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LEE R. COURTRIGHT,
Plaintiff,
VS.
W. D. OWEN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Comes the Defendant in the above styled cause and demurs to the Plaintiff's complaint and for grounds thereof says:

FIRST:

There is a misjoinder of counts in that Count One is in debt, Counts Two and Three are in trespass, Count Four is for conversion, and Count Five is in assumpsit.

SECOND:

There is a misjoinder of counts in the said complaint because Count One is in debt, Counts Two, Three and Four are in tort, and Count Five in assumpsit.

THIRD:

There is a misjoinder of counts in the said complaint because Count One is in debt and Counts Two, Three and Four are in tort.

FOURTH:

There is a misjoinder of counts in the said complaint because Count One is in debt and Count Five is in assumpsit.

FIFTH:

There is a misjoinder of counts in the said complaint because Counts Two, Three and Four are in tort and Count Five is in assumpsit.

SIXTH:

There is a misjoinder of counts in the said complaint because said complaint joins a count in conversion, namely Count Four, with a count in debt, namely Count One, and a count in trespass, namely Counts Two and Three

SEVENTH:

There is a misjoinder of counts in the said complaint

because said complaint joins a count in assumpsit, namely Count Five, and a count in debt, namely Count One, and a count in tort, namely Counts Two and Three.

EIGHTH:

There is a misjoinder of counts in the said complaint because said complaint joins counts in debt, trespass, conversion and assumpsit.

NINTH:

There is a misjoinder of counts in said complaint because Count One is in debt, Counts Two and Three in trespass, Count Four in conversion, and Count Five in assumpsit, and it does not appear from the said complaint that the matters complained of in each of the said counts arose out of the same transaction or relate to the same subject matter.

TENTH:

There is a misjoinder of counts in the said complaint because said complaint joins counts in actions ex delicto and ex contractu, and it does not appear from the said complaint that said actions arose out of the same transaction or relate to the same subject matter.

ELEVENTH:

There is a misjoinder of actions in the said complaint because the said complaint joins actions ex delicto and ex contractu, and it does not appear from said complaint that the said actions arose out of the same transaction or relate to the same subject matter.

TWELFTH:

There is a misjoinder of causes of action in the said complaint because Count Five claims money received by the Plaintiff for use of the Defendant and is joined with other actions ex contractu and ex delicto and it does not appear from the said complaint that the action complained of in Count Five grew out of the same transaction or relate to the same subject matter as the other actions complained of in the said Counts One, Two, Three and Four.

Beebe Hall & Beebe
Attorneys for the Defendant.

RECORDED

Book

7-505

DEMURRERS

LEE R. COURTRIGHT,

Plaintiff,

VS.

W. D. OWEN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Filed this *21* day *July*, 19*36*

Robert A. Beck

Clerk-Register

the following chattels, viz: 500 trees cut by either his agents or employees on the southwest quarter of the northwest quarter of section 24, Township 7 south, Range 2 East, Baldwin County, Alabama, the property of the plaintiff.

5th. The Plaintiff claims of the Defendant \$5,000.00 due from him for money upon towit, divers days subsequent to January 1st, 1936, and prior to the filing of this suit, received by the defendant to the use of the Plaintiff, which sum of money with the interest thereon is still unpaid.

James F. Hogan
Attorney for Plaintiff.

Note: Plaintiff demands a jury trial of the foregoing cause.

James F. Hogan
Attorney for Plaintiff

COMPLAINT

NTING CO., BAY MINNET

OF ALABAMA,
Baldwin County.

No. 273

CIT COURT

June 24th,

1936

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon W. D. OWEN

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against W. D. OWEN,

Defendant by LEE R. COURTRIGHT

Plaintiff

Witness my hand this 24th day of June 1936

Robert S. Duck Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

RECORDED

Duck

7-504

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STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

LEE R. COURTRIGHT,

PLAINTIFF

VS.

W. D. OWEN,

DEFENDANT

Summons and Complaint

Filed, JUNE 24th, 1936

Robert S. Duck, Clerk.

Defendant Lives at

Plaintiff's Attorney.

Defendant's Attorney

RECEIVED IN OFFICE

June 24, 1936
R. H. Wilkins, Sheriff

I have executed this Writ

this July 7, 1936

by leaving a copy of the within Summons and
Complaint with

W. D. Owen

M. H. Wilkins, Sheriff.
C. N. Anderson, Deputy Sheriff.

LEE R. COURTRIGHT,

Plaintiff,

-vs-

W. D. OWEN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

INTERROGATORIES PROPOUNDED BY THE PLAINTIFF TO DEFENDANT

FIRST: Did you at any time within the next preceding year through your agents or employees, cut any timber on the southwest quarter of the Northwest quarter of section 24, Township 7 South, Range 2 East, Baldwin County, Alabama? If you state that your agents or employees did cut any timber on said lands, then please state whether they were acting under your instructions or direction.
their names and

SECOND: If you have stated that either you or your agents or employees cut timber on said land, then please state when you cut said timber, also state how many trees you cut and the kind of said trees and the size thereof.

THIRD: If you have stated that either you or your agents or employees acting under your authority cut any timber on said lands, please state whether you sold the same. If sold, to whom did you sell it? How much timber did you sell and for what price did you sell it?

FOURTH: If you have stated that you or your agents or employees cut any timber on said lands at any time within the next preceding year, please state whether you sold the same. If so, to whom did you sell it? What was the consideration of said sale? What consideration did you receive for said timber?

Jesse F. Hogan
Attorney for Plaintiff

STATE OF ALABAMA,
COUNTY OF MOBILE.

Before me, K.C. Cuthbert, a Notary Public in and for said county in said State, personally appeared Jesse F. Hogan, who is known to me, who being by me first duly sworn deposes and says that he is the attorney of record for the plaintiff; that he desires to take the testimony of the defendant in this suit, and that the answers of the defendant to the foregoing interrogatories will be material testimony for the plaintiff in the cause.

Jesse F. Hogan

Subscribed and sworn to before me
this 20th day of June, 1936.

H. L. Lambrecht
Notary Public, Mobile County, Alabama.

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[Handwritten signature]

Filed this 24 day June 1936
Robert E. Duck
Clerk-Register

L. R. Countrey et
vs.

Boatyard Timber Co

Circuit Court, Tuscaloosa Co
Ala. at Law

Comes the defendant in the above
styled cause and answering plaintiff's
complaint says the matters therein alleged
are not true.

Further answering the same the defend-
ant says it is not guilty of the matters
therein alleged

Hubert Hall O'Brien
for defendant

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Answer.

Filed Aug 19, 1937

Ronald
Clerk