

CLARA J. SANFORD,
Complainant,

vs.

SANFORD-SEEVER ORCHARDS COM-
PANY, a corporation, F. L.
*SANFORD, individually and as
President and Treasurer of San-
ford-Seever Orchards Company,
*C.M. SEEVER, individually and as
Secretary of Sanford-Seever
Orchards Company and L. W. SEEVER,
Respondents.

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

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

Comes Clara J. Sanford and humbly complain-
ing against Sanford-Seever Orchards Company, a corporation,
F. L. Sanford, individually and as President and Treasurer
of Sanford-Seever Orchards Company, C. M. Seever, individual-
ly and as Secretary of Sanford-Seever Orchards Company and
L. W. Seever, and respectfully shows unto your Honor as fol-
lows:

FIRST.

That Clara J. Sanford, complainant, is over
the age of twenty-one years, and a resident of Zona, Louisiana;
that Sanford-Seever Orchards Company is a corporation organized
under the laws of the State of Alabama, with its principal of-
fice and place of business at Robertsdale, Baldwin County, Ala-
bama; that F. L. Sanford is over the age of twenty-one years,
is the President and Treasurer of Sanford-Seever Orchards Com-
pany, and until recently was a resident of Zona, Louisiana,
residing with Complainant as lawful husband and wife, but has
abandoned her and attempted to establish a residence in ^{Nevada} ~~Nebras-~~
~~ka~~, but his present place of residence and Post Office address

is unknown to complainant; that C. M. Seeever is over the age of twenty-one years and a resident of Robertsdale, Alabama, and is Secretary of said Sanford-Seeever Orchards Company; that L. W. Seeever is over the age of twenty-one years and resides at Robertsdale, Alabama.

SECOND.

That complainant and said F. L. Sanford are husband and wife having intermarried more than twelve years ago; that during their married life complainant from time to time advanced moneys to said F. L. Sanford for investment; that the latter part of the year 1916 or in the Spring of 1917, the exact date being unknown to complainant, the said F. L. Sanford transferred to complainant in partial settlement for such advances eighty-eight shares of stock of the par value each of one hundred dollars in the Baldwin County Pecan Company, a corporation organized under the laws of the State of Alabama and she thereby became the true and lawful owner thereof; that at that time said F. L. Sanford was President and Treasurer of said Baldwin County Pecan Company, and C. M. Seeever was Secretary; the said corporation was capitalized at ten thousand dollars, divided into one hundred shares of stock of the par value of one hundred dollars each and after the transfer of the aforesaid shares of stock to complainant as aforesaid, the stock in said corporation was owned as follows:

Complainant eighty-eight shares; F. L. Sanford, two shares; C. M. Seeever, nine shares; and L. W. Seeever, one share:

That complainant has never disposed of her shares of stock in the said corporation but is still the true and lawful owner thereof:

That on to-wit: the 12 day of January 1920, without notice to complainant and in fraud of her rights the aforesaid F. L. Sanford, C. M. Seever and L. W. Seever filed in the office of the Judge of Probate of Baldwin County, Alabama, a declaration attempting to change the name of said corporation from Baldwin County Pecan Company to Sanford-Seever Orchards Company, in which declaration the stock in said Baldwin County Pecan Company is alleged to be owned as follows:

F. L. Sanford, fifty shares; C. M. Seever, twenty-five shares; and L. W. Seever, twenty-five shares:

That complainant was ignorant of this action until a short while before the filing of this suit:

That subsequent thereto and on to-wit the 25th day of January, 1922, the aforesaid F. L. Sanford, C.M. Seever and L.W. Seever, without notice to complainant and in fraud of her rights, filed in the office of the Judge of Probate of Baldwin County, Alabama, a declaration increasing the capital stock of said corporation from ten thousand dollars to one hundred thousand dollars, and without putting additional moneys into the corporation, but basing the increased capital stock issue on the increased value of the property owned by the corporation, issued to themselves stock in said corporation as follows:

F. L. Sanford, five hundred shares; C. M. Seever, two hundred and fifty shares; and to L. W. Seever, two hundred and fifty shares:

That these said transactions were without notice to and without the knowledge of complainant, and in fraud of her rights as a stockholder in the aforesaid Baldwin County Pecan Company, and she has only learned of them

a short while before the filing of this suit.

