above granted and described premises with the appurtenances unto the said J W Earle and to his heirs and assigns, and to their sole and only proper use, benefit and behoof forever. Provided always, and these presents are upon the express condition, that if the said Jonas & Artemelia Harris shall well and truly pay to the said J. W. Earle the sum of one hundred & fifty dollars, then these presents shall cease, determine and to be void, otherwise to remain in full force.

And the said Jonas & Artemelia Harris does hereby vest the said J. W. Earle or his assigns, with full power and authority upon the happening of a default in the payment of the note above described, to sell their interest in said property at public sale for cash, giving 10 days notice in a newspaper published in Bay Minette and the proceeds to apply, first, to the payment of the amount due on said note with interest on same; second, to the payments of the costs of sale, including a reasonable attorney's fee, and if there shall be a surplus, then the balance to be paid over to Jonas & Artemelia Harris. And we do authorize the said J. W. Earle to conduct the sale, and to make deed to the purchaser, and the title so made we hereby agree to defend against all persons. It is agreed that the mortgagee herein may bid at said sale as if he were a stranger to this instrument.

Given under our hand and seal this 28 day of March in the year of our Lord one thousand 9 nine hundred & 28.

Signed, sealed and
delivered in presence
of M. M. Breazeals
T. J. Earle

Jonas Harris (Seal)
Artemelia Harris (Seal)

THE STATE OF ALABAMA

BALDWIN COUNTY.

I, William A Breazeals, hereby certify that Jonas Harris 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

Given under my hand this 28th day of March A. D.

1928

Wm A. Breazeals, a Notary Public

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And I do hereby further certify that on the 28 day of March, 1928, came before me the above named Artemelia Harris known to me to be the wife of the above named Jonas Harris who being examined by me separate and apart from her husband touching her signature to the above instrument, acknowledged that she signed the same of her own free will and accord and without fear, constraint or threats on the part of her husband.

In witness whereof, I hereunto set my hand this 28th day of March 1928

Wm A. Breazeale, a Notary Public

110

Plaintiff Exhibit 6

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 Artemelis Harris, Jonas Harris and

J. W. Earle

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

W.T. Robinson and C.W. Hall

against said Artemelia Harris, Jonas Harris and J. W. Earle

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, Robert S. Duck Register of said Circuit Court, this 28th day of

January 193 5

Robert S. Duck

Register

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

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY:

Come your Complainants, W. T. ROBINSON and C. W.
HALL, and respectfully represent and show unto your Honor
and this Honorable Court as follows:

FIRST:

That they are residents of Atmore, Escambia County,
Alabama, over twenty-one years of age.

SECOND:

That the Respondents, ARTEMELIA HARRIS and JONAS
and J. W. Earle.
HARRIS, are bona fide residents of Baldwin County, Alabama,
over twenty-one years of age.

THIRD:

That on March 28th, 1928, Artemelia Harris and Jonas
Harris made, executed and delivered to J. W. Earle a mortgage
on certain lands in Baldwin County, Alabama, to secure an in-
debtedness of One Hundred and Fifty (\$150.00) Dollars; that
said mortgage is of record in the office of the Probate Judge
of Baldwin County, Alabama, in Mortgage Book 43, pages 12-13;
that a copy of said mortgage is hereto attached marked Exhibit
"A", and asked to be taken a part hereof as though herein fully
set out.

FOURTH:

That the said mortgage and the indebtedness secured
thereby were transferred, assigned and delivered over by the
said J. W. Earle to the Complainants.

FIFTH:

That the Respondents were the owners, and in the pos-

session of an interest in the following described lands in Baldwin County, Alabama, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter of Section 17, Township 3 North of Range 3 East, less 7 acres to Dick Reese;

that this was the only land owned by the said Respondents, and it was the intention and agreement of the Respondents and the said J. W. Earle that this land should be described in the said mortgage, however, the party drafting the mortgage incorrectly described the lands as set out in the copy of mortgage hereto attached, marked Exhibit "A".

DEATH:

That the indebtedness secured by said mortgage, to-wit, One Hundred and Fifty (\$150.00) Dollars, is still due and unpaid, together with interest thereon from March 28th, 1928.

WHEREFORE the premises considered, Complainants pray that your Honor will, by proper process, make the said Artemelia Harris and Jonas Harris and J. W. Earle, parties respondent to this Bill of Complaint, requiring them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further pray that upon a final hearing of this cause Your Honor will make and enter an order and decree reforming the said mortgage of Artemelia Harris and Jonas Harris to J. W. Earle, which is now the property of your Complainants, so that the same shall describe the land as follows:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter, less 7 acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East, in Baldwin County, Alabama,

and establishing the indebtedness of the Complainants against the said Respondents, Artemelia Harris and Jonas Harris, including a reasonable attorney's fee as provided in said mortgage, and further establishing a lien of the Complainants against the

said property, in Baldwin County, Alabama, described as follows, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter less 7 acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East;

and ordering the Register of the Circuit Court of Baldwin County, Alabama, to sell the said land in satisfaction of the said indebtedness and to make proper deed to the purchaser.

