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IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY.

GEORGE F. HANSON, BY GUARDIAN OF
HIS PERSON AND ESTATE, JAS. A. PROUT,

Complainant,

VS.

CORINE GROTZ,

Respondent.

TRIED BEFORE THE HON. F. W. HARE, JUDGE PRESIDING:

A P P E A R A N C E S:

FOR THE COMPLAINANT:

HON. EDWARD P. TOTTEN.

FOR THE RESPONDENT:

HON. N. C. STONE:

TRANSCRIPT OF THE EVIDENCE.

JUDGE GEORGE W. HUMPHREYS, a witness for the Complainant, having been first duly and legally sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

DIRECT EXAMINATION, by Mr. Totten:

Q. What is your name ?

A. George W. Humphreys.

Q. Are you the Judge of Probate of this County ?

A. Yes, sir.

Q. And were you such during all of the year, 1928 ?

A. Yes, sir.

Q. The records of the Probate Court are kept and taken under your direction and control ?

A. Yes, sir.

Q. I will ask you whether or not on the 20th., day of December, 1928, one George F. Hanson was brought before you on a petition for appointment as Guardian for him?

A. I don't remember the date, but the records will show.

Q. I will ask you to refer to the records?

A. This is dated on the 30th., of November, 1928, and that is the petition. This is the minutes here, Mr. Totten. You've got the wrong book. The Probate records are what you want.

Q. I will ask you to state whether or not the records you have show that a petition was filed for appointment as Guardian before James A. Prout was appointed as the Guardian of the person and estate of George F. Hanson?

A. Yes, sir.

Q. And George F. Hanson was determined by you to be a person of unsound mind?

MR. STONE: We object to the last question, on the ground that the proceedings now inquired about occurred at a date shown by the papers to be over a year after the date of the deed.

THE COURT: I don't think it is necessary to make any objections at this time. You can just point it out later. Mr. Totten, I should think that a certified copy of that decree would be the best evidence. I would suggest that you get certified copies from The Probate Office and introduce it in that way.

J. A. PROUT, a witness for the Complainant, having been first duly and legally sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

DIRECT EXAMINATION, by Mr. Totten:

Q. Is your name James A. Prout?

A. Yes, sir.

Q. And you are the person named in the bill of complaint as the Guardian of the person and estate of George F. Hanson?

A. I am.

Q. State how long you have known George Hanson?

A. I have known George Hanson about ten years, a little more than ten years.

Q. You may state, if you know, about what age George F. Hanson is?

A. I should take him to be about forty years of age or forty-five, something like that.

Q. You may state, if you know, as to the reputation of the said George Hanson for being of unsound mind?

MR. STONE: Of course, we object to that, and all of our objections to the testimony are considered made.

THE COURT: Mr. Totten, under our Alabama law, in order to qualify a non-expert as to the condition of a man's mind he has to show how long he has known him, and he has to recite the facts upon which he bases his opinion. In other words, he can testify what makes him think he is insane. He

can't give an opinion without predicating upon certain facts which in the mind of the Court would tend to show an unusual condition.

Q. Where has George Hanson lived with reference to where you live ?

A. We both lived in Fairhope. He was raised with his father and mother right across the street from where I live.

Q. For how long a period did that continue, that is, live across the street from you ?

A. For as long as he lived in Fairhope, possibly five years before an incident occurred that I will make use of, before he left Fairhope.

Q. How often during the time that you were acquainted with him did you see him personally ?

A. Every day.

Q. Did you talk with him during those times ?

A. Yes, sir. He labored for me during the time often and I came in contact with him very often during that time.

Q. Did you have any business transactions with him ?

A. Yes, sir, his employment was such that it would bring about a business condition. He hauled sand for me, and he would get so much a load for hauling this sand. I said to him after he had hauled it: "George, how much do I owe you". "I don't know", he would say. He was to get fifty cents a load. He hauled five or six loads once and I gave him just to see if he would know, \$1.75, and I said: "George, does that pay the bill", and he said: "Yes, that pays the bill". "Then you are satisfied", "Yes, perfectly satisfied". I then went to his mother and said to his mother: "George is not capable of collecting the money that he labors for."

Q. Could he count money ?

A. He could not.

BY THE COURT:

Q. What particular time are you referring to, at the time he was declared insane ?

A. I am referring to the time previously.

Q. How long did that condition last ?

A. From five years to the time that I got acquainted with him up to the time within probably a month previous to the time of the date of that deed.

DIRECT EXAMINATION, by Mr. Tooten (Contd)

Q. The time you're testifying to was previous to the date of this deed of the 14th., of December, 1927 ?

A. Yes, sir.

Q. How long prior to that time, the 14th., of December 1927?

A. My contacts with him in business would be from the time that I first got acquainted with him up to the time of about a month previous to this deed.

Q. When was it he left Fairhope and went to Mobile ?

A. That was about 2 or 3 years previous to the time of his signing this deed, but he was in Florida previous to that.

Q. How long was he in Florida, if you know ?

A. He was in Florida probably a year and a half. Would you like to know the cause of his going to Florida ? I will come direct to the issue.

THE COURT: LET'S hear it.

- A. Well, he had a horse and wagon hauling sand and he loaded that horse too heavy and the Woman's Humane Society got on to it, and the Marshal of Fairhope called upon him and so scared the poor fellow that he took his horse and wagon and went on his way to Florida, and he sold the horse and wagon for about - he told me himself - that he got about \$10.00 for it.

BY THE COURT:

- Q. What were they worth in your judgment ?
A. At least \$125.00.

BY MR. TOTTEN:

- Q. From your acquaintance and dealings with him during the years you knew him and immediately prior to the date of this deed, what can you say as to his mental condition, and his ability for transacting business ?
A. I would consider that he was totally incapable of transacting business to protect himself.

BY THE COURT:

- Q. Mr. Prout, did you base that opinion on anything else besides what you have told here ?
A. I would say that the statement that I made would be sufficient.
Q. I want to know if there's anything else upon which you base your opinion ?
A. No, sir, only since the time of that deed.
Q. Could he read and write ?
A. No, sir, he could scarcely make a mark.