That said F. L. Sanford and complainant are husband and wife and lived together until on or about the 1 day of May, 1922, when said F. L. Sanford voluntarily abandoned complainant without fault on her part; that he seeks by the aforesaid transactions to defraud her out of her property and her interest in his property; that she has filed her suit in the ^{26th Judicial District} Court of Washington Parish, Louisiana, seeking a separation of community property and the protection of her separate estate in that State.

WHEREFORE complainant prays this Court will take jurisdiction of the cause made by this bill of complaint and by proper process make the aforesaid Sanford-Seever Orchards Company, a corporation, F. L. Sanford, individually and as President and Treasurer of said Sanford-Seever Orchards Company, C. M. Seever, individually and as Secretary of said Sanford-Seever Orchards Company and L. W. Seever parties defendant to this bill and that they be required to answer, plead or demur to this bill within the time and under the penalties prescribed by law and the practice of this Honorable Court:

That the aforesaid Sanford-Seever Orchards Company, F. L. Sanford, individually and as President and Treasurer of said Sanford-Seever Orchards Company, C. M. Seever, individually and as Secretary of said Sanford-Seever Orchards Company, and L. W. Seever be enjoined from disposing of the stock of said complainant which they fraudulently hold; that an attachment be issued against said shares of stock; that upon the final hearing of this cause your Honor will decree that complainant is the true and lawful owner of eight hundred eighty shares of stock in the Sanford-Seever Orchards Company and the aforesaid defendants be required to issue the

same to complainant; and complainant prays for such other,
further or different relief as in equity she shall be entitled
to.

Richardby & Beebe
Lawrence M. Beebe
Solicitors for Complainant.

Defendants are required to answer every allegation of the
foregoing bill of complaint, paragraphs one and two inclu-
sive but not under oath, oath is hereby expressly waived.

Richardby & Beebe
Lawrence M. Beebe
Solicitors for Complainant.

CLARA J. SANFORD,

COMPLAINANT

VS

SANFORD'S SEEVER ORCHARDS
COMPANY, F. L. SANFORD, ETAL,
DEFENDANTS.

CIRCUIT COURT, BALDWIN COUNTY,
ALABAMA. IN EQUITY.

Comes the complainant in the above styled cause and amends
her bill of complaint to show her true and proper christian name and
~~abrogates the word~~ "Clara" to "Carrie" wherever the same appears in said
complaint.

Gillard, Merhorne & Arno
Pickens & Beebe
Solicitors for Complainant.

CLARA J. SANFORD,

COMPLAINANT

VS

SANFORD^OSEEVER ORCHARDS
COMPANY, F.L.SANFORD, ETAL,
DEFENDANTS.

CIRCUIT COURT, BALDWIN COUNTY,
ALABAMA. IN EQUITY.

Comes the complainant in the above styled cause and amends
her bill of complaint to show her true and proper christian name and
changes the word "Clara" to "Carrie" wherever the same appears in said
complaint.

Gallard Mahomet Arisap
Reckard & Beebe
Solicitors for Complainant.

CARRIE J. SANFORD,
COMPLAINANT

VS

F.L. SANFORD AND OTHERS,
DEFENDANT

CIRCUIT COURT, BALDWIN
COUNTY, ALABAMA. IN EQUITY.

Comes the Complainant in the above
styled cause and dismisses her bill heretofore filed.

Boseman O'Fallen
Gaillard, Mahan & Arnold,
Rickaby Beebe & Co
SOLICITOR'S FOR COMPLAINANT

CARRIE J. SANFORD,

COMPLAINANT

VS

F.L. SANFORD AND OTHERS,

DEFENDANT

CIRCUIT COURT, BALDWIN

COUNTY, ALABAMA. IN EQUITY.

We hereby waive notice of the foregoing
dismissal and consent to said dismissal.

James H. Stacey

Solicitor's for Defendants.