CIVIL COST BILL — Gill Printing Co., Mobile

The State of Alabama,

Baldwin COUNTY.

CIRCUIT COURT

Spring, Term, 1937

Godfrey Klumpp.

No. 296, vs.

Mary Knight Hunter.

BILL OF COSTS

	CLERK'S FEES	@	Amount
1	Issuing 3 Summons and Complaint	$1 25	3 75
2	Issuing 3 copies thereof	30	90
3	Making every copy thereof, when over 200 words, per 100 words	15	
4	Entering Sheriff's return or copy thereof	20	
5	Docketing cause, to be charged but once	25	25
6	Entering Appearance	20	20
7	Filing 22 pleas, demurrer and other pleadings, for each	10	2220
8	Every trial, with or without jury, and its incidents, not including judgments by default or nil dicit	75	
9	Entering Continuance (each)	10	
10	Entering judgment, (each)	30	30
11	Entering any other order of Court (each)	30	
12	Issuing Scire Facias, or notice in the nature thereof (each)	75	
13	Issuing Execution or copy thereof (each)	50	
14	Entering return, or copy thereof, for each 100 words, 15 cts; but in no case less than	20	
15	Recording award of arbitrators, referees, auditors, etc., for each 100 words	15	
16	Issuing execution or attachment thereon, and entering return	1 00	
17	Taking bond for certiorari supersedeas, or appeal, or copy thereof and filing same	75	
18	Issuing Subpoenas for Witness (each)	30	
19	Administering an oath, not relating to a trial pending and certifying the same	25	
20	Issuing Attachment and taking bond (each)	1 00	
21	Filing papers in attachment (each)	10	
22	Issuing Summons for garnishee (each)	50	
23	Swearing and taking examination for Garnishee and recording same, for each 100 words 15 cts; but not less than	50	
24	Order to advertise, or order or survey, or copy thereof	50	
25	Certificate of Judgment	50	
26	Recording each surveyor and surveyor's report or copy thereof, each 100 words 15 cts; but not less than	25	
27	Issuing Commission to take depositions, or copy thereof	75	
28	Making copy of interrogatories accompanying commission	50	50
29	Or for each 100 words	15	45
30	Filing packages of depositions (each)	10	
31	Indorsing package of depositions, opened (each)	10	
32	Issuing writ of ad quod damnum or writ in the nature thereof	75	
33	Recording the return and inquest thereon	50	
34	Or for each 100 words	15	
35	Issuing Writ of certiorari, prohibition, mandamus, or writ in the nature thereof	75	
36	Filing the same and entering return	15	
37	Making a complete record of a cause or copy thereof, for each 100 words	15	20 00
38	Making copy of any paper not herein provided for, for each 100 words	15	50
39	Making each certificate requiring the seal of office, and affixing seal	50	75
40	Taking any bond not otherwise provided for	75	
41	Making necessary certificates not otherwise provided for (each witness)	25	
42	For certifying abstract, in lieu of fees for transcript under section 2851 of the Code U S	5 00	22 50
43	Record for Supreme Court, for each 100 words	15	
44	Each additional copy thereof, for each 100 words	05	
45	Collecting money on judgments wherein said judgment has not been paid within 30 days after rendition, one half the per cent allowed sheriffs for same services for collecting money on execution		
	Total Clerk's Fees		5230

	SHERIFF'S FEES	@	Amount
1	Levying Attachment	$3 00	
2	Entering and returning Attachment	25	
3	Summoning garnishee and return	1 50	
4	Serving Summons and Return	1 50	
5	Serving Subpoenas	65	
6	Impaneling jury	75	
7	Making deed	2 50	
8	Serving Summons, forcible entry, etc.	1 50	
9	Executing writ of restitution or possession	5 00	
10	Collecting execution for cost	1 50	
11	Serving Sci. Fa., notices, etc.	1 50	
12	Serving any summons not provided for and return	1 50	
13	Serving attachment for contempt	1 50	
14	Taking and approving bond	1 00	
15	Seizing personal property in detinue	3 00	
16	Collecting money under execution, 5% first $200.00; 4% to $500.00; 3% all over $500.00		
17	Selling property attached, same for selling under execution		
18	Former Sheriff's fees		
	Total Sheriff's Fees		52 30

RECAPITULATION

1	Clerk's Fees	52 30
2	Clerk's Fees	
3	Sheriff's Fees	
4	Sheriff's Fees	
5	Witness Fees in Circuit Court	
6	Justice of the Peace Fees	
7	Witness Fees, in Justice of the Peace Court	
8	Commissioner's Fees	
9	Commissioner's Residence	
10	Constable's Fees	
11	Garnishee's Fees	
12	Printer's Fees	
13	Stenographer's Fees	
14	Trial Tax	3 00
	Total Fees	55 30
15	Judgment	
16	Date	
17	Interest	
18	Damages	
	Total Judgment	
	Interest and Damages	
	Grand Total	

Paid
Nov 18/39
R S Duck
By H E Smith
Deputy

GODFREY KLUMPP, Plaintiff	:	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
versus	:	AT LAW.
MARY KNIGHT HUNTER, Defendant	:	

