

ERNEST L. PARROTT and
KATIE PARROTT,
Plaintiffs.

-vs-

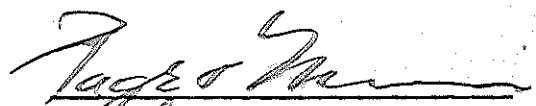
S. A. SCOTT.

Defendant.

IN THE CIRCUIT COURT
LAW SIDE

STATE OF ALABAMA.
BALDWIN COUNTY.

For answer to the complaint the defendant says he is
not guilty., of the matters alleged therein.



ATTORNEYS FOR DEFENDANT

PLEA OF DEFENDANT.

Ernest L. Parrott and
Katie Parrott,
Plaintiffs.

-VS-

S. A. Scott,
Defendant.

Circuit Court-Law Side.
State of Alabama
Baldwin County

Filed this the 15 day of
May, 1919.

J. W. Richardson
Clerk.

Ernest L. Parrott, and
Katie Parrott,
Plaintiffs.

vs.

S.A. Scott,
Defendant.

The plaintiffs sue to recover possession of the following tract of land: Farm No. Nine, being the Northeast Quarter of the Southeast Quarter of Section Thirty-one, Township Six South, Range Four East, of St. Stephens Meridian, in Baldwin County, Alabama, of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with Five Hundred dollars for the detention thereof.

J. M. Anderson
Richard Trayer & Bush
attys for Pltiffs

The State of Alabama,
BALDWIN COUNTY.

No.

Circuit Court

Spring Term, 1919

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon S.A. Scott

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 him the Defendant

by Ernest L. Parrott and Katie Parrott,

Plaintiff

Witness my hand this 15th day of April 1919

T. W. Richardson

Clerk.

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

Dollars due by

Plaintiff's Attorney.

No. 1501

State of Alabama,

BALDWIN COUNTY.

Circuit Court

Ernest L. Perrott

Perrott.

vs.

Plaintiffs

S.A. Scott,

Defendants

SUMMONS AND COMPLAINT

Filed

April 15th, 1919

D. W. Richardson

Clerk

Defendant lives at

Summerdale.

Rickerby Austill and Berbe.

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

April 15th,

1919

D. W. Richardson

Sheriff

I have executed this Writ

this

April 18

1919

by leaving a copy of the within summons and complaint with

S. A. Scott

D. W. Richardson

Sheriff

Deputy Sheriff.

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

The State of Alabama, }

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

W. J. Cleveland.
John Wynn. George Baelewin

if to be found in your county, at the instance of the

Plff

to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on the

day of *Nov* *18/19*, then and there to testify, and the truth to say, in a certain case pend-

ing, wherein

E. L. Parrott
J. A. Scott

Plaintiff,

Defendant,

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ .

Witness my hand this *10* day of *Nov* A. D., 19*19*

ATTEST:

J. M. Benson Clerk.

Received Nov.
13th 1919
W. R. Smith
by B. O. Wiggins S.

Original

No.

The State of Alabama,
BALDWIN COUNTY.

E. L. Carroll

SUBPOENA FOR

H. A. Scott

Circuit Court

WITNESSES

H. L. Cleveland *Witness*
John Wynn *Witness*
George Baldwin *Notar Public*

SET FOR TRIAL

18 day of *Nov* 19*19*

Baldwin Times Print.

Robinson

EARNEST L. PARROTT AND
KATIE PARROTT,
Plaintiffs.

vs

S. A. SCOTT,
Defendant.

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.
At Law.

Comes the Defendant, S. A. Scott, and moves the Court to transfer the above styled cause from the law side of the court to the equity side of said court and assigns the following grounds:

1. That he claim an equitable right in said land.
2. That he purchased the land sued for in this suit under a contract of purchase and has paid a part of the purchase money/and been put in possession by the Plaintiffs.
3. That the defendants defense cannot be disposed of in the law side of this court and depends upon the assertion of an equitable right or defense.

James E. Page & Moore
Solicitors for Defendant
Head

State of Alabama,
Baldwin County.

Defendant

Before me, T. W. Richerson, Clerk of the Circuit Court, Baldwin County, Alabama, personally appeared S. A. Scott, Defendant in the above styled cause, who, being by me first duly and legally sworn doth depose and say:

That he is Defendant named in the above styled cause and that the allegation contained in the above motion are true and correct.

Dated this 18th day of November, 1919.

Sworn and subscribed to before me this 18th day of November, 1919.

T. W. Richerson
Clerk of Circuit Court.