Complainants pray for such other, further, different or general relief as they may be in equity and good conscience entitled to receive. And as in duty bound they will ever pray.

Reese & Hall
Solicitors for Complainants.

FOOT NOTE:

The Respondents and each of them are required to answer each and every allegation contained in paragraphs FIRST to SIXTH, but not under oath, oath being hereby expressly waived.

Reese & Hall
Solicitors for Complainants.

EXHIBIT "A"

THE STATE OF ALABAMA

BALDWIN COUNTY

Know all men by these presents that we Jonas & Artemelia Harris in consideration of the sum of one hundred & fifty dollars, to us in hand paid by J W Earle, the receipt whereof is hereby acknowledged, do grant, bargain, sell and convey unto J W Earle, heirs and assigns forever, all S $\frac{1}{2}$ of SE $\frac{1}{4}$, NE $\frac{1}{4}$ less 7 to all in Sec 17 Dock Reese, also one Maria Mule, Black Rome Babby.

To have and to hold, the above granted and described premises with the appurtenances unto the said J W Earle and to his heirs and assigns, and to their sole and only proper use, benefit and behoof forever. Provided always, and these presents are upon the express condition, that if the said Jonas & Artemelia Harris shall well and truly pay to the said J. W. Earle the sum of one hundred & fifty dollars, then these presents shall cease, determine and to be void, otherwise to remain in full force.

And the said Jonas & Artemelia Harris does hereby vest the said J. W. Earle or his assigns, with full power and authority upon the happening of a default in the payment of the note above described, to sell their interest in said property at public sale for cash, giving 10 days notice in a newspaper published in Bay Minette and the proceeds to apply, first, to the payment of the amount due on said note with interest on same; second, to the payments of the costs of sale, including a reasonable attorney's fee, and if there shall be a surplus, then the balance to be paid over to Jonas & Artemelia Harris. And we do authorize the said J. W. Earle to conduct the sale, and to make deed to the purchaser, and the title so made we hereby agree to defend against all persons. It is agreed that the mortgagee herein may bid at said sale as if he were a stranger to this instrument.

Given under our hand and seal this 28 day of March in the year of our Lord one thousand 9 nine hundred & 28.

Signed, sealed and
delivered in presence
of M. M. Breazeals
T. J. Earle.

Jonas Harris (Seal)
Artemelia Harris (Seal)

THE STATE OF ALABAMA

BALDWIN COUNTY.

I, William A Breazeals, hereby certify that Jonas Harris 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

Given under my hand this 28th day of March A. D.

1928

Wm A. Breazeale, a Notary Public

And I do hereby further certify that on the 28 day of March, 1928, came before me the above named Artemelia Harris known to me to be the wife of the above named Jonas Harris who being examined by me separate and apart from her husband touching her signature to the above instrument, acknowledged that she signed the same of her own free will and accord, and without fear, constraint or threats on the part of her husband

In witness whereof, I hereunto set my hand this 28th day of March 1928

Wm A. Breazeale, a Notary Public

TO HONORABLE F. W. HANE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY:

Come your Complainants, W. T. ROBINSON and C. W.
HALL, and respectfully represent and show unto your Honor
and this Honorable Court as follows:

FIRST:

That they are residents of Atmore, Escambia County,
Alabama, over twenty-one years of age.

SECOND:

That the Respondents, ARTEMELIA HARRIS and JONAS
HARRIS, are bona fide residents of Baldwin County, Alabama,
over twenty-one years of age.

THIRD:

That on March 28th, 1923, Artemelia Harris and Jones
Harris made, executed and delivered to J. W. Earle a mortgage
on certain lands in Baldwin County, Alabama, to secure an in-
debtedness of One Hundred and Fifty (\$150.00) Dollars; that
said mortgage is of record in the office of the Probate Judge
of Baldwin County, Alabama, in Mortgage Book 43, pages 12-13;
that a copy of said mortgage is hereto attached marked Exhibit
"A", and asked to be taken a part hereof as though herein fully
set out.

FOURTH:

That the said mortgage and the indebtedness secured
thereby were transferred, assigned and delivered over by the
said J. W. Earle to the Complainants.

FIFTH:

That the Respondents were the owners, and in the pos-

session of an interest in the following described lands in Baldwin County, Alabama, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter of Section 17, Township 3 North of Range 3 East, less 7 acres to Dick Reese;

that this was the only land owned by the said Respondents, and it was the intention and agreement of the Respondents and the said J. W. Earle that this land should be described in the said mortgage, however, the party drafting the mortgage incorrectly described the lands as set out in the copy of mortgage hereto attached, marked Exhibit "A".

