

FRED C. GRIFFIN,

Complainant,

VS.

E. A. SHELDON, SR., E. A. SHELDON, JR.,
EVA LOU BARNHILL, ROGER P. BARNHILL,
CHARLES BARNHILL, HAZEL V. MCVAY, O. P. E.
WINDBERG, DAVID BARNHILL, MARJORIE BARNHILL,
MANTON BARNHILL, GORDON BARNHILL, BUNNIE
BARNHILL, D. WINDELL BARNHILL, Minors,
EVA LOU BARNHILL, Guardian of said Minors,
FANNIE S. DALE, CHARLOTTE SHEERMAN, CELIA
SHELDON, ESTELLE SHELDON, TRACY SHELDON,
O. W. SHELDON, ROSE L. SHELDON, NUGENIA
ROSE SHELDON, a minor, A. B. DOOLEY, RE-
CONSTRUCTION FINANCE CORPORATION, RIVER
PARK FRUIT COMPANY, JOHN C. WILLIAMS, JAMES
C. RUPERT, E. B. RUPERT, ELIZABETH RUPERT,
JOHN G. ENGLISH, CYRUS C. ENGLISH, MARGARET
R. ENGLISH, FANNIE L. ENGLISH, JAMES K.
ENGLISH, JEANNE E. BAIRDGARDNER, SALLIE E.
PARIS, WILLIAM JONES, JR., THOMAS J. WATTS,
FRANCIS H. WILLIAMS, WILLIAM A. WILLIAMS,
SAMUEL W. WILLIAMS, ABRAHAM D. CAVANAUGH, JAMES
W. TAYLOR, W. B. AMOS, THOMAS P. MILLER,
RUDOLPHUS D. WILLIAMS, JOHN W. MILLER, CHARLES
B. MILLER, GEORGE E. MILLER, EDWARD C. MILLER,
HENRY L. MILLER, C. M. WORTHINGTON, C. C. MICHAM,
THOMAS C. SINGLETARY, WILLIAM ACKLIN, JAMES R.
SMITH, PERRY THOMAS, JOHN T. HARDIE, THADDEUS
MCNULTY, JOHN W. SCHMIDT, FRANK SCHULTZ, KATHERINE
HARLY, KENNETH DONALD NICHOLSON, RODRICK MILLER
SURGEON, KITTIE M. LEA, GEORGE W. MCALISTER, DAVID
LEA, ROBERT A. BROCKMAY, FRANCIS CYPERT, JOHN A.
GOTTRILL, BENJAMIN F. DAVIS, JOHN B. WATKINS,
CHARLES C. WHITTHURST, SARAH L. M. WILLIAMS,
CLAUDIA A. BENDERBERRY, JAMES ELLIOTT, SARAH GOLDS-
BORO, JOHN STRAND, JOHN LAUER, JONATHAN HUNT,
JOSEPH J. MILSTED and J. E. LOXLEY & SONS, if
they be living, and if dead, the unknown heirs
and devisees of them, and each of them, and any
and all other persons, firms or corporations
claiming any title to, interest in, lien or en-
cumbrance upon said lands or any part or parcel
thereof, and the following described lands in
Baldwin County, Alabama:
ALL OF THE SE $\frac{1}{2}$ of NW $\frac{1}{2}$ of Sec. 32, T6S, R3E, LYING
EAST OF FISH RIVER, containing 30 acres, more or less.
SW $\frac{1}{2}$ of Sec. 32, T6S, R3E; W $\frac{1}{2}$ of NW $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec. 32,
T6S, R3E; NW $\frac{1}{2}$ of SW $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec. 32, T6S, R3E;
NW $\frac{1}{2}$ of Sec. 4, T6S, R3E; W $\frac{1}{2}$ of SW $\frac{1}{2}$ of Sec. 4, T6S, R3E;
NE $\frac{1}{2}$ of SW $\frac{1}{2}$ of Sec. 4, T6S, R3E, excepting the SW $\frac{1}{2}$ of NE $\frac{1}{2}$
of SW $\frac{1}{2}$; S $\frac{1}{2}$ of Sec. 5, T6S, R3E; SE $\frac{1}{2}$ of NE $\frac{1}{2}$ of Sec. 5,
T6S, R3E; W $\frac{1}{2}$ of NW $\frac{1}{2}$ of Sec. 5, T6S, R3E; E $\frac{1}{2}$ of NW $\frac{1}{2}$ of
Sec. 5, T6S, R3E; S $\frac{1}{2}$ of SW $\frac{1}{2}$ of NW $\frac{1}{2}$ of Sec. 5, T6S, R3E;
W $\frac{1}{2}$ of NW $\frac{1}{2}$ of Sec. 6, T6S, R3E; SE $\frac{1}{2}$ of NW $\frac{1}{2}$ of Sec. 8,
T6S, R3E, except oil, gas and mineral rights as reserv-
ed to United States in patent; S $\frac{1}{2}$ of NE $\frac{1}{2}$ of Sec. 8, T6S
R3E; NW $\frac{1}{2}$ of NE $\frac{1}{2}$ of Sec. 8, T6S, R3E, excepting the NW $\frac{1}{2}$
of NW $\frac{1}{2}$ of NE $\frac{1}{2}$; NW $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec. 8, T6S, R3E; NW $\frac{1}{2}$ of
NE $\frac{1}{2}$ of SE $\frac{1}{2}$ of Sec. 8, T6S, R3E.

Respondents.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
ALABAMA, IN EQUITY,
NUMBER 626.

This cause coming on to be heard was submitted for final decree upon the pleadings, decrees pro confesso, and proof as noted by the Register, and it appearing to the Court that the Complainant is the owner of and in the possession of the said lands and each and every parcel thereof, and that the title of the Complainant has been duly and fully proven by legal and competent evidence, the Court is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the Respondents, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bonnie Barnhill, D. Windell Barnhill, Exa Lou Barnhill, as Guardian, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Joanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Anos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechen, Thomas C. Singletary, William Acklin, James E. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAllister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons, and the unknown heirs and devisees of E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bonnie Barnhill, D. Windell Barnhill, Exa Lou Barnhill, Guardian, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Joanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Anos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller,

Charles B. Miller, George E. Miller, Edward G. Miller, Henry L. Miller, C. M. Worthington, C. C. Meenan, Thomas C. Singletary, William Asklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McFulky, John V. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAllister, David Lea, Robert A. Brockett, Frances Gypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons, and each of them, and any and all other persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon said lands or any part or parcel thereof, have no estate, right, claim, interest in or encumbrance upon the following described lands or any part or parcel thereof, in Baldwin County, Alabama, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas, and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the full fee-simple title to said lands, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East, excepting the

Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East,

In Baldwin County, Alabama,

is vested absolutely in the Complainant, Fred C. Griffin.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that a certified copy of this decree be recorded in the Office of the Judge of Probate of Baldwin County, Alabama, in the Direct Index in the names of E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bonnie Barnhill, D. Windell Barnhill, Exa Lou Barnhill, as Guardian, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John C. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John C. English, Cyrus C. English, Margaret R. English, Fannie L. English, James E. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Meehan, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McFulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Burgess, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons, and the unknown heirs of E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bonnie Barnhill, D. Windell Barnhill, Exa Lou Barnhill, as Guardian, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John C. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John C. English, Cyrus C.

English, Margaret E. English, Fannie L. English, James K. English, Jennie E. Baumgardner, Sallie B. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George B. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAllister, David Lea, Robert A. Brockett, Frances Cybert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. B. Loxley & Sons, and in the Indirect Index in the name of Fred C. Griffin.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Register shall, within thirty days from the rendition of this decree, file a certified copy thereof in the Office of the Judge of Probate of Baldwin County, Alabama, for record, and that the cost thereof be taxed in the costs of this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs of this cause, for which execution may issue.

Done at Monroeville, Alabama, on the 10th day of July, 1940.

F. W. HARR
Judge of the First Judicial Circuit of Alabama.

SEATS OF ALABAMA, }
BALDWIN COUNTY. }

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery, hereby certify that the foregoing is a full, true, correct and complete copy of the final decree rendered in the Circuit Court of Baldwin County, Alabama, in Equity, on the 10th day of July, 1940, in the cause therein pending entitled Fred C. Griffin, Complainant, vs. E. A. Sheldon, Sr., et al., Respondents, as the same appears of record in my office.

IN WITNESS WHEREOF, I have hereunto set my hand and the official seal of said Court on this 10th day of July, 1940.

R. S. Duck
Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery.

TESTIMONY OF FRED C. GRIFFIN, COMPLAINANT:

My name is Fred C. Griffin. I live at Loxley, in Baldwin County, Alabama, and am over twenty-one years of age. I am the owner in fee simple, and in the actual possession of the following described lands in Baldwin County, Alabama, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

TESTIMONY OF PHILIP G. ARMSTRONG, A WITNESS FOR THE COMPLAINANT:

My name is Philip G. Armstrong. I live at Silverhill, in Baldwin County, Alabama. I am personally acquainted with the lands described in the Bill of Complaint in this cause and have known them for the past thirty years and more, that is, since I came to Baldwin County, Alabama, in about 1907 or 1908. All of the said lands lie adjacent to the Town of Silverhill, in Baldwin County, Alabama, and I have had occasion to see them and be upon them several times each year.

My wife, Elvera C. Armstrong, and I conveyed a part of the land to Fred C. Griffin, as shown by Exhibit 1; that my wife and I acquired the said lands from Oscar Johnson, on August 26th, 1929, as shown by deed filed for record in the office of the Probate Judge of Baldwin County, Alabama, on May 22nd, 1930, and of record therein in Deed Book 48 NS, pages 493-4; that in September, 1929, the said Oscar Johnson died; that he, Philip G. Armstrong, was named as Executor of the said Last Will and Testament; that the said Oscar Johnson left surviving him as his heirs, his widow, Josephine Johnson, Elvera C. Armstrong and Agnes E. Utter; that on June 27th, 1931, the Executor and heirs of the said Oscar Johnson executed to Elvera C. Armstrong and Philip G. Armstrong a deed of correction, which deed is of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 51 NS, pages 267-9; that he does not have the original deeds herein mentioned; that the said Oscar Johnson, in his Last Will and Testament, left all of his property to his two daughters, Elvera C. Armstrong and Agnes E. Utter; that he knows of his own personal knowledge that the said Oscar Johnson was, on August 26th, 1929, in the actual possession of said lands, exercising exclusive control thereover, and that no one at any time, so far as he knows, made any adverse claims thereto, and that since the execution of the deeds to them, he and his wife, Elvera C. Armstrong, have been in the actual possession thereof and delivered such possession over to Fred C. Griffin;

That he is personally acquainted with the ^{South half of the} Southwest quarter of the Northwest quarter of Section 5, Township 6 South of Range 3 East; that the said land was purchased by Oscar Johnson at a tax sale, on May 24th, 1926, for a consideration of Forty-one and 35/100 (\$41.35) Dollars; that he immediately went into the actual possession of said land, and on December 6th, 1928, secured a deed from the Probate Judge of Baldwin County, Alabama, which is of record in Deed Book 46 NS, pages 256-7; that the said Oscar Johnson was in the actual possession of the said lands until the time of his death, at which time it passed over to his heirs and later to Fred C. Griffin; that during the entire time there has been no one that set up any claim to or exercised

cise any adverse claim thereto.