BY MR. TOTTEN:

- Q. State, if you know, who managed his affairs during the time that you testified to prior to the 14th., of December, 1927 ?
A. His mother did while she was living. While she was alive she transacted all of his business. After he came back from Florida he lived with Mrs. Grotz in Mobile, the mother of Corine Grotz. He worked at a planing mill and he would bring home his envelope containing his check, and would give that to Mrs. Grotz. Mrs. Grotz transacted the business, took the money and paid for his board, bought him his socks and clothes, and supposedly put the balance of his money in the bank.
Q. When did his mother die, if you know ?
A. His mother died - I forget the exact time, but it was shortly before he went to Florida.
Q. What time did he go to Florida with reference to the time of the execution of the deed ?
A. Itx would be about four years I judge.
Q. State if you know when his father died ?
A. His father, a blind man, died about a year and a half or so ago.
Q. State, if you know, whether he had other near relatives ?
A. He had a sister that lived in Mobile and the sister committed suicide, I contend out of this trouble of her brother.
Q. Are you acquainted with the defendant, Corine Grotz ?
A. Very slightly. I probably met her once or twice.

Q. At the time he left for Florida was he working for you ?
A. When he was in Florida was he working for me ?

Q. No, when he left for Florida ?
A. He had been working for me. Probably he would work a day when I would want him to haul sand for me.

Q. He didn't owe you any money when he left for Florida, did he?
A. No, sir.

Q. And his estate owes you nothing now ?
A. It only owes me for what I have paid out.

Q. Paid out for what ?
A. For this case in getting my bond.

Q. Then they simply owe you as Guardian ?
A. Yes, sir, that's all.

Q. When did you learn of this deed having been made ?
A. I learned that the deed was made about six months probably after the time the deed was made.

Q. How close is the property covered by the deed to your property?
A. It is right across the street.

Q. Do you own any property adjoining it on that side of the street ?
A. No, sir.

Q. It's across the street ?
A. Yes, sir, my property is across the street from that.

Q. Now, Mr. Hanson's condition that you have testified to didn't interfere with him during work, did it ?
A. Only where he needed to do brain work.

Q. So a man working in a planer mill doesn't need to do brain work ?
A. No, sir.

Q. Was he in the same condition mentally at all times ?
A. Yes, sir, all the time I knew him up until the time of last week when I tried to induce him to come up here and come before the Judge himself.

Q. Was he living in Mobile at the time he made this deed ?
A. He was.

Q. How long had he been there ?
A. He had been there some three to four years, that is, to and from there.

Q. Had he been living in this same place all the time ?
A. No, sir, not all the time.

Q. Had he been doing this same work all the time ?
A. No, sir.

Q. What other kind of work has he been doing ?
A. Since the time that he was working in the planing mill he has been working in the incinerator plant of Mobile.

Q. Do you know how much he earns ?
A. He earns on a average of \$90.00 a month.

Q. Do you know how much he earned while working at the planing mill ?
A. No, sir, I never have been able to get that, but I am going to get it.

Q. You say supposedly Mrs. Grotz took his money and put it in the bank, are you referring to Corine Grotz's mother ?
A. Yes, sir, her mother.

Q. Do you know of your own knowledge that she took his money ?
A. Yes, sir, from what he told me and what she told me herself.

Q. Do you know that she did not put it in the bank for him ?
A. I do not, only I do know that my ward never got it.

J. A. PATTERSON, a witness for the Complainant, having been first duly and legally sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

DIRECT EXAMINATION, by Mr. Totten:

Q. What is your name and residence ?
A. J. A. Patterson, Fairhope.

Q. How long have you been living at Fairhope ?
A. About 28 years.

Q. Are you acquainted with George F. Hanson ?
A. Yes, sir.

Q. Who is the plaintiff in this action ?
A. Yes, sir.

Q. How long have you known him ?
A. 25 to 27 years, something like that.

Q. Have you seen him frequently during that time ?
A. Well, for the last several years I've only seen him two or three times a year.

Q. Prior to the last several years how often did you see him ?
A. He lived in Fairhope there and I saw him practically every day.

Q. State whether you have ever had any opportunity of dealing with him, or have you done so ?
A. Yes, sir. I have had him do little jobs for me.

Q. Did you pay him for it ?
A. Yes, sir.

Q. How did you pay him ?
A. Well, I had him do little jobs for me and in paying him he didn't seem to know what bills were at all. He didn't seem to know the difference in a 2-dollar bill and a 10-dollar bill. He didn't seem to know what they were, but he seemed to know what two bits and silver dollars were. Whenever I paid him he always wanted me to pay him off in silver. If I had to pay him \$2.00 he wanted it in silver.

Q. What work was he doing while he was in Fairhope ?
A. He was hauling some sand for me. That seemed to be his job about that time. He was hauling sand for the masons right along regular.

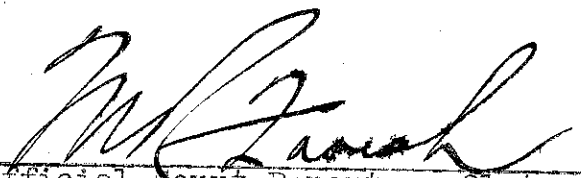
Q. Hauling sand to the different buildings as they went up there in Fairhope ?
A. Yes, sir.

Q. And you say he didn't seem to know the difference in different kinds of bills ?
A. No, sir.

C E R T I F I C A T E.

I hereby certify that the foregoing pages, numbered one to eleven, both inclusive, contain a full and correct transcript of the testimony taken in the cause herein styled on the 7th., day of August, 1929. said testimony having been taken before the Hon. F. W. Hare, Judge of the Twenty-First Judicial Circuit of Alabama, at Bay Minette, Alabama.

Given under my hand this the 29th., day of August, 1929.


Official Court Reporter, 21st.,
Judicial Circuit of Alabama.

STATE OF ALABAMA

IN CIRCUIT COURT

COUNTY OF BALDWIN

IN EQUITY

GEORGE F. HANSON, by Guardian
of his Person and Estate,
JAMES A. PROUT, - - Complainant,

vs.

NOTICE OF APPEARANCE

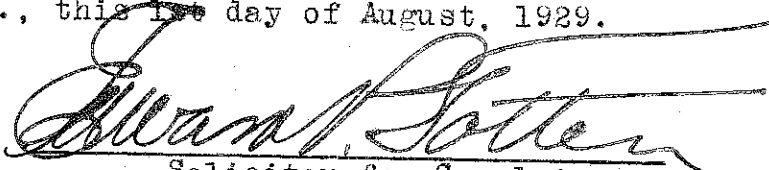
CORINE GROTZ, - Defendant.

