

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Amelia G. Perkins, a Notary Public, in and for said State and County, personally appeared Harry J. Wilters, Jr., who being by me first duly sworn, deposes and says: That he is agent and Attorney for the Plaintiff, Anna Simba; that the witness whose testimony is to be taken is a non resident of the State of Alabama, residing in 885 Donauworth Adalbert-Stifterstr. 6/II, Germany; that the witness, Anna Simba, is a material witness for the Plaintiff, and her evidence to be secured by this deposition will be material evidence for the Plaintiff on the trial of this cause.

Harry J. Wilters Jr.

Sworn to and subscribed before me this 15th day of

September, 1967.

Amelia G. Perkins

Notary Public, Baldwin County, Ala.

ANNA SIMBA,

Plaintiff,

vs.

LAWRENCE J. KRAUSS,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7052

TO MR. FOREST A. CHRISTIAN, ATTORNEY OF RECORD FOR LAWRENCE J. KRAUSS, DEFENDANT:

You are hereby given notice that the Plaintiff has filed with the undersigned the attached interrogatories for answers of which are to be taken from Anna Simba, a material witness, before the U. S. Consulate General, 8 M u n c h e n, KoniginstraBe, on the 17th day of October, 1967, at 1500 o'clock Greenwich Time at the above address. I am preparing a commission to be issued to the U. S. Consulate General, and you are hereby given ten (10) days notice from the receipt of this instrument to send your cross interrogatories or make a demand for a oral examination.

Done this 15 day of Sept., 1967.


Alice J. Duck, Clerk

85-40-95

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Lawrence J. Krauss, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of Anna Simba.

1966.

WITNESS my hand this 7th day of July,

Alice J. Duck
Alice J. Duck, Clerk

ANNA SIMBA,

Plaintiff

vs.

LAWRENCE J. KRAUSS,

Defendant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 7053

Plaintiff sues to recover possession of the following tract of land located in Baldwin County, Alabama, to-wit:

The Southeast Quarter of the Northeast Quarter,
Section 15, Township 7 South, Range 5 East.

of which she was in possession, and upon which pending such possession, and before the commencement of this suit, the Defendant entered and unlawfully withholds together with THREE THOUSAND DOLLARS (\$3,000.00) for the detention thereof.

WILTERS & BRANTLEY

BY: Harry J. Wilters Jr.

The Defendant resides at:
Elberta, Alabama

FILED

JUL 7 1966

ALICE J. DUCK, CLERK

67-7-11-66

368

711 J. J. Williams Rd.
CASE NO. 7052

ANNA SIMBA,
Plaintiff
vs;
LAWRENCE J. KRAUSS,
Defendant.

988-6725

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW, CASE NO. 7052

Walters & Brantley, Attys.

Subscribed 7 day of July 1966
and on 11 day of July 1966
I served a copy of the within on
on Lawrence J. Krauss

By service on Above

TAYLOR WILKINS, Sheriff
Jm Eastman
Elberta, Ala.

Sheriff claims 84
Ten Cents per mile Total 8.40
TAYLOR WILKINS, Sheriff
Jm Eastman
DEPUTY SHERIFF

ANNA SIMBA, X
PLAINTIFF, X IN THE CIRCUIT COURT OF
VS: X BALDWIN COUNTY, ALABAMA
LAWRENCE J. KRAUSS, X AT LAW
DEFENDANT. X CASE NO. 7052

Comes now the Defendant in the above styled cause
and for answer to the Plaintiff's Complaint, says:

1.

That he is not guilty of the matters alleged therein.

FOREST A. CHRISTIAN


Attorney for the Defendant

The Defendant demands an abstract in writing of the
title that the Plaintiff is relying on for the recovery on the
said suit.

FOREST A. CHRISTIAN


Attorney for the Defendant

FILED
DEC 3 1963
ALICE L. DICK, CLERK
REGISTER

ANNA SIMBA,

Plaintiff,

vs.

LAWRENCE J. KRAUSS,

Defendant,

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7052

Comes now the Plaintiff, Anna Simba, and makes this demand in writing to the Defendant, Lawrence J. Krauss, for an abstract in writing of the title or titles in which he will rely on for a defense against the action brought by the Plaintiff.

This the 12th day of August, 1966.

WILTERS & BRANTLEY

BY: [Signature]

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12 day of August, 1966 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By: [Signature]

FILED

AUG 22 1966

ALICE L. DUKK, CLERK

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7052

ANNA SIMBA,

Plaintiff,

vs.

LAWRENCE J. KRAUSS,

Defendant,

WILTERS & BRANTLEY
Attorney for the Plaintiff
Bay Minette, Alabama

FOREST A. CHRISTIAN
Attorney for the Defendant
Foley, Alabama

FILED

AUG 12 1988

ALICE A. DICK
CLERK
REGISTER

ANNA SIMBA, X
PLAINTIFF, X IN THE CIRCUIT COURT OF
VS: X BALDWIN COUNTY, ALABAMA
LAWRENCE J. KRAUSS, X AT LAW
DEFENDANT. X CASE NO. 7052

CROSS-INTERROGATORIES

Now comes the Defendant and propounds cross-interrogatories to Mrs. Anna Simba, a witness whose testimony, when taken, will be material evidence for the Defendant on the trial of the above cause.

