

EDWARD C. WOLCOTT,  
Plaintiff,  
VS.  
JOHN H. TITUS,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW.

Comes the Plaintiff and demurs to the original  
complaint in this cause and for grounds thereof says:

ONE:

That said complaint does not state a cause of  
action.

TWO:

That said complaint does not state whether the  
alleged note was indorsed to the Plaintiff before maturity.

Beebe & Hall  
Attorneys for Defendant.

Defendant demands a trial by Jury.

Beebe & Hall  
Attorneys for Defendant.

*July 90*

RECORDED

EDWARD G. WOLCOTT,

Plaintiff,

VS.

JOHN H. TITUS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

Filed this the 5 day of  
November, 1934.

*M. A. Stone*  
Clerk.

*copy to Mr. Titus*

*11/5/34*

The State of Alabama, }  
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, E. C. Wolcott

M. A. Stone  
hath complained on oath to me, ~~W. C. Ferguson~~, Clerk of Circuit Court of Baldwin County,  
Ala., that John H. Titus

is justly indebted to the Plaintiff E. C. Wolcott

in the sum of Four Hundred and 00/100 Dollars, and  
E. C. Wolcott having made affidavit and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of  
a heard of dairy cattle, sixteen or more cows and their increase and  
40 acre tract, SW $\frac{1}{2}$  of the NW $\frac{1}{2}$  of Section 21, Tp. 6 S., of R. 2 East,

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such  
estate, so attached unless replevied, so to secure, that the same may be liable to further pro-  
ceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be  
held at the Court House of said County, on \_\_\_\_\_ Monday of \_\_\_\_\_

\_\_\_\_\_ 19\_\_\_\_ next; when and where you must make known to said Court how  
you have executed this Writ,

WITNESS, my hand, this 15th day of Oct. A. D. 19234

M. A. Stone Clerk.

No. ....

**ATTACHMENT**

*E. C. Walcott*

Vs. } Attachment

*J. H. Titus*

Issued ..... 192

Moore Printing Co. ::: Bay Minette, Ala.

*Executed & attested  
16<sup>th</sup> / 1934 by attaching  
16 Head of Dairy Cattle &  
40 acres of land SW  
1/4 of NW 1/4 of Sec  
21 Township 6.5. of  
Range East.*

**RECORDED**

*W. R. Bennett  
Att*

*J. H. Titus is bailer for  
property by order of my  
Richardly atty for  
WRS*

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

J O H N H. T I T U S

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

E D W A R D C. W O L C O T T

Witness my hand, this 13th day of October 1934

*M. A. Stone*

Clerk.

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**COMPLAINT**

The plaintiff claims of the defendant the sum of TWELVE HUNDRED DOLLARS, balance due by note made by him on the 7th day of May, 1928, and payable on May 6th, 1929, with interest thereon from January 6th, 1930.

Plaintiff further avers that by the terms of said note the defendant waived all rights of exemption against any process that may issue for the collection of same and further agreed to pay a reasonable attorney's fee for the collection of same, which Plaintiff now claims in the further sum of two hundred and fifty dollars.

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*Christie B. Rinsley*  
Attorney for Plaintiff.

RECORDED

No. 90

Received in office \_\_\_\_\_ day of \_\_\_\_\_ 19

Sheriff of \_\_\_\_\_ County, Ala.

Executed by serving \_\_\_\_\_ cop 9 of the within Summons and Complaint on

*J. H. Titus*

RECORDED

Defendant

This the 15 day of Oct 1934

*W. R. Stuart*

Sheriff of Baldwin County, Ala.

By \_\_\_\_\_ Deputy Sheriff.

EDWARD G. WOLCOTT

VS.

JOHN H. TITUS

IN CIRCUIT COURT OF BALDWIN COUNTY

Term 19

SUMMONS AND COMPLAINT

Filed in office this 15<sup>th</sup> day of

*Oct* *W. A. Stone* A. D. 1934 Clerk.

E. G. RICKARBY, Plaintiff's Attorney.

Moore Printing Co. Bay Minette, Ala.

