

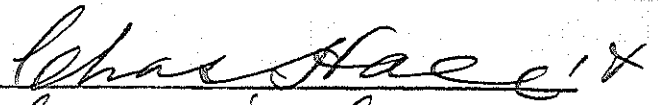
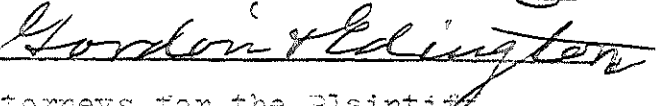
306-5

J. B. LAWRENCE,	:	
	:	
Plaintiff,	:	Circuit Court of
	:	
Vs.	:	Baldwin County, Alabama.
	:	
HOME GARDENS LAND COMPANY,	:	
a Corporation,	:	
Defendants.	:	

Plaintiff claims from the defendant the sum of \$5394.54 due from it by account of October 1, 1918, which sum of money, with the interest thereon, is still unpaid.

Second. Plaintiff claims of the defendant the sum of \$5394.54 due from it for work and labor done for the defendant by the plaintiff from November 1, 1911 to October 1, 1918, at defendant's request, which sum of money, with the interest thereon, is due and unpaid.

The above suit is based upon an itemized, verified statement of the account and which said itemized, verified statement is herewith filed.

  
Charles Haeck  
  
Gordon Edington  
 Attorneys for the Plaintiff.

Price 1914-1918  
M. M. M. M.  
Clarity

Dyas, Alabama, October 1st, 1918

Home Gardens Land Company, a corporation,

To-

J.B.Lawrence, Dr.

To salary for services rendered said corporation as General Manager from November 1st, 1911 to October 1st, 1918 - 83 months @ \$200.00 per month.....\$16,000.00

CREDITS:

1912-April 2, By cash	\$ 200.00
May 25, " "	50.00
June 17, " "	250.00
July 11, " "	52.46
August 9, " "	45.17
Sept. 28, " "	400.00
Dec. 7th " "	220.00
Dec. 24, " "	500.00
1913-February 13, By cash	300.00
March 7th " "	400.00
1914-December 31st " "	440.00
1915-June 30th " "	14.91
December 27th " "	230.50
1916-February 29th " "	50.00
June 30th " "	1,000.00
August 31st " "	75.00
October 31st, " "	177.45
November 30th, " "	500.00
December 31st " "	1,700.00
1917-March 31st " "	275.00
June 30th " "	24.20
November 30th " "	500.00
December 31st " "	1,500.00
1918-March 18th " "	70.75
April 3rd " "	200.00
June 10th " "	33.96
August 29th " "	1,296.04
September 28th " "	700.00
	<hr/>
	\$11,205.46

Balance due J.B.Lawrence October 1st, 1918 \$5,394.54

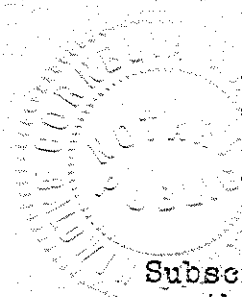
The State of Alabama, :  
:  
Baldwin County. :

Before me, *Cornelia Hall*,  
Notary Public in and for said County and State, personally appeared J.B.Lawrence, a competent witness, who being first duly sworn, doth depose and say, that he is the general manager of the Home Gardens Land Company, a corporation; that he knows from his own personal knowledge that the foregoing account, and each item thereof is true and correct, and that the amount thereof, to-wit: \$5,394.54 with the interest thereon, is still due from the Home Gardens Land Company, a corporation, to the said J.B.Lawrence, and is unpaid.

*J.B. Lawrence*

Subscribed and sworn to before me this 9th, day of October, 1918.

*Cornelia Hall*  
Notary Public, Baldwin County, Alabama.



The State of Alabama,  
BALDWIN COUNTY.

No. ....

Circuit Court

..... Fall Term ..... 1918 .....

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Home Gardens Land Company, a Corporation,

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against them the Defendant.

by J. B. Lawrence,

Plaintiff

Witness my hand this 14th day of October 1918.

T. W. Reardon Clerk.

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

..... Dollars due by

..... Plaintiff's Attorney.

State of Alabama,  
BALDWIN COUNTY.

Circuit Court

J. N. LAWRENCE

vs. Plaintiffs

HON. GORDON JORD

GORDON, et al. DEPENDENTS  
Defendants

SUMMONS AND COMPLAINT

Filed October 14th 1918

W. B. Williams Clerk

Defendant lives at

DYER, Ala.