To the Hon. T. W. Richerson,
Register of the Circuit Court:

Sir:-

You will please enter my name, in your Appearance
Register, as Solicitor for the Complainant in the cause above
entitled.

Dated at Fairhope, Ala., this 1st day of August, 1929.


Solicitor for Complainant

Chas. M. Tompkins

Esq.

Mobile, Alabama

August 2, 1929.

Register of Equity Division of Circuit Court of Baldwin Co.,
Bay Minette, Alabama.

Dear Sir:

Kindly advise me when your Equity Division of
Circuit Court of Baldwin County meets. I will appreciate
your sending me any notices that have been filed, or may
be filed, in the case of George F. Hansen, Guardian of his
Person and Estate, James Prout, Complainant, vs Corine
Grotz, Defendant.

Respectfully,

C. M. Tompkins

T/TL

- Q. Did he seem to know the value of money ?
 A. No, sir, I have had occasion to have him do little jobs for me and he didn't seem to have any idea about what he wanted to charge. If youx gave him a quarter he seemed to be as well satisfied as if you gave him a half dollar.
- Q. State if you know whether he was taken advantage of by reason of that fact ?
 A. I don't knowx of any occasion, but it could have been easily done, I believe.
- Q. When did you last see George F. Hanson ?
 A. I think the last time I saw him he was up here last Fall..
- Q. That the time you came up here as a witness when the petition was filed for Mr. Prout's guardianship ?
 A. Yes, sir.
- Q. Prior to that time when was the last time you saw him ?
 A. I couldn't say, but he would come to Fairhope two or three times ~~and~~ a year and I always saw him then.
- Q. From your acquaintance and dealings with him, state whether or not in your opinion he was capable of handling his own business affairs ?
 A. I don't think he was, judging from the business transactions I've had with him.

CROSS EXAMINATION, by Stone:

- Q. How many different times did he work for you ?
 A. Half a dozen times or more.
- Q. Part of that time he was hauling sand and the other times he was doing what ?
 A. Just doing little odd jobs for me.
- Q. Was it known to you that he couldn't read and write ?
 A. Yes, sir.
- Q. In your judgment did that have anything to do with his desire to be paid in silver money rather than paper money ?
 A. I know of one or two occasion as I stated before, too, that--
- Q. Just answer the question ?
 A. Well, I think it did.
- Q. You say he was regularly engaged in hauling sand ?
 A. Yes, sir, that seemed to be his regular job.
- Q. Was he running a public dray ?
 A. Practically so, Yes, sir.
- Q. How long did he carry on that business ?
 A. He carried it on for several months.
- Q. Did he earn a living from it ?
 A. He did to a large extent.
- Q. And your statement as to his mentality are based upon those instances as you have cited--of your own knowledge that is all the personal knowledge you have of his ability to handle his own business transactions ?
 A. Well, largely, Yes, sir.
Re-Direct By Mr. Satten:
- Q. Have you ever discussed with others as to the mental condition of George F. Hanson ?
 A.

THE COURT: I don't think that is relevant.

burnt out the tubes and nearly ~~ruined~~ ruined my boiler, but I never had trusted ~~with~~ him with that before.

- Q. Did you ever have him employed after that in other work ?
 A. I don't believe I did.
- Q. Do you know whether or not George can read or write ?
 A. I'm sure he can't. He couldn't at that time.
- Q.

Q. The last time you had any dealings with him he couldn't read nor write ?

A. No, sir.

Q. This was all prior to December 14th., 1927 ?

A. Yes, sir.

Q. You may state, Mr. Beirglin, from your personal knowledge of George Hanson your opinion as to his ability to transact business and manage his own affairs ?

MR. STONE: I don't think he has shown enough knowledge of him to state that.

BY THE COURT:

Q. You may qualify him to state his ability to conduct an intelligent conversation.

WITNESS: I don't believe he can, Judge.

BY THE COURT:

Q. Does he know the denomination of money ?

A. He might know of silver but not of paper money. In fact when he was working for me I would pay him on Saturday and give him three or four dollars and ask him would that satisfy him and he'd say "yes". He was incompetent as far as money matters are concerned.

Q. How long has this continued during the time you have known him ?

A. All his life. I don't believe he has ever been able to count money.

Q. Did he understand business transactions ?

A. In a very limited way. His mother used to attend to that for him.

DIRECT EXAMINATION, by Mr. Totten (contd).

Q. Do you know about how old George Hanson is ?

A. I judge about 40.

BY THE COURT:

Q. What property was in that deed, you know ?

A. I know the location, I believe its on Pearce Street.

Q. Have you any idea of the value of it ?

A. No, sir, I don't know the value of property down there much.

BY MR. TOTTEN (Contd)

Q. State in your opinion from you personal knowledge of him whether George Hanson would be capable of understanding a transaction of executing a deed transferring and conveying land ?

A. I don't think he would.

CROSS EXAMINATION, by Mr. Stone:

Q. If the Notary Public that took the acknowledgement to the deed told him that he was selling a certain lot of land would he understand that ?

A. I doubt that very much.

Q. If he was paid in silver money would he know how much he was getting ?

A. Well, he might be able to count four or five dollars.

- Q. Have you ever seen him count four or five dollars ?
A. No, sir, but I know he has an awful time counting a dollar.
- Q. What business was he in when he wasn't working for you ?
A. He washauling wood and sand and gravel.
- Q. He made a living from it, didn't he ?
A. Yes, sir.
- Q. Took care of himself alright, didn't he ?
A. Well, I don't know about that -
- Q. He never had a guardian that you know of appointed by the Court, did he ?
A. No, sir, only his mother took care of him.
- Q. And the only time you had any experience with him was 10 or 15 years ago when you hired him there and put him in charge of the boiler while you were gone to lunch, and you had an automatic pump which he shut off instead of running ?
A. Yes, sir.
- Q. And the parts of that pump would be better known to a man that was better qualified to run it, who had had some experience in running it, isn't that right ?
A. Well, of course, but he had been working there a little while and he had helped fire some before.
- Q. You never had occasion to teach him to fire, did you ?
A. Well, we were teaching him then, I told them to teach him that day.
- Q. You don't know of your own knowledge anything about the particular transaction involved in this case, do you ?
A. No, sir.
- Q. How long has George Hanson been away from Fairhope ?
A. Two or three years.
- Q. Where has he been working ?
A. In Mobile, I think.
- Q. And has he been coming backwards and forwards to and from Fairhope ?
A. Yes, sir.
- Q. Traveling alone ?
A. Yes, sir.
- Q. What kind of work has he been doing in Mobile ?
A. I believe he's been working in the shipyards.