CROSS-EXAMINATION BY HON. T. J. MASHBURN, GUARDIAN AD LITEM:

Q: Do you know the Sheldons and have they been in possession of any part of said land?

A: No, I don't.

Q: Do you know whether or not the Sheldon's bought a tax title?

A: I don't know.

Q: Is it true that Sheldon bought this land and moved on it in 1926.

A: No, he didn't.

RE-DIRECT EXAMINATION BY HON. HUBERT M. HALL, SOLICITOR FOR COMPLAINANT:

Mrs. Josephine Johnson, the widow of Oscar Johnson and the mother of Elvera C. Armstrong and Agnes E. Utter, is now dead, having died some three months ago.

Philip G. Armstrong.

I purchased the following lands from Elvera C. Armstrong and Philip G. Armstrong, husband and wife, by deed dated December 12th, 1938, acknowledged on the same date, before R. C. Keeney, a Notary Public, Baldwin County, Alabama, filed for record in the office of the Probate Judge of Baldwin County, Alabama, on December 13th, 1938, and of record therein in Deed Book 67 NS, pages 315-6:

The East half of the Northwest quarter; Southwest quarter of the Northwest quarter; Northwest quarter of the Southwest quarter; North half of the Northeast quarter of the Southwest quarter; Southeast quarter of the Northeast quarter of the Southwest quarter, all in Section 4;

The East half of West half and West half of Southwest quarter; South half of the Southwest quarter of the Northwest quarter; West half of the East half, and Southeast quarter of the Northeast quarter, Northeast quarter of the Southeast quarter and West half of the Southeast quarter of the Southeast quarter, all in Section 5;

The West half of the Northwest quarter; Northwest quarter of the Southeast quarter; Northwest quarter of the Northeast quarter of the Southeast quarter; South half of the Northeast quarter; South half of the Northwest quarter of the Northeast quarter and Northeast quarter of the Northwest quarter of the Northeast quarter, all in Section 8;

All in Township 6 South, Range 3 East.

The attached deed marked Exhibit 1 is the original of said deed.

I bought the Northwest quarter of the Northwest quarter of Section 4, Township 6 South of Range 3 East from W. J. B. Kerr and Alicia T. Kerr, his wife, on January 14th, 1939, by deed acknowledged the same date, filed for record in the Office of the Probate Judge of Baldwin County, Alabama, on January 18th, 1939, and of record therein in Deed Book 67 NS, pages 449-50, as shown by original deed attached hereto, marked Exhibit 2.

I purchased the Southwest quarter of Section 32, Township 5 South of Range 3 East from Ella M. Anderson, a widow, and Scott F. Anderson, unmarried, by deed dated April 5th, 1939, acknowledged the same date, filed for record in the office of the Probate Judge of Baldwin County, Alabama, on April 14th, 1939, and recorded therein in Deed Book 69 NS, pages 197-8, as shown by original deed attached hereto, marked exhibit 3.

I purchased the East half of the Southeast quarter of the Southeast quarter of Section 5, Township 6 South of Range 3 East and the Southwest quarter of the Southwest quarter of Section 4, Township 6 South of Range 3 East from Mathilda Hoff Linden and N. P. Linden, her husband, by deed dated January 14th, 1939, acknowledged the same date, filed for record in the office of the Probate Judge of Baldwin County, Alabama, on January 18th, 1939, and of record therein in Deed Book 67 NS, page 449; that the attached is the original of said deed, marked Exhibit 4.

I purchased the West half of the Northwest quarter of the Southeast quarter; all of the Southeast quarter of the Northwest quarter lying East of Fish River, and the Northwest quarter of the Southwest quarter of the Southeast quarter, in Section 32, Township 5 South of Range 3 East, by deed dated December 7th, 1939, from Ollie Crosby and Louise Crosby, husband and wife, Marshall Crosby and Vleva Crosby, husband and wife, and Ollie Crosby, Marshall Crosby and Martin Crosby, trustees under the Last Will and Testament of T. W. Crosby, deceased, as shown by deed filed for record in the office of the Probate Judge of Baldwin County, Alabama, on December 20th, 1939, and of record therein in Deed Book 70 NS, pages 626-7; that the attached is the original of said deed, marked Exhibit 5.

The Complainant offers in evidence the original deeds described above and marked Exhibits 1, 2, 3, 4, and 5.

That he, immediately after purchasing the respective lands, went into the actual possession thereof, had them surveyed, the lines blazed and pointed out, and began and has continued to this time to exercise exclusive control and rights of possession over the same; that he has assessed the said properties for taxes on the records in the offices of the Tax Assessor and Tax Collector of Baldwin County, Alabama, and paid the same; that there is no suit pending to test his title to, interest in, or rights of possession to said lands; that he knows the members of the firm of Crosby Turpentine Company, who are the sons of T. W. Crosby, deceased: Ollie Crosby, Marshall Crosby and Martin Crosby, who were in the possession of that part of the land bought from them at the time of the execution of the deed and the possession of which was turned over to him; that the several parties from whom he purchased the said lands were, at the time he purchased them, in the actual possession thereof and delivered such possession over to him; that he has made inquiries as to the addresses of the parties named in the Bill of Complaint, whose addresses are not given, and has been unable to secure the same; that in an effort to get the correct addresses of all parties therein, he employed Hubert M. Hall of the firm of Beebe & Hall, and gave instructions that he make such effort as was necessary to secure the names, ages and addresses of all parties whom the record showed to have any interest in or claim against the said property; that before purchasing the said land, the Complainant discussed them with residents of Silverhill, in Baldwin County, Alabama, in the vicinity of said lands, with Philip G. Armstrong and others, and learned that the parties in possession of the said lands at that time, and those through whom they claimed, had been in the possession thereof for many years prior to

that time; that the Complainant does not have the original deeds from those through whom he claims and has not been able to locate the same thusfar; that he has made an effort to secure them; Neither does he have the patents to said lands.

CROSS-EXAMINATION BY HON. T. J. MASHBURN, GUARDIAN AD LITEM:

Q: Have the Barnhills' made any claim to these lands?

A: No.

Q: Have you had any correspondence or contact with them about the lands?

A: Roger Barnhill is the head of the outfit since Mr. Barnhill died, several years ago, and when the advertisement came out in the paper, he came to me and asked me about it and I sent him to see Hubert and then he came back and told me that they had no claim.

Q: Was he Trustee of the Estate?

A: I don't know. He took the whole thing over after Mr. Barnhill died.

F. D. Sullivan

TESTIMONY OF PHILIP G. ARMSTRONG, A WITNESS FOR THE COMPLAINANT:

My name is Philip G. Armstrong. I live at Silverhill, in Baldwin County, Alabama. I am personally acquainted with the lands described in the Bill of Complaint in this cause and have known them for the past thirty years and more, that is, since I came to Baldwin County, Alabama, in about 1907 or 1908. All of the said lands lie adjacent to the Town of Silverhill, in Baldwin County, Alabama, and I have had occasion to see them and be upon them several times each year.

My wife, Elvera C. Armstrong, and I conveyed a part of the land to Fred C. Griffin, as shown by Exhibit 1; that my wife and I acquired the said lands from Oscar Johnson, on August 26th, 1929, as shown by deed filed for record in the office of the Probate Judge of Baldwin County, Alabama, on May 22nd, 1930, and of record therein in Deed Book 48 NS, pages 493-4; that in September, 1929, the said Oscar Johnson died; that he, Philip G. Armstrong, was named as Executor of the said Last Will and Testament; that the said Oscar Johnson left surviving him as his heirs, his widow, Josephine Johnson, Elvera C. Armstrong and Agnes E. Utter; that on June 27th, 1931, the Executor and heirs of the said Oscar Johnson executed to Elvera C. Armstrong and Philip G. Armstrong a deed of correction, which deed is of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 51 NS, pages 267-9; that he does not have the original deeds herein mentioned; that the said Oscar Johnson, in his Last Will and Testament, left all of his property to his two daughters, Elvera C. Armstrong and Agnes E. Utter; that he knows of his own personal knowledge that the said Oscar Johnson was, on August 26th, 1929, in the actual possession of said lands, exercising exclusive control thereover, and that no one at any time, so far as he knows, made any adverse claims thereto, and that since the execution of the deeds to them, he and his wife, Elvera C. Armstrong, have been in the actual possession thereof and delivered such possession over to Fred C. Griffin;

South half of the
That he is personally acquainted with the the/Southwest quarter of the Northwest quarter of Section 5, Township 6 South of Range 3 East; that the said land was purchased by Oscar Johnson at a tax sale, on May 24th, 1926, for a consideration of Forty-one and 35/100 (\$41.35) Dollars; that he immediately went into the actual possession of said land, and on December 6th, 1928, secured a deed from the Probate Judge of Baldwin County, Alabama, which is of record in Deed Book 46 NS, pages 256-7; that the said Oscar Johnson was in the actual possession of the said lands until the time of his death, at which time it passed over to his heirs and later to Fred C. Griffin; that during the entire time there has been no one that set up any claim to or exercised

any rights of possession to said land; that he knows of his own personal knowledge that Fred C. Griffin, the present owner, and those through whom he claims, have been in the actual possession of said land, ever claiming to own the same, for more than twenty-five (25) years;

That he is personally acquainted with the Southwest quarter of Section 32, Township 5 South of Range 3 East; that when he first knew the said lands, Amos D. Scott was in the possession thereof and exercised complete control over the same until his death; that the said Amos D. Scott left surviving him as his heirs, his widow: Emily M. Scott, and one daughter, Ella M. Anderson; that subsequent to the death of the said Amos D. Scott, his widow and daughter remained in the possession of the said lands until the death of the widow, Emily M. Scott, after which time the daughter, Ella M. Scott, and Scott F. Anderson, a son of Ella M. Anderson, remained in the possession of the said land until they conveyed the same to F. C. Griffin; that he knows of his own personal knowledge that F. C. Griffin, Ella M. Anderson, Scott F. Anderson and Emily Scott have been in the actual possession of said lands, ever claiming to own the same, for more than thirty years; that during said time no one has ever made any adverse claim thereto.