COUNT I. The plaintiff claims of the defendant Ten Thousand and No/100 ($10,000.00) Dollars, as damages for this, that heretofore on, to wit, the 27th day of June, 1936, the defendant, while driving or operating an automobile on or along the public highway in Baldwin County, Alabama, known as Point Clear Road, at or near a point on said road known as Joe Klumpp's place, did negligently cause or allow said automobile to run into, over or against a wagon being then and there driven by the plaintiff and as the proximate result and consequence of said negligence of defendant, the said wagon was so violently struck by said automobile as to severely injure plaintiff in that his back was so violently wrenched as to be permanentlydisabled, his head and face cruelly lacerated, his leg seriously cut and bruised, and as the proximate result of said injuries, plaintiff was unable to leave his bed for a long period of time and has ever since been unable to perform physical labor such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his horse and wagon; all this being the proximate result and consequence of the aforesaid negligence of the defendant, wherefore plaintiff sues and asks judgment in the aforementioned sum of Ten Thousand and No/100 ($10,000.00) Dollars.

COUNT 2. The Plaintiff claims of the defendant the further sum of Ten Thousand and No/100 ($10,000.00) Dollars, as damages for this, that heretofore on, to wit, the 27th day of June, 1936, the defendant, while driving

or operating an automobile on or along the public highway in Baldwin County, Alabama, known as Point Clear Road, at or near a point on said road known as Joe Klumpp's Place, wilfully or wantonly injured plaintiff by wilfully or wantonly causing or allowing said automobile to run into, over or against a wagonbeing then and there driven by the plaintiff, and as the proximate result and consequence of said wilful or wanton negligence of the defendant, said wagon was so violently struck by said automobile as to severely injure plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face were cruelly lacerated, his leg seriously cut and bruised, and as a proximate result of said injuries, plaintiff was unable to leave his bed for a long period of time and has ever since been unable to perform physical labor such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering fiancial loss from the loss of his horse and wagon; all of this being the proximate result and consequence of the wilful or wanton negligence of the defendant, wherefore plaintiff sues and asks judgement in the aforementioned sum of Ten Thousand and No/100 ($10,000.00) Dollars.

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

Plaintiff demands trial by jury of the above styled cause.

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

THE STATE OF ALABAMA, Baldwin County. } No. _____ CIRCUIT COURT

January 30, 1937

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Mary Edith Hutson.

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

Mary Edith Hutson, Defendant by Geffrey Kumpe,

Plaintiff

Witness my hand this 30th day of January, 1937

R. L. Luck Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

George B. Stone, Jr.

Plaintiff's Attorney.

Alias

No. _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Ladsfry Klumpp
PLAINTIFF

VS.

Mary Knight Apuntu
DEFENDANT

Summons and Complaint

Filed, January 30 1937

_____, Clerk.

Defendant Lives at
716 Orange Ave
Orlando Fla

George Estomeh
Plaintiff's Attorney.

Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

RECEIVED IN OFFICE

_____, 193__

_____, Sheriff

I have executed this Writ

this _____, 193__

by leaving a copy of the within Summons and Complaint with

_____, Sheriff.

_____, Deputy Sheriff.

HOWELL TURNER

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

Feb. 1, 1937

Mr. R. S. Duck, Clerk
Circuit Court- Baldwin County
Bay Minette, Ala.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Clyde Hunter, Defendant

Godfrey Klumpp, Plaintiff
v.
Mary knight Hunter, Defendant

Enclosed herewith find copy of letter which, together with copy of summons and complaint was sent to the Sheriff of Orlando, Florida, by registered mail, return receipt requested, also copy of interrogatories, with request that service be made on Mary Knight Hunter.

Yours very truly,

Howell Turner

Howell Turner,
Secretary of State.

HT:M
CC: Mr. George E. Stone, Jr
Merchants National Bank Bldg.
Mobile, Ala.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

Feb. 1, 1937

Godfrey Klumpp, Plaintiff	)	
v.	)	In the Circuit Court of Baldwin County, Alabama.
Mary Knight Hunter, Defendant	)	

Miss Mary Knight Hunter,
716 S. Orange Ave.
Orlando, Fla.

You are hereby given notice under H. B. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama, together with the enclosed copy of interrogatories.

Please acknowledge receipt.

Howell Turner

Howell Turner,
Secretary of State.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

Feb. 1, 1937

Godfrey Kumpe,
Plaintiff

v.

Mary Knight Hunter,
Defendant

In the Circuit Court of
Baldwin County, Alabama

Miss Mary Knight Hunter,
716 S. Orange Ave.
Orlando, Fla.

You are hereby given notice under R. S. 64 of the General Laws of Alabama that enclosed summons and complaint was served on us in the above styled cause, as Secretary of State of the State of Alabama, together with the enclosed copy of interrogatories.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

Filed February 3, 1937
C. S. Deck, Clerk

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

September 15, 1936

Godfrey Klumpp, Plaintiff	)	
v.	)	In the Circuit Court of Baldwin
Mary Knight Hunter, Defendant	)	County, Alabama.

