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THOMAS J. TAYLOR, AARON A. LOWENSTEIN
AND SIDNEY LOWENSTEIN, PARTNERS, DOING
BUSINESS UNDER THE FIRM NAME OF TAYLOR,
LOWENSTEIN & COMPANY,

Plaintiffs,

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

VS.

J. W. McMILLAN,

Defendant.

The plaintiffs, Thomas J. Taylor, Aaron A. Lowenstein
and Sidney Lowenstein, who are partners, doing business under the firm
name and style of Taylor, Lowenstein & Company, claim of the defendant
Thirty Four Thousand Two Hundred and One & 47/100---Dollars (\$34,201.47)
due from him by account on towit the 31st day of December, 1934, which
sum of money with the interest thereon, is still unpaid.

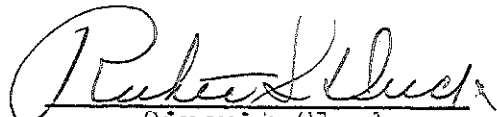

ATTORNEY FOR THE PLAINTIFFS.

STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF IN THE STATE OF ALABAMA:

You are hereby commanded to summon J. W. McMillan to appear within thirty (30) days within service of this writ in the Circuit Court of this county at the place of holding same, then and there to answer the complaint of Thomas J. Taylor, Aaron A. Lowenstein and Sidney Lowenstein, partners, doing business under the firm name of Taylor, Lowenstein & Company.

WITNESS my hand this 18th day of November, 1935.


Circuit Clerk.

26

Rec. in office
11/18/35
M.H. Wilkins
Sheriff

12-4-35

by serving copy of within Summons and
Complaint on
J.W. McMillan

M.H. Wilkins Sheriff
by C. Anderson Deputy Sheriff

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RECORDED

such

Sidney Lowenstein, Aaron A. 7-385
Lowenstein and Thomas J.
Taylor, partners, doing busi-
ness under the firm name of
TAYLOR, LOWENSTEIN & COMPANY,

Plaintiffs,

VS

J. W. McMillan,

Defendants

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALA.

Summons and Complaint

Filed this 18 day of Nov.,
1935.

Ruth D. Dyer
CLERK.

(copy)

QUIT CLAIM DEED

THE STATE OF ALABAMA

BALDWIN COUNTY

THIS DEED made this 29th day of January, 1935, between SUDIE PAGE EUBANKS and J. F. EUBANKS her husband of the first part, and LAUDA D. LEAK of the second part

WITNESSETH, that the parties of the first part, in consideration of ONE DOLLAR and other valuable considerations to us in hand paid by the party of the second part, the receipt of which is hereby acknowledged, has remised, released and quit-claimed and by these presents does remise, release and forever quit-claim unto the said party of the second part LAUDA D. LEAK, her heirs, and assigns forever, all the real property in Baldwin County, Alabama, described as follows, to-wit:

SW $\frac{1}{4}$ of NW $\frac{1}{4}$ of SE $\frac{1}{4}$; SE $\frac{1}{4}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ in section 18-28-3E, containing 20 acres.

TO HAVE AND TO HOLD the said released premises unto the said LAUDA D. LEAK, her heirs and assigns forever; so that neither the party of the first part their heirs or assigns nor any other person in trust for them or in their name shall or will, can or may, by any ways or means whatsoever, hereafter have or claim any right or title thereto; BUT THAT the said parties of the first part their heirs and assigns each and every one of them from all estate, right, title, interest, or claim and demand whatsoever, in or to the said premises, or any part thereof, are, is, and shall be, by these presents, FOREVER EXCLUDED AND DEBARRED.

IN WITNESS WHEREOF, the parties of the first part have hereunto set their hands and seals the day and year first above written.

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF:

Ort H. Ertzinger

Sudie Page Eubanks (SEAL)
J. F. EUBANKS (SEAL)

STATE OF ALABAMA BALDWIN COUNTY

I, Ort H. Ertzinger, a Notary Public in and for said County in said State, hereby certify that Sudie Page Eubanks and J. F. Eubanks, her husband, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance they executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 29th day of January, A. D. 1935.

(SEAL)

Ort H. Ertzinger,
Notary Public
Baldwin Co. Ala.

STATE OF ALABAMA BALDWIN COUNTY

I, Ort H. Ertzinger, a Notary Public in and for said County and State, do hereby certify that on the 29th day of January, 1935, came before me the within-named Sudie Page Eubanks, known to me to be the wife of the within named J. F. Eubanks, who being examined separate and apart from her husband touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord, and without fear, constraint or threats on the part of the husband.

IN WITNESS WHEREOF, I hereunto set my hand and official seal this 29th day of January, 1935.

