

E. L. HIGDON,
Plaintiff

vs.

~~CLARENCE WALKER, JACEL WALKER,~~
J. L. LOW, H. M. LOW AND ELVIN G.
LOW,
Defendants.

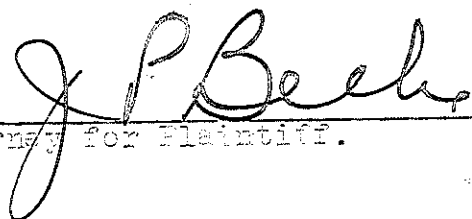
In THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. #99.

Comes the Plaintiff in the above entitled cause and
amends complaint heretofore filed so as to read as follows,
viz:

Plaintiff sues to recover possession of the following
tract of land situated in Baldwin County, Alabama, and described
as follows, to-wit:

Beginning at the Southeast corner of Section 35, Township
8 South of Range 3 East, run due West on said Section
line 506.2 ft. to a point, thence North 5° 30' West 882
ft. to a point, thence North 24° 30' West 177 ft. to a
point which is the Northwest corner of the C. B. Dannelly
lot for a point of beginning, thence run West 482 ft.
to a point, thence South 24° East, 1050 ft. to the Margin
of Bay Cronoco (sometime known as Bay St. John) thence
Easterly along the Margin of said Bay Cronoco to a point
which is located as: From the Northeast corner of Section
2, Township 9 South of Range 3 East, run 506.2 ft. to
a point, thence South 5° 30' East 211.7 ft. to the said
point, which is also the Southwest corner of the Addie
Otis lot, thence North 5° 30' West 1035.7 ft. to a point,
thence North 24° 30' West 177 ft. to the place of begin-
ning.

Of which the said Plaintiff was in possession and pending
such possession and before the commencement of this suit the
Defendants entered and unlawfully withhold, together with \$500.00
damages for the detention thereof.


Attorney for Plaintiff.

99
E. L. HIGDON,
Plaintiff

vs.

CLARENCE WALKER, HAZEL WALKER,
J. L. LOW, H. M. LOW AND
ELVIN G. LOW,
Defendants.

Amended Complaint

Filed the 15 day of
July, 1940.

Is Duas
Clerk.

E. L. HIGDON,

Plaintiff,

vs.

CLARENCE WALKER, HAZEL WALKER,
J. L. LOW, H. M. LOW and ELVIN
G. LOW,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

#99.

Come the defendants in the above styled cause and move to strike the amended complaint heretofore filed in this Court on July 15, 1940, and as grounds therefor say:

1st. That there is no such suit pending in this court between the said parties.

2nd. That the suit heretofore pending in this court between the said parties has been dismissed.

3rd. That there has been a discontinuance of the suit heretofore pending in this court between the said parties.

4th. That the said amendment was not filed within the time required by the order of this Honorable Court heretofore pending in this court between the said parties.

5th. That the cause heretofore pending in this court between the said parties has been long since abandoned by the plaintiff and is no longer pending in this court.

Becke Hall
by W C Becke

Attorneys for Defendants.

Edgdon
E. L. LOW,
Plaintiff,

vs.

CLARENCE WALKER, HAZEL
WALKER, J. L. LOW, H. M.
LOW and ELVIN G. LOW,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. #99.

M O T I O N

Filed

August 13, 1940

R. S. Duck

Clerk.

THE STATE OF ALABAMA, } No. 99
Baldwin County }

CIRCUIT COURT

Sept. _____ Term, 1942

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of

_____ E L Higdon. _____ Plaintiff _____ in the suit,
you cause to be made the sum of _____ Dollars.

costs of suit, created by said Plaintiff, for that, whereas, on the 20th day of Sept. 1942, the said Plaintiff ~~recovered by the Judgment of the said Circuit Court~~ Abated by Death of Plaintiff. of said County, against

Defendant_____

to the suit, the sum of Thirteen and 65100. Dollars,
besides _____ Dollars. costs of suit:

~~Upon which Judgment an Execution has been issued and returned by the Sheriff, "No property found."~~

AND HAVE YOU THAT MONEY ready to render to R S Duck.
Clerk of said Court, and make return with this Writ and the Execution thereof, according to law.

Witness my hand this 23 day of Dec. 194 2

R. R. Luck

Clerk

[illegible]

No. 99..... Page.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

E L Higdon, Plaintiff...

vs.

Clarence Walker, et al.

Defendant...

Civil Execution for Costs
Against Plaintiff

Costs - - - - \$ 13.65.

Civil Fee Book..... Page.....
Cds.

Execution Docket..... Page.....

Filed Dec. 23, 1942

R. R. R. Clerk.

B F McMillan Jr.
Plaintiff's Attorney

Beeb & Hall.
Defendant's Attorney

Received in Sheriff's Office
this 23 day of Dec., 1942
W. R. STUART, Sheriff

COLLECTION COSTS FROM

The State of Alabama, }
BALDWIN COUNTY

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

This day of 194 ..

Clerk.

Received in office

194 ..

Sheriff

Sheriff's Execution Docket, Page

Sheriff's Fee Book, Page

Returned 3/23/43
no property found
W. R. Stuart, Sheriff
By [Signature]

Sheriff

THE STATE OF ALABAMA,
Baldwin County.

By virtue of the within execution, I have at

o'clock, M., this day of 194 .. levied

E. L. HIGDON,

Plaintiff,

vs.

CLARENCE WALKER, HAZEL
WALKER, J. L. LOWE,
H. M. LOWE and ELEVYN
LOWE,

Defendants.