Miss Mary Knight Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice under H. B. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner

Howell Turner,
Secretary of State.

Received
Sept 18, 1936

RECORDED
Duck
7-546

Secretary of State.
Howell Turner,

Please acknowledge receipt.

State of Alabama
Office of Secretary of State
Montgomery

September 16, 1936

Secretary of State of the State of Alabama
Montgomery, Alabama.

Dear Sir:

Pursuant to an order of the Probate Court of Clarke County, Alabama, I have this day qualified as Guardian of the estate of Mary Knight Hunter, a minor.

Yours truly,

Godfrey Kimmel
Guardian

Filed Sept. 16, 1936
R. S. Duck,
Clerk

HOWELL TURNER

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

Feb. 1, 1937

Mr. R. S. Duck, Clerk
Circuit Court - Baldwin County
Bay Minette, Ala.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Clyde Hunter, Defendant

Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter, Defendant

Enclosed herewith find copy of letter which, together with copy of summons and complaint, was sent to the Sheriff of Orlando, Florida by registered mail, return receipt requested, also copy of interrogatories, with request that service be made on Clyde Hunter, as parent of Mary Knight Hunter.

Yours very truly,

Howell Turner

Howell Turner,
Secretary of State.

HT:M
CC: Mr. George Stone, Jr
Merchants National Bank Bldg.
Mobile, Ala.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

Feb. 1, 1937

Godfrey Klumpp, Plaintiff	)	In the Circuit Court of Baldwin County, Alabama.
v.	)	
Mary Knight Hunter, Defendant	)	

My Clyde Hunter,
716 S. Orange Ave.
Orlando, Fla.

You are hereby given notice, as parent of Mary Knight Hunter, minor, under H. B. 84 of the General Laws of Alabama, that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner

Howell Turner,
Secretary of State.

Feb 3 Acknowledge receipt
Amos Lyons R.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

Feb. 1, 1937

Courtney Kinney,
Plaintiff

v.

Mary Knight Minter,
Defendant

In the Circuit Court of
Baldwin County, Alabama.

Filed February 3, 1937
R. S. Leach, Clerk

Mr Clyde Minter,
Fla S. Orange Ave.
Orlando, Fla.

You are hereby given notice, as parent of Mary Knight Minter, minor, under R. 8, 86 of the General Laws of Alabama, that scribed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

September 15, 1936

Godfrey Klumpp, Plaintiff	)	In the Circuit Court of Baldwin County, Alabama
v.	)	
Mary Knight Hunter, Defendant	)	

Mr. Clyde Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice, as father of Mary Knight Hunter, minor, under H. B. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner

Howell Turner,
Secretary of State.

Civil Docket
Filed Sept. 15, 1936
Godfrey

RECORDED
Duck
7-547

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY

September 16, 1936

HOWELL TURNER

Please acknowledge receipt.

Yours very truly,
HOWELL TURNER,
Secretary of State.

Mrs. Clyde Murder,
Ala. Orange Ave.,
Orlando, Fla.

Dear Madam:

Your petition of Albert Murder against Mary Murder, filed in the office of Secretary of State on the 14th day of September, 1936, has been duly examined and found to be in the proper form and contains the allegations required by the statutes of Alabama, and the same is hereby accepted and filed as of the date hereof.

Notice is hereby given that the said Mary Murder, the respondent, is required to answer said petition on or before the 14th day of October, 1936, in the Circuit Court of Jefferson County, Alabama, Bessemer Division, at Bessemer, Alabama.

Respectfully yours,
HOWELL TURNER,
Secretary of State.

Filed Sept. 16, 1936
R. S. Duck,
Clerk

STATE OF ALABAMA :
BALDWIN COUNTY :

TO ANY SHERIFF OF THE
STATE OF ALABAMA :

You are hereby commanded to summon Clyde Hunter, as Parent of Mary Knight Hunter, to appear within thirty days from the service of this writ in the circuit, to be held for said county at Bay Minnette, in Baldwin County, Alabama, then and there to answer the complaint of Godfrey Klumpp against the said Mary Knight Hunter.

Witness my hand, this 21 day of October, 1936.

R S Deck
CLERK

STATE OF ALABAMA :
BALDWIN COUNTY :

TO ANY SHERIFF OF THE
STATE OF ALABAMA :

You are hereby commanded to summon Mary Knight Hunter to appear within thirty days from the service of this writ in the circuit court, to be held for said county at Bay Minnette, in Baldwin County, Alabama, then and there to answer the complaint of Godfrey Klumpp.

Witness my hand, this 21 day of October, 1936.

R. Duck
CLERK

HOWELL TURNER

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY

September 19, 1936.

Mr. R. S. Duck,
Clerk, Circuit Court, Baldwin County,
Bay Minette, Ala.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of Baldwin County, Alabama.

This is to certify that under H. B. 84 of the General Laws of Alabama, I did, on the 15th day of September, 1936, send by registered mail, return receipt requested, addressed to addressee only, to Miss Mary Knight Hunter, 716 S. Orange Ave., Orlando, Florida, and also Mr. Clyde Hunter, as father of Miss Hunter, 716 S. Orange Ave., Orlando, Florida, summons and complaint in the above styled cause.