George F. Hansen
by Guardian
James A. Parout
vs

Corine Gotsy

Testimony

Filed Aug 30/1929
T W McInnon
Clerk

Filed August 30th
1929
T W McInnon
Register

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George F. Hanson, by Guardian of
his person and Estate, Jas. A. Prout,
Complainant.

vs.

Corine Grotz,
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. IN EQUITY.

DEPOSITIONS OF CORINE GROTZ, JULIA C. GROTZ, W. J. HORN, MRS. JAMES
MURPHY, WITNESSES FOR DEFENDANT IN THE ABOVE ENTITLED CAUSE.

INTERROGATORIES TO BE PROPOUNDED TO CORINE GROTZ.

First Interrogatories: Kindly give your name and place of residence.

Second Interrogatory: Where was your place of residence on December 14,
1927, and where were you residing on the 14th
day of May, 1929, and where are you residing now?

Third Interrogatory: Prior to December 14, 1927, where was George
Hansen living? Where was he living on December
14, 1927? In the summer of 1927, where was he
living and who was taking care of him?

Fourth Interrogatory: How long have you known the said George Hansen?
State whether or not you know him intimately
prior to and on December 14, 1927? During that
time, did you see him frequently? If so, kindly
state how frequently you saw him? Did you notice
any unusual actions and conversations during that
time? If so, kindly detail them. In your
opinion was or not the said George Hansen on
December 14, 1927, a man of sound and disposing
mind?

Fifth Interrogatory: Did you ever hear him refer to the deed he
executed to you on December 14, 1927? If so,
what did he say?

Sixth Interrogatory: Do you or not, know of the sister of George Hansen
committing suicide? If so, do you or not know
the cause of said suicide?

Seventh Interrogatory: Are you or not the party to whom George Hansen
deeded the following property, Lot Numbered Thirty-
two of Magnolia Beach addition to the town of
Fairhope, as per map or plat thereof recorded in

Miscellaneous Book 1, page 36, Probate Records of Baldwin County. Being the same property conveyed to this grantor by D. H. Stewart and wife, and George A. Tonsmeire, as Trustee, by deed of record in Book 21 N. S., page 168-9, on December 14, 1927? If so, who prepared said deed for you?

Eighth Interrogatory: What consideration, if any, did you pay to said George Hansen for the property deeded to you on December 14, 1927?

Ninth Interrogatory: State any circumstance within your knowledge or any facts you may know about the execution of the deed of George Hansen to you on December 14, 1927.

INTERROGATORIES TO BE PROPOUNDED TO JULIA C. GROTZ.

First Interrogatory: Kindly give your name, place of residence, and state whether or not you are the mother of Corine Grotz?

Second Interrogatory: Where was Corrine Grotz's place of residence on December 14, 1927? And where was she residing on the 14th day of May, 1929, and where is she residing at present?

Third Interrogatory: Did or not George Hansen ever give you any money to put in any bank for him?

Fourth Interrogatory: Did you or not ever tell Mr. G. M. Pruitt that George Hansen ever gave you any money to put in the bank for him? Has George Hansen ever given you a cent since he has been working in the incinerator plant in Mobile, Alabama? How long has he been working in said incinerator plant?

Fifth Interrogatory: Prior to December 14, 1927, where was George Hansen living? Where was he living on December 14, 1927? In the summer of 1927 where was he living and who was taking care of him?

Sixth Interrogatory: How long have you known the said George Hansen?

State whether or not you knew him intimately prior to and on December 14, 1927? During that time, did you see him frequently, if so, how frequently did you see him? Did you notice any unusual actions and conversations during that time?

If so, kindly detail them. In your opinion, was or not the said George Hansen, on December 14, 1927, a man of sound and disposing mind?

Eighth Interrogatory: Did you ever hear him refer to the deed he had executed to Corine Grotz, on December 14, 1927? If so, what did he say?

Ninth Interrogatory: Do you or not remember the time the said George Hansen took his horse and wagon and went to Florida? If so, kindly detail facts and circumstances of that trip? Do you or not know what became of this horse and wagon and why it was sold? If so, state what you know in regard to the same, and how you obtained your information?

Tenth Interrogatory: Did you or not know of the sister of George Hansen committing suicide? If so, do you or not know the cause of said suicide?

Eleventh Interrogatory: Did you or not know the mother of George Hansen before her death? If so, state whether or not you were the Executrix under her last will and testament? If so, have you or not closed your administrations? Who was your attorney while you were Executrix for that estate? And in what court was said estate administered?

Twelfth Interrogatory: State any circumstance within your knowledge or any facts you may know about the execution of the deed by George Hansen to Corine Grotz on December 14, 1927?

INTERROGATORIES TO BE PROPOUNDED TO W.J. HORN.

- First Interrogatory: Kindly state your name, occupation and place of residence?
- Second Interrogatory: Give your occupation in Mobile, Alabama, on December 14, 1927?
- Third Interrogatory: Did or not you prepare the deed from George Hansen to Corine Grotz dated December 14, 1927? Did you or not witness said deed? Did you or not pay, for Corine Grotz, the Five Dollars consideration expressed in said deed to George Hansen at the time said deed was executed?
- Fourth Interrogatory: Did you or not explain said deed in detail to George Hansen before the same was signed? If so, what did you tell him and what did he tell you?
- Fifth Interrogatory: Were you or not personally acquainted with George Hansen, the party who made the deed to Corine Grotz on December 14, 1927?
- Sixth Interrogatory: Did or not the said George Hansen talk to you in an intelligent manner about said deed? What did he say to you, if anything, about the same?
- Seventh Interrogatory: Did the said George Hansen understand the transaction of the deeding of said property before he executed said deed?
- Eight Interrogatory: In your opinion on December 14, 1927, at the time said deed was executed, was the said George Hansen a man of sound and disposing mind?

INTERROGATORIES TO BE PROPOUNDED TO JAMES MURPHY and
MRS JAMES MURPHY.

