

HENRY SANSPREE

Plaintiff

vs

MORRIS TAYLOR

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5231

Comes the plaintiff in the above styled cause and propounds the following interrogatories to the defendant, Morris Taylor:

1. State your name.
2. Are you the defendant in this case?
3. State the dates on which the plaintiff herein, using his skidder, pulled timber for you.
4. State the of the lands and land description on which said timber was pulled by the plaintiff herein, using his skidder.
5. State the agent or company through whom you sold the pulpwood pulled by the skidder of the plaintiff herein.
6. State the number of cords you sold and if delivered to more than one pulp mill, the amounts delivered to each pulp mill.
7. State the names of all individuals employed with whom you contracted who handled any portion of the timber pulled by the skidder of the plaintiff herein.
8. State the amount which you paid the plaintiff herein for his services and attach a copy of the receipt or check involved in said payment.

THOMPSON & WHITE

BY: C. LeNoir Thompson
Attorneys for plaintiff

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned Notary Public, in and for said State and County, personally appeared C. LeNoir Thompson, who being by me first duly sworn, deposes on oath and says as follows:

My name is C. LeNoir Thompson and I am one of the Attorneys of Record for the plaintiff in the above entitled cause, and as such, I am authorized to make this affidavit. I further state that the answer of the defendant to the foregoing interrogatories will, if truthfully made, be material evidence for the plaintiff on the trial of said cause.

C. LeNoir Thompson
C. LeNoir Thompson

Subscribed and sworn to before me by the said C. LeNoir Thompson on this the 4th day of October, 1963.

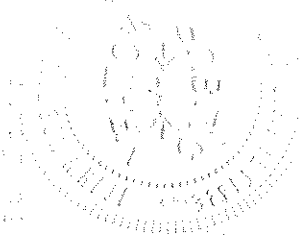
OCT 4 1963

ALICE J. DUCK, CLERK
REGISTER

Mary Thompson White
Notary Public State of Alabama at Large

32367

5731



ved 4 day of Oct 1963
in 3 day of Oct 1963
ed a copy of the within D & C
Morris Taylor
vice on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbot D. S.
omi'

Henry Sandsplee

OS

Morris Taylor

FILED

1963

ALICE J. HICK

CLERK
REGISTER

Bay Minette

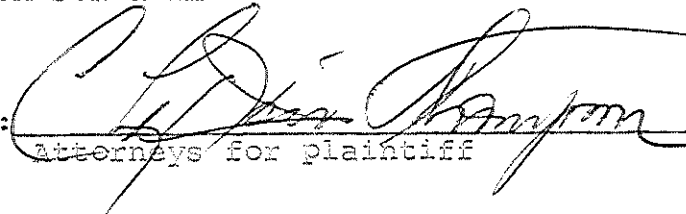
HENRY SANSPREE	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
MORRIS TAYLOR	X	AT LAW NO. 5731
Defendant	X	

To The HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Comes the plaintiff, Henry Sanspree, and shows unto the Court that more than thirty days prior to the filing of this motion, on to-wit, October 5, 1963, the plaintiff in the above styled cause propounded interrogatories to defendant, Morris Taylor, under Code 1940, Title 7, Sections 477-486, requiring said defendant to answer certain interrogatories therein propounded, and that although more than sixty days have elapsed since the service by the sheriff of said interrogatories upon the said defendant, Morris Taylor, the said defendant has failed, and still fails and refuses to answer the interrogatories therein propounded.

Wherefore, the plaintiff moves the Court to enforce the penalty as provided by Title 7, Section 483 of the Code of 1940, as recompiled.

THOMPSON & WHITE

BY: 
Attorneys for plaintiff

FILED

1963

ALICE I. DUCK, CLERK
REGISTER

FILED

DEC 10 1963

ALICE I. DUCK, CLERK
REGISTER

HENRY SANSPREE,

IN THE CIRCUIT COURT OF

Plaintiff

vs:

BALDWIN COUNTY, ALABAMA

MORRIS TAYLOR,

Defendant.

AT LAW, CASE NO. 5731

Comes the Defendant in the above style cause and for answer to
the Complaint, says he is not indebted to the Plaintiff.

Morris Taylor
Defendant.

FILED

OCT 8 1963

ALICE J. DUCK, CLERK
REGISTER

HENRY SANSPREE

Plaintiff

vs

MORRIS TAYLOR

Defendant

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5221

-1-

The plaintiff claims of the defendant, Morris, Taylor, the sum of One Hundred Seventy-five and 50/100 (\$175.50) Dollars for work and labor done for the defendant by the plaintiff on to-wit, September 16, 1963, which sum of money with interest thereon is still unpaid.

-2-

The plaintiff claims of the defendant, Morris Taylor, the sum of One Hundred Seventy-five and 50/100 (\$175.50) Dollars for money on to-wit, September 20, 1963, received by the defendant to the use of the plaintiff which sum of money with the interest thereon is still unpaid.

THOMPSON & WHEAT

BY: 

Attorneys for plaintiff

FILED

OCT 1 1963

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 5731

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Morris Taylor

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

-----Morris Taylor-----, Defendant-----

by Henry Sanspree-----

-----, Plaintiff-----

Witness my hand this 1st day of Oct - 1963

64-11-5-63

Alice J. Luck, Clerk

No. 5731

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

HENRY SANSFREE

Plaintiffs

vs.

MORRIS TAYLOR

Defendants

Summons and Complaint

Filed

FILED

19

OCT

1 1963

Clerk

ALICE J. DUCK

CLERK
REGISTER

Thompson & White

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Alabama

Received In Office

Oct 2, 1963

Sheriff.

I have executed this summons

this

Oct 5

19

by leaving a copy with

Morris Taylor

Taylor Wilkins

Sheriff.

W. A. Talbert

Deputy Sheriff.

Omni