I further certify that said return receipts which are herewith enclosed, were received by me on the 19th day of September, 1936.

Yours very truly,

Howell Turner,
Secretary of State.

T/ab

CC - Hon. George E. Stone, Jr.,
Merchants National Bank Bldg.,
Mobile, Ala.

RECORDED
Duck
7-5-46

Filed Sept 22, 1936
R S Duck
Clerk

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

THE STATE OF ALABAMA, } No._____ CIRCUIT COURT
Baldwin County.

October 22 1936

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Mary Knight Hunter

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against Mary Knight Hunter Defendant by Godfrey Klumpp.

Plaintiff

Witness my hand this 22 day of October 1936

R. S. Leach Clerk.

COMPLAINT

_____ Plaintiff versus _____

The Plaintiff claims of the Defendant _____ Dollars, due by

_____
Plaintiff's Attorney.

GODFREY KLUMPP, Plaintiff	:	
	:	IN THE CIRCUIT COURT OF
vs.	:	BALDWIN COUNTY, ALABAMA.
	:	AT LAW.
MARY KNIGHT HUNTER, Defendant	:	

COUNT I.

The Plaintiff claims of the Defendant Ten Thousand and No/100 ($10,000.00) Dollars as damages for this, that heretofore on, to wit, the 27th day of June, 1936, the Defendant, while driving or operating an automobile on or along the public highway in Baldwin County, Alabama known as Point Clear Road, at or near a point on said highway known as Joe Klumpp's Place, did negligently cause or allow said automobile to run into, over or against a wagon being then and there driven by Plaintiff, and as the proximate result and consequence of said negligence of the Defendant, said wagon was so violently struck by said automobile as to severely injure Plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face were cruelly lacerated, his leg seriously cut and bruised, as the proximate result and consequence of said injuries, Plaintiff was unable to leave his bed for a long period of time and has ever since been unable to perform physical labour such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his horse; all of this being the proximate result and consequence of the aforesaid negligence of the Defendant, wherefore Plaintiff sues and asks judgement in the aforementioned sum of Ten Thousand and No/100 ($10,000.00) Dollars.

COUNT 2.

Plaintiff claims of the Defendant the further sum of Ten Thousand and no/100($10,000.00) Dollars as damages for

this, that heretofore on, to wit, the 27th day of June, 1936, the Defendant, while driving or operating an automobile on or along the public highway in Baldwin County, Alabama known as Point Clear Road, at or near a point on said highway known as Joe Klumpp's Place, wilfully or wantonly injured Plaintiff by wilfully or wantonly causing or allowing said automobile to run into, over or against a wagon being then and there driven by the Plaintiff, and as the proximate result and consequence of said wilful or wanton negligence of the Defendant, said wagon was so violently struck by said automobile as to severely injure Plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face were cruelly lacerated, his leg seriously cut and bruised, and as the proximate result and consequence of said injuries, Plaintiff was unable to leave his bed for a long period of time, and for several months was unable to perform physical labour such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his horse and wagon; and all this was the proximate result of the wilful or wanton negligence of the Defendant, wherefore Plaintiff sues and asks judgement in the aforementioned sum of Ten Thousand and No/100 ($10,000.00) Dollars. Plaintiff claims punitive damages.

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

Plaintiff demdnds trial by jury of the above entitled cause.

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

THE STATE OF ALABAMA, No. _____ **CIRCUIT COURT**
Baldwin County.

October 21 193 36

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Clyde Hunter as Demant [illegible]

Hunter

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against [redacted]

[redacted] Mary Knight Hunter Defendant by Godfrey Kemp

Plaintiff

Witness my hand this 21 day of October 193 6

Clerk.

RECEIVED
SECRETARY OF STATE
FEB 27 1977
SECRETARY OF STATE

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

GODFREY KLUMPP,
Plaintiff

vs.

MARY KNIGHT HUNTER,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

COUNT I.

The Plaintiff claims of the Defendant Ten Thousand and no/100 ($10,000.00) Dollars as damages for this, that heretofore on, to wit, the 27th day of June, 1956, the Defendant, while driving or operating an automobile on or along the public highway in Baldwin County, Alabama known as Point Clear Road, at or near a point on said highway known as Joe Klumpp'S Place, did negligently cause or allow said automobile to run into, over or against a wagon being then and there driven by Plaintiff, and as the proximate result and consequence of said negligence of Defendant said wagon was so violently struck by said automobile as to severely injure Plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face were cruelly lacerated, his leg seriously cut and bruised, and as the proximate result and consequence of said injuries, Plaintiff was unable to leave his bed for a long period of time and has ever since been unable to perform physical labour such as he has always been obliged todo in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his horse; all of this being the proximate result and consequence of the aforesaid negligence of the Defendant , wherefore Plaintiff sues and asks judgement in the aforementioned amount of Ten Thousand and No/100($10,000.00) Dollars.

COUNT 2.

