

Mrs. Alice Jones
Plaintiff.

vs.

Mrs. Lou Marshall

Circuit Court
Baldwin County,
Alabama.

Motion.

Comes now the defendant and, the title of the Plaintiff being based on a tax deed, moves the Court to ascertain the amount paid by the Plaintiff for such tax deed and subsequent taxes, plus interest and a reasonable attorney's fee, and for an order permitting defendant to pay such amount and redeem the property sued for within a reasonable time, as by law provided.

Rept. Tomagney
Attorney for deft.

199, ^{Duck} RECORDED
7-445
motion-53

Jones
to

Marshall

Motion

Filed March 30 1936
J. Edgar Hoover
Chief

Leopold Magney
Atty for Def

MRS ALICE JONES,
Plaintiff,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

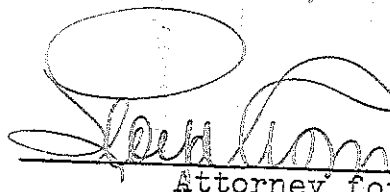
-VS-

DEMURRER

MRS. LOU MARSHALL,
Defendant.

Comes now the defendant and demurs to the complaint in the
above entitled cause and as ground for such demurrer says:

That said complaint does not state a cause of action against
this defendant.


Attorney for Defendant.

Defendant demands a trial-by jury.

199
RECORDED

sub-
7-332

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

MRS. ALICE JONES,
Plaintiff,

-vs-

MRS. LOU MARSHALL,
Defendant.

DEMURRER

Filed Oct 14, 1935

Robert S. Duck
Clerk

Lloyd A. Magney
Attorney
Foley, Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MRS. LOU MARSHALL 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 MRS. ALICE JONES.

WITNESS my hand this 5th day of October, 1935.

Robert L. Lusk
Clerk.

MRS. ALICE JONES,

Plaintiff,

VS.

MRS. LOU MARSHALL,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

The Plaintiff sues to recover possession of the following tract of land:

Start at Southwest corner of Section 5, Township 7 South, Range 3 East, run North 898½ feet, thence East along South line of Dr. Grant Minnichs lot, 439½ feet to place of beginning, run East 154.2 feet to West side public road, thence North 75 feet along West side public road, thence North 16½ degrees East 178 feet along East side public road, thence North 60 degrees West 250 feet, thence South 385½ feet to place of beginning, Section 5, Township 7 South, Range 3 East, in Baldwin County, Alabama,

of which she was in possession and upon which pending such possession, and before the commencement of this suit, the Defendant entered and unlawfully withheld, together with TWO HUNDRED (\$200.00) DOLLARS for the detention thereof.

Beebe & Hale
Attorneys for Plaintiff.

RECORDED

199 *Duck*
7-331

53
Regin office
10/5/35 *M. H. Wilkins - Sheriff*

Executed *Oct 9 1935*
by serving copy of within ~~summons and~~
Complaint on *unit on*

Mrs Lou Marshall

M. H. Wilkins
By *A. H. Anderson* Deputy Sheriff

MRS. ALICE JONES,
Plaintiff,

VS.

MRS. LOU MARSHALL,
Defendant.

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

BILL OF COMPLAINT.

Filed this 5 day of Oct.,
1935.

Robert S. Duck
Clerk.

Marlow

The State of Alabama,

No. 149

CIRCUIT COURT

County.

Term, 1934

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

YOU ARE HEREBY COMMANDED, That of the goods and chattels, lands and tenements of

you cause to be made the sum of

which

recovered of

on the

day of

1934

by the Judgment of our Circuit Court held for the County of

besides the sum of

costs of suit, and have the same to render to the said

the execution thereof, according to law.

Interest from

1934, to

19

Witness, my hand this

20

day of

Sept

1934

Clerk.

CLERK'S FEES	AMOUNT	SHERIFF'S FEES	AMOUNT
Issuing..... Summons and Complaint.....	\$1.25	Serving and Returning..... Summons.....	\$1.50
Issuing..... copies of same.....	.30	Serving and Returning..... Writs.....	1.30
Issuing..... Branch Summons and Complaint.....	1.25	Serving and Returning..... Subpoenas for ... Wit.	.65
Issuing..... copies of same.....	.30	Levying..... Attachment.....	3.00
Entering..... Sheriff's Return or copy of above.....	.20	Entering and Returning..... Attachment.....	.25
Docketing Cause.....	.25	Summoning and Returning..... Garnishee.....	1.50
Entering..... Appearances.....	.20	Serving and Returning..... Sci. Fas..... Notices.....	1.50
Filing..... Pleas..... Demurrers.....	.10	Impaneling Jury.....	.75
..... Affidavits, Certified.....	.25	Collecting Cost, Execution.....	1.50
..... Commissions to take Depositions.....	.75	Taking and Approving..... Replevin Bonds.....	1.00
..... copies of Interrogatories.....		 Claim Bonds.....	1.00
..... Notices of Filing Interrogatories.....	.50	 Garnishment Bonds.....	.75
Filing..... Packages of Depositions.....	.10	 Forthcoming Bonds.....	1.00
Inclosing..... Packages of Depositions.....	.10	 Bail Bonds.....	1.00
..... Orders in Court.....	.30	 Detinue Bond.....	1.00
..... Continuances.....	.10	Writ of Possession.....	5.00
Issuing..... Subpoenas for..... Witnesses.....	.30	Making Deed.....	5.00
Trial and Incidents.....	.75	Collecting Money on Execution.....	
Entering..... Judgment.....	.30	Writ of Restitution.....	2.00
Issuing..... Execution.....	.50	Sheriff's Commissions.....	
Entering..... Sheriff's Return of Execution.....	.20	Sheriff's Deed.....	
Issuing..... Certiorari..... Sci. Fas.....	.75	Seizing Personal Property in Detinue.....	3.00
Filing..... Certiorari, etc.....	.15	Former Sheriff's Fees.....	
Issuing..... Notices.....	.75	TOTAL SHERIFF'S FEES.....	17.75
Issuing..... copies of same.....	.50	WAIVER..... NO WAIVER.....	
Taking..... Bonds.....	.75	RECAPITULATION.....	
Filing..... Bonds.....	.10	Judgment for..... for.....	200.00
Issuing..... Attachment Writ... and taking Bond.....	1.00	Interest from 4-13-34.....	
Filing..... Attachments.....	.10	Damages.....	
..... Summons of Garnishee.....	.50	Clerk's Fees.....	6.25
Swearing and Ent..... Answer of Garnishee.....		Sheriff's Fees.....	1.75
Complete Record, 15c per 100 words.....	3.00	Justice of Peace Fees.....	
Transcript to Supreme Court.....		Witness Fees in Justice of Peace Court.....	
Certificate of Appeal to Supreme Court.....	.75	Constable's Fees.....	
..... Notices of Appeal.....	.75	Commissioner's Fees.....	
..... Appeal Bond.....	.75	Commissioner's Residence.....	
Certificate of Judgment.....	.50	Printer's Fees.....	
..... Witness Certificates.....	.25	Garnishee's Fees.....	
TOTAL CLERK'S FEES.....	6.25	Witness Fees in Circuit Court.....	
		Former Clerk's Fees.....	
		Trial Tax.....	3.00
		TOTAL FEES.....	211.66

11.00

2- The court charges the jury that if you believe the evidence in this case you should find a verdict in favor of the defendant Joe Berga Sr.,

Given

J. W. Hare, Jr.