- First Interrogatory: Kindly give your name, occupation and place of residence?
- Second Interrogatory: Do you or not know George Hansen, and how long have you known him?
- Third Interrogatory: Where does the said George Hansen work and how long has he been so employed? Where does he reside and how long has he resided there?

Fourth Interrogatory: Do you know him intimately? Do you see him frequently? How often do you see him? Have you or not noticed any unusual actions or conversations during that time? If so, detail them.

Fifth Interrogatory: Do you consider him a man of sound or unsound mind?

Sixth Interrogatory: Have you or not ever heard him refer to deed given Corine Grotz on December 14, 1927? If so, what did he say, if anything, in regard to said deed?

Charles W. Tompkins
Thelma Leslie
Solicitors for Respondent.

Thelma Leslie is suggested as a suitable person to whom commission issue to take the depositions of the above named witnesses, she and said witnesses reside in Mobile County, Alabama.

Charles W. Tompkins
Thelma Leslie
Solicitors for Respondent.

State of Alabama,

Mobile County.

Before me F. W. Herrmann, a Notary Public, in and for said County and State, personally appeared Charles W. Tompkins, who is known to me and who being by me first duly sworn deposes and says, that he is one of the attorneys for the Defendant in the above entitled cause, and the defense of said Defendant, or a material part thereof depends exclusively on the evidence of said witnesses ^{& said witnesses are} ~~or~~ material to the defense of the Defendant in said cause.

Charles W. Tompkins
Attorney for Defendant.

Sworn and subscribed to before me

this 17th day of September, 1929.

F. W. Herrmann
Notary Public.
Mobile County,
State of Alabama.

THE STATE OF ALABAMA--MOBILE COUNTY.

GEorge F. Hansen, by Guardian of
his Person and Estate, James A. Prout,
Complainant.

vs

Corinne Grotz,
Defenant.

No.-----

The deposition of Corinne Grtoz,

Julia C. Grotz, W. J. Horn and Mrs. James Murphy

witnesses examined on behalf of the Defendant

in the above entitled cause which is pending in the Honorable the
Baldwin County Circuit Court, Equity Division.

The said witnesses appeared before me at the times and places
hereinafter named, and after having been first duly sworn by me to
speak the truth, the whole truth, and nothing but the truth, did testify
and say as follows. That is to say Corinne Grotz, Julia C. Grotz, W. J
Horn and Mrs. James Murphy being duly sworn testified as follows:

DEPOSITIONS OF CORINNE GROTZ.

Answer to First Interrogatory:- My name is Corinne Grotz, and my place of residence is Mobile, Alabama.

Answer to Second Interrogatory:- My place of residence on December 14, 1927 was Mobile, Alabama. And I was residing in Mobile, Alabama, on May 14, 1929, and am residing in Mobile, Alabama, now.

Answer to Third Interrogatory:- Prior to December 14, 1927, George Hansen was living at my house in Mobile, Alabama. In the summer of 1927 he was living at the same place. He was living at my house in Mobile, Alabama, and I was taking care of him.

Answer to Fourth Interrogatory: I have known George Hansen since 1916. Yes, I knew him immediately prior to & on December 14, 1927. Yes, during that time I saw him frequently, he lived at my house and I saw him every day. I did not notice any unusual actions or conversations of his during that time. I never noticed any unusual actions or conversations, therefore I cannot detail them. Yes, on December 14, 1927, in my opinion, George Hansen was a man of sound and disposing mind.

Answer to Fifth Interrogatory: Yes, I heard him refer to the deed he executed to me on December 14, 1927. He said, I had been so nice to him and he owed me money, and he could not pay it, and he wanted me to have that piece of ground.

Answer to Sixth Interrogatory: Yes, I knew of the sister of George

Hansen committing suicide. I just heard of it. I heard it was domestic troubles on account of her husband.

Answer to Seventh Interrogatory: Yes, I am the party to whom George Hansen deeded the following property:-
Lot Numbered Thirty-two of Magnolia Beach addition to the town of Fairhope, as per map or plat thereof recorded in Miscellaneous Book 1, page 36, Probate Records of Baldwin County. Being the same property conveyed to this grantor by D. H. Stewart and wife, and George A. Tonsmeire, as Trustee, by deed of record in Book 21 N.S. page 168-9, on December 14, 1927. This deed was prepared by Mr. Walter G. Horn.

Answer to Eighth Interrogatory: I had fed him previous to that all the summer, and loaned him Two Dollars a week for spending money, and for his tobacco, and paid his laundry bill, he being out of work, and at the time the deed was made I gave him an additional Five Dollars in cash.

Answer to Ninth Interrogatory: He stated, that he could not pay me for the cash I had loaned him, and what I had paid for his laundry and board, and he told me if I would give him Five Dollars in cash he would deed this property to me, and we would call it square. I did so and the deed was executed.

Carrie G. G. G. G.

Sworn and subscribed to before me
this 11th day of October, 1929.

Helma Leslie
Commissioner

DEPOSITIONS OF MRS. JAMES MURPHY.

Answer to First Interrogatory: My name is Lillian Murphy, wife of James Murphy. My occupation is housewife, and I reside at 1055 Marine Street.

Answer to Second Interrogatory: Yes, I know George Hansen, and have known him for about a year.

Answer to Third Interrogatory: George Hansen is not working now, but he is employed at the Mobile City Incinerator, he has been working at the Incinerator for about one year. George Hansen lived at 958 Seneca Street, and he has lived there for about six months.

Answer to Fourth Interrogatory: Yes, I know him intimately. Yes, I see him frequently. When he is working I see him about once a month, but when he is not working I see him almost every day. I have not noticed any unusual actions or conversations during that time. I cannot detail them as I have never seen any.

Answer to Fifth Interrogatory: I consider him unquestionably, a man of sound mind.

Answer to Sixth Interrogatory: Yes, I have heard him refer to that deed. He said, he had given Corinne Grotz a deed to a Lot he owned in Baldwin County, Alabama, and that he wanted her to have the Lot, because she was good to him.

Lillian Murphy

Sworn and subscribed to before me
this 15th day of October, 1929.

Thelma Leake
Commissioner
Mobile County,
State of Alabama.

