

WILLIAM DOSCHER, Assignee
of Ed Doscher,

Plaintiff

vs.

GEORGE LENZ and EMMA
LENZ,

Defendants

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

INTERROGATORIES PROPOUNDED BY THE DEFENDANT, EMMA
LENZ, TO THE PLAINTIFF WILLIAM DOSCHER,
ASSIGNEE OF ED DOSCHER

First Interrogatory

Please state when said note, which you are suing upon in this cause, was assigned to you. If the assignment was in writing, please attach a copy of the assignment to your answer to this interrogatory and mark same Exhibit "A". If the said assignment was not in writing, please state the exact conversation had between you and Ed Doscher at the time that you state he assigned the note to you, that is, the conversation relative to the assignment.

Second Interrogatory

Please state what consideration you gave to Ed Doscher for the assignment of the said note to you, stating the exact date you gave the consideration, where you were, who was present, and whether said consideration was cash or what.

Third Interrogatory

Please state if you ever filed suit in any court against George Lenz on this note prior to this action. If you say you did, please state whether or not you joined Emma Lenz as a defendant in said suit. If you say you did file such a suit, please state in what court said suit was filed, who was your attorney that filed said suit, and what

disposition was made of said suit in said court.

Fourth Interrogatory

Please state whether or not you ever received a notice from the United States Court for the Southern Division of Alabama, notifying you that George Lenz had been adjudicated a bankrupt and had listed the note upon which you are now suing as one of his liabilities. If you answer that you did, please state if you filed any claim in said Bankrupt Court based upon the note upon which you are now suing.

Fifth Interrogatory

Please attach a copy of the note upon which you are basing this suit to your answers to these interrogatories and mark same as Exhibit "B". Please state if you were present at the time the said note was executed and delivered to Ed Doscher. If you were, please state whether or not Emma Lenz was present. If you state she was present, please state whether or not Emma Lenz received any of the money for which said note was given. Please state whether or not Ed Doscher loaned George Lenz One Thousand (\$1,000.00) Dollars and in return therefor George Lenz gave to him the note in question, signed by his wife, Emma Lenz, and that Emma Lenz received no part of said money. If you know, please state the whole transaction leading up to the execution of the note sued upon between Ed Doscher, George Lenz and Emma Lenz.

Gordon Sampton Leigh
ATTORNEYS FOR DEFENDANT, EMMA
LENZ

STATE OF ALABAMA,
COUNTY OF MOBILE.

Personally appeared before me, *Janie Ryzer Davis*,
a Notary Public in and for said State and County, Robert E.
Gordon, who being by me first duly sworn, deposes and says
as follows:

That he is one of the attorneys of record for the defendant, Emma Lenz, in the above entitled cause, and if the foregoing interrogatories are well and truly answered by the plaintiff, that same will be material testimony for the defendant, Emma Lenz, at the trial of said cause.

Robert E. Garrison

Subscribed and sworn to before
me this 17th day of August,
1936.

Janie Roper Davis
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

Service accepted of these
enclaved Interrogatories

Wm. M. Brown
Attorney for Plaintiff.

William Doecker.

vs.

George Lenz, et al.

Interrogatories.

Filed this 17 day Aug. 1936
Robert S. Luck
Clerk-Register

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon GEORGE LENZ and EMMA LENZ to appear within thirty 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 WILLIAM DOSCHER, assignee of Ed Doscher.

Witness my hand, this 20th day of July, 1936.

Robert A. Duck, Clerk.

WILLIAM DOSCHER,
Assignee of Ed Doscher,
Plaintiff

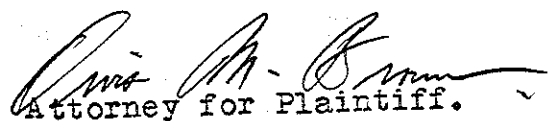
vs

GEORGE LENZ and EMMA LENZ,
Defendants.

The Plaintiff, assignee, claims of the Defendants ONE THOUSAND DOLLARS, as the assignee of a promissory waive note executed on the 6th day of March, 1931 and payable to the Assignor on the 6th day of March, 1932 and assigned to the plaintiff, with interest thereon.

TWO: The Plaintiff, assignee, claims of the Defendants ONE THOUSAND DOLLARS due by promissory waive note made by them on the 6th day of March, 1931 and payable on the 6th day of March 1932 with interest and attorney fees.

THIRD: The Plaintiff, assignee, claims of the Defendants ONE THOUSAND DOLLARS due by promissory waive note made by them on the 6th day of March, 1931 and payable on the 6th day of March 1932 with interest and attorney fees which is still due and unpaid.


Attorney for Plaintiff.

RECORDED
Duck
7-524

WILLIAM DOSCHER,
Assignee of Ed Doscher,
Plaintiff

vs

GEORGE LENZ and EMMA LENZ,
Defendants.

SUMMONS AND COMPLAINT.

Filed this 20 day July, 1936
Robert A. Duck
Clerk-Register

ORVIS M. BROWN
ATTORNEY AT LAW
Robertsdale, Alabama

(113)
Rec'd in office
7/20/36
M. H. Watkins

Executed this 23rd day
of July 1936 by
serving a copy of the
within summons &
complaint on
George Lenz and
Emma Lenz Ref'd

M. H. Watkins Sheriff
By *Lennie Bryan*, D.S.

WILLIAM DOSCHER, Assignee
of Ed Doscher,

Plaintiff

vs.

GEORGE LENZ and EMMA
LENZ,

Defendants

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

Now comes the defendant, Emma Lenz, and demurs to
Counts One, Two and Third, each separately and severally,
and as grounds therefor assigns the following:

1. Because it is not averred or shown to whom the
said note was executed.
2. Because it is not averred or shown to whom said
note was made payable.
3. Because it is not averred or shown whether said
note was transferred or assigned before maturity.
4. Because it does not aver or show that there was
any consideration for the assignment of said note.
5. Because it is not averred or shown that said
note provided for any interest or attorney's fee.
6. Because it is not averred or shown whether the
plaintiff has a legal title or the party really interested
in said litigation.

Gordon E. Seigh
ATTORNEYS FOR DEFENDANT, EMMA
LENZ

Demurrers

Filed this 17 day Aug. 1936
Robert J. Buck
Clark-Register