

STATE OF ALABAMA,)
COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PFEIFFER FARMS, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer, and Robert R. Nahrgang, and WILLIAM F. PFEIFFER, C. O. PFEIFFER, and ROBERT R. NAHRGANG, individually, to appear within thirty (30) 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 CECIL MARCUS.

WITNESS my hand this 9th day of August, 1935.

Rakto L. Duck
Clerk.

CECIL MARCUS,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

PFEIFFER FARMS, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and WILLIAM F. PFEIFFER, C. O. PFEIFFER and ROBERT R. NAHRGANG, individually,

AT LAW.

Defendants.

COUNT ONE:

The Plaintiff claims of the Defendants TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, Damages for unlawfully arresting and imprisoning the Plaintiff on a charge that the Plaintiff, with other persons met together to commit a breach of the peace or to do other unlawful acts, for ten (10) days, viz: on the 6th day of May, 1935.

COUNT TWO:

The Plaintiff claims of the Defendants the further sum of TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, damages for unlawfully causing the Plaintiff to be arrested and imprisoned on a charge of meeting together with other persons to commit a breach of peace or to do other unlawful acts, for ten (10) days, viz: on the 6th day of May, 1935.

This suit and the separate counts thereof are based on one and the same cause of action and the total amount claimed in this cause is TWENTY-NINE HUNDRED (\$2900.00) DOLLARS.

cause.
The Plaintiff demands a trial by Jury in the above stated

cause.
The Plaintiff demands a trial by Jury in the above stated

Lawrence J. Genard

Berke & Hall

Attorneys for Plaintiff.

Lawrence J. Genard

Berke & Hall

Attorneys for Plaintiff.

Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, -----Cecil Marcus

.....
 Robert S. Duck,
 hath complained on oath to me, ~~T. W. McPherson~~, Clerk of Circuit Court of Baldwin County,
 Ala., that Pfeiffer Farms, a co-partnership composed of William
F. Pfeiffer, C. C. Pfeiffer and Robert R. Nahrgang, and William
F. Pfeiffer, C. C. Pfeiffer and Robert R. Nahrgang, individually

 is justly indebted to the Plaintiff Cecil Marcus.

in the sum of Two Thousand & nine hundred & no/100----- Dollars, and
Cecil Marcus having made affidavit and given ~~XXXXXX~~

electing not to give bond
as required by law, in such cases, you are hereby commanded to attach so much of the estate of
...Pfeiffer Farms, ...a co-partnership composed of William F. Pfeiffer,
C. O. Pfeiffer, and Robert R. Nahrgang, and William F. Pfeiffer,
C. O. Pfeiffer, and Robert R. Nahrgang, individually,

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 proceedings 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 within thirty days from the service~~ hereof, ----- 19⁵⁵ next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 16th day of August A. D. 19235

By Ralph S. Leach Clerk

RECORDED

164261
7-335

No. 191

ATTACHMENT

Levil M. Mace

Vs. Attachment

William F. Pfeiffer

Issued Aug 16 1935

Moore Printing Co. Bay Minette, Ala.

I have executed the within Writ on this the 9th day of October, 1935, by attaching all right, title and interest of William F. Pfeiffer and C. O. Pfeiffer, in and to the following described personal property:

- 3-Iron Age two-row potato planters
- 1 Potato grader
- 2 Two-row potato diggers
- 2 Sets of Tractor Disc Harrows
- 1 Fordson Tractor
- 1 Farmall Tractor
- 1-17on Ford Truck
- 1 Disc Tractor plow
- 1 Four-row Dusting Machine.

Dated this 9th day of October, 1935.

Matthew Wilkins
Sheriff, Baldwin County, Alabama.

STATE OF ALABAMA,
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PFEIFFER FARMS, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and WILLIAM F. PFEIFFER, C. O. PFEIFFER, and ROBERT R. NAHRGANG, individually, to appear within thirty (30) 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 CECIL MARCUS.

WITNESS my hand this 9th day of August, 1935.

Robert L. Hines
Clerk.

CECIL MARCUS,

Plaintiff,

VS.

PFEIFFER FARMS, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and WILLIAM F. PFEIFFER, C. O. PFEIFFER and ROBERT R. NAHRGANG, individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendants TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, damages for unlawfully arresting and imprisoning the Plaintiff on a charge that the Plaintiff, with other persons met together to commit a breach of the peace or to do other unlawful acts, for ten (10) days, viz: on the 6th day of May, 1935.

COUNT TWO:

The Plaintiff claims of the Defendants the further sum of

TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, damages for unlawfully causing the Plaintiff to be arrested and imprisoned on a charge of meeting together with other persons to commit a breach of peace or to do other unlawful acts, for ten (10) days, viz: on the 6th day of May, 1935.