Plaintiff claims of the Defendant the further sum of Ten Thousand and no/100($10,000.00) Dollars as damages for

this, that heretofore on, to wit, the 27th day of June, 1936, the Defendant, while driving or operating an automobile on or along the public highway in Baldwin County, Alabama, known as Point Clear Road, at or near a point on said highway known as Joe Klumpp's Place, wilfully or wantonly injured Plaintiff by wilfully or wantonly causing or allowing said automobile to run into, over or against a wagon being then and there driven by the Plaintiff, and as the proximate result and consequence of said wilful or wanton negligence of the Defendant, said wagon was so violently struck by said automobile as to severely injure Plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face were cruelly lacerated, his leg seriously cut and bruised, and as the proximate result and consequence of said injuries, Plaintiff was unable to leave his bed for a long period of time, and for several months was unable to perform physical labour such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his horse and wagon; and all this was the proximate result and consequence of the wilful or wanton negligence of the Defendant, wherefore Plaintiff sues and asks judgement in the aforementioned amount of Ten Thousand and No/100 ($10,000.00) Dollars. Plaintiff Claims punitive damages.

Plaintiff demands trial by jury of the above entitled cause.

ATTORNEY FOR PLAINTIFF

0556

0543

0089

0021

0307

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

Harrell Tarrio

(Signature or name of addressee)

(Signature of addressee's agent)

Date of delivery

Postmark

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature or name of addressee)

(Signature of addressee's agent)

MOORE PRINTING CO.

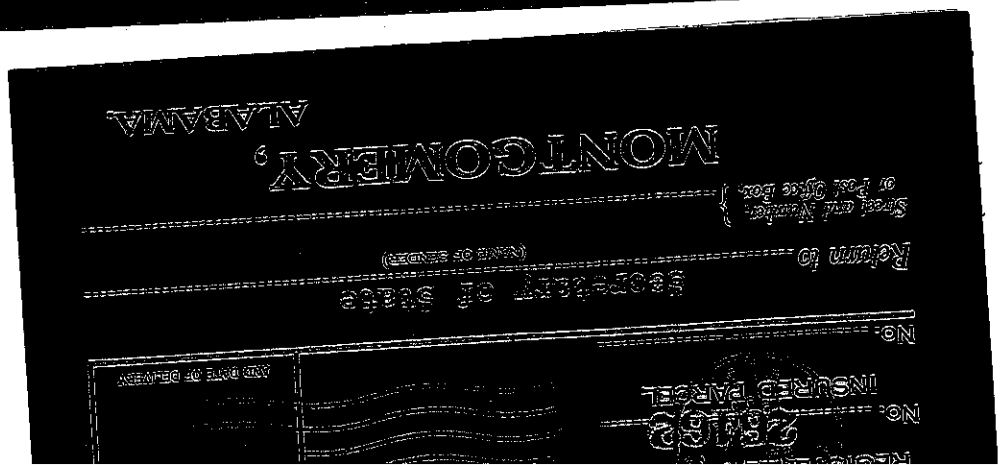
GIVES YOU BETTER PRINTING AT LOW PRICES

TELEPHONE 142-J

60
30
18.00
12.00
2.50
32.50

40
30
12.00

Commercial Printing——Office Supp



Post Office Department

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

REGISTERED ARTICLE

No. 7

INSURED PARCEL

No.

POSTMARK OF DELIVERING OFFICE

AND DATE OF DELIVERY

RECEIVED AUG 11 1936 SECRETARY OF STATE

Return to Secretary of State

(NAME OF SENDER)

Street and Number or Post Office Box

MONTGOMERY,

ALABAMA

Post Office Department

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

REGISTERED ARTICLE

No. 26461

INSURED PARCEL

No.

POSTMARK OF DELIVERING OFFICE

AND DATE OF DELIVERY

RECEIVED AUG 11 1936 SECRETARY OF STATE

Return to Secretary of State

(NAME OF SENDER)

Street and Number or Post Office Box

MONTGOMERY,

ALABAMA

Post Office Department

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

REGISTERED ARTICLE

No. 26460

INSURED PARCEL

No.

POSTMARK OF DELIVERING OFFICE

AND DATE OF DELIVERY

Return to Secretary of State

(NAME OF SENDER)

Street and Number or Post Office Box

MONTGOMERY,

ALABAMA

GK
MKH
CH

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature or name of addressee)

Delivered to Addressee Only

(Signature of addressee's agent)

SEP 17 1936

Date of delivery _____ *193*

Form 3811

U. S. GOVERNMENT PRINTING OFFICE

RECEIVED
SEP 19 1936
SECRETARY OF STATE

GK
MKH
CH

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature or name of addressee)

(Signature of addressee's agent)

AUG 10 1936

Date of delivery _____ *193*

Form 3811

U. S. GOVERNMENT PRINTING OFFICE 1935

GK
MKH

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature or name of addressee)

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AUG 10 1936

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Form 3811

U. S. GOVERNMENT PRINTING OFFICE 1935

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

October 24, 1936.

Godfrey Klumpp, Plaintiff	)	
v.	)	In the Circuit Court of
Mary Knight Hunter, Defendant	)	Baldwin County, Alabama

Mr. Clyde Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice, as parent of Mary Knight Hunter, minor, under H. Bl 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

RECORDED
Duck
7-588

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

October 26, 1936.