That he is also personally acquainted with the Northwest quarter of the Northwest quarter of Section 4, Township 6 South, Range 3 East; that he remembers said land prior to July 14th, 1916, at which time the said land was in the actual possession of Oscar Johnson, who exercised complete and exclusive rights of possession and control over the same; that on July 14th, 1916, Oscar Johnson and Josephina Johnson, his wife, conveyed the said land to W. J. B. Kerr, who immediately went into the actual possession thereof, fenced and cleared a part of the land and cultivated the same for a number of years; that there is now the old fence, a part of which is still under fence; that the said W. J. B. Kerr conveyed the same to F. C. Griffin, who went into possession thereof and is in possession of the same now; that he knows of his own personal knowledge that F. C. Griffin, W. J. B. Kerr and Oscar Johnson have been in the actual possession of the said lands, ever claiming to own the same, for more than thirty years;

That he also knows the East half of the Southeast quarter of the Southeast quarter of Section 5, Township 6 South of Range 3 East; that when he first knew the land, about 1908, Oscar Johnson, his father-in-law, was in the actual possession thereof and that about that time, on to-wit, February 1st, 1908, conveyed the same to Chas. Hoff; that he was personally acquainted with Chas. Hoff; that the said Chas. Hoff, after purchasing the same, went into the possession thereof and continued in

the possession until his death, sometime in 1927; that the said Chas. Hoff left surviving him as his only heir and next of kin, his widow, Mathilda Hoff, who went into possession of the said land and remained in such possession up until the time she conveyed the same to F. C. Griffin; that subsequent to the death of Chas. Hoff, the said Mathilda Hoff married N. P. Linden; that Fred C. Griffin, Mathilda Hoff Linden and Chas. Hoff, of his own personal knowledge, have been in the actual possession of said lands for more than thirty years; that several years ago there was a man in the vicinity of Silverhill, John U. Schmidt, who acquired oil leases to said lands; that he knows of his own personal knowledge that the said John U. Schmidt did not at any time drill a well or attempt to drill any wells in the vicinity of these lands; that he knows of his own personal knowledge that no parties have, at any time, drilled or attempted to drill any oil wells on or near the lands described in this matter; that he personally knows O. F. E. Windberg and knows that he has not drilled any wells or paid any royalties on said lands or exercised or attempted to exercise any rights to any lands or exploration contract that he has; that at one time oil leases were given to R. C. Keeney, or A. B. Dooley, and he knows of his own personal knowledge that these parties have not exercised or attempted to exercise any rights under said leases and that the same have long since been forfeited;

That he is also personally acquainted with the Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East, all of the Southeast quarter of the Northwest quarter of Section 32, East of Fish River, and the West half of the Northwest quarter of the Southeast quarter of Section 32, all in Township 5 South of Range 3 East; that the said lands were at one time known as the G. E. Worthington lands, who owned them and exercised a turpentine business thereon; that he turpented these lands for a number of years, during which time no other person made any claim thereto; that in January, 1929, he conveyed the said lands to T. W. Crosby, who immediately went into the possession thereof and operated a turpentine business thereon, until the time of his death, sometime about April 1st, 1937; that subsequent to the death of the said T. W. Crosby, his son, Ollie W. Crosby, continued to operate a turpentine business thereon until he, together with his brothers, conveyed the same to Fred C. Griffin; that he knows of his own personal knowledge that the said Fred C. Griffin, T. W. Crosby, his heirs, and G. E. Worthington have been in the actual possession of said lands for more than the past fifteen (15) years, and that during that time no one has attempted to exer-

IN WITNESS WHEREOF, we have hereunto set our hands and seals, on this the 12th day of December, 1938.

Elvera C. Armstrong (SEAL)
Philip G. Armstrong (SEAL)

STATE OF ALABAMA.

BALDWIN COUNTY.

I, R C Keeney, a Notary Public in and for said County, in said State, hereby certify that Elvera C. Armstrong and Philip G. Armstrong, husband and wife, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

And I do further certify that on the 12th day of December, 1938, came before me the within named Elvera C. Armstrong, known to me to be the wife of the within named Philip G. Armstrong, and who being examined separate and apart from her husband touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints or threats on the part of her husband.

Given under my hand and seal on this the 12th day of December, 1938.

R C Keeney
Notary Public, Baldwin County,
Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

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)

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon E. A. SHELDON, SR., E. A. SHELDON, JR., EXA LOU BARNHILL, ROGER F. BARNHILL, CHARLES BARNHILL, HAZEL V. MCVAY, O. F. E. WINBERG; DAVID BARNHILL, MARJORIE BARNHILL, MASTON BARNHILL, GORDON BARNHILL, BENNIE BARNHILL, D. WINDELL BARNHILL, minors, EXA LOU BARNHILL, Guardian of said minors; FANNIE S. DALE, CHARLOTTE SHERMAN, CELIA SHELDON, ESTELLE SHELDON, TRACY SHELDON, O. W. SHELDON, ROSE L. SHELDON, EUGENIA ROSE SHELDON, a minor, A. B. DOOLEY, RECONSTRUCTION FINANCE CORPORATION, RIVER PARK FRUIT COMPANY, JOHN G. WILLIAMS, JAMES C. RUPERT, E. B. RUPERT, ELIZABETH RUPERT, JOHN G. ENGLISH, CYRUS C. ENGLISH, MARGARET R. ENGLISH, FANNIE L. ENGLISH, JAMES K. ENGLISH, JEANNE E. BAUMGARDNER, SALLIE E. FARIS, WILLIAM JONES, JR., THOMAS J. WATTS, FRANCES H. WILLIAMS, WILLIAM A. WILLIAMS, SMAUEL W. WILLIAMS, ABRAM D. CAVANAUGH, JAMES W. TAYLOR, W. B. AMOS, THOMAS P. MILLER, RUDOLPHUS D. WILLIAMS, JOHN W. MILLER, CHARLES B. MILLER, GEORGE E. MILLER, EDWARD C. MILLER, HENRY L. MILLER, C. M. WORTHINGTON, C. C. MECHEM, THOMAS C. SINGLETARY, WILLIAM ACKLIN, JAMES R. SMITH, PERRY THOMAS, JOHN T. HARDIE, THADDEUS MCNUITY, JOHN U. SCHMIDT, FRANK SCHULTZ, KATHERINE HANLY, KENETH DONALD NICHOLSON, RODERICK MILLER SURGEON, KITTIE M. LEA, GEORGE W. MCALISTER, DAVID LEA, ROBERT A. BROCKETT, FRANCES CYPERT, JOHN A. COTTRELL, BENJAMIN F. DAVIS, JOHN B. WATKINS, CHARLES C. WHITEHURST, SARAH L. M. WILLIAMS, CLAUDIA A. BENBERRY, JAMES ELLIOTT, SARAH GOLDSBORO, JOHN STRAND, JOHN LAUER, JONATHAN HUNT, JOSEPH J. MILSTED and J. E. LOXLEY & SONS, if be living, and if dead, the unknown heirs and devisees of them, and each of them, 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 FRED C. GRIFFIN against said above named, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendants 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, R. S. DUCK, Register of said Circuit Court, this 8th
day of April, 1940.

R. S. Duck

Register.

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

Comes your Complainant, FRED C. GRIFFIN, and presents this his
Bill of Complaint against the following described lands in Baldwin County,
Alabama, to-wit:

All of the Southeast quarter of the Northwest quarter
of Section 32, Township 5 South, Range 3 East, lying
East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South,
Range 3 East.

The West half of the Northwest quarter of the South-
east quarter of Section 32, Township 5 South, Range
3 East.

The Northwest quarter of the Southwest quarter of the
Southeast quarter of Section 32, Township 5 South,
Range 3 East.

The Northwest quarter of Section 4, Township 6 South,
Range 3 East.

The West half of the Southwest quarter of Section 4,
Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Sec-
tion 4, Township 6 South, Range 3 East, excepting the
Southwest quarter of the Northeast quarter of the South-
west quarter.

The South half of Section 5, Township 6 South, Range 3
East.

The Southeast quarter of the Northeast quarter of Sec-
tion 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5,
Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5,
Township 6 South, Range 3 East.

The South half of the Southwest quarter of the North-
west quarter of Section 5, Township 6 South, Range 3
East.

The West half of the Northwest quarter of Section 8,
Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Sec-
tion 8, Township 6 South, Range 3 East, except oil, gas
and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8,
Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Sec-
tion 8, Township 6 South, Range 3 East, excepting the
Northwest quarter of the Northwest quarter of the North-
east quarter.

The Northwest quarter of the Southeast quarter of Sec-
tion 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East,

and against E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill; Charles Barnhill, Hazel V. McVay, and O. F. E. Winberg, all residents of Baldwin County, Alabama, and over twenty-one years of age; David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, minors residing with their mother, Exa Lou Barnhill, at Loxley, in Baldwin County, Alabama, who is their guardian; Fannie S. Dale, a non-resident of the State of Alabama, and residing at Brooklyn, New York; Charlotte Sherman, a non-resident of the State of Alabama, and residing at Hollandale, Minn; Celia Sheldon, a non-resident of the State of Alabama, and residing at Huntsville, Texas; Estelle Sheldon, a non-resident of the State of Alabama, and residing at Huntsville, Texas; Tracy Sheldon, a non-resident of the State of Alabama, and residing at Des Moines, Iowa; O. W. Sheldon, a non-resident of the State of Alabama, and residing at Mt. Eagle, Tenn; Rose L. Sheldon, a non-resident of the State of Alabama, and residing at Chicago, Illinois, all over twenty-one years of age; and Eugenia Rose Sheldon, a minor, and non-resident of the State of Alabama, residing in Chicago, Illinois; A. B. Dooley, over twenty-one years of age and a non-resident of the State of Alabama, whose address is unknown; Reconstruction Finance Corporation, a corporation, with offices in Birmingham, Alabama; River Park Fruit Company, a corporation, address unknown; and John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Faris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, and Joseph J. Milsted, and J. E. Loxley & Sons, and against each of them, separately

and severally, and if either or any of them be dead, then against their, and each of their, heirs, and devisees, separately and severally, and against any and all other persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said lands or any part or parcel thereof, and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant is over twenty-one years of age and a bona fide resident of Loxley, in Baldwin County, Alabama; that he is the owner in fee simple and in the actual possession of said lands, in Baldwin County, Alabama, described as follows, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

2. That no suit is pending to test the Complainant's title to, interest in, or his rights to the possession of said lands.