This suit and the separate counts thereof are based on one and the same cause of action and the total amount claimed in this cause is TWENTY-NINE HUNDRED (\$2900.00) DOLLARS.

Lawrence J. Gurnea

Becker & Haege
Attorneys for Plaintiff.

The Plaintiff demands a trial by Jury in the above stated cause.

Lawrence J. Gurnea

Becker & Haege
Attorneys for Plaintiff.

STATE OF ALABAMA,)
COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PFEIFFER FARMS, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and WILLIAM F. PFEIFFER, C. O. PFEIFFER, and ROBERT R. NAHRGANG, individually, to appear within thirty (30) 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 CECIL MARCUS.

WITNESS my hand this 9 day of August, 1935.

Robert L. Duck
Clerk.

CECIL MARCUS,

Plaintiff,

VS.

PFEIFFER FARMS, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and WILLIAM F. PFEIFFER, C. O. PFEIFFER and ROBERT R. NAHRGANG, individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

COUNT ONE:

The Plaintiff claims of the Defendants TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, damages for unlawfully arresting and imprisoning the Plaintiff on a charge that the Plaintiff, with other persons met together to commit a breach of the peace or to do other unlawful acts, for ten (10) days, viz: on the 6th day of May, 1935.

COUNT TWO:

The Plaintiff claims of the Defendants the further sum of

TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, damages for unlawfully causing the Plaintiff to be arrested and imprisoned on a charge of meeting together with other persons to commit a breach of peace or to do other unlawful acts, for ten (10) days, viz: on the 6th day of May, 1935.

This suit and the separate counts thereof are based on one and the same cause of action and the total amount claimed in this cause is TWENTY-NINE HUNDRED (\$2900.00) DOLLARS.

Lawrence J. Gines

Becker & Hall
Attorneys for Plaintiff.

The Plaintiff demands a trial by Jury in the above stated cause.

Lawrence J. Gines

Becker & Hall
Attorneys for Plaintiff.

RECORDED
Duck
7-334

191
CECIL MARCUS,

Plaintiff,

vs.

PFEIFFER FARM, a Co-
partnership composed of
William F. Pfeiffer, C. O.
Pfeiffer and Robert R. Hah-
gang, and WILLIAM F. PFEIFFER,
C. O. PFEIFFER and ROBERT R.
HAIRGANG, individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

SUMMONS AND COMPLAINT.

Filed this 9th day of Aug.
1935.

Richard L. Duck
Clerk.

148
Rec in office
9/9/35
M. H. Wilkins
Sheriff

Entered Oct. 9 1935
Involving one of the defendants and
Complaint on individually and as a
Robert R. Hahgang
member of Pfeiffer family
only William Pfeiffer
and C. O. Pfeiffer not
found in Baldwin Co.
M. H. Wilkins
C. N. Anderson

CECIL MARCUS,

Plaintiff,

-vs-

PFEIFFER FARMS, a co-
partnership composed of
William F. Pfeiffer, C. O.
Pfeiffer and Robert R. Nahr-
gang, and WILLIAM F. PFEIFFER,
C. O. PFEIFFER and ROBERT R.
NAHRGANG, individually,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DEMURRER

Come now the defendants and demur to the Complaint
in the above entitled cause and as ground for such demurrer say:

That said Complaint does not state a cause of action
against the defendants.



Attorney for Defendants.

RECORDED

191

ouch
7-338

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CECIL MARCUS,

Plaintiff,

-vs-

PFEIFFER FARMS, a co-
partnership composed of
William F. Pfeiffer, C. O.
Pfeiffer and Robert R. Nahr-
gang, and WILLIAM F. PFEIFFER,
C. O. PFEIFFER and ROBERT R.
NAHRGANG, individually,

Defendants.

DEMURRER

38 OCT 38
Richard Duck

Clerk

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

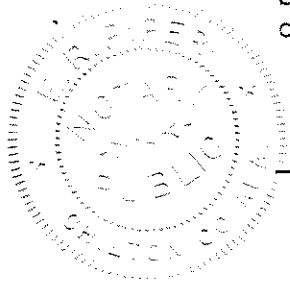
STATE OF ALABAMA

COUNTY OF CHILTON.

Before me, the undersigned authority, in and for said County in said State, personally appeared Cecil Marcus, who being duly sworn, deposes and says that Pfeiffer Farms, a co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, individually, are justly indebted to the said Cecil Marcus, in the sum of Twenty-nine Hundred (\$2900.00) Dollars, and that the said William F. Pfeiffer and C. O. Pfeiffer are a non-residents of the the State of Alabama, and that this attachment is not sued out for the purpose of vexing or harassing the said William F. Pfeiffer, C. O. Pfeiffer or Robert R. Nahrgang.