Godfrey Kimmel,
Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of
Baldwin County, Alabama

Mr. Clyde Bunter,
Ala. S. Orange Ave.,
Orlando, Fla.

Your Honor, Miss Mary Knight Hunter, minor, by her next friend, as the law requires, and as the statute of Alabama and Congress authorized, summons and cause of action, as the statute of Alabama provides and requires.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

Filed Oct. 27, 1936
R. S. Duck, Clerk

HOWELL TURNER

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY

November 12, 19361

Mr. R. S. Duck,
Clerk, Circuit Court, Baldwin County,
Bay Minette, Ala.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of Baldwin
County, Alabama.

The copy of summons and complaint which was sent by registered mail, return receipt requested, the envelopes marked "Deliver to addressee only", to Miss Mary Knight Hunter, 716 S. Orange Ave., Orlando, Florida, and toMr. Clyde Hunter, 716 S. Orange Ave., Orlando, Florida, as parent of Mary Knight Hunter, minor, have been returned, the envelopes reading "unclaimed."

Upon your advice we will attempt to effect service accordingly.

Yours very truly,

Howell Turner,
Secretzry of State.

T/ab

CC - Hon. George E. Stone, Jr.,
Merchants National Bank Bldg.,
Mobile, Ala.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

October 24, 1936.

Godfrey Klumpp Plaintiff	)	
v.	)	In the Circuit Court of Baldwin
Mary Knight Hunter, Defendant	)	County, Alabama.

Miss Mary Knight Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice under H. B. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama, together with the enclosed copy of interrogatories.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

October 24, 1936.

Godfrey Klump Plaintiff v. Mary Knight Hunter, Defendant	In the Circuit Court of Baldwin County, Alabama.

Miss Mary Knight Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice under M. A. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama, together with the enclosed copy of interrogatories.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

Filed Oct. 24 1936
R. L. Duck, Clerk

RECORDED
Duck
7-5-87

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

November 21, 1936.

Hon. George E. Stone, Jr.,
Merchants National Bank Bldg.,
Mobile, Ala.

Dear Sir: Re: Godfrey Klumpp, Plaintiff
v.
Clyde Hunter, Defendant

Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of Baldwin
County, Alabama.

Enclosed herewith find copy of letter which, together with copy of summons and complaint, was sent to the Sheriff of Orlando, Florida, by registered mail, return receipt requested, also copy of interrogatories, with request that service be made on Clyde Hunter, Mary Knight Hunter, and Clyde Hunter, as parent of Mary Knight Hunter.

Yours very truly,

Howell Turner,
Secretary of State.

T/ab

CC - Mr. R. S. Duck,
Clerk of the Circuit Court, Baldwin County,
Bay Minette, Ala.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

November 21, 1936

To the Sheriff,
Orlando, Florida.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of Baldwin County,
Alabama.

Will you please serve the enclosed notice and summons and complaint on the defendant and also on Clyde Hunter as parent of the defendant at the following address: (also enclosed copy of interrogatories)

716 S. Orange Ave.,
Orlando, Florida.

Please make return on one copy of the summons and complaint and return to me.

Your fee is enclosed with letter re Godfrey Klumpp v. Clyde Hunter.

Please acknowledge receipt.

Yours very truly,

Howell Turner,
Secretary of State.

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

November 21, 1936

To the Sheriff,
Orlando, Florida.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of Baldwin County
Alabama.

Will you please serve the enclosed notice and summons and complaint on the defendant and also on Clyde Hunter as parent of the defendant at the following address:
(also enclosed copy of interrogatories)
716 S. Orange Ave.,
Orlando, Florida.

Please make return on one copy of the summons and complaint and return to me.

Your fee is enclosed with letter re Godfrey Klumpp v. Clyde Hunter.

Please acknowledge receipt.

Yours very truly,

Howell Turner,
Secretary of State.

Filed November 23, 1936
R. L. Lucas, Clerk

GODFREY KLUMPP, Plaintiff	:	
versus	:	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
MARY KNIGHT HUNTER, Defendant	:	AT LAW.

COUNT I. The plaintiff claims of the defendant Ten Thousand and no/100 ($10,000.00) Dollars, as damages for this, that heretofore on, to wit, the 27th day of June, 1936, the defendant, while driving or operating an automobile on or along the public highway in Baldwim County, Alabama known as Point Clear Road, at or near a point on said road known as Joe Klumpp's Place, did negligently cause or allow said automobile to run over, into, or against a wagon being then and there driven by the plaintiff and as a proximate result and consequence of said negligence of defendant, the wagon was so violently struck by said automobile as to severely injure plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face cruelly lacerated, his leg seriously cut and bruised, and as the proximate result of said injuries, plaintiff was unable to leave his bed for a long period of time and has ever since been unable to perform physical labour such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his wagon and horse; all this being the proximate result and consequence of the aforesaid negligence of the defendant, wherefore plaintiff sues and asks judgement in the aforementioned sum of Ten Thousand and no/100 ($10,000.00) Dollars.