(SEAL)

Ort H. Ertzinger, Notary Public
Baldwin County, Ala.

B. L. PAGE, as Administrator
of the Estate of SAMUEL PAGE,
Deceased,

Plaintiff,

vs.

S. L. LEAK, LAUDA D. LEAK, and
WILLIE CHANDLER,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 496.

ANSWERS TO INTERROGATORIES PROPOUNDED TO
DEFENDANT, S. L. LEAK.

-o-

NOW COMES S. L. LEAK, one of the Defendants in the above-styled cause, and makes and files these answers to the Interrogatories propounded to him by the Plaintiff in said cause, under Section 7764 et sequenter of the Code of Alabama (1923), answering each Interrogatory by number as follows, to-wit:

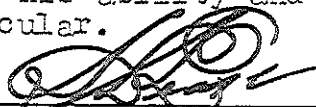
1. I claim this land in the right of my wife, Lauda D. Leak. She has title and claims an interest in the land described. Willie Chandler is only our tenant.
2. My wife, Lauda D. Leak, has title to this property and claims an interest in it. She acquired title first by a deed from Samuel Page, which said deed was dated January 9, 1923. She later acquired a quit claim deed to this property from Sudie Page Eubanks and J. F. Eubanks, her husband. This latter deed is dated January 29, 1935, and is recorded in Deed Book 56 N. S., pages 426-7, of the Records of Baldwin County, Alabama. The said Sudie Page Eubanks is one of the heirs-at-law of Samuel Page, now deceased.
3. I cannot attach hereto a copy of the first deed above mentioned from Samuel Page to my wife, for the reason that this deed was never recorded, and I do not know its present location, except that I am of the firm belief that it is in the possession of Mr. J. B. Blackburn, Attorney for the Plaintiff, or that it was in his possession the last time I knew of its location. A copy of the deed from Sudie Page Eubanks and husband is attached hereto.
4. We paid \$100.00 down on this property, and were to pay the balance of \$800.00 in instalments of \$100.00 per year. The total purchase price was \$_____.
5. Onx October 18, 1932, there was only one note for \$100.00 which had not been paid. The same was true on July 1, 1939.
6. Willie Chandler has been in possession of said property since October 18, 1932, as the tenant of Lauda D. Leak, the owner.
7. Yes. Rent was paid by Willie Chandler each year out of cotton, and paid to me.
8. Rentals were paid at the rate of \$50.00 per year since the 18th day of October, 1932, in the Fall of each year, ~~except 1933~~, which has not yet been paid. The exact dates are not recalled.

STATE OF ALABAMA

BALDWIN COUNTY

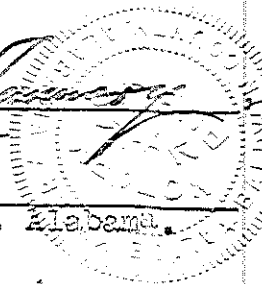
Before me, ~~Leak~~, a Notary Public in and for said County in said State, personally appeared S. L. LEAK, whose name is known to me, and who, being first duly sworn, deposes and says:

That his answers given to the foregoing interrogatories are answered to the best of his ability and that they are truthfully answered in every particular.


Defendant.

Sworn to and subscribed before me this 30th day of January, 1948.


Notary Public, Baldwin County, Alabama.



At Law No. 496

B. L. PAGE, As Administrator, of
Estate of Samuel Page, Deceased,
Plaintiff,

vs.

S. L. LEAK, LAUDA D. LEAK, and
WILLIE CHANDLER,
Defendants.

ANSWERS BY S. L. LEAK to
INTERROGATORIES

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Filed in office this _____
day of September, 1939.

Clerk,

by _____
As Deputy Clerk.

B. L. PAGE, as Administrator
of the Estate of SAMUEL PAGE,
Deceased,

Plaintiff,

vs.

S. L. LEAK, LAUDA D. LEAK, and
WILLIE CHANDLER,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW. No. 496.

ANSWERS TO INTERROGATORIES PROPOUNDED TO
DEFENDANT, LAUDA D. LEAK.