Chas. Hill,

GORDON and WILLIAMS  
Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

October 14th 1918

W. B. Williams Sheriff

I have executed this writ

this 18th day of October 1918  
by ~~me~~ *W. B. Williams* a copy of the within summons and complaint

*W. B. Williams, Sheriff*  
*Henry and General Managers*  
*of the Home News,*  
*at Dyer, Ala., and by*  
*deputy of the said*  
*Home News and Complaint*  
*to W. B. Williams,*  
*Deic. President of the*  
*Home News and*  
*Company, a copy of the*  
*on the same day,*

*W. B. Williams* Sheriff

Deputy Sheriff.



Dyas, Alabama, October 1st, 1918

HOME GARDENS LAND COMPANY, a corporation,

To-

J.B.Lawrence,

Dr.

To salary for services rendered said corporation as general manager from November 1st, 1911, to October 1, 1918- 83 months @ \$200.00 per month.....\$16,000.00

CREDITS.

1912, April 2.	By cash	\$200.00
May 25	" "	50.00
June 17	" "	250.00
July 11	" "	52.46
August 9	" "	45.17
Sept. 28	" "	400.00
Dec. 7th	" "	220.00
Dec. 24	" "	500.00
1913, Feby. 13	" "	300.00
March 7,	" "	400.00
1914 Dec. 31	" "	440.00
1915 June 30	" "	14.91
Dec. 27	" "	230.50
1916, Feby. 29	" "	50.00
June 30	" "	1000.00
Aug. 31	" "	75.00
Oct. 31	" "	177.45
Nov. 30	" "	500.00
Dec. 31	" "	1700.00
1917, March 31	" "	275.00
June 30	" "	24.20
Nov. 30	" "	500.00
Dec. 31	" "	1500.00
1918, Mch. 18	" "	70.75
Apr. 8	" "	200.00
June 10	" "	53.96
Aug. 29	" "	1296.04
Sept. 28	" "	700.00

\$11,205.46

Balance due J.B.Lawrence Oct.1, 1918

\$5,394.54

The State of Alabama, :  
Baldwin County. :

Before me, Cornelia Hall, a Notary Public in and for said County and State, personally appeared J.B.Lawrence, a competent witness, who being first duly sworn, doth depose and say, that he is the general manager of the Home Gardens Land Company, a corporation; that he knows from his own personal knowledge that the foregoing account, and each item thereof is true and correct, and that the amount thereof, to-wit: \$5,394.54 with the interest thereon, is still due from the Home Gardens Land Company, incorporation, to the said J.B.Lawrence, and is unpaid.

Subscribed and sworn to before me this 9th, day of October, 1918.

J.B.Lawrence.

Cornelia Hall, Notary Public,  
Baldwin County, Ala. (Seal)

*1007*

The State of Alabama,  
BALDWIN COUNTY.

No. ....

Circuit Court

*Fall Term* 191*8*

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon

*Home Gardens Land Company a Corporation*

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit

Court of Baldwin County, State of Alabama, at Bay Minette, against *it* Defendant

by *J. B. Lawrence* Plaintiff

Witness my hand this *14<sup>th</sup>* day of *October* 191*8*

*T. W. Rickerson* Clerk.

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

Dollars due by

Plaintiff's Attorney.



No.

State of Alabama,

BALDWIN COUNTY,

Circuit Court

*J. P. Lawrence*

Plaintiffs

vs.

*Alma Gardner Leach*  
*Lee, a corp.*

Defendants

SUMMONS AND COMPLAINT

Filed ..... 191.....

Defendant lives at ..... Clerk

Plaintiff's Attorney

Defendant's Attorney

*Times Print, Bay Minette.*

Received in office

191.....

I have executed this Writ ..... Sheriff

this ..... 191.....  
by leaving a copy of the within summons and com-  
plaint with

Sheriff

Deputy Sheriff

J. HAMILTON HASTIE,  
Complainant,

v.

THE HEIRS AT LAW, PERSONAL  
REPRESENTATIVES, EXECUTORS,  
AND DEVISEES OF JAMES ABER-  
CROMBIE, AND MRS. GLADYS B.  
WILLETTS, MRS. VERA B. SCRIBNER  
AND MISS BLANCHE MESLIER,  
Respondents.