COUNT 2. The plaintiff claims of the defendant the further sum of Ten Thousand and no/100 ($10,000.00) Dollars, as damages for this, that heretofore on, to wit, the 27th day of June, 1936, the defendant, while driving or operating

an automobile on or along the public highway in Baldwin County, Alabama known as Point Clear Road, at or near a point on said road known as Joe Klumpp's Place, wilfully or wantonly injured plaintiff by wilfully or wantonly causing or allowing said automobile to run into, over or against a wagon being then and there driven by the plaintiff, and as the proximate result and consequence of said wilful or wanton negligence of defendant, said wagon was so violently struck by said automobile as to severely injure plaintiff in that his back was so violently wrenched as to be permanently disabled, his head and face were cruelly lacerated, his leg seriously cut and bruised, and as a proximate result of said injuries, plaintiff was unable to leave his bed for a long period of time and has ever since been unable to perform physical labour such as he has always been obliged to do in order to earn a living. Plaintiff has further suffered intense physical pain and mental anguish, together with great humiliation and embarrassment, besides incurring charges for medical attention and suffering financial loss from the loss of his wagon and horse; all this being the proximate result and consequence of the aforesaid negligence of the defendant, wherefore plaintiff sues and asks judgement in the aforementioned sum of Ten Thousand and no/100 ($10,000.00) Dollars.

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

Plaintiff demands trial by jury of the above styled cause.

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

Duck
7-544

Filed this 1st day Aug. 1936
Robert S. Duck,
~~Clerk-Register~~ Clerk

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

August 8, 1936.

Godfrey Klumpp, Plaintiff v. Mary Knight Hunter, Defendant	In the Circuit Court of Baldwin County, Alabama

Mr. Clyde Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice, as father of Mary Knight Hunter, minor, under H. B. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner,
Secretary of State.

RECORDED

Deck

7-545

Filed this 19 day Aug 1964

Clerk-Register

HOWELL TURNER

SECRETARY OF STATE

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

August 6, 1964.

To the Circuit Court of
Baldwin County, Alabama

Gentlemen:

Please acknowledge receipt.

Yours very truly,

Secretary of State.

HOWELL TURNER

Secretary of State

Attest:

Certificate of Acknowledgment of Receipt of Notice of Meeting Federal Savings and Loan Association of Alabama, Mobile, Alabama, as Certified and Recorded in Minute Book 7 of the Records of the Circuit Court of Baldwin County, Alabama, Minute Book 7, Page 545.

Witness my hand and seal of office this the 19 day of August, 1964.

Clerk-Register

STATE OF ALABAMA

OFFICE OF SECRETARY OF STATE

MONTGOMERY

HOWELL TURNER

August 8, 1936.

Godfrey Klumpp, Plaintiff v. Mary Knight Hunter, Defendant	In the Circuit Court of Baldwin County, Alabama

Miss Mary Knight Hunter,
716 S. Orange Ave.,
Orlando, Fla.

You are hereby given notice under H. B. 84 of the General Laws of Alabama that enclosed summons and complaint was served on me in the above styled cause, as Secretary of State of the State of Alabama.

Please acknowledge receipt.

Howell Turner
Howell Turner,
Secretary of State.

HOWELL TURNER

STATE OF ALABAMA
OFFICE OF SECRETARY OF STATE
MONTGOMERY

August 13, 1936.

Mr. R. S. Duck,
Clerk, Circuit Court, Baldwin County,
Bay Minette, Ala.

Dear Sir:

Re: Godfrey Klumpp, Plaintiff
v.
Mary Knight Hunter,
Defendant

In the Circuit Court of Baldwin County, Alabama.

This is to certify that under H. B. 84 of the General Laws of Alabama, I did, on the 8th day of August, 1936, send by registered mail, return receipt requested, addressed to addressee only, to Miss Mary Knight Hunter, 716 S. Orange Ave., Orlando, Florida, and also to Mr. Clyde Hunter, as father of Miss Hunter, 716 S. Orange Ave., Orlando, Florida, summons and complaint in the above styled cause.

I further certify that said return receipts which are herewith enclosed, were received by me on the 13th day of August, 1936.

Yours very truly,

Howell Turner,
Secretary of State.

T/ab

CC - Hon. George E. Stone, Jr.,
Merchants National Bank Bldg.,
Mobile, Alabama.

RECORDED
Duck
7-544

Filed this........day..........19.....
Filed August 10-11 1936
Judge-Register
Rubie L. Duck
Clerk

GODFREY KLUMPP, Plaintiff,	)	IN THE CIRCUIT COURT OF
versus	)	MOBILE COUNTY, ALABAMA
MARY KNIGHT HUNTER, Defendant.	)	AT LAW

COMES the defendant in the above entitled cause and appears specially and for no other purpose than entering this her motion to quash the service and set aside the return, on the following separate and several grounds:

1. Because there was no legal service of process on the defendant.

2. Because it is apparent from the face of the record that there was no legal service on the defendant, a nonresident minor, under the age of eighteen years.