3. That the Complainant obtained title to said lands by purchases from Elvira C. Armstrong and Philip G. Armstrong, husband and wife, by deed dated December 12th, 1938; W. J. B. Kerr and Alicia T. Kerr, his wife, by deed dated January 14th, 1939; Ella M. Anderson and Scott F. Anderson, by deed dated April 5th, 1939; Ollie Crosby and Louise Crosby, husband and wife, Marshall Crosby and Vieva Crosby, husband and wife, and Ollie Crosby, Marshall Crosby and Martin Crosby, Trustees under the Last Will and Testament of T. W. Crosby, deceased, being all of the members of the co-partnership known as Crosby Turpentine Company, by deed dated December 7th, 1939; Mathilda Hoff Linden and N. P. Linden, her husband, by deed dated January 14th, 1939; all of said deeds being of record in the office of the Probate Judge of Baldwin County, Alabama.

4. That the title to said lands claimed by the Complainant stands upon the records in the Probate Court of Baldwin County, Alabama, in the names of Fred C. Griffin, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty,

John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons.

5. That no one has at any time within ten years next preceding the filing of this Bill of Complaint paid any taxes upon, or had any possession of said lands, or any part thereof, except Fred C. Griffin and those through whom he claims by mesne conveyances, to-wit: Elvera C. Armstrong, Philip G. Armstrong, Philip G. Armstrong, Executor of Estate of Oscar Johnson, Oscar Johnson, S. F. Anderson, A. D. Scott, Emily Scott, Ella M. Anderson, Mrs. Charles A. Hoff, Mrs. M. P. Linden, Charles Hoff, W. J. B. Kerr, Crosby Turpentine Company, T. W. Crosby, G. E. Worthington, W. W. Harrison, R. F. Mitchell, Jr., J. L. Tucker, D. N. Long and A. H. Russ.

6. That the only persons known by your Complainant to claim said lands or any part thereof or any interest therein are: Fred C. Griffin of Loxley, in Baldwin County, Alabama, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons; that a diligent search and inquiry has been made from residents in the

vicinity of said lands, from residents of Fairhope, Silverhill, Robertsdale, and Bay Minette, in Baldwin County, Alabama, and from the records at Bay Minette, the County Seat of Baldwin County, Alabama, to ascertain the present addresses of said parties whose addresses are unknown, and whether or not they or any of them are dead, and if dead, the names, ages and addresses of their, and each of their, heirs, and they are unknown; that from such information obtainable, all are over twenty-one years of age and non-residents of the State of Alabama.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said E. A. Sheldon, Sr., E.A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, Reconstruction Finance Corporation, and each of them, and A. B. Dooley, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons, and each of them, and the unknown heirs and devisees of them, if either or any of them should be dead, and any other person, firm or corporation claiming any right, title to, interest in, or encumbrance upon said lands, to-wit;

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East,

situated in Baldwin County, Alabama, or any part thereof, to be made parties respondent to this Bill of Complaint, and by appropriate process require them and each of them to, separately and severally, plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing of this cause, this Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of encumbrances, to the said lands and to each part and parcel thereof is vested in your Complainant, FRED C. GRIFFIN, and that E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia ^{Rose} Sheldon, Reconstruction Finance Corporation, and A. B. Dooley, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons, if they be living, and if dead, their and each of their unknown heirs and devisees, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said lands, or any part thereof, and that any and all doubts and disputes concerning the same be cleared up. And your Complainant prays for such other, further, different or general relief as in equity and good conscience shall seem mete and proper.

BEEBE & HALL,

By: 
Solicitors for Complainant.

STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

Before me, the undersigned authority, in and for said County, in said State, personally appeared HUBERT M. HALL, who is known to me, and who having been by me first duly sworn, deposes and says: That he is a member of the firm of Beebe & Hall, Solicitors of record and agents of the Complainant, Fred C. Griffin, in the above styled cause, and duly authorized by him to make this affidavit, and that the facts stated in the foregoing Bill of Complaint, from all information obtainable, are true, and from such information obtained, he verily believes and so states that the same are true.

Hubert M. Hall

Sworn to and subscribed before me
this 5th day of April, 1940.

W. Byrnes Jones
Notary Public, Baldwin County, Ala.

**CHANCERY EXECUTION
BILL OF COSTS**

No. *656*

De Luff Vs. *Ea Shilden et al*

Plaintiff

Defendant

FEES OF REGISTER		Dollars	Cents	Brought Forward	
Filing each bill and other papers	10	<i>2</i>	<i>10</i>		<i>2465</i>
Issuing each subpoena	50	<i>1</i>	<i>50</i>	For Receiving, keeping and paying out or distributing money, etc.; 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
Issuing each copy thereof	40	<i>1</i>	<i>40</i>	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Entering each return thereof	15	<i>1</i>	<i>40</i>	Each notice sent by mail to creditor	15
For each order of publication	1 00	<i>1</i>	<i>00</i>	Filing, receipting for and docketing each claim, etc.	25
Issuing writ of injunction	1 50			For all entries on subpoena docket, etc.	50
For each copy thereof	50			For all entries on commission docket, etc.	50
Entering each return thereof	15			Making final record, per 100 words	15
Issuing Writ of Attachment	1 00			Certified copy of decree	1 00
Entering each return thereof	15			Report of divorce to State Health Office (Acts 1915)	50
Docketing each case	1 00	<i>1</i>	<i>00</i>	Total Fees of Register	<i>4530</i>
Entering each appearance	25	<i>1</i>	<i>00</i>	FEES OF SHERIFF	
Issuing each decree pro confesso on per. ser.	1 00	<i>1</i>	<i>00</i>	Serving and returning subpoena on deft.	50
Issuing each decree pro confesso on publica.	1 00	<i>1</i>	<i>00</i>	Serving and returning subpoena for witness	65
Each order appointing guardian	1 00	<i>1</i>	<i>00</i>	Levying attachment	3 00
Any other order by Register	50	<i>1</i>	<i>00</i>	Entering and returning same	25
Issuing commission to take testimony	50	<i>1</i>	<i>00</i>	Selling property attached	
Receiving and filing	10	<i>1</i>	<i>00</i>	Impanelling Jury	75
Endorsing each package	10	<i>1</i>	<i>00</i>	Executing writ of possession	2 50
Entering order submitting cause	50	<i>1</i>	<i>00</i>	Collecting execution for costs	1 50
Entering any other order of court	25	<i>1</i>	<i>00</i>	Serving and returning sci. fa., each	65
Noting all testimony	50	<i>1</i>	<i>00</i>	Serving and returning notice	65
Abstract of cause, etc.	1 00	<i>1</i>	<i>00</i>	Serving and returning writ of injunction	1 50
Entering each decree	75	<i>1</i>	<i>00</i>	Serving and returning writ of exeat	1 50
For every 100 words over 500	15	<i>1</i>	<i>00</i>	Taking and approving bonds, each	75
Taking account, etc.	3 00	<i>1</i>	<i>00</i>	Collecting money on execution	
Taking testimony, etc.	15	<i>1</i>	<i>00</i>	Making deed	2 50
Each report, 500 words or less	2 50	<i>1</i>	<i>00</i>	Serving and returning application, etc.	1 00
For every 100 words over 500	15	<i>1</i>	<i>00</i>	Serving attachment, contempt of court	1 50
Amount claimed less than \$500, etc.	2 00	<i>1</i>	<i>00</i>	Total Fees of Sheriff	<i>3550</i>
Issuing each subpoena	25	<i>1</i>	<i>00</i>	RECAPITULATION	
Witness certificate, each	25	<i>1</i>	<i>00</i>	Register's Fees	<i>4530</i>
Issuing execution, each	15	<i>1</i>	<i>00</i>	Sheriff's Fees	<i>2350</i>
Entering each return	15	<i>1</i>	<i>00</i>	Commissioner's Fees	<i>1500</i>
Taking and approving bond, each	1 00	<i>1</i>	<i>00</i>	Solicitor's Fees	
Making copy of bill, etc.	15	<i>1</i>	<i>00</i>	Witness Fees	<i>3500</i>
Each notice not otherwise provided for	50	<i>1</i>	<i>00</i>	Guardian Ad Litem	<i>6195</i>
Each certificate of affidavit, with seal	50	<i>1</i>	<i>00</i>	Printer's Fees	<i>800</i>
Each certificate or affidavit, no seal	25	<i>1</i>	<i>00</i>	Trial Tax	<i>300</i>
Hearing and passing on application, etc.	3 00	<i>1</i>	<i>00</i>	Recording Decree in Probate Court	<i>810</i>
Each settlement with receiver, etc.	3 00	<i>1</i>	<i>00</i>	Total	<i>19125</i>
Examining each voucher of Receiver, etc.	10	<i>1</i>	<i>00</i>		
Examining each answer, etc.	3 00	<i>1</i>	<i>00</i>		
Recording resignation, etc.	75	<i>1</i>	<i>00</i>		
Entering each certificate to Supreme Court	50	<i>1</i>	<i>00</i>		
Taking questions and answers, etc.	25	<i>1</i>	<i>00</i>		
For all other ser relating to such proceedings	1 00	<i>1</i>	<i>00</i>		
For services in proceeding to relieve minors, etc.. same fee as in similar cases.		<i>1</i>	<i>00</i>		
Commission on sales, etc: 1st \$100, 2 per ct.; all over \$100 and not exceeding \$1,000, 1 1-2 per ct; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct.		<i>1</i>	<i>00</i>		
Sub Total Carried Forward		<i>2465</i>			

The State of Alabama, } No. _____
 Baldwin County. } Circuit Court, In Equity _____ Term, 193__

To Any Sheriff of the State of Alabama—GREETING:
 You are hereby commanded, That of the goods and chattels, lands and tenements of _____

_____ Defendant

you cause to be made the sum of _____ Dollars,
 which _____ Plaintiff

_____ recovered of _____ on the _____ day of _____ 193__

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of _____ Dollars,

costs of suit, and have the same to render to the said _____ and make return of this Writ and the execution thereof, according to law.

