

J. H. REICHERT,
Plaintiff,

-vs-

JEROME H. SHEIP, Inc.,
and FANNIE I. BECKER,
Defendants.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY.

AT LAW.

Now comes the plaintiff in the above entitled cause and propounds the following interrogatories to the defendants in said cause.

1. You will please give the name of each of the grantors under whom you claim title to each portion of the property which is sued for in this case. At the same time, set forth the date of each conveyance under which you claim title, and the place where it is recorded.

2. You will please set forth the chain of title under which you claim the property which is the subject matter of this suit, giving the date of each conveyance referred to in the chain, and the place of its record.

3. You will please give a list of all payments of taxes upon the property in question which you have paid, giving the date and the amount of each payment, and the name of the officer to whom the payment was made.

4. You will please state whether or not you claim title under any patent that has been issued by the United States Government, either to you or any other person under whom you claim, and if you do claim title under such a patent, you will then please attach to your answers a copy of the patent under which you claim, and if you do not do this, give the date of the patent, the name of the patentees, and the place where it is recorded.

5. Do you claim to have acquired title to the property in question, or any part thereof, by adverse possession, if so,

give the name of each of the parties under whose possession you claim, and state exactly what portion of the property each of such persons actually occupied, and of what such occupation consisted, and state in detail as far as you are able to do so, every act of possession by such party and the date thereof.

6. Have you ever had the land in question, or any part of it, surveyed, and if so, when and by whom.

Harry T. Smith & Gaffey
Attorneys for Plaintiff

STATE OF ALABAMA)
COUNTY OF MOBILE)

Personally appeared before me, Lillie A. Booth, a Notary Public, in and for said County in said State, Harry T. Smith, who upon oath deposes and says that he is one of the attorneys for the plaintiff in the above entitled cause, and that the answers to the above and foregoing interrogatories, if truthfully made, will be material evidence for the plaintiff in said cause.

Harry T. Smith

Subscribed and sworn to before me this 6th day of Nov., 1918.

Lillie A. Booth
NOTARY PUBLIC, STATE OF ALABAMA, MOBILE COUNTY.



3rd

Filed 11/8-1918
D. W. Richardson
Clerk

Original Copy
Given Sheriff
When served on
Clegg receipt
D. W. Richardson