

22

WALTER ROBERTS,

Plaintiff,

vs

G. R. WOOD,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW

No. \_\_\_\_\_

1. Plaintiff claims of defendant Four Hundred Eight and 30/100 (\$408.30) dollars balance due by promissory note made by him on to-wit; January 18th, 1928, and payable February 18th, 1928, with interest.
  2. Plaintiff claims of defendant the further sum of Eighteen and 94/100 (\$18.94) dollars, balance due by promissory note made by him on January 18th, 1928 and payable on February 10th, 1928, with interest thereon.
  3. Plaintiff claims of defendant the further sum of Fifty and 00/100 (\$50.00) dollars due by him by promissory note made by him on August 15th, 1927, and payable to the order of Miss Catherine Roberts ninety days after date with interest thereon, and plaintiff alleges that the said note is the property of plaintiff.
- Plaintiff alleges that the defendant in the foregoing notes and as part thereof, waived exemptions as to personal property.
4. Plaintiff claims of defendant the further sum of Eighty-three and 70/100 (\$83.70) dollars, reasonable attorney's fees provided for in the collection of said note.

B. X. McMichael  
ATTORNEY FOR PLAINTIFF

WALTER ROBERTS,

Plaintiff,

-vs-

G. R. WOOD,

Defendant.

IN THE CIRCUIT COURT-AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Now comes the Defendant and for plea to the Complaint in this cause, and each count thereof, separately and severally, says:-

1st. Non-assumpsit.

2nd. Denies the allegations of the Complaint.

3rd. That the said Note was paid by the Defendant to the Plaintiff prior to the bringing of this suit.

4th. That said Note is barred by the Statute of Limitations of six years.

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Attorneys for Defendant.

WALTER ROBERTS,

Plaintiff,

-vs-

G. R. WOOD,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Comes the Defendant and for answer to the Interrogatories propounded by the Plaintiff says:-

1st. I executed and delivered the Notes described in the Complaint, Said Notes represent an indebtedness the consideration for which has failed.

2nd. Said Notes were released under agreement with the Plaintiff. No. Nothing.

G. R. Wood

Sworn to and subscribed before me, this 10<sup>th</sup> day of September, 1934.

R. C. Heard

Notary Public, Baldwin County,  
State of Alabama.

WALTER ROBERTS,

Plaintiff,

-VS-

G. R. WOOD,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause, and to each and every count thereof, separately and severally, and as grounds therefor says:-

FIRST:

That said Complaint does not state a cause of action.

*Hybert, Heard & Person*  
Attorneys for Defendant.

Defendant demands trial of  
this cause by Jury.

*Hybert, Heard & Person*  
Attorneys for Defendant.

STATE OF ALABAMA |

BALDWIN COUNTY |

CIRCUIT COURT  
LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon G. R. WOOD  
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 WALTER ROBERTS, .

WITNESS MY HAND, this 10th, day of February, 1934.

M. A. Stone  
Clerk of the Circuit Court  
Baldwin County, Alabama.

RECORDED  
INDEXED  
034  
DEMURRER.

WALTER ROBERTS,

Plaintiff,

-VS-

G. R. WOOD,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE  
STATE OF ALABAMA  
BALDWIN COUNTY.

Filed May

8<sup>th</sup>

, 1934

Wm. D. Stue  
Clerk. *cc*

LAW OFFICES

HYBART, HEARD  
& CHASON

BAY MINETTE, ALABAMA

22

Copy sent B & M a M. 7/1

22

RECORDED

ANSWER TO INTERROGATORIES.

WALTER ROBERTS,

Plaintiff,

-VS-

G. R. WOOD,

Defendant.

IN THE CIRCUIT COURT-AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Filed September 10, 1934

M. G. Stone

Clerk.

9/10/34

Copy to B.F. McMillan

P L E A.

RECORDED  
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WALTER ROBERTS,  
Plaintiff,  
-vs-  
G. R. WOOD,  
Defendant.

IN THE CIRCUIT COURT-AT LAW  
STATE OF ALABAMA  
BALDWIN COUNTY.

Filed August 29, 1934  
W. A. Stone  
Clerk.



J. L. Bradley.  
Farewell

and therefore, it is not possible to find the names of  
persons who were not in the area at the time of the  
attack on the ship. The names of the persons who were  
in the area at the time of the attack are listed in  
the following table:

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ORIGINAL

100-443887-100

Received 6 Day of April 1934  
and on 6 Day of April 1934  
I served a Copy of the within to H. R. O'Leary  
on \_\_\_\_\_  
\_\_\_\_\_

BY Wm. H. Holcombe  
W. H. HOLCOMBE, Sheriff

TO JAMES E. HARRIS, JR.  
JAMES E. HARRIS, JR., Sheriff

RECORDED  
INDEXED