SIXTH:

That the indebtedness secured by said mortgage, to-wit, One Hundred and Fifty (\$150.00) Dollars, is still due and unpaid, together with interest thereon from March 28th, 1928.

WHEREFORE the premises considered, Complainants pray that your Honor will, by proper process, make the said Artemelia Harris and Jonas Harris and J. W. Earle, parties respondent to this Bill of Complaint, requiring them to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainants further pray that upon a final hearing of this cause Your Honor will make and enter an order and decree reforming the said mortgage of Artemelia Harris and Jonas Harris to J. W. Earle, which is now the property of your Complainants, so that the same shall describe the land as follows:

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and establishing the indebtedness of the Complainants against the said Respondents, Artemelia Harris and Jonas Harris, including a reasonable attorney's fee as provided in said mortgage, and further establishing a lien of the Complainants against the

said property, in Baldwin County, Alabama, described as follows, to-wit:

The South half of the Southeast quarter and the Northeast quarter of the Southeast quarter less 7 acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East;

and ordering the Register of the Circuit Court of Baldwin County, Alabama, to sell the said land in satisfaction of the said indebtedness and to make proper deed to the purchaser.

Complainants pray for such other, further, different or general relief as they may be in equity and good conscience entitled to receive, and as in duty bound they will ever pray.

Beebe & Hall
Solicitors for Complainants.

FOOT NOTE:

The Respondents and each of them are required to answer each and every allegation contained in paragraphs FIRST to SIXTH, but not under oath, oath being hereby expressly waived.

Beebe & Hall
Solicitors for Complainants.

EXHIBIT "A"

THE STATE OF ALABAMA

BALDWIN COUNTY

Know all men by these presents that we Jonas & Artemelia Harris in consideration of the sum of one hundred & fifty dollars, to us in hand paid by J W Earle, the receipt whereof is hereby acknowledged, do grant, bargain, sell and convey unto J W Earle, heirs and assigns forever, all S $\frac{1}{2}$ of SE $\frac{1}{4}$, NE $\frac{1}{4}$ less 7 to all in Sec 17 Dock Reese, also one Maria Mule, Black Rome Babby.

To have and to hold, the above granted and described premises with the appurtenances unto the said J W Earle and to his heirs and assigns, and to their sole and only proper use, benefit and behoof forever. Provided always, and these presents are upon the express condition, that if the said Jonas & Artemelia Harris shall well and truly pay to the said J. W. Earle the sum of one hundred & fifty dollars, then these presents shall cease, determine and to be void, otherwise to remain in full force.

And the said Jonas & Artemelia Harris does hereby vest the said J. W. Earle or his assigns, with full power and authority upon the happening of a default in the payment of the note above described, to sell their interest in said property at public sale for cash, giving 10 days notice in a newspaper published in Bay Minette and the proceeds to apply, first, to the payment of the amount due on said note with interest on same; second, to the payments of the costs of sale, including a reasonable attorney's fee, and if there shall be a surplus, then the balance to be paid over to Jonas & Artemelia Harris. And we do authorize the said J. W. Earle to conduct the sale, and to make deed to the purchaser, and the title so made we hereby agree to defend against all persons. It is agreed that the mortgagee herein may bid at said sale as if he were a stranger to this instrument.

Given under our hand and seal this 28 day of March in the year of our Lord one thousand 9 nine hundred & 28.

Signed, sealed and delivered in presence of M. M. Breazeals
T. J. Earle.

Jonas Harris (Seal)

Artemelia Harris (Seal)

THE STATE OF ALABAMA

BALDWIN COUNTY.

I, William A Breazeals, hereby certify that Jonas Harris 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

Given under my hand this 28th day of March A. D.

1928

Wm A. Breazeale, a Notary Public

And I do hereby further certify that on the 28 day of March, 1928, came before me the above named Artemelia Harris known to me to be the wife of the above named Jonas Harris who being examined by me separate and apart from her husband touching her signature to the above instrument, acknowledged that she signed the same of her own free will and accord, and without fear, constraint or threats on the part of her husband

In witness whereof, I hereunto set my hand this 28th day of March 1928

Wm A. Breazeale, a Notary Public

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RECORDED
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W. T. ROBINSON and
C. W. HALL,

Complainants,

VS.

ARTEMELIA HARRIS, JONAS
HARRIS and J. W. EARLE,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY,
NUMBER 110.

REPORT OF SALE OF LAND FOR
CONFIRMATION

Filed 5 day of June, 1935.
Robert S. Duck
Clerk.