Vertical text on the right side of the page, possibly bleed-through or a separate column of text, including the word "RECORDED" repeated vertically.

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT

Personally appeared before me, ~~a notary public~~ ~~W. H. KITCHERSON, Clerk of the Circuit Court~~ in and for Baldwin County and State aforesaid Edwin C. Walcott

who being duly sworn, on oath says, that a regular Spring Term of the Circuit Court of Baldwin County, to-wit: on the 22th day of April 1935 192, Edwin C. Wolcott

recovered a judgment against John H. Titus for the sum of Nineteen hundred and fifty-four Dollars,

besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that Paul W. Bonnell and the Bonnell Sunnyside Guernsey Farm are

supposed to be indebted to or have effects of the said John H. Titus in their possession, or under their control, and that he believes process of Garnishment against said said Garnishees is necessary to obtain satisfaction of said Judgment.

Sworn to and subscribed this 18th day of November 1935, A. D. 19

*Edwin C. Wolcott*

*Ellis H. Raines*  
Notary Public, Baldwin County  
Ala.

*Civil*  
**RECORDED**  
*Duck*  
*7362*

No. 90

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# CIRCUIT COURT

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E. C. WOLCOTT  
Plaintiff

VS.

JOHN H. TITUS  
Defendant

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## AFFIDAVIT

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Filed in Office,

*Jan 30* 1931  
*Richard Duck*  
Clerk.



The State of Alabama }  
Baldwin County

CIRCUIT COURT

No. 90 April Term, 1935

To Any Sheriff of the State of Alabama--Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of Jacob H. Bates Defendants,  
you cause to be made the sum of Five hundred Fifty seven and 10/100 Dollars,  
which Edward C. Woodruff Plaintiffs  
recovered of Him on the 12 day of April 1935 by  
the Judgment of our Circuit Court, held for the County of Baldwin, besides the sum of \_\_\_\_\_ Dollars

costs of suit, and have the same to render to the said \_\_\_\_\_  
and make return of this Writ and the execution thereof, according to law.

Interest from \_\_\_\_\_, 1935, to date of collection.  
Witness my hand, this 15 day of April 1935  
Robert K. Dyer Clerk

CLERK'S FEES	AMOUNT	SHERIFF'S FEES	AMOUNT
For every Summons & Complaint	1.25	For Levying an Attachment	\$3.00
Each copy thereof	.30	Entering and Returning Attachment	.25
Entering a Sheriff's Return	.20	Summoning Garnishee	1.50
Docketing	.25	Serving Summons on Writ	1.50
Entering Appearance	.20	Serving Notice Sci. Fa. Notice, etc.	.65
Filings	.10	Serving Subpoenas	.65
Every order made in Court	.30	Empanelling Jury	.75
Copy thereof	.25	Entering and Returning Execution	.25
Every Trial with or without Jury	.75	Collecting Cost Execution	1.50
Entering up Judgment or copy thereof	.30	Executing a Writ of Possession	2.50
Issuing Execution	.50	Taking and Approving Bonds	1.00
Docketing Execution	.25	Commissions	
Entering Return on Execution	.20	Sheriff's Commission for Property Sold under Attachment	3.00
Issuing Subpoenas	.30	Seizing Personal Property on Writ of Detinue	3.00
Administering Oath	.25		
Issuing each Attachment, taking bond	1.00		
Filing Attachment	.10		
Each Summons for Garnishee	.50		
Each Copy	.50		
Notice to Deft. in Garnishee on Summons and copy, per 100 words	.20		
Commissions to take Depositions or Copy	.75		
Order to Execute Writ of Inquiry	.30		
Copy of Interrogatories, 15c per hundred words or	.50		
Filing each Deposition and endorsing same	.20		
Final Record, per hundred words	.15		
Every Certificate	.50		
Taking Bond not Otherwise Provided for	.75		
Witness Certificates	.25		
Continuance	.10		
Certificate of Judgment	.50		
Order of Publication	1.00		
	6.80		
		RECAPITULATION	
		Judgment for	for \$ 1954.00
		Interest from	
		Damages	6.80
		Clerk's Fees	5.95
		Sheriff's Fees	
		Justice of Peace Fees	
		Witness Fees in Justice of Peace Court	
		Constable's Fees	
		Commissioner's Fees	
		Printer's Fees	
		Witness Fee in Circuit Court	
		Former Clerk's Fee	
		Stenographer's Fee	\$5.00
		Trial Tax	\$3.00
			3.00
			1970.20