Interest from _____ 193__ to date of collection.

Witness my hand, this _____ day of _____ 193__

Register.

FINAL DECREE.

FRED C. GRIFFIN,

Complainant,

VS.

E. A. SHELDON, SR.,
ET AL.,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NO. 626.

Filed July 11 1940
W. B. BEEBE
R. H. HALL

State of Alabama }
Baldwin County. } Probate Court
Filed in office this 11 day JUL 11 1940
at 1110 Ave and duly recorded
Book No. 7175 at page 826-453
and I certify that \$ _____ Dues
tax and \$ _____ Wife tax has
been paid as required by law.
W. B. BEEBE
Judge of Probate.

BEEBE & HALL
LAWYERS
BAY MINETTE, ALABAMA

500

RECORDED

BILL OF COMPLAINT

FRED C. GRIFFIN,

Complainant,

VS.

E. A. SHELDON, SR.,
ET AL.,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

*Filed April 3, 1940
R. S. Dink, Register*

BEEBE & HALL

LAWYERS

BAY MINETTE, ALABAMA

Executed 4-18 1940
by serving copy of within Summons and
Complaint on

- E. A. Sheldon Sr -
- E. A. Sheldon Jr
- Dr. O. F. E. Windberg
- Martin Barnhill
- Erica Lou Barnhill
- Bernie Barnhill
- Erica Lou Barnhill as guardian
- Gordon Barnhill
- D. Wendell Barnhill
- Roger E. Barnhill
- Charles Barnhill
- Marjorie Barnhill
- Hayel V. McVay
- W. B. Stuart Sheriff
- B. F. Mucena Deputy Sheriff

Executed _____ 19____
by serving copy of within Summons and
Complaint on

By _____
Deputy Sheriff

Received in Sheriff Office
April 12th 1940 W.R. Stout Sheriff

to.
J. C. Guffin

1-14-39

89
25-

State of Alabama,
Baldwin County.

Probate Court

Filed in office this _____ day of IAN 18 1939
at 8 am and duly recorded
Book No. 6775 at page 442-50
and I certify that \$ _____ Cts. 1.00 Debt
tax and \$ _____ cts. Mtgs tax, has
been paid as required by law.

[Signature]
Judge of Probate

ORVIS M. BROWN
ATTORNEY AND COUNSELLOR AT LAW
BALDWIN BUILDING
ROBERTSDALE, ALA.

J C Guffin
Notary

D 1.00
R 25
1 75

WARRANTY DEED:

5

ELIA M. ANDERSON, a widow,
and SCOTT F. ANDERSON,
unmarried,

4-5-39

to

F. C. GRIFFIN.

45

State of Alabama,
Baldwin County,

Public Seal

APR 14 1939

Filed in office this day of

at 9:30 am and duly recorded

in Book No. 6975 at page 197-8

and I certify that \$ Sp. Deed

has not been paid as required by law

W. Roberts
Judge of Probate

BEEBE, HALL & BEEBE
LAWYERS
BAY MINETTE, ALABAMA

DSD

7
43-

WARRANTY DEED:

MATHILDA HOFF LINDEN
and N. P. LINDEN, her
husband,

to 1-14-39

F. C. GRIFFIN.

State of Alabama,
Baldwin County.

Probate Court

Filed in office this JAN 18 day of 1939

at Bain and duly recorded
in Book No. 6775 at page 449

and I certify that \$ 1 cts. 50 Dead
tax and \$ cts. Mitgs tax, has
been paid as required by law.

[Signature]
Judge of Probate

BEEBE, HALL & BEEBE

LAWYERS

BAY MINETTE, ALABAMA

AP 50
DI

37
Ollie Crosby wife
Marshall Crosby wife
J.W. Crosby and by trustee
12-2-39

OLLIE CROSBY, ET AL

TO

FRED C. GRIFFIN

WARRANTY DEED

State of Alabama, Probate Court
Baldwin County, DEC 20 1939

I filed in office this 3rd day of
at 3 PM and duly recorded
in Book No. 7085 at page 267
and I certify that \$50.00
has been paid as required by law.

[Signature]
Judge of Probate

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

[Signature]
R 11/30
D 1/60

Elvira C. Armstrong
Philip H. Armstrong $\frac{7}{45}$
to
Fred C. Sufferin
12-12-38

State of Alabama }
Baldwin County. } Probate Court
Filed in office this day DEC 13 1938
and duly recorded
Book No. 67 at page 354
and I certify that \$ 9.50 Real
tax and \$ _____ etc. _____
has been paid as required by law.
[Signature]
Judge of Probate

BEEBE, HALL & BEEBE
LAWYERS
BAY MINETTE, ALABAMA D350

WARRANTY DEED

STATE OF ALABAMA }
BALDWIN COUNTY }

KNOW ALL MEN BY THESE PRESENTS: That we, Ollie Crosby and Louise Crosby, husband and wife, Marshall Crosby and Viera Crosby, husband and wife, and Ollie Crosby, Marshall Crosby and Martin Crosby, trustees under the last will and testament of T. W. Crosby, deceased, being all of the members of the co-partnership known as Crosby Turpentine Company, for and in consideration of other valuable considerations and the sum of ONE DOLLAR (\$1.00) to us in hand paid by Fred C. Griffin, the receipt whereof being hereby acknowledged, do hereby GRANT, BARGAIN, SELL and CONVEY unto the said Fred C. Griffin, his heirs and assigns, all of the following described real estate in Baldwin County, Alabama, to-wit:-

The West half ($W\frac{1}{2}$) of the Northwest quarter ($NW\frac{1}{4}$) of the Southeast quarter ($SE\frac{1}{4}$); all of the Southeast quarter ($SE\frac{1}{4}$) of the Northwest quarter ($NW\frac{1}{4}$) lying East of Fish River and the Northwest quarter ($NW\frac{1}{4}$) of the Southwest quarter ($SW\frac{1}{4}$) of the Southeast quarter ($SE\frac{1}{4}$) in Section Thirty-two (32), Township Five (5) South of Range Three (3) East.....

together with all the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, TO HAVE AND TO HOLD the same unto the said Fred C. Griffin, his heirs and assigns FOREVER.

We do hereby covenant and agree with the said Fred C. Griffin, his heirs and assigns, that we are lawfully seized of an indefeasible title in fee simple, in and to said premises; that the same are free and clear of all liens and encumbrances; that we have good right and lawful authority to sell the same, and that we will, and our heirs, executors and administrators shall, warrant and defend the title to and possession of said premises unto the said Fred C. Griffin, his heirs and assigns, against the lawful claims of all persons whomsoever.

IN WITNESS WHEREOF: We have hereunto set our hands and seals this 7 day of December, 1939.

Ollie Crosby (SEAL)
Ollie Crosby--Individually

Louise Crosby (SEAL)

Marshall Crosby (SEAL)
Marshall Crosby--Individually

Viera C. Crosby (SEAL)

Ollie Crosby (SEAL)
As trustee under the will of T. W. Crosby, deceased

Marshall Crosby (SEAL)
As trustee under the will of T. W. Crosby, deceased

Martin Crosby (SEAL)
As trustee under the will of T. W. Crosby, deceased

STATE OF FLORIDA)
ESCAMBIA COUNTY)

I, H. Penney, a Notary Public, in and for said County and State, do hereby certify that Ollie Crosby and Louise Crosby, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that, being informed of the contents of the said conveyance, they executed the same voluntarily on the day the same bears date.

December And I do further certify that on the 2d day of ~~November~~, 1939, personally appeared before me the within named Louise Crosby, known to me to be the wife of the within named Ollie Crosby, who, being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she executed 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 have hereunto set my hand and official seal this 2d day of December, 1939.

My commission expires the 30 day of June, 1942

H. Penney
Notary Public, Escambia County, Fla.

STATE OF ALABAMA)
BALDWIN COUNTY)

I, Lloyd A. Magney, a Notary Public, in and for said County and State, do hereby certify that Marshall Crosby and Vieve Crosby, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that, being informed of the contents of the said conveyance, they executed the same voluntarily on the day the same bears date.

December And I do further certify that on the 7 day of ~~November~~, 1939, personally appeared before me the within named Vieve Crosby, known to me to be the wife of the within named Marshall Crosby, who, being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she executed 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 have hereunto set my hand and official seal this 7 day of December, 1939.

Lloyd A. Magney
Notary Public.

STATE OF ALABAMA)
BALDWIN COUNTY)

I, Lloyd A. Magney, a Notary Public in and for said County and State, do hereby certify that Ollie Crosby, Marshall Crosby and Martin Crosby, whose names as trustees under the last will and testament of T. W. Crosby, deceased, are signed to the foregoing conveyance and who are known to me, acknowledged before me on this day that, being informed of the contents of the said conveyance, they, in their capacity as such trustees, executed the same voluntarily on the day the same bears date.

IN WITNESS WHEREOF: I have hereunto set my hand and official seal this 7 day of December, 1939.

Lloyd A. Magney
Notary Public.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, That We, ELLA M. ANDERSON, a widow, and SCOTT F. ANDERSON, unmarried, Grantors, for and in consideration of the sum of ONE (\$1.00) DOLLAR and other good and valuable considerations to us in hand paid by F. C. GRIFFIN, Grantee, the receipt of which is hereby acknowledged, do hereby GRANT, BARGAIN, SELL and CONVEY unto the said Grantee all the following described lands situated in Baldwin County, Alabama, to-wit:

The Southwest quarter of Section 32, Township 5 South of Range 3 East.

TOGETHER WITH ALL AND SINGULAR the rights, members, privileges, tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

TO HAVE AND TO HOLD unto the said Grantee, his heirs and assigns forever. And we do covenant with the said Grantee that we are lawfully seized in fee simple of the said premises; that we have a good right to sell and convey the same as aforesaid; that said premises are free from all liens and encumbrances, and that we will and our heirs, executors, administrators and assigns forever warrant and defend the title to the same unto the said Grantee, his heirs and assigns, against the lawful claims of all persons whomsoever.

IN WITNESS WHEREOF, We have hereunto set our hands and seals on this

5th day of April, 1939.

Ella M. Anderson (SEAL)

Scott F. Anderson (SEAL)

STATE OF ALABAMA,)
BALDWIN COUNTY.)

