

HOWARD ADAMS,

Plaintiff,

VS.

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

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. 193.

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.

STATE OF ALABAMA,  
COUNTY OF CHILTON.

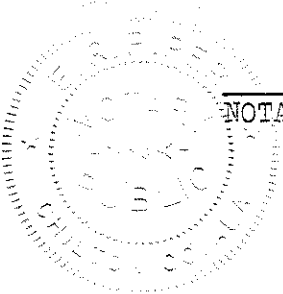
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Before me, the undersigned authority, in and for said County in said State, personally appeared Howard Adams, who being duly sworn, deposes and says that Pfeiffer Farms, a Co-partnership composed of William F. Pfeiffer, C. O. Pfeiffer and Robert R. Nahrgang, and William F. Pfeiffer, C. O. Pfeiffer and Robert Nahrgang individually, are justly indebted to the said Howard Adams, in the sum of Twenty-nine Hundred (\$2900.00) Dollars, and that the said William F. Pfeiffer and C. O. Pfeiffer are non-residents of 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.

Howard Adams

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

E. R. Pickett  
NOTARY PUBLIC, CHILTON COUNTY,  
ALABAMA.

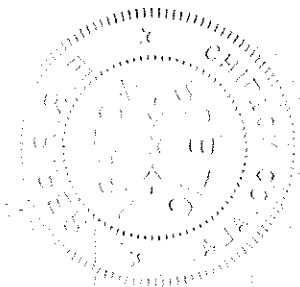


193

RECORDED

bank

7 - 308-9



Filed this 9 day Sept 1931  
Robert S. Lusk  
Clerk-Register

193

STATE OF ALABAMA.

CHILTON COUNTY.

Personally appeared before me the undersigned authority in and for said County in said State, Howard Adams, who having been by me duly sworn deposes and says:

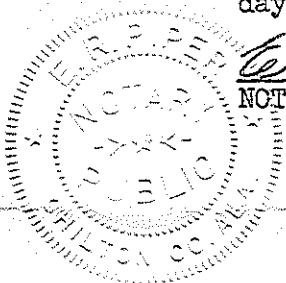
That he is 27 years of age and resides with his parents in Chilton County, State of Alabama. That on the 6th day of May 1935, he was arrested by Robert R. Nahrgang at a farm some miles from Foley in Baldwin County, Alabama. That he had been working on said farm being employed by the owners thereof to-wit: William 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 rifle 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 Ala. or 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 Swction 6177 Code of Alabama 1923.

Howard Adams

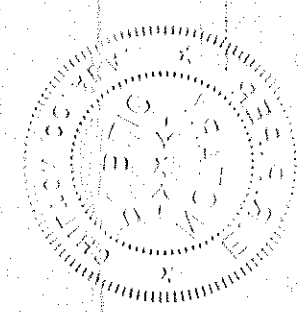
Sworn to and described  
before me this the 16th  
day of August, 1935.

[Signature]  
NOTARY PUBLIC.



193  
RECORDED  
Duck  
7-309

Filed this 9<sup>th</sup> day of Sept 1923  
*Robert L. Duck*  
Clerk-Register



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 HOWARD ADAMS.

WITNESS my hand this 9th day of August, 1955.

Robert L. Cuck  
Clerk.

HOWARD ADAMS,  
Plaintiff,

VS.

PFEIFFER FARMS, a Co-  
partnership composed of  
William F. Pfeiffer, C. O.  
Pfeiffer and Robert R. Wahr-  
gang, 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 HUND-  
RED (\$2900.00) DOLLARS, damages for unlawfully arresting and im-  
prisoning 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, 1955.

COUNT TWO:

The Plaintiff claims of the Defendants the further sum of  
TWENTY-NINE HUNDRED (\$2900.00) DOLLARS, damages for unlawfully caus-  
ing the Plaintiff to be arrested and imprisoned on a charge of meet-  
ing 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. Givens

Becker & Hall  
Attorneys for Plaintiff.

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

Lawrence J. Givens

Becker & Hall  
Attorneys for Plaintiff.

1935

RECORDED  
Duck  
7-337

HOWARD ADAMS,

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.  
NAHNGANG, individually,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

SUMMONS AND COMPLAINT.

Filed this 9th day of  
August, 1935.

Robert S. Duck

Clerk.

1/49

Rec in office

9/9/35

M. H. Wilkins  
Sheriff

Executed Oct. 9- 1935

by serving copy of within Summons and  
Complaint on,

individually and as a  
Robert R. Nahrang,  
member of Pfeiffer Farms a partnership  
only William Pfeiffer  
and C. O. Pfeiffer not  
found in Baldwin Co.  
M. H. Wilkins Sheriff

By C. N. Anderson Deputy Sheriff



HOWARD ADAMS,

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.