Cecil Marcus

Sworn to and subscribed before me
on this 7 day of September, 1935.



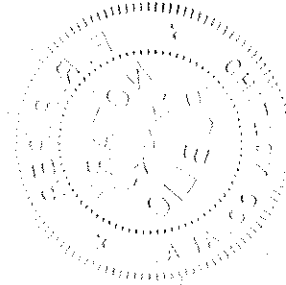
E. A. [Signature]
NOTARY PUBLIC, CHILTON COUNTY, ALA.

191

RECORDED

ack

7 - 307



Filed this 9-21-35 Sept 1935
Robert L. Quirk
Clerk

STATE OF ALABAMA

CHILTON COUNTY.

Personally appeared before me the undersigned authority in and for said County in said State, Cecil Marcus, who having been be me duly sworn deposes and says:

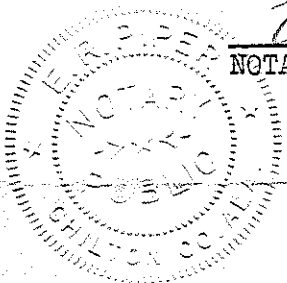
That he is 91 years of age and resides with his parents in Chilton County, State of Alabama. That on the 6th day of May 1935, he was arrested by Robert R. Nahrgang at a farm some miles from Foley in Baldwin County, Alabama. That he had been working on said farm being employed by the owners thereof to-wit: Willism F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang. That said Robert R. Nahrgang at the time of the arrest of this affiant, and at the time of the occurrences herein stated was a part owner of said farm with said other parties and was general manager in charge of the operation of said farm, with general authority to manage and conduct business of same. That early on the morning of May 6th, 1935, affiant being on said farm seeking employment thereon was arrested, as stated, by Robert R. Nahrgang and was compelled to march more than a mile at the point of a riffle held by said Robert R. Nahrgang, to Foley, Baldwin County, Alabama. That all said facts occurred without any warrant having been issued against this affiant charging any criminal offense against the laws of Alabama and that affiant had not committed any criminal offense against the laws of Alabama or of any municipality therein and that the action of said Robert R. Nahrgang was without any justification or without probable cause to believe that he had such justification. That the affiant remained in the County jail in Bay Minette in Baldwin County, Alabama 10 days from May 6th, 1935 until he was released on bond. That after being placed in jail he was arrested under a warrant issued upon the complaint of said Robert R. Nahrgang charging the affiant and others being guilty of an unlawful assembly in relation to laborers on said farm and that this affiant was tried in the County Court of Baldwin County, Alabama on the 3rd day of June 1935 and was acquitted of said charge.

That this affidavit was made by affiant and filed in aid of his suit against said William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang in the Circuit Court of Baldwin County, Alabama under Section 6177 code of Alabama 1923.

Cecil Marcus

Sworn to and described
before me this the 16th
Day of August, 1935.

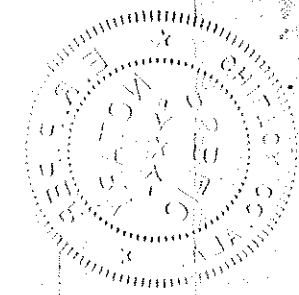
E. A. G. J.
NOTARY PUBLIC.



RECORDED

191

Clerk
7-307



Filed this 4th day Sept 1911
Clerk-Register

CECIL MARCUS,

Plaintiff,

VS.

PFEIFFER FARMS, a
Co-Partnership composed of
WILLIAM F. PFEIFFER, C. O.
PFEIFFER and ROBERT R. NAHRGANG,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 191.

I, ROBERT S. DUCK, Clerk of the Circuit
Court of Baldwin County, Alabama, do hereby certify that the
judgment in the above styled case has been satisfied in full
and the costs paid.

This the _____ day of March, 1936.

Circuit Clerk.

CECIL MARCUS

PLAINTIFF

VS

PFEIFFER FARMS, a Co-Partnership, &
William F. Pfeiffer, C.O. Pfeiffer,
and Robert R. Nahrgang,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

NO. 191

TO MESSRS BEEBE & HALL: BAY MINETTE,

You are hereby notified that the Defendants in this cause through their attorney this day entered an unqualified appearance in said cause. This notice is given as required by section 6176 of the 1923 Code.

Dated this the 28th day of October, 1935.


Clerk of the Circuit Court.

Rec in office
10-28-35

M. H. Wilkins Shff

191

RECORDED
Duck
7-3-35

Original

executed 10-28 1935

by serving ~~subpoena~~ notice
on Hubert Hall

M. H. Wilkins Sheriff

by _____ Deputy Sheriff

Oct. 28, 1935