-o-

Now Comes LAUDA D. LEAK, one of the Defendants in the above-styled cause, and makes and files these answers to the Interrogatories propounded to her by the Plaintiff in said cause, under section 7764 et sequenter of the Code of Alabama (1923), answering each Interrogatory by number as follows, to-wit:

1. Yes, I do.
2. I do. I acquired title first by a deed from Samuel Page, which said deed was dated January 9, 1923. I later acquired a quit claim deed to this property from Sudie Page Eubanks and J. F. Eubanks, her husband. This latter deed is dated January 29, 1935, and is recorded in Deed Book 56 N. S., pages 426-7, of the Records of Baldwin County, Alabama. The said Sudie Page Eubanks is one of the heirs-at-law of Samuel Page, now deceased.
3. I cannot attach hereto a copy of the first deed above mentioned from Samuel Page to me, for the reason that this deed was never recorded, and I do not know its present location, except that I am informed that it is in the possession of Mr. J. B. Blackburn, Attorney for the Plaintiff, or that it was in possession of Mr. Blackburn the last time its location was known. A copy of the deed from Sudie Page Eubanks and husband is attached hereto.
4. The transaction was handled for me by my husband, S. L. Leak, and I understand that we paid \$100.00 down and were to pay the balance of \$800.00 in instalments of \$100.00 per year. The total purchase price was \$_____.
5. It is my understanding that on October 18, 1932, there was only one note for \$100.00 which had not been paid. The same was true of July 1, 1939.
6. Willie Chandler, as my tenant.
7. Yes. Willie Chandler paid it to my husband.
8. Rentals were paid at the rate of \$50.00 per year since October 18, 1932, in the Fall of each year, except for 1939, which has not yet been paid. The exact dates are not recalled.

QUIT CLAIM DEED

THE STATE OF ALABAMA

BALDWIN COUNTY

THIS DEED made this 29th day of January, 1935, between SUDIE PAGE EUBANKS and J. F. EUBANKS her husband of the first part, and LAUDA D. LEAK of the second part

WITNESSETH, that the parties of the first part, in consideration of ONE DOLLAR and other valuable considerations to us in hand paid by the party of the second part, the receipt of which is hereby acknowledged, has remised, released and quit-claimed and by these presents does remise, release and forever quit-claim unto the said party of the second part LAUDA D. LEAK, her heirs, and assigns forever, all the real property in Baldwin County, Alabama, described as follows, to-wit:

SW $\frac{1}{4}$ of NW $\frac{1}{4}$ of SE $\frac{1}{4}$; SE $\frac{1}{4}$ of NW $\frac{1}{4}$ of SW $\frac{1}{4}$ in section 18-28-3E, containing 20 acres.

TO HAVE AND TO HOLD the said released premises unto the said LAUDA D. LEAK, her heirs and assigns forever; So that neither the party of the first part their heirs or assigns nor any other person in trust for them or in their name shall or will, can or may, by any ways or means whatsoever, hereafter have or claim any right or title thereto; BUT THAT the said parties of the first part their heirs and assigns each and every one of them from all estate, right, title, interest, or claim and demand whatsoever, in or to the said premises, or any part thereof, are, is, and shall be, by these presents, FOREVER EXCLUDED AND DEBARRED.

IN WITNESS WHEREOF, the parties of the first part have hereunto set their hands and seals the day and year first above written.

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF:

Ort H. Ertzinger

Sudie Page Eubanks (SEAL)
J. F. EUBANKS (SEAL)

STATE OF ALABAMA BALDWIN COUNTY

I, Ort H. Ertzinger, a Notary Public in and for said County in said State, hereby certify that Sudie Page Eubanks and J. F. Eubanks, her husband, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance they executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 29th day of January, A. D. 1935.

(SEAL)

Ort H. Ertzinger,
Notary Public
Baldwin Co. Ala.

STATE OF ALABAMA BALDWIN COUNTY

I, Ort H. Ertzinger, a Notary Public in and for said County and State, do hereby certify that on the 29th day of January, 1935, came before me the within-named Sudie Page Eubanks, known to me to be the wife of the within named J. F. Eubanks, who being examined separate and apart from her husband touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord, and without fear, constraint or threats on the part of the husband.

IN WITNESS WHEREOF, I hereunto set my hand and official seal this 29th day of January, 1935.

Ort H. Ertzinger, Notary Public

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Leslie Hall, a Notary Public in and for said County in said State, personally appeared Lauda D. Leak, who is known to me, and who, being first duly sworn, deposes and says:

That her answers to the interrogatories hereinbefore mentioned are answered to the best of her ability and that they are truthfully answered in every particular.

Lauda D. Leak
Defendant.

Sworn to and subscribed before me this 13th day of Sept.,
1939.

Leslie B. Hall
Notary Public, Baldwin County, Alabama.

Law Side, No. 496.

B. L. PAGE, as Administrator
of Estate of Samuel Page,
Deceased,
Plaintiff,

vs.

S. L. LEAK, LAUDA D. LEAK,
and WILLIE CHANDLER,
Defendants.

Lauda D. Leak,
ANSWERS TO INTERROGATORIES

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Filed in office this _____
day of September, 1939.

Clerk,

by _____
AS Deputy Clerk.