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The bill of complaint of J. Hamilton Hastie, complainant,  
against the heirs at law, personal representatives, executors,  
and devisees of James Abercrombie, and Mrs Gladys B. Willetts,  
Mrs. Vera B. Scribner and Miss Blanche Meslier, respondents,  
respectfully shows unto your honor:

FIRST.

Complainant is over the age of twenty-one year and resides in  
Stockton, Baldwin county, Alabama;

Complainant has made diligent search to ascertain the names  
and residences of the heirs at law, personal representatives, executors  
and devisees of James Abercrombie, deceased, but is unable to as-  
certain the same; but complainant is informed and believes, and upon  
such information and beliefs states that they are non-residents of  
the State of Alabama and are over the age of twenty-one years:  
the respondent Mrs. Gladys B. Willetts is over the age of twenty-one  
years and resides at 150 West Fifty-eighth Street in the City of New  
York; and respondent Mrs. Vera B. Scribner is over the age of twenty-  
one years and resides in the City of New York, but her more particular  
address is to complainant unknown; the respondent Miss Blanche Mes-  
lier is over the age of twenty-one years and resides in St. Louis, Miss-  
ouri.

SECOND.

The complainant owns and is in the peaceable possession of that  
certain land in Baldwin County, Alabama, known as the Hastie homestead  
and particularly described as follows:

That certain piece, parcel or lot of land known as the Robert  
or Barlow Moll  
Gilchrist tract, being Section 43, township 1 south, range 2 east, and

2.

That certain piece, parcel of lot of land commencing at a point at the north east corner of the Robert Gilchrist tract, being section 43 in township 1 south, range 2 east, running thence north 38 degrees 45 minutes east 64 chains and 33 links to a point in section 11, township 1 south, range 2 east; thence south 52 degrees east 58 chains and 45 links to a point in section 13, township 1 south, range 2 east; thence south 52 chains and 20 links to a point in section 24 township 1 south range 2 east; thence west 31 chains and 58 links to a point in section 23, township 1 south, range 2 east; thence south 15 degrees and 30 minutes west 20 chains; thence west 61 chains and 39 links to a point on the east line of said Robert Gilchrist tract; thence north 18 degrees east along the east line of said Robert Gilchrist tract 61 chains and 31 links to the place of beginning, it being the same property reserved as a homestead of geclusa K. Hastie in deed from John F. Popp and Mary F. Popp, his wife, to A. W. Bryant and Peyton R. Tunstall Jr., recorded in deed book 3, pages 544-548 of the Baldwin County records.

THIRD.

~~That complainant's title to said real property is denied or disputed or is reputed to be denied or disputed by the respondent's herein who claim or are reputed to claim some right, title or interest in or to of lien upon the said real property and no suit is pending to enforce the validity of such right, title or interest.~~

Fourth

Complainant calls upon said respondents above named and upon each and all of them, to set forth and specify their title, claim, interest, lien or encumbrance in, to or upon <sup>said</sup> real property, and how and by what instrument the same is derived and created.

PRAYER FOR PROCESS.

~~complainant prays that by the state's writ of subpoena or by~~ process of publication, as may be appropriate, the said heirs at law personal representatives, executors, and devisees of James Abercrombie, and the said Mrs. Gladys B. Willette, Mrs. Vera B. Scribner, and Miss Blanche Meslier, be made respondents to this bill of complaint and be commanded to demur to, plead to or answer this bill of complaint within

the time allowed by law.

PRAYER FOR RELIEF.

Complainant prays that upon a hearing of this cause your Honor will order and decree that the respondents above named, and none of them have any right, title, interest, estate or claim in or to, or lien or encumbrance upon, said real property above described, or any part thereof; and complainant prays for such further or other or different relief as complainant may be entitled to, and to your Honor may seem meet.

---Brooks & McMillan - - - - -

Solicitors for Complainant.

Foot Note:

Respondents are required to answer each and all of the allegations of each paragraph of the foregoing bill of complaint from first to fourth, both inclusive, but not under oath, to answer under oath being hereby expressly waived.

Brooks & McMillan.

Solicitors for Complainant.

State of Alabama, )  
                          ))  
Baldwin County,  )

Before me, W. H. McMillan, a Notary Public in and for said County, in said State, personally appeared J. Hamilton Hastie, who is known to me and who, being first duly sworn, says that the allegations of the foregoing bill of complaint are true.

Sworn to and subscribed before me this     day of December 1918.

\_\_\_\_\_  
Notary Public, Mobile, Co. Ala.