Original
Month's Rec. Page 100

110

SERVE ON _____

Circuit Court of Baldwin County
IN EQUITY

No. 110

SUMMONS

W. J. Robinson
C. W. Hall

vs.
Artemelia Thomas
Jones Thomas
Grand J. W. Cole

Bulke & Hall
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this Jan 28
day of _____ 1935

M. H. Wilburn
SHERIFF

Executed this Feb 14 the day of
Feb 1935

by leaving a copy of the within Summons with

L. W. Cole

Artemelia Thomas
Defendant

Jones Thomas
W. W. Wilburn Sheriff
BY *J. W. Cole*
Deputy Sheriff

110

~~CONFIDENTIAL~~
Puck

W. T. ROBINSON and C. W. HALL,

Complainants,

VS.

ARTEMELIA HARRIS, JONAS HARRIS and J. W. EARLE,

Respondents.

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

BILL OF COMPLAINT

Filed this 26 day of January, 1935.

January 1935
Sherrill
Robert S. Duck
Register

118

110

W. T. ROBINSON and C. W.
HALL,

Complainants,

VS.

ARTEMELLA HARRIS, JONAS HARRIS
and J. W. EARLE,

Respondents.

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

BILL OF COMPLAINT.

Filed this 25 day of
January, 1935.

Robert S. Rusk
Clerk.

The State of Alabama,
Baldwin County.

{ No. 110 ... CIRCUIT COURT IN EQUITY.

W. J. Robinson and C. W. Hall Complainant

vs.

Artemelia Harris et al Defendant

Motion is hereby made for a Decree Pro Confesso against *Artemelia*

Harris, Jonas Harris & J. W. Carl Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant *J. W. Carl*; and that said summons was duly served according to law, and that said Defendant *J. W. Carl* have failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This *16* day of *March* 19 *35*

Beebe, Isaac Solicitor.

BAY MINETTE, ALA.

May 9

M *R.S. Duck.*

THE BALDWIN TIMES

NOTICE OF SALE

Under and by virtue and in pursuance of a decree rendered in the Circuit Court of Baldwin County, Alabama, in Equity, on March 23rd, 1935, I as Register of said Court, will, on the 3rd day of June, 1935, in front of the Court-house floor of Baldwin County, Alabama, at twelve o'clock noon, sell for cash, to the highest bidder, the property described in that certain mortgage from Artemelia Harris and Jonas Harris to J. W. Barle, dated March 28th, 1928, and of record in the office of the Probate Judge of Baldwin County, Alabama, in mortgage book 43, pages 12-13, and by the said J. W. Barle assigned to W. R. Robinson and C. W. Hall, the description in said mortgage having been heretofore reformed and the said land ordered sold by the above decree, said property being described as follows:

The South half of the Southeast quarter, the Northeast quarter of the Southeast quarter, less seven acres to Dick Reese, all in Section 17, Township 3 North of Range 3 East, in Baldwin County, Alabama.

Said sale to be conducted and the proceeds applied in accordance with the above decree.

ROBERT S. DUCK, Register of Circuit Court of Baldwin County, Alabama.

BEEBE & HALL, Attorneys. 13-4t.

D IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$1.50 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

Notice of Sale

Barle to W. R. Robinson & C. W. Hall

2 W. 7 1/2 T

\$9.99

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 110

March

Term, 1935

W. J. Robinson & C. H. Hall, Complainant

vs.

Artemelia Harris et al, Defendant

To Robert S. Duck, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainants by their

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beck & Haag

Solicitor for Complainant.

*W. J. Robinson &
C. W. Hall*

VS.

*Artemelia Harris
Jonas Harris and
J. H. Earle*

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

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

*Personal Service on defendants,
Motion for decree pro Confesso Decree
Pro Confesso, Request for Decree
in vacation -*

and in behalf of Defendant upon _____

Robert S. Duck

Register.

RECORDED
Duck

110

No. 110

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

H. T. Robinson &
C. W. Hall

VS.

Artemelia Harris
et al

NOTE OF TESTIMONY

Filed in Open Court this 20

day of March 1935

Robert S. Duck

REGISTER

RECORDED

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No. 110

Duck
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THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

W. J. Robinson &
C. H. Hall

vs.

Artemelia Harris
et al

REQUEST FOR DECREE IN
VACATION

FILED *March 20* 192*5*

Robert S. Duck
ast Register

RECORDED IN RECORD

VOL. PAGE

Register

C H Hall 1310
W J Robinson

~~RECORDED~~

Deck

110

110

Julia May 8

1935

Robert D. D.

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RECORDED
Duck

No. 110

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The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

H. J. Robinson and

C. W. Hall

vs.

Artemelia Harris

et al

**MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE**

Filed *March 16* 1935

Robert S. Duck
a/s/s Register.

Recorded in..... Record,

Vol. Page

Register.