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

THE STATE OF ALABAMA,  
Baldwin County

**CIRCUIT COURT**

vs. \_\_\_\_\_  
Plaintiffs

\_\_\_\_\_ Defendants

**CIVIL EXECUTION**

Judgment for \_\_\_\_\_ for \$ \_\_\_\_\_

Interest from \_\_\_\_\_ 193 \_\_\_\_\_

to \_\_\_\_\_ 193 \$ \_\_\_\_\_

Damages \_\_\_\_\_ \$ \_\_\_\_\_

Costs \_\_\_\_\_ \$ \_\_\_\_\_

Total - - - - \$ \_\_\_\_\_

Civil Fee Book \_\_\_\_\_ Page \_\_\_\_\_

Execution Docket \_\_\_\_\_ Page \_\_\_\_\_

Filed \_\_\_\_\_ 193 \_\_\_\_\_

\_\_\_\_\_ Clerk.

\_\_\_\_\_ Plaintiff's Attorney.

\_\_\_\_\_ Defendant's Attorney.

COLLECT COST FROM

THE STATE OF ALABAMA,  
Baldwin County

I hereby certify that the within Judgment  
and Costs in this case are correct, and there  
was a waiver of exemption as to personal  
property under the Constitution and Laws of  
Alabama.

This \_\_\_\_\_ day of \_\_\_\_\_ 193 \_\_\_\_\_

\_\_\_\_\_ Clerk.

RECEIVED IN OFFICE

\_\_\_\_\_ 193 \_\_\_\_\_

\_\_\_\_\_ Sheriff

Sheriff's Execution Docket, Page \_\_\_\_\_

Sheriff's Fee Book, Page \_\_\_\_\_

Clerk's Civil Fee Book, Page \_\_\_\_\_

Clerk's Civil Execution Docket, Page \_\_\_\_\_

The State of Alabama }  
Baldwin County

By virtue of the within execution, I have, at \_\_\_\_\_

\_\_\_\_\_ o'clock, \_\_\_\_\_ M., this

\_\_\_\_\_ day of \_\_\_\_\_ 193 \_\_\_\_\_, levied

EDWIN C. WOLCOTT,  
Plaintiff

No. 91 L A W  
CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VS

JOHN H. TITUS,  
Defendant.

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA:

You are hereby commanded that of the goods and chattels, lands and tenements of JOHN H. TITUS, particularly of those heretofore levied on by you under an attachment issued in this cause, and now in your possession, you cause to be made the sum of Four Hundred Ninety-six and 80/100 Dollars, which Edwin C. Wolcott recovered of said John H. Titus on the 13th day of April, 1935, by the judgment of the Circuit Court of Baldwin County, Alabama, besides costs of suit, and have the same to render to said Edwin C. Wolcott and make return of this writ and the execution thereof according to law.

Witness my hand this 10 day of April, 1935.

*Robert L. Gust*

EDWIN C. WOLCOTT

Plaintiff

JOHN H. TITUS

Defendant

EDWIN C. WOLCOTT

Plaintiff

EDWIN C. WOLCOTT, Plaintiff

vs

JOHN H. TITUS, Defendant

EDWIN C. WOLCOTT,

Plaintiff.

vs

JOHN H. TITUS,

Defendant.

EXECUTION

*Usual Supr 10 1939.*

*Robert S. Davis*

1935

1935

1935

EDWIN C. WOLCOTT, Plaintiff.

EDWIN C. WOLCOTT,  
Plaintiff.

vs

JOHN H. TITUS,  
Defendant.

EXECUTION

*Usual Supr 10 1935.*  
*Robert S. Davis*