I, R. C. Keeney, a Notary Public, in and for said County, in said State, hereby certify that Ella M. Anderson, a widow, and Scott F. Anderson, unmarried, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this 5th day of April, 1939.

R. C. Keeney
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, That We, MATHILDA HOFF LINDEN (formerly Mathilda Hoff) and N. P. LINDEN, her husband, Grantors, for and in consideration of the sum of ONE (\$1.00) DOLLAR and other good and valuable considerations to us in hand paid by F. C. GRIFFIN, Grantee, the receipt of which is hereby acknowledged, do hereby GRANT, BARGAIN, SELL and CONVEY unto the said Grantee all the following described real property situated in Baldwin County, Alabama, to-wit:

The East half of the Southeast quarter of the Southeast quarter of Section 5, Township 6 South of Range 3 East;

The Southwest quarter of the Southwest quarter of Section 4, Township 6 South of Range 3 East.

TOGETHER WITH ALL AND SINGULAR the rights, members, privileges, tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

TO HAVE AND TO HOLD unto the said Grantee, his heirs and assigns forever. And we do covenant with the said Grantee that we are lawfully seized in fee simple of the said premises; that we have a good right to sell and convey the same as aforesaid; that said premises are free from all liens and encumbrances, and that we will and our heirs, executors, administrators and assigns forever warrant and defend the title to the same unto the said Grantee, his heirs and assigns, against the lawful claims of all persons whomsoever.

IN WITNESS WHEREOF, We have hereunto set our hands and seals on this

14th day of January, 1939.

Mathilda Hoff Linden (SEAL)

N. P. Linden (SEAL)

STATE OF ALABAMA,)
BALDWIN COUNTY.)

I, R. C. Keeney, a Notary Public, in and for said County, in said State, hereby certify that N. P. Linden, 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 and seal this 14th day of January, 1939.

R. C. Keeney
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA,)
MOBILE COUNTY.)

I, R C Keeney, a Notary Public, in and for said County, in said State, hereby certify that Mathilda Hoff Linden, 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, she executed the same voluntarily on the day the same bears date.

And I do further certify that on the 14th day of January, 1939, came before me the within named Mathilda Hoff Linden, known to me to be the wife of the within named N. P. Linden, and who being examined separate and apart from her husband touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints or threats on the part of her husband.

Given under my hand and seal on this 14th day of January, 1939.

R. C. Keeney
Notary Public, Mobile County, Alabama.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, That We, W. J. B. KERR and ALICIA T. KERR, his wife, Grantors, for and in consideration of the sum of ONE (\$1.00) DOLLAR and other good and valuable considerations to us in hand paid by F. C. GRIFFIN, Grantee, the receipt of which is hereby acknowledged, do hereby GRANT, BARGAIN, SELL and CONVEY unto the said Grantee all the following described real property situated in Baldwin County, Alabama, to-wit:

The Northwest quarter of the Northwest quarter of section 4, Township 6 South of Range 3 East, containing 40 acres, more or less.

TOGETHER WITH ALL AND SINGULAR the rights, members, privileges, tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

TO HAVE AND TO HOLD unto the said Grantee, his heirs and assigns forever. And we do covenant with the said Grantee that we are lawfully seized in fee simple of the said premises; that we have a good right to sell and convey the same as aforesaid; that said premises are free from all liens and encumbrances and that we will and our heirs, executors, administrators and assigns forever warrant and defend the title to the same unto the said Grantee, his heirs and assigns, against the lawful claims of all persons whomsoever.

IN WITNESS WHEREOF, We have hereunto set our hands and seals on this

14th day of January, 1939.

W. J. B. Kerr (SEAL)
Alicia T. Kerr (SEAL)

STATE OF ALABAMA,)
BALDWIN COUNTY.)

I, R. C. Keevey, a Notary Public, in and for said County, in said State, hereby certify that W. J. B. Kerr and Alicia T. Kerr, his wife, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

And I do further certify that on the 14th day of January, 1939, came before me the within named Alicia T. Kerr, known to me to be the wife of the within named W. J. B. Kerr, and who being examined separate and apart from her husband touching her signature to the within conveyance, 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.

Given under my hand and seal on this 14th day of January, 1939.

R. C. Keamey,

Residence, Houston, Alabama

FRED C. GRIFFIN,
 Complainant,
 VS.
 E. A. SHELDON, SR., ET AL.,
 Respondents.

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA,
 IN EQUITY,
 NO. 626.

NOTE OF TESTIMONY:

This cause is submitted in behalf of the Complainant upon the original Bill of Complaint; Certificate of Sheriffs showing personal service on David Barnhill, Reconstruction Finance Corporation, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Dr. O. F. E. Windberg, Maston Barnhill, Exa Lou Barnhill, Bennie Barnhill, Exa Lou Barnhill, as Guardian, Gordon Barnhill, D. Windell Barnhill, Roger F. Barnhill, Charles Barnhill, Marjorie Barnhill, and Hazel V. McVay; Copy of notice published in the Baldwin Times, a newspaper published at Bay Minette, in Baldwin County, Alabama; Proof of publication of notice in the Baldwin Times; Disclaimer on the part of the Reconstruction Finance Corporation; Notice filed in the Lis Pendens Record in the Office of the Probate Judge of Baldwin County, Alabama; Motion for Decree Pro Confesso on personal service against David Barnhill, Hazel V. McVay, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Dr. O. F. E. Windberg, Maston Barnhill, Exa Lou Barnhill, Bennie Barnhill, Exa Lou Barnhill, as Guardian, Gordon Barnhill, D. Windell Barnhill, Roger F. Barnhill, Charles Barnhill and Marjorie Barnhill; Motion for Decree Pro Confesso on Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W.B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John P. Watkins, Charles C. Whitehurst, John Strand, John Lauer, Sarah L.M.

Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons, and the unknown heirs and devisees of them, if either or any of them should be dead, and any other person, firm or corporation claiming any right, title to, interest in, or encumbrance upon the following described lands, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East, situated in Baldwin County, Alabama.

Decree Pro Confesso on Personal Service against David Barnhill, Hazel V. McVay, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Dr. O. F. E. Windberg, Maston Barnhill, Exa Lou Barnhill, Bennie Barnhill, Exa Lou Barnhill, as Guardian, Gordon Barnhill, D. Windell Barnhill, Roger F. Barnhill, Charles Barnhill and Marjorie Barnhill;

Decree Pro Confesso on Publication against Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Single- tary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John P. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons, and the unknown heirs and devisees of them, if ehtier or any of them should be dead, and any other person, firm or corporation claiming any right, title to, interest in, or encumbrance upon the following described lands, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

~~The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.~~

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East,

Situated in Baldwin County, Alabama;

Request for taking testimony orally of witnesses, Fred C. Griffin, Philip G. Armstrong and Hubert M. Hall, and the appointment of Miss O'Byrne Jones, as Special Commissioner; Notice of time set for taking testimony of witnesses on behalf of the Complainant: Fred C. Griffin, Philip G. Armstrong and Hubert M. Hall, before Miss O'Byrne Jones, as Special Commissioner; Commission issued by Register to Miss O'Byrne Jones, as Special Commissioner; Appointment, Acceptance and Answer of T. J. Mashburn, Jr., as Guardian ad Litem; Testimony of Fred C. Griffin, Philip G. Armstrong and Hubert M. Hall; Request for Decree in Vacation; and the following instruments introduced in evidence: Deed from G. E. Worthington and Tulliah Worthington, his wife, to T. W. Crosby; Warranty Deed from T. W. Crosby and Mary Eva Crosby, his wife, to Crosby Turpentine Company; Certified copy of Last Will and Testament of T. W. Crosby, deceased; Warranty Deed from Oscar Johnson and Josephina Johnson, his wife, to W. J. B. Kerr; Warranty Deed from Oscar Johnson and Josephina Johnson, his wife, to Chas. Hoff; Certified Copy of Last Will and Testament of Chas. A. Hoff; Deed from Nils J. Monson and Anna C. Monson to Amos D. Scott; Warranty Deed from Oscar Johnson and Josephine Johnson, his wife, to Elvira C. Armstrong and Phillip G. Armstrong; Certified copy of Last Will and Testament of Oscar Johnson; Correction deed from Philip

G. Armstrong, Executor of the Last Will and Testament of Oscar Johnson, deceased, et al. to Elvera C. Armstrong and Philip G. Armstrong; Warranty Deed from G. E. Worthington and Tuliah Worthington, his wife, to T. W. Crosby; Warranty Deed from G. E. Worthington and Tuliah Worthington, his wife, to T. W. Crosby; Warranty Deed from T. W. Crosby and Mary Eva Crosby, his wife, to Crosby Turpentine Company; Patent to William Acklin, John S. Barton, John G. Williams and James C. Rupert, John G. Williams and James C. Rupert, John G. Williams and James C. Rupert, John G. English, Wm. Jones, Jr., Thomas J. Watts, Thos. J. Watts, Perry Thos., Francis H. Williams, John G. Williams, William Jones, Jr., James R. Smith, Joseph J. Milsted, Francis H. Williams, John G. Williams and James C. Rupert, and certificate of John Brandon, Secretary of State.

Rs Deed

RECORDED

NOTE OF TESTIMONY:

FRED C. GRIFFIN,

Complainant,

VS.

E. A. SHELDON, SR., ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NO. 626.

Filed July 9, 1940
A. S. Duck, Register

ORAL EXAMINATION

I, O'Byrne Jones, as ~~Register~~ ^{Special} ~~and~~ Commissioner hereby certify that the foregoing deposition ~~s~~ on Oral Examination was taken down in writing by me in the words of the witness~~es~~ and read over to them and they signed the same in the presence of myself _____ at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness~~s~~ or had proof made before me of the identity of said witness~~es~~; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 5th day of July, 19⁴⁰

O'Byrne Jones (L. S.)
Special Commissioner

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

FRED C. GREENE,

Complainant

Vs.

E. A. SHELDON, SR., ET AL.

Respondent

ORAL DEPOSITION

Filed _____, 19____

_____, Register

RECORDED IN

_____, Record

Vol. _____ Page _____

_____, Register

THE STATE OF ALABAMA
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

FRED C. GRIFFIN

COMPLAINANT

VS.