Cross-Interrogatories to Anna Simba, WITNESS;

1. How are you related to ADOLPH LANGER?
2. When did you last see him?
3. When did you last correspond with him?
4. Have you ever paid any taxes on the land described in this legal action?
5. If so, when did you last pay taxes?
6. Have you or your agents been in possession of this property?
7. If so, when were you in possession?
8. How did you have possession?

ATTORNEY FOR THE DEFENDANT


Forest A. Christian
Foley, Alabama

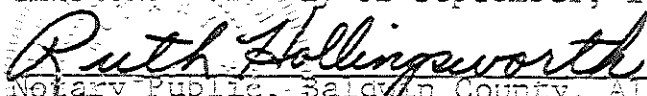
STATE OF ALABAMA,)

BALDWIN COUNTY.)

Before me, RUTH HOLLINGSWORTH, a Notary Public, in and for said County and State, personally appeared FOREST A. CHRISTIAN, who being by me first duly sworn, deposes and says: That he is agent and attorney for the Defendant, and ANNA SIMBA's evidence to be secured by this deposition will be material evidence for the Defendant on the trial of this cause.


Forest A. Christian

Sworn to and subscribed before me on
this the 22nd day of September, 1967.


Notary Public, Baldwin County, Alabama

My Commission Expires: Mar. 2, 1970

FILED

SEP 25 1967

ALICE J. DUCK CLERK
REGISTER

ANNA SIMBA,	X	
		IN THE CIRCUIT COURT OF
Plaintiff,	X	
		BALDWIN COUNTY, ALABAMA
vs.	X	
		AT LAW
LAWRENCE J. KRAUSS,	X	
		CASE NO. 7052
Defendant.	X	

INTERROGATORIES

Now comes the Plaintiff and propounds interrogatories to Mrs. Anna Simba, a witness whose testimony, when taken, will be material evidence for the Plaintiff on the trial of the above cause.

Interrogatories to Anna Simba, WITNESS:

1. State your name, sex and age.
2. What is your residence.
3. Did you know Adolph Langer?
4. Was he related to you?
5. Do you know if he is living or dead?
6. If he is dead, give the date of his death and where he died.
7. Do you know who are the heirs of Adolph Langer?
8. Is his mother and father living?
9. Did he have any desendants; that is to say, did he have any children? If so are they living or dead. If living what are their names and residences, and if dead give the names and residences of their desendants.
10. In the event Mr. Langer did not have any desendants, did he have any brothers and sisters? If he had any brothers and sisters name then, and whether living or dead. Please name those that are living and give their addresses. Name those that are deceased, and whether or not they had any desendants. If they had

desendants, then give their names and if living give their
addresses.

WILTERS & BRANTLEY

BY: Harry J. Wilters, Jr.

FILE

SEP 16 1957

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED

ANNA SIMBA,

Plaintiff,

vs.

LAWRENCE J. KRAUSS,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7052

TO LAWRENCE J. KRAUSS, DEFENDANT:

You are hereby given notice that the Plaintiff has filed with the undersigned the attached interrogatories for answers of which are to be taken from Anna Simba, a material witness, before the U. S. Consulate General, 8 M u n c h e n, KoniginstraÙe, on the 17th day of October, 1967, at 1500 o'clock Greenwich Time at the above address. I am preparing a commission to be issued to the U. S. Consulate General, and you are hereby given ten (10) days notice from the receipt of this instrument to send your cross interrogatories or make a demand for a oral examination.

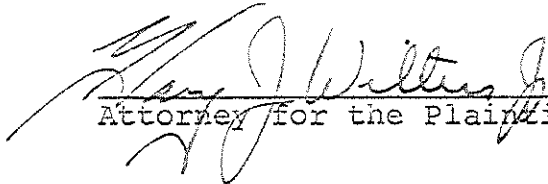
Done this 15 day of Sept., 1967.


Alice J. Duck, Clerk

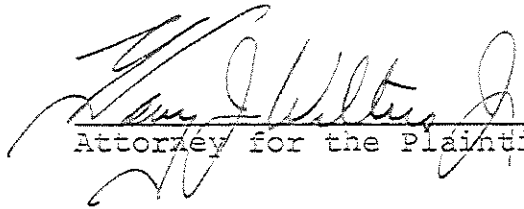
1967
SEP 18 1967

1967
SEP 18 1967

The United States Consulate General, U. S. Consulate General 8 M u n c h e n, KonigistraBe 5. is suggested as a fit and suitable person to take down the answers to the foregoing Interrogatories, and it is requested that a commission issue to him for that purpose.


Attorney for the Plaintiff

Comes now the Plaintiff, Anna Simba, by and through her attorney, Harry J. Wilters, Jr., and prays that the Clerk of the Circuit Court of Baldwin County, Alabama, cause a copy of the above Interrogatories and affidavit attached thereto to be sent to the Honorable Forest A. Christian, Attorney for the Defendant, Lawrence J. Krauss, and Lawrence J. Krauss, individually, and giving to them ten (10) days notice to file cross Interrogatories and advising them that we are issuing a commission to the U. S. Consulate General, 8 M u n c h e n, KonigistraBe, and directing the Consulate General to take the testimony of the witness, at the above address on the 17th day of October, 1967, at 1500 o'clock Greenwich time.


Attorney for the Plaintiff

8371080

10/17/67