193  
RECORDED  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

*Such*  
7-538

HOWARD ADAMS,

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

35  
and this 35th day of Sept. 1933  
*Richard L. Litch*  
Clerk of Court

LLOYD A. MAGNEY  
Attorney  
Foley, 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 HOWARD ADAMS.

WITNESS my hand this \_\_\_\_\_ day of August, 1935.

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

HOWARD ADAMS,  
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.

10329.  
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. Grant

Berke & Hall  
Attorneys for Plaintiff.

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

Lawrence J. Grant

Berke & Hall  
Attorneys for Plaintiff.

193

HOWARD ADAMS,

Plaintiff,

VS.

PFEIFFER PAIRS, 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.

SUMMONS AND COMPLAINT.

Filed this \_\_\_\_\_ day of August,  
1935.

Clerk.

*Howard Adams*  
*Robert R. Nahr-  
gang*  
RECEIVED FOR DEPOSIT

Settled evoked and at that of said a returned and

*William F. Pfeiffer*  
*Robert R. Nahr-  
gang*  
RECEIVED FOR DEPOSIT

seal

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 HOWARD ADAMS.

WITNESS my hand this \_\_\_\_\_ day of August, 1935.

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

HOWARD ADAMS,  
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. Graves

Becke & Hall

Attorneys for Plaintiff.

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

Lawrence J. Graves

Becke & Hall

Attorneys for Plaintiff.

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*Handwritten signature*

RECEIVED

Filed this \_\_\_\_\_ day of August, 1935.

Clerk.

SUMMONS AND COMPLAINT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

defendants.

PFEIFFER, ROBERT R., C.O.,  
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,

VS.

Plaintiff,

HOWARD ADAMS

has this day entered

for the purpose of

\$2500.00 (2500) DOLLARS.

and the same cause of action and the same amount claimed in  
this suit and the separate causes are based on

1935

ORDER REPLYING FOR THE PURPOSE OF THE COURT OF LAW



HOWARD ADAMS

PLAINTIFF

VS

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

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, Ala.

NO. 193

TO. MESSRS BEBBE & 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 28th day of October, 1935.

  
Clerk of the Circuit Court.

Rec in office  
10-28-30

mswulkin - sff

193  
RECORDED  
Duck  
7-338

Original

Executed 10-28 1935

by serving ~~subpoena~~ Notice

on Hubert Hall

mswulkin Sheriff

By Deputy Sheriff

The State of Alabama, }

Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, Howard Adams

hath complained on oath to me, Robert S. Duck,  
~~Robert S. Duck,~~ Clerk of Circuit Court of Baldwin County,  
Ala., 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,

is justly indebted to the Plaintiff Howard Adams,

in the sum of Two Thousand Nine Hundred & 00/100 Dollars, and

Howard Adams having made affidavit and given bond  
as Defendants are non-residents, electing not to give bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of  
a co-partnership composed of  
Pfeiffer Farms, 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 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, ~~xx~~ within thirty days from the service  
hereof, 19 35 next; when and where you must make known to said Court how

you have executed this Writ,

WITNESS, my hand, this 16th day of September A. D. 1935

*Robert S. Duck*

Clerk.

Recorded to state of

ALABAMA TO STATE OF ALABAMA

Recorded  
9-338

No. 193

# ATTACHMENT

Howard Adams

Vs. } Attachment

Pfeiffer Farms

Issued Oct. 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  
1-1700 Ford Truck  
1 Disc Tractor plow  
1 Four-row Dusting Machine.  
Dated this 9th day of October, 1935.

How has the interest in the property of the above named parties been attached to the writ as

W. H. Wilkins  
Sheriff, Baldwin County, Alabama.

COPIES OF THIS WRIT ARE TO BE FURNISHED TO THE CLERK OF THE DISTRICT COURT OF THE DISTRICT OF ALABAMA

and the Clerk of the District Court of the District of Alabama, and the Clerk of the District Court of the District of Alabama

and the Clerk of the District Court of the District of Alabama, and the Clerk of the District Court of the District of Alabama

and the Clerk of the District Court of the District of Alabama, and the Clerk of the District Court of the District of Alabama

and the Clerk of the District Court of the District of Alabama, and the Clerk of the District Court of the District of Alabama

7. The court charges the jury that if plaintiffs own negligence as charged in the pleas, proximately contributed to the damages sued for, plaintiffs cannot recover in this suit however slight his contributory negligence may have been

*Given*  
*J. W. Hare, Judge*