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

Come the defendants in the above styled cause and demur
to plaintiff's complaint, and for grounds therefor say:

1. That said complaint does not state a cause of
action.
2. Said complaint does not describe the land with
sufficient certainty to apprise the defendants of the land sought
to be recovered.
3. Said complaint does not state in what section the
said lands lie.
4. It does not appear by the said complaint what
lands are sought to be recovered.

Beebe & Hall
Attorneys for Defendants.

99
RECORDED

E. L. HIGDON,
Plaintiff,

vs.

CLARENCE WALKER ET AL.,
Defendants.

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. AT LAW.

DEMURRER.

Filed December 6, 1934.

Wm. A. Steele
Clerk.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

E L Higdon, Plaintiff...

vs.

Clarence Walker, et al.

Defendant...

Civil Execution for Costs
Against Plaintiff

Costs - - - - \$ 13.65.

Civil Fee Book..... Page.....
Cds.

Execution Docket..... Page.....

Filed Dec. 23, 1942
R. J. [Signature] Clerk.

B F McMillan Jr.
Plaintiff's Attorney

Beeb & Hall.
Defendant's Attorney

Received in Sheriff's Office
this 22 day of Dec, 1942
W. R. STUART, Sheriff

COLLECTION COSTS FROM

The State of Alabama, }
BALDWIN COUNTY

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

This day of 194 ..

Clerk.

Received in office

194...

Sheriff

Sheriff's Execution Docket, Page

Sheriff's Fee Book, Page

*Returned 3/23/43
no property found
W.R. Stuart, Sheriff
By [Signature]*

Sheriff

THE STATE OF ALABAMA,
Baldwin County.

By virtue of the within execution, I have at

o'clock, M., this day of 194 .. levied

E. L. Higdon, Plaintiff, *
vs : Circuit Court; Baldwin
Clarence Walker, Hazel Walker :
and J. L. Lowe, Defendants. : County. At Law No
*

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

Beginning at the northwest corner of land of Addie Ottis
and running thence west 210 feet, thence south 1050 feet
to bay St. John, thence east along Bay St. John 210 feet,
thence along the line of property of Addie Ottis to place
of beginning, containing five acres more or less:

and
Lot of land immediately to the west of and adjoining the
tract above described having a front of 420 feet with a depth
extending north 1050 feet with same width in rear as in front.

of which he was in possession and upon which pending such posses
sion and before commencement of this suit, defendant entered and un
lawfully withholds, together with \$500.00 damages for the deten
tion thereof.

B. F. McMillan, Jr.,
Attorney for plaintiff.

Plaintiff demands a jury trial.

B. F. McMillan, Jr.,
Attorney for Plaintiff.

Docket Page 90

7/6 99 RECORDED

Executed Nov 16th 1934
by serving copy of within Summons and
Complaint on

Clarence Walker
Hazel Walker and
J. L. Lowe

W. R. Stuart Sheriff
J. R. Davis Deputy Sheriff

RECORDED

RECORDED

J. L. Lowe
Not found
W. R. Stuart
11/2/34

Summons & Complaint

Filed Oct 3/1934
M. A. Stone
Clerk

I have executed
the within writ
by handing copy
to Clarence Walker
and Hazel Walker
this the 13th day of
Nov 1934
W. R. Stuart - Sheriff
By John R. Davis ss.

THE STATE OF ALABAMA
COUNTY OF BALDWIN,

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-
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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon, H. M. LOWE, and EVELYN LOWE, 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, Ala., against CLARENCE WALKER, HAZEL WALKER, J. W. LOWE, H. M. LOWE, and EVELYN LOWE, Defendants, by E. L. HIGDON, Plaintiff.

WITNESS my hand this 5 day of November, 1934.

M. A. Stone
Clerk.

E. L. HIGDON, PLAINTIFF, I

VS I

CIRCUIT COURT, BALDWIN COUNTY,

CLARENCE WALKER, HAZEL WALKER, I
AND J. L. LOWE, DEFENDANTS. I

AT LAW, NUMBER _____.

Comes the plaintiff and amends the complaint filed in this cause by adding as parties defendant H. M. Lowe and Evelyn Lowe so that the complaint will read as follows:

E. L. HIGDON, PLAINTIFF, I

VS I

CIRCUIT COURT, BALDWIN COUNTY,

CLARENCE WALKER, HAZEL WALKER, I
J. L. LOWE, H. M. LOWE AND
EVELYN LOWE, DEFENDANTS. I

AT LAW, NUMBER _____.

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

Beginning at the northwest corner of land of Addie Ottis and running thence west 210 feet, thence south 1050 feet to Bay St. John, thence east along Bay St. John 210 feet, thence along the line of property of Addie Ottis to place of beginning, containing five acres more or less:

and

Lot of land immediately to the west of and adjoining the tract above described having a front of 420 feet with a depth extending north 1050 feet with same width in rear as in front.

of which he was in possession and upon which pending such possession and before commencement of this suit, defendant entered and unlawfully withholds, together with \$500.00 damages for the detention thereof.

B. F. Mc MILLAN, Jr.,
Attorney for Plaintiff.

Plaintiff demands a jury trial.

B. F. McMillan, Jr.,
Attorney for Plaintiff.

RECORDED
NO. 99

E. L. HIGDON,

VS.

CLARENCE WALKER, HAZEL WALKER,

J. L. LOWE, H. M. LOWE And

EVERLYN LOWE,

Executed November 17th 1934
by serving copy of within Amended
Complaint on

Elvin Lowe & H.M. Lowe

RECORDED

W.R. Stuart
By M. Winters Deputy Sheriff

AMENDED COMPLAINT,

Filed for 3rd 1934
M. A. Stone
R. L. Hartsdell