E. A. SHELDON, SR., ET AL.

RESPONDENT

I, O'Byrne Jones

as Special
Register and Commissioner

have called and caused to come before me Fred C. Griffin, Philip G. Armstrong and
Hubert M. Hall

witnesses named in the Requirement for Oral Examination, on the 5th day of July
1940, at the office of Beebe & Hall

in Ray Minette, Alabama, and having first sworn said witnesses to speak the truth,
the whole truth, and nothing but the truth, the said Fred C. Griffin, Philip G. Armstrong,
and Hubert M. Hall doth depose and say as follows:

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 DAVID BARNHILL 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 Fred C. Griffin against said David Barnhill, et al, 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, R. S. Duck, Register of said Circuit Court, this 8
day of April, 1940.

R. S. Duck

Register.

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

Comes your Complainant, FRED C. GRIFFIN, and presents this his
Bill of Complaint against the following described lands in Baldwin County,
Alabama, to-wit;

All of the Southeast quarter of the Northwest quarter
of Section 32, Township 5 South, Range 3 East, lying
East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South,
Range 3 East.

The West half of the Northwest quarter of the South-
east quarter of Section 32, Township 5 South, Range
3 East.

The Northwest quarter of the Southwest quarter of the
Southeast quarter of Section 32, Township 5 South,
Range 3 East.

The Northwest quarter of Section 4, Township 6 South,
Range 3 East.

The West half of the Southwest quarter of Section 4,
Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Sec-
tion 4, Township 6 South, Range 3 East, excepting the
Southwest quarter of the Northeast quarter of the South-
west quarter.

The South half of Section 5, Township 6 South, Range 3
East.

The Southeast quarter of the Northeast quarter of Sec-
tion 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5,
Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5,
Township 6 South, Range 3 East.

The South half of the Southwest quarter of the North-
west quarter of Section 5, Township 6 South, Range 3
East.

The West half of the Northwest quarter of Section 8,
Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Sec-
tion 8, Township 6 South, Range 3 East, except oil, gas
and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8,
Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Sec-
tion 8, Township 6 South, Range 3 East, excepting the
Northwest quarter of the Northwest quarter of the North-
east quarter.

The Northwest quarter of the Southeast quarter of Sec-
tion 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East,

and against E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill; Charles Barnhill, Hazel V. McVay, and O. F. E. Winberg, all residents of Baldwin County, Alabama, and over twenty-one years of age; David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, B. Windell Barnhill, minors residing with their mother, Exa Lou Barnhill, at Loxley, in Baldwin County, Alabama, who is their guardian; Fannie S. Dale, a non-resident of the State of Alabama, and residing at Brooklyn, New York; Charlotte Sherman, a non-resident of the State of Alabama, and residing at Hollandale, Minn; Celia Sheldon, a non-resident of the State of Alabama, and residing at Huntsville, Texas; Estelle Sheldon, a non-resident of the State of Alabama, and residing at Huntsville, Texas; Tracy Sheldon, a non-resident of the State of Alabama, and residing at Des Moines, Iowa; O. W. Sheldon, a non-resident of the State of Alabama, and residing at Mt. Eagle, Tenn; Rose L. Sheldon, a non-resident of the State of Alabama, and residing at Chicago, Illinois, all over twenty-one years of age; and Eugenia Rose Sheldon, a minor, and non-resident of the State of Alabama, residing in Chicago, Illinois; A. B. Dooley, over twenty-one years of age and a non-resident of the State of Alabama, whose address is unknown; Reconstruction Finance Corporation, a corporation, with offices in Birmingham, Alabama; River Park Fruit Company, a corporation, address unknown; and John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John C. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Erockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, and Joseph J. Milsted, and J. E. Loxley & Sons, and against each of them, separately

and severally, and if either or any of them be dead, then against their, and each of their, heirs, and devisees, separately and severally, and against any and all other persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said lands or any part or parcel thereof, and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant is over twenty-one years of age and a bona fide resident of Loxley, in Baldwin County, Alabama; that he is the owner in fee simple and in the actual possession of said lands, in Baldwin County, Alabama, described as follows, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

2. That no suit is pending to test the Complainant's title to, interest in, or his rights to the possession of said lands.

3. That the Complainant obtained title to said lands by purchases from Elvera C. Armstrong and Philip G. Armstrong, husband and wife, by deed dated December 12th, 1938; W. J. B. Kerr and Alicia T. Kerr, his wife, by deed dated January 14th, 1939; Ella M. Anderson and Scott F. Anderson, by deed dated April 5th, 1939; Ollie Crosby and Louise Crosby, husband and wife, Marshall Crosby and Vieva Crosby, husband and wife, and Ollie Crosby, Marshall Crosby, and Martin Crosby, Trustees under the Last Will and Testament of T. W. Crosby, deceased, being all of the members of the co-partnership known as Crosby Turpentine Company, by deed dated December 7th, 1939; Mathilda Hoff Linden and N. P. Linden, her husband, by deed dated January 14th, 1939; all of said deeds being of record in the office of the Probate Judge of Baldwin County, Alabama.

4. That the title to said lands claimed by the Complainant stands upon the records in the Probate Court of Baldwin County, Alabama, in the names of Fred C. Griffin, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret E. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Faris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram Williams, James W. Taylor, W. B. Amos, Thomas M. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty,

John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons.

5. That no one has at any time within ten years next preceding the filing of this Bill of Complaint paid any taxes upon, or had any possession of said lands, or any part thereof, except Fred C. Griffin and those through whom he claims by mesne conveyances, to-wit: Oliver C. Armstrong, Philip G. Armstrong, Philip G. Armstrong, Executor of Estate of Oscar Johnson, Oscar Johnson, S. F. Anderson, A. D. Scott, Emily Scott, Ella M. Anderson, Mrs. Charles A. Hoff, Mrs. M. P. Linden, Charles Hoff, W. J. B. Kerr, Crosby Turpentine Company, T. W. Crosby, G. E. Worthington, W. W. Harrison, R. F. Mitchell, Jr., J. L. Tucker, D. N. Long and A. H. Russ.

6. That the only persons known by your Complainant to claim said lands or any part thereof or any interest therein are: Fred C. Griffin of Loxley, in Baldwin County, Alabama, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, C. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. E. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Faris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro,

John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons; that a diligent search and inquiry has been made from residents in the vicinity of said lands, from residents of Fairhope, Silverhill, Robertsdale, and Bay Minette, in Baldwin County, Alabama, and from the records at Bay Minette, the County Seat of Baldwin County, Alabama, to ascertain the present addresses of said parties whose addresses are unknown, and whether or not they or any of them are dead, and if dead, the names, ages and addresses of their, and each of their, heirs, and they are unknown; that from such information obtainable, all are over twenty-one years of age and non-residents of the State of Alabama.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Maston Barnhill, Gordon Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, Reconstruction Finance Corporation, and each of them, and A. B. Dooley, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. N. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John P. Watkins, Charles C. Whitehurst, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons, and each of them, and the unknown heirs and devisees of them, if either or any of them should be dead, and any other person, firm or corporation claiming any right, title to, interest in, or encumbrance upon said lands, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

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The West half of the Northwest quarter of Section 8, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 8, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

situated in Baldwin County, Alabama, or any part thereof, to be made parties respondent to this Bill of Complaint, and by appropriate process require them and each of them to, separately and severally, plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing of this cause, this Honorable Court will make and enter a decree ascertaining and decreeing that the fee simple title, free of encumbrances, to the said lands and to each part and parcel thereof is vested in your Complainant, FRED C. GRIFFIN, and that E. A. Sheldon, Sr., E. A. Sheldon, Jr., Exa Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, Reconstruction Finance Corporation, and A. B. Dooley, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Faris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Meehem, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Keneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whitehurst, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons, if they be living, and if dead, their and each of their unknown heirs and devisees, and any and all persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said lands, or any part thereof, and that any and all doubts and disputes concerning the same be cleared up. And your Complainant prays for such other, further, different or general relief as in equity and good conscience shall seem mete and proper.

BEEBE & HALL.

By: 
Solicitors for Complainant.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

Before me, the undersigned authority, in and for said County, in said State, personally appeared HUBERT M. HALL, who is known to me, and who having been by me first duly sworn, deposes and says: That he is a member of the firm of Beebe & Hall, Solicitors of record and agents of the Complainant, Fred C. Griffin, in the above styled cause, and duly authorized by him to make this affidavit, and that the facts stated in the foregoing Bill of Complaint, from all information obtainable, are true, and from such information obtained, he verily believes and so states that the same are true.

Hubert M. Hall

Sworn to and subscribed before me
this 5th day of April, 1940.

W. Eugene Jones
Notary Public Baldwin County, Ala.

Original
Bill of Complaint

for David Bawhill

Return
Ala

RECORDED

I have executed the within writ
by leaving copy of same with

David Bawhill

this the 2nd day of April 1940

W. J. Luch
Notary

Filed April 8, 1940
R. S. Duesch, Register

Original
Bill of Complaint

for David Bauhull

Arthur
Ala

RECORDED

I have executed the within writ
by leaving copy of same with
David Bauhull

~~This is the 2nd copy of the original~~
W. J. Luch
Notary.

Filed April 8, 1940
R. S. Dush, Register

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 RECONSTRUCTION FINANCE CORPORATION, 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 Fred C. Griffin against said Reconstruction Finance Corporation, et al., 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, R. S. Duck, Register of said Circuit Court, this 8
day of April, 1940.

R. S. Duck
Register.

TO HONORABLE F. W. HARR, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY;

Comes your Complainant, FRED C. GRIFFIN, and presents this his
Bill of Complaint against the following described lands in Baldwin County,
Alabama, to-wit:

All of the Southeast quarter of the Northwest quarter
of Section 32, Township 5 South, Range 3 East, lying
East of Fish River, containing 30 acres, more or less.

The Southwest quarter of Section 32, Township 5 South,
Range 3 East.

The West half of the Northwest quarter of the South-
east quarter of Section 32, Township 5 South, Range
3 East.

The Northwest quarter of the Southwest quarter of the
Southeast quarter of Section 32, Township 5 South,
Range 3 East.

The Northwest quarter of Section 4, Township 6 South,
Range 3 East.

The West half of the Southwest quarter of Section 4,
Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Sec-
tion 4, Township 6 South, Range 3 East, excepting the
Southwest quarter of the Northeast quarter of the South-
west quarter.

The South half of Section 5, Township 6 South, Range 3
East.

The Southeast quarter of the Northeast quarter of Sec-
tion 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5,
Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5,
Township 6 South, Range 3 East.

The South half of the Southwest quarter of the North-
west quarter of Section 5, Township 6 South, Range 3
East.