3. Because the defendant is a minor under the age of eighteen years, and the record shows on its face that there has been no service on either of defendant's parents or her guardian.

4. Because the defendant is a minor under the age of eighteen years, and the record fails to show that a copy of the summons and complaint was served on either of defendant's parents or her guardian by personal service.

5. Because defendant is a minor under the age of eighteen years, and the record fails to show that process was served on either of defendant's parents or her guardain by publication.

6. Because defendant is a minor, under the age of eighteen years, and the record fails to show that a copy of the summons and complaint was mailed to either of defendant's parents or her guardian.

7. Because to render a judgment against the defendant would be in violation of her rights under the Fourteenth Amendment of the Constitution of the United States.

8. Because to render a judgment against the defendant would be in violation of due process of law.

9. Because the defendant has not been served according to the laws of the State of Alabama.

Smith & Johnston
Attorneys for Defendant

7-545

IN THE CIRCUIT COURT OF
MOBILE COUNTY, ALABAMA
AT LAW

GODFREY KLUMPP,

Plaintiff,

versus

MARY KNIGHT HUNTER,

Defendant.

Motion to Quash the Service
And Set Aside the Return

Filed Sept 8 1936
R S Duck

Refiled Oct. 2, 1936
R. S. Duck, clerk.

Refiled Dec 16 1936
R S Duck Clerk

Filed July 19 1937
R S Duck Clerk

Smith & Johnston,
Attorneys for Defendant

GODFREY KLUMPP, Plaintiff	:	
versus	:	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
MARY KNIGHT HUNTER, Defendant	:	AT LAW.

Comes the plaintiff in the above styled cause and moves the Court to allow plaintiff to amend his bill of complaint in the following particulars:

That in each and every paragraph the words and figures as follows: " The plaintiff claims of the defendant the sum of Ten Thousand and nol/00 ($10,000.00) Dollars ", shall be changes and amended ao as to read as follows; " The plaintiff claims of the defendant the sum of Two Thousand, Nine Hundred Dollars and no/100 ($2,900.00) ".

That in each and every paragraph the words and figures as follows: " The plaintiff claims of the defendant the further sum of Ten Thousand and no/100 ($10,000.00) Dollars ", shall be changes and amended so as to read as follows: " The plaintiff claims of the defendant the sum of Two Thousand, Nine Hundred Dollars and nol/100 ($2,900.00) ".

That in each and every paragraph the words and figrues as follows: " wherefore plaintiff sues and asks damages in the aforementioned amount of Ten Thousand and No/100 Dollars ", shall be changed and amended so as to read as follows: " wherefore plaintiff sues and asks damages in the aforementioned amount of Two Thousand, Nine Hundred Dollars and no/100 ($2,900.00) ".

George E. Stone Jr.
ATTORNEY FOR PLAINTIFF

GODFREY KLUMPP, Plaintiff,	)	IN THE CIRCUIT COURT OF
versus	)	BALDWIN COUNTY, ALABAMA
MARY KNIGHT HUNTER, Defendant.	)	AT LAW - NO. 296

TO - Mr. George E. Stone, Jr., attorney of record for plaintiff in the above styled cause:

Please take notice that the defendant, Mary Knight Hunter, in this cause intends to and will, on the 27th day of February, 1937, file in the Circuit Court of Baldwin County, Alabama, a petition and bond in the form hereto attached for the removal of said cause to the District Court of the United States for the Southern District of Alabama, Southern Division, and will, as soon thereafter as consent can be had, move the Court for an order of removal of said cause to the United States District Court.

DATED this 27th day of February, 1937.

Smith & Johnston
Attorneys for Defendant

STATE OF ALABAMA)
)
COUNTY OF MOBILE)

Before me, the undersigned authority in and for said State and County, personally appeared Dan T. McCall, Jr., who, upon being first duly sworn, on oath deposes and says that he is one of the attorneys for the defendant in the above entitled cause, and that as such attorney he has authority to make this affidavit; that he served a copy of the above and foregoing notice, together with copies of the petition and bond referred to therein, on Mr. George E. Stone, Jr., attorney of record for the plaintiff, Godfrey Klumpp, on the 27th day of February, 1937.

Dan T. McCall, Jr.

Subscribed and sworn to before me
this 27th day of February, 1937.

Genevieve G. Guellwood
Notary Public, Mobile County, Alabama

Deck

RECORDED

8-107

Filed 2-11-27 1439
139 pm
Resident
Clerk

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - NO. 296

GODFREY KLUMPP,

Plaintiff,

versus

MARY KNIGHT HUNTER,

Defendant.

N O T I C E

of filing of petition and
bond for removal

Filed Feb 27 1927
at 3 1/2 P.M.
R L Duck

SMITH & JOHNSTON

Attorneys for Defendant

RECORDED

F-109

Filed Jul. 27 1939
1:39 pm
Resident
Clerk

GODFREY KLUMPP, Plaintiff,	)	IN THE CIRCUIT COURT OF
versus	)	BALDWIN COUNTY, ALABAMA
MARY KNIGHT HUNTER, Defendant.	)	AT LAW - NO. 296

COMES your petitioner, Mary Knight Hunter