The State of Alabama, {
Baldwin County

CIRCUIT COURT

To Thelma Leslie , Mobile Alabama,

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you

and examine Corine Grotz, Julia C. Grotz, W.J. Horn, Mrs. James Murphy, *James Murphy*
Mobile Alabama,

as witnesses in behalf of Defendant, in a cause pending in our Circuit

Court of Baldwin County, of said State, wherein George F. Hanson, by Guardian,
of his person and Estate , James A. Prout,

Complainant
and Corine Grotz,

Defendant,

on oath to be by you administered, upon Interrogatories,
to take and certify the deposition... of the witnesses... and return the same to our Court, with all convenient speed, under your hand.

Witness 9th day of October 19 29

Thelma Leslie

REGISTER

COMMISSIONER'S FEE, \$ 8.50 *due and unpaid.*

WITNESS' FEES, \$ Thelma Leslie
Commissioner

DEPOSITIONS OF JULIA C. GROTZ.

Answer to First Interrogatory:- My name is Julia C. Grotz, my place of residence is Mobile, Alabama. Yes, I am the Mother of Corinne Grotz.

Answer to Second Interrogatory: Corinne Grotz's place of residence on December 14, 1927, was in Mobile, Alabama. She was residing in Mobile, Alabama, on May 14, 1929, and at the present is residing in Mobile, Alabama.

Answer to Third Interrogatory: No, George Hansen never gave me any money to put in the bank for him.

Answer to Fourth Interrogatory: No, I never told Mr. G. A. Pruitt or anyone else that George Hansen ever gave me any money to put in the bank for him. George Hansen has never given me one cent since he has been working in the Incinerator Plant in Mobile, Alabama. I do not know how long he has been working at the Incinerator Plant, he left the home of Corinne Grotz last February one year ago, up to that time he was not working anywhere.

Answer to Fifth Interrogatory: Prior to December 14, 1927, George Hansen was living at the house of Corinne Grotz. I am her Mother, and she and I live in the same house. On December 14, 1927, George Hansen was living at the same place. In the summer of 1927 he was living at the same place and Corinne Grotz was taking care of him.

Answer to Sixth Interrogatory: I have known George Hansen since 1914. Yes, I knew him intimately prior to and on December 14, 1927. Yes, I saw him frequently, I saw him every day as he was living in the same house with us. I never noticed any unusual actions or

DEPOSITIONS OF W. J. HORN.

- Answer to First Interrogatory: My name is W. J. Horn, I am in the Real Estate business, and reside at Mobile, Alabama.
- Answer to Second Interrogatory: I was President of the W. J. Horn Realty Company, a Real Estate Agency in Mobile, Alabama, on December 14, 1927.
- Answer to Third Interrogatory: I did prepare a deed from George Hansen to Corinne Grotz on December 14, 1927. I was present when it was signed and witnessed the signature of George Hansen. I saw the money paid to George Hansen by Corinne Grotz.
- Answer to Fourth Interrogatory: Yes, I read the deed over to Hansen and told him just exactly what it meant, that the conveyance of Lot in Baldwin County to Corinne Grotz, and that when he signed it, it was no longer his Lot but was the Lot of Corinne Grotz. He told me that he understood it and was ready to sign it.
- Answer to Fifth Interrogatory: I knew him, and had known him in a casual way for some time, possibly two or three years prior to December 14, 1927.
- Answer to Sixth Interrogatory: Yes, George Hansen said, he knew what he was doing, that he understood he was signing a conveyance or Deed over to Corinne Grotz to the Lot he owned in Baldwin County.
- Answer to Seventh Interrogatory: Yes, he certainly understood it.
- Answer to Eighth Interrogatory: Yes, in my opinion George Hansen was a man of sound and disposing mind at the time the deed was signed on December 14, 1927.

Sworn and subscribed to before me
this 14 day of October, 1929.

Thelma Leckie
Commissioner
Mobile, County, Alabama.

W. J. Horn

conversations during that time. I cannot detail any unusual actions or conversations because I never saw any. Yes, in my opinion on December 14, 1927, George Hansen was a man of sound and disposing mind.

Answer to Eighth Interrogatory: Yes, I heard him refer a number of times of the deed he executed to Corinne Grotz on December 14, 1927. He said, "she had been good to him, paid his laundry, and gave him spending money, and he could not repay her, and he wanted her to have the property he deeded to her.

Answer to Ninth Interrogatory: Yes, I remember the time George Hansen took his horse and wagon and went to Florida. His horse had a sore on its back, and the Marshall forbid him from working the horse on account of its sore back, I gave him money for medicine for it, he could not get work so he took his horse and wagon and went to Florida. He told me when he came back the reason he sold his horse he got to some State Line and they would not let him cross without a certificate

Answer to Tenth Interrogatory: I knew of the sister of George Hansen committing suicide. George Hansen told me of it himself, and told me it was on account of domestic trouble with her husband.

Answer to Eleventh Interrogatory: I knew the Mother of George Hansen before her death. Yes, I was Executrix of her last Will and Testament. Yes, I have closed my administration of her Estate, my attorney was William J. Young and the Estate was administered in the Probate Court of Baldwin County. I never received any compensation for it.

Answer to Twelfth Interrogatory: I was over the Bay when the deed of George Hansen to Corinne Grotz was

executed on December 14, 1927, I came back about a week afterwards, and George Hansen told me that he had executed the deed to Corinne Grotz, and wanted her to have it, because she had been so good to him and he owed her money that ~~he~~ could never repay.

Julia C. Grotz

Sworn and subscribed to before me
this 11th day of October, 1929.

Thelma Leslie
~~Commissioner~~
Mobile County,
State of Alabama.

CERTIFICATE

I, Thelma Leslie, one of the Commissioners named in the foregoing commission which issued out of the Honorable the Circuit Court of Baldwin County, Alabama, Equity Division, do hereby certify that in a certain cause pending in said Court, wherein George F. Hansen, by Guardian of his Person and Estate, James A. Prout is Complainant, and Corinne Grotz is Defendant under and by virtue of the power conferred upon me by said commission, I caused the said Corinne Grotz, Julia C. Grotz, W. J. Horn and Mrs. James Murphy, who are known to me and who are known to me to be the identical witnesses named in the commission to come before me at the times and places hereinafter named, that is to say I caused the said Corinne Grotz to come before me at Office 215 Pollock Building, at Mobile, Alabama, on the 11th day of October A.D. 1929; and the said Julia C. Grotz at the same place on the 11th day of October A.D., 1929; and the said W. J. Horn at the same place on the 14th day of October A.D., 1929, and the said Mrs. James Murphy at 1055 Marine Street, in Mobile, Alabama, on the 15th day of October, A.D., 1929, that said witnesses were first duly sworn by me as stated; that the said witnesses were examined upon the interrogatories hereto attached, and testified in response thereto as it is herein above written; that their testimony was by me reduced to writing as given by them and as near as might be in the identical language of the said witnesses and that after their testimony had been so reduced to writing, it was by me read over to the said witnesses who assented to and signed the same in my presence and in the presence of the Solicitor for the Defendant, the Solicitor of the Complainant having waived notice of the same, James Murphy not appearing.