The West half of the Northwest quarter of Section 5,
Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Sec-
tion 5, Township 6 South, Range 3 East, except oil, gas
and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 5,
Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Sec-
tion 5, Township 6 South, Range 3 East, excepting the
Northwest quarter of the Northwest quarter of the North-
east quarter.

The Northwest quarter of the Southeast quarter of Sec-
tion 5, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the
Southeast quarter of Section 8, Township 6 South,
Range 3 East,

and against E. A. Sheldon, Sr., E. A. Sheldon, Jr., Eva Lou Barnhill, Roger
F. Barnhill, Charles Barnhill, Hazel V. McVay, and O. F. E. Winberg, all
residents of Baldwin County, Alabama, and over twenty-one years of age;
David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Hennie
Barnhill, E. Windell Barnhill, minors residing with their mother, Eva Lou
Barnhill, at Loxley, in Baldwin County, Alabama, who is their guardian;
Fannie S. Dale, a non-resident of the State of Alabama, and residing at
Brooklyn, New York; Charlotte Sherman, a non-resident of the State of Ala-
bama, and residing at Hollandale, Minn; Celia Sheldon, a non-resident of
the State of Alabama, and residing at Huntsville, Texas; Estelle Sheldon,
a non-resident of the State of Alabama, and residing at Huntsville, Texas;
Tracy Sheldon, a non-resident of the State of Alabama, and residing at Des
Moines, Iowa; O. W. Sheldon, a non-resident of the State of Alabama, and
residing at Mt. Eagle, Tenn; Ross L. Sheldon, a non-resident of the State
of Alabama, and residing at Chicago, Illinois, all over twenty-one years of
age; and Eugenia Rose Sheldon, a minor, and non-resident of the State of
Alabama, residing in Chicago, Illinois; A. B. Dudley, over twenty-one years
of age and a non-resident of the State of Alabama, whose address is unknown;
Reconstruction Finance Corporation, a corporation, with offices in Birming-
ham, Alabama; River Park Fruit Company, a corporation, address unknown; and
John S. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John C.
English, Cyrus C. English, Margaret R. English, Fannie L. English, James E.
English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas
J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram
D. Cavanaugh, James W. Taylor, W. B. Ams, Thomas P. Miller, Rudolphus D.
Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Mil-
ler, Henry L. Miller, C. M. Worthington, C. C. Meehan, Thomas C. Singletary,
William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddens McNulty,
John U. Schmidt, Frank Schultz, Katherine Early, Kenneth Donald Nicholson,
Roderick Miller Surgeon, Kattie M. Lee, George W. McAllister, David Lee, Robert
A. Brackett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B.
Watkins, Charles C. Whitehurst, Sarah L. M. Williams, Claudia A. Benberry,
James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, and
Joseph J. Milsted, and J. E. Loxley & Sons, and against each of them, separately

and severally, and if either or any of them be dead, then against their, and each of their, heirs, and devisees, separately and severally, and against any and all other persons, firms or corporations claiming any title to, interest in, lien or encumbrance upon the said lands or any part or parcel thereof, and respectfully represents and shows unto your Honor and this Honorable Court as follows;

1. That your Complainant is over twenty-one years of age and a bona fide resident of Loxley, in Baldwin County, Alabama; that he is the owner in fee simple and in the actual possession of said lands, in Baldwin County, Alabama, described as follows, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 3 East, lying East of Fish River, containing 50 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 8, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 8, Township 6 South, Range 3 East.

2. That no suit is pending to test the Complainant's title to, interest in, or his rights to the possession of said lands.

3. That the Complainant obtained title to said lands by purchases from Elvera C. Armstrong and Philip C. Armstrong, husband and wife, by deed dated December 12th, 1938; W. J. B. Kerr and Alicia T. Kerr, his wife, by deed dated January 14th, 1939; Ella M. Anderson and Scott F. Anderson, by deed dated April 5th, 1939; Ollie Crosby and Louise Crosby, husband and wife, Marshall Crosby and Verna Crosby, husband and wife, and Ollie Crosby, Marshall Crosby, and Martin Crosby, Trustees under the Last Will and Testament of T. W. Crosby, deceased, being all of the members of the co-partnership known as Crosby Turpentine Company, by deed dated December 7th, 1939; Mathilda Hoff Linden and N. P. Linden, her husband, by deed dated January 14th, 1939; all of said deeds being of record in the office of the Probate Judge of Baldwin County, Alabama.

4. That the title to said lands claimed by the Complainant stands upon the records in the Probate Court of Baldwin County, Alabama, in the names of Fred C. Griffin, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Emma Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, C. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Bennie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, C. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John C. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John C. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. E. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechem, Thomas C. Singletary, William Acklin, James E. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty,

John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whithurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons.

5. That no one has at any time within ten years next preceding the filing of this Bill of Complaint paid any taxes upon, or had any possession of said lands, or any part thereof, except Fred C. Griffin and those through whom he claims by means conveyances, to-wit: Rivera C. Armstrong, Philip G. Armstrong, Philip G. Armstrong, Executor of Estate of Oscar Johnson, Oscar Johnson, S. F. Anderson, A. D. Scott, Emily Scott, Ella M. Anderson, Mrs. Charles A. Hoff, Mrs. M. P. Linden, Charles Hoff, W. J. E. Kerr, Crosby Turpentine Company, T. W. Crosby, G. E. Worthington, W. W. Harrison, R. F. Mitchell, Jr., J. L. Tucker, D. H. Long and A. H. Russ.

6. That the only persons known by your Complainant to claim said lands or any part thereof or any interest therein are: Fred C. Griffin of Loxley, in Baldwin County, Alabama, E. A. Sheldon, Sr., E. A. Sheldon, Jr., Ess Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Hazel V. McVay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Maston Barnhill, Gordon Barnhill, Nannie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celia Sheldon, Estelle Sheldon, Tracy Sheldon, C. W. Sheldon, Rose L. Sheldon, Eugenia Rose Sheldon, A. B. Dooley, Reconstruction Finance Corporation, River Park Fruit Company, John G. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret R. English, Fannie L. English, James K. English, Jeanne E. Baumgardner, Sallie E. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Mechen, Thomas C. Singletary, William Acklin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McNulty, John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George W. McAlister, David Lea, Robert A. Brockett, Frances Cypert, John A. Cottrell, Benjamin F. Davis, John B. Watkins, Charles C. Whithurst, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro,

John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted and J. E. Loxley & Sons; that a diligent search and inquiry has been made from residents in the vicinity of said lands, from residents of Fairhope, Silverhill, Robertsdale, and Bay Minette, in Baldwin County, Alabama, and from the records at Bay Minette, the County Seat of Baldwin County, Alabama, to ascertain the present addresses of said parties whose addresses are unknown, and whether or not they or any of them are dead, and if dead, the names, ages and addresses of their, and each of their, heirs, and they are unknown; that from such information obtainable, all are over twenty-one years of age and non-residents of the State of Alabama.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this Bill of Complaint and by appropriate process make the said E. A. Sheldon, Sr., E. A. Sheldon, Jr., Emma Lou Barnhill, Roger F. Barnhill, Charles Barnhill, Newton Barnhill, Gordon Barnhill, Hazel V. McWay, O. F. E. Winberg, David Barnhill, Marjorie Barnhill, Bonnie Barnhill, D. Windell Barnhill, Fannie S. Dale, Charlotte Sherman, Celis Sheldon, Estelle Sheldon, Tracy Sheldon, O. W. Sheldon, Rose L. Sheldon, Eugenia Ross Sheldon, Reconstruction Finance Corporation, and each of them, and A. B. Dooley, River Park Fruit Company, John C. Williams, James C. Rupert, E. B. Rupert, Elizabeth Rupert, John G. English, Cyrus C. English, Margaret E. English, Fannie L. English, James E. English, Joanne E. Baumgardner, Sallie H. Paris, William Jones, Jr., Thomas J. Watts, Frances H. Williams, William A. Williams, Samuel W. Williams, Abram D. Cavanaugh, James W. Taylor, W. B. Amos, Thomas P. Miller, Rudolphus D. Williams, John W. Miller, Charles B. Miller, George E. Miller, Edward C. Miller, Henry L. Miller, C. M. Worthington, C. C. Nechem, Thomas C. Singletary, William Aikin, James R. Smith, Perry Thomas, John T. Hardie, Thaddeus McTultry, John U. Schmidt, Frank Schultz, Katherine Hanly, Kenneth Donald Nicholson, Roderick Miller Surgeon, Kittie M. Lea, George N. McAllister, David Lea, Robert A. Brockett, Frances Gypert, John A. Cottrell, Benjamin F. Davis, Sarah L. M. Williams, Claudia A. Benberry, James Elliott, Sarah Goldsboro, John P. Watkins, Charles C. Whitehurst, John Strand, John Lauer, Jonathan Hunt, Joseph J. Milsted, and J. E. Loxley & Sons, and each of them, and the unknown heirs and devisees of them, if either or any of them should be dead, and any other person, firm or corporation claiming any right, title to, interest in, or encumbrance upon said lands, to-wit:

All of the Southeast quarter of the Northwest quarter of Section 32, Township 5 South, Range 5 East, lying East of Fish River, containing 50 acres, more or less.

The Southwest quarter of Section 32, Township 5 South, Range 3 East.

The West half of the Northwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of the Southwest quarter of the Southeast quarter of Section 32, Township 5 South, Range 3 East.

The Northwest quarter of Section 4, Township 6 South, Range 3 East.

The West half of the Southwest quarter of Section 4, Township 6 South, Range 3 East.

The Northeast quarter of the Southwest quarter of Section 4, Township 6 South, Range 3 East, excepting the Southwest quarter of the Northeast quarter of the Southwest quarter.

The South half of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The East half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The South half of the Southwest quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The West half of the Northwest quarter of Section 5, Township 6 South, Range 3 East.

The Southeast quarter of the Northwest quarter of Section 5, Township 6 South, Range 3 East, except oil, gas and mineral rights as reserved to United States in patent.

The South half of the Northeast quarter of Section 5, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of Section 5, Township 6 South, Range 3 East, excepting the Northwest quarter of the Northwest quarter of the Northeast quarter.

The Northwest quarter of the Southeast quarter of Section 5, Township 6 South, Range 3 East.

The Northwest quarter of the Northeast quarter of the Southeast quarter of Section 5, Township 6 South, Range 3 East.

situated in Baldwin County, Alabama, or any part thereof, to be made parties respondent to this Bill of Complaint, and by appropriate process require them and each of them to, separately and severally, plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court.