J. HAMILTON HASTIE,  
Complainant,

v.

THE HEIRS AT LAW, PERSONAL  
REPRESENTATIVES, EXECUTORS,  
AND DEVISEES OF JAMES ABER-  
CROMBIE, AND MRS. GLADYS B.  
WILLETTS, MRS. VERA E. SCRIBNER  
AND MISS BLANCHE MESLIER,  
Respondents.

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The bill of complaint of J. Hamilton Hastie, complainant,  
against the heirs at law, personal representatives, executors,  
and devisees of James Abercrombie, and <sup>again</sup> Mrs Gladys B. Willetts,  
Mrs. Vera B. Scribner and Miss Blanche Meslier, respondents,  
respectfully shows unto your honor:

FIRST.

Complainant is over the age of twenty-one year and resides in  
Stockton, Baldwin county, Alabama;

Complainant has made diligent search to ascertain the names  
and residences of the heirs at law, personal representatives, executors  
and devisees of James Abercrombie, deceased, but is unable to as-  
certain the same; but complainant is informed and believes, and upon  
such information and beliefs states that they are non-residents of  
the state of Alabama and are over the age of twenty-one years:  
the respondent Mrs. Gladys B. Willetts is over the age of twenty-one  
years and resides at 150 West Fifty-eighth Street in the City of New  
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one years and resides in the City of New York, but her more particular  
address is to complainant unknown; the respondent Miss Blanche Mes-  
lier is over the age of twenty-one years and resides in St. Louis, Mis-  
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That certain piece, parcel or lot of land known as the Robert  
<sup>or Barlow Mill</sup> Gilchrist tract, being Section 43, township 1 south, range 2 east, and

That certain piece, parcel of lot of land commencing at a point at the north east corner of the Robert Gilchrist tract, being section 43 in township 1 south, range 2 east, running thence north 38 degrees 45 minutes east 64 chains and 33 links to a point in section 11, township 1 south, range 2 east; thence south 52 degrees east 58 chains and 45 links to a point in section 13, township 1 south, range 2 east; thence south 52 chains and 20 links to a point in section 24 township 1 south range 2 east; thence west 31 chains and 58 links to a point in section 23, township 1 south, range 2 east; thence south 15 degrees and 30 minutes west 20 chains; thence west 61 chains and 39 links to a point on the east line of said Robert Gilchrist tract; thence north 18 degrees east along the east line of said Robert Gilchrist tract 61 chains and 31 links to the place of beginning, it being the same property reserved as a homestead of geclusa K. Hastie in deed from John F. Popp and Mary F. Popp, his wife, to A. W. Bryant and Peyton R. Tunstall Jr., recorded in deed book 8, pages 544-548 of the Baldwin County records.

### THIRD.

That complainant's title to said real property is denied or disputed or is reputed to be denied or disputed by the respondent's herein who claim or are reputed to claim some right, title or interest in or to of lien upon the said real property and no suit is pending to enforce the validity of such right, title or interest.

### Fourth

Complainant calls upon said respondents above named and upon each and all of them, to set forth and specify their title, claim, interest, lien or encumbrance in, to or upon said property, and how and by what instrument the same is derived and created.

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Complainant prays that by the state's writ of subpoena or by process of publication, as may be appropriate, the said heirs at law personal representatives, executors, and devisees of James Abercrombie, and the said Mrs. Gladys B. Willetts, Mrs. Vera B. Scribner, and Miss Blanche Meslier, be made respondents to this bill of complaint and be commanded to demur to, plead to or answer this bill of complaint within

the time allowed by law.

PRAYER FOR RELIEF.

Complainant prays that upon a hearing of this cause your Honor will order and decree that the respondents above named, and none of them have any right, title, interest, estate or claim in or to, or lien or encumbrance upon, said real property above described, or any part thereof; and complainant prays for such further or other or different relief as complainant may be entitled to, and to your Honor may seem meet.

---Brooks-&-McMillan - - - - -

Solicitors for Complainant.

Foot Note:

Respondents are required to answer each and all of the allegations of each paragraph of the foregoing bill of complaint from first to fourth, both inclusive, but not under oath, to answer under oath being hereby expressly waived.

Brooks & McMillan

Solicitors for Complainant.

State of Alabama, )  
                          ))  
Baldwin County,  )

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Sworn to and subscribed before me this      day of December 1918.

\_\_\_\_\_  
Notary Public, Mobile, Co. Ala.