I further certify that I am not of Counsel or of kin to any of the parties to the cause and am not in anywise interested in the result thereof.

WITNESS my hand this the 16th day of
October, A.D., 1929.

Thelma Leslie Commissioner

George F. Hanson, by Guardian)
of his Person and Estate,)
James A. Prout,)

Complainant.)

vs)

Corine Grotz)
Defendant.)

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. IN EQUITY.

COMES THE RESPONDENT IN THE ABOVE ENTITLED CAUSE, AND FOR ANSWER TO
THE FOREGOING COMPLAINT, ANSWERS AS FOLLOWS.

First: Respondent neither admits nor denies what is alleged in
first paragraph of said Bill of Complaint, but demands
strict proof of same.

Second: Respondent denies what is alleged in second paragraph of
said Bill of Complaint, and demands strict proof of same.

Third: Respondent denies what is alleged in third paragraph of
said Bill of Complaint and demands strict proof of same.

Fourth: Respondent denies what is alleged in fourth paragraph of
said Bill of Complaint and demands strict proof of same.

Fifth: Respondent denies what is alleged in fifth paragraph of said
Bill of Complaint and demands strict proof of same.

Sixth: Respondent denies what is alleged in sixth paragraph of said
Bill of Complaint, and demands strict proof of same.

And for further answer to said Bill of Complaint, Respondent states
that on December 14, 1927, the said James A. Prout deeded to Respondent
for a valuable consideration the property described in the Bill of
Complaint. That said deed was properly executed and recorded by
Respondent in the Probate Court of Baldwin County, Alabama. That the
time said deed was executed the said James A. Prout was of sound
mind and had the legal right to dispose of the property in the
manner aforesaid.

And having as fully answered said Bill of Complaint as Respondent is
advised she is to do, prays her discharge with her costs.

John H. Camp
Solicitor for Complainant.

STATE OF ALABAMA
COUNTY OF BALDWIN

IN CIRCUIT COURT
IN EQUITY

GEORGE F. HANSON, by Guardian
of his Person and Estate,
JAMES A. PROUT, - Complainant,

vs.

BILL OF COMPLAINT

CORINE GROTZ, Defendant.

TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT:

Humbly complaining, your Orator shows unto this Honorable Court that James A. Prout, above named, is the duly qualified, legal, and acting Guardian of the Person and Estate of George F. Hanson, Complainant herein, who was, on December 20th, 1928, in the Probate Court of Baldwin County, Alabama, formally adjudged a Person of Unsound Mind, and that the Defendant, Corine Grotz, is a person over the age of twenty,one years residing in Baldwin county, Alabama;

That George F. Hanson, Complainant, is a man past thirty five years of age and that for more than ten years next preceding the date of the filing of this Bill, the said Hanson has been mentally unsound, universally recognized as such by all who knew him, and that he was during all of such time wholly incapable of transacting business, of managing or disposing of his property, and of protecting and defending his rights and interests in and to his property and possessions, and that all of these facts were well known to the Defendant;

That, notwithstanding such knowledge of Hanson's unsound mental condition, the Defendant did wilfully and unlawfully, with the purpose and intention of depriving the said Hanson of his property rights and interest therein, heretofore, on to-wit: December 14th, 1927, contrive and procure said Hanson to affix his mark to, and acknowledge the execution of, a certain Deed conveying to the Defendant, Corine Grotz, a particular tract of land in Baldwin county, Alabama;

That, at the time of affixing his mark to such Deed, and acknowledging the execution thereof, on to-wit: December 14th, 1927, the said Hanson was unable to read or write, and was utterly incapable, by reason of his unsound mental condition, of understanding or comprehending the contents or effect of such document, and was legally incapable of disposing of, assigning or granting any of his property interests to the said Defendant, and all of this the said Defendant well knew;

That there was no valuable consideration of any kind or nature moving from the Defendant to the said Hanson, in connection with the procuring by Defendant of Hanson's mark to such Deed or of his execution or acknowledgment of the same, and the recital of valuable considerations in said instrument was wholly false and fraudulent, and this the said Defendant well knew at the time of the execution of such instrument;

That the procuring of said Hanson to affix his mark and acknowledge such document as his voluntary act and deed by the Defendant, in the manner and form aforesaid, was wholly in fraud of the rights and equities of said Hanson in the premises and that, by reason thereof, the said Deed from Hanson to the Defendant is and should be void and without force or effect in law, but the Defendant has had the said Deed recorded in the Probate Records of Baldwin county, Alabama, and the same stands as a transfer of the tract described therein to the said Defendant, Corine Grotz, upon the said records, and under said Deed, so procured, the said Defendant is claiming ownership of the said land and is attempting to exercise power over the same and control thereof, in fraud of the rights of Complainant;

That the particular tract of land attempted to be conveyed by said Deed is Lot numbered Thirty Two of Magnolia Beach Addition to the Town of Fairhope, and the said Deed, as it appears on the records of Baldwin county, Alabama, is herewith set out in full, in words and figures, as follows:

KNOW ALL MEN BY THESE PRESENTS that George Hansen, unmarried, the grantor, in consideration of five dollars and other valuable considerations hereby acknowledged to have been paid to him by Corine Grotz, the grantee, do hereby grant, bargain, sell and convey unto the said grantee all that real property in Baldwin County, State of Alabama, described as follows: Lot numbered Thirty Two of Magnolia Beach Addition to the town of Fairhope, as per plat thereof recorded in Miscellaneous Book 1, Page 36, Probate Records of Baldwin County. Being the same property conveyed to this grantor by D. H. Stewart and wife and George A. Tonsmeire, as Trustee, by deed of record in Book 21 N. S., page 168-169. The Streets, parks and beach of Magnolia Beach are dedicated to the use of residents and lot owners in Magnolia Beach. Together with all and singular the rights, members, privileges and appertences thereunto belonging or in any wise appertaining; to have and to hold the same unto the grantee, heirs and assigns forever. And, except, as to taxes hereafter falling due, which are assumed by the grantee, the said grantor, for himself and his heirs, executors and administrators hereby covenant with the grantee, her heirs and assigns, that he is seized of an indefeasible estate in fee simple in said property, that said property is free from all encumbrances and that he does hereby warrant and will forever defend the title to said property unto the grantee, her heirs and assigns, against the lawful claims of all persons.

In Witness Whereof the grantor does hereunto set his hand and seal this 14 day of December, 1927.

Witness: W. G. HORN

GEORGE his
 X HANSEN
 mark

THE STATE OF ALABAMA
MOBILE COUNTY

I, Emma J. Luscher, a Notary Public in and for said State and County, hereby certify that George Hansen whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents ~~of~~ conveyance executed the same voluntarily on the day the same bears date.

Given under my hand and official seal at Mobile, Alabama, this 14th day of December, 1927.

EMMA J. LUSCHER, Notary Public,
Mobile County, Alabama

(SEAL)

State of Alabama
County of Baldwin

I, G. W. Humphries, Judge of Probate for
said county, hereby certify that the following privilege tax has
been paid on the within instrument as required by Acts 1923 -
\$ cts. 50

G. W. HUMPHRIES, Judge of Probate,
By J. L. KESSLER, Clerk.

Filed for record at 8 A. M. January 11th, 1928
Recorded January 11th, 1928.

G. W. HUMPHRIES,
Judge of Probate

(Recorded in DEED RECORD 44, at pages 311-312)

That the person named in said Deed
as grantor as George Hansen is the identical person who as Com-
plainant. George F. Hanson, is named in this Bill, and the grant-
ee in said Deed, Corine Grotz, is the Defendant herein.

THE PREMISES CONSIDERED, your Orator
prays that your Honor will take jurisdiction of the cause made
by this Bill of Complaint and that, by proper process issuing
to her from this Honorable Court, the Defendant, Corine Grotz,
may be made party respondent hereto and be required to answer
the charges herein made against her in all things as required by
the rules and practice of this Court;

P R A Y E R F O R R E L I E F

Your Orator prays that, upon the final hearing of this
cause, your Honor will order, adjudge and decree that the Deed
described is utterly void and of no force or effect whatever to
transfer any interest of Complainant in said land to the Defendant,
that said Deed be set aside and cancelled on the records of this
county, and that the title to the land described, in so far as
any right or claim of Defendant therein is concerned, may be
quieted in the Complainant; that the entire cost of this pro-
ceeding, including reasonable counsel fees for Complainant, may
be assessed against the Defendant, and that your Orator may have
such other and further relief as may seem just and equitable in
the premises, or as equity and good conscience may require, if
your Orator has in any wise prayed or asked amiss.

NOTE:

Dated April 30th, 1929.
Defendant is required to answer
every allegation of above Bill
but answer under oath is hereby expressly waived.

Edward P. Gotten
Solicitor for Complainant

Chas. W. Tompkins
Law
Mobile, Alabama

June 22, 1929.

Register of the Circuit Court of Baldwin Co.,
Bay Minette, Alabama.

Dear Sir:

Corine Grotz has retained me in the matter of the bill
filed in your Court by George Hanson, by guardian of his
person and Estate, James A. Prout. Kindly send me a copy
of said bill and oblige.

Respectfully,
C. W. Tompkins
(Per) J. L.

T/TL

TWENTY-FIRST JUDICIAL CIRCUIT
OF ALABAMA
F. W. HARE, JUDGE
M. R. FARISH, COURT REPORTER
MONROEVILLE, ALABAMA

August 29th., 1929.

Mr. T. W. Richerson,
Bay Minette, Alabama.

Dear Mr. Richardson:

I am enclosing herewith transcript of testimony taken in the case of Prout Vs. Grotz, which testimony was taken before the Judge the last time we were in Bay Minette, and which, I presume, should be filed in the cause until the balance of the testimony is taken. I am also enclosing a statement of my charges for this transcript which I would thank you to insert in the file.

With kindest regards and best wishes,

I am,

Yours very truly,

A handwritten signature in cursive script, appearing to read "M. R. Farish".

**The State of Alabama,
Baldwin County.**

Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon.....Corine Grotz

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by George F. Hanson, by Guardian of his person and Estate, James A. Prout

against said Corine Grotz

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 4th day of May 1929

J. M. McCreary Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

JAMES A. PROUT, as Guardian
for George F. Hanson, a non
compos mentis,

Complainant,

vs.

CORINNE GROTZ,

Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

Comes the Respondent, Corinne Grotz, and in open Court
suggests:

FIRST:

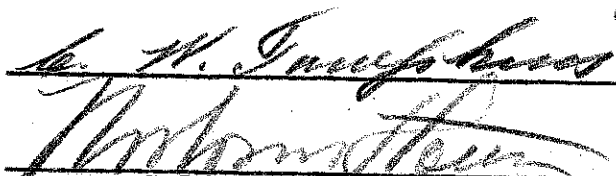
The removal of the Ward's guardian, who is the only
complainant in said action.

SECOND:

The removal of the guardian of the non compos mentis,
who is the only party complainant in this cause of action, said
guardian having been removed from said guardianship by a decretal
order of the Probate Court of Baldwin County, Alabama, the Court
from whom he received his appointment, and he has not any legal
authority to prosecute this case as complainant.

THIRD:

Because there is not any competent and legal party com-
plainant to this cause of action.


Solicitors for Respondent.

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

Geo. F. Hanson, by Guardian
Person and Estate, James
A. Prout

vs. 67

Corine Grotz

Edward P. Totten
Solicitor for Complainant

in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this
day of 192

of his Sheriff.

Executed this 21 day of

June 1927

by leaving a copy of the within Summons with

Corine Grotz

Defendant.

Pat Byrnes

Sheriff.

By C. Smith
Deputy Sheriff.

MONROEVILLE, ALA. Aug 27 1929

M. Pratt vs. Gatz

Baldwin Co. Gen. Sgnty

IN ACCOUNT WITH
M. R. FARISH
COURT REPORTER

To Transcript of testimony taken
in above case on Aug 7, 1929

6 00

Bills for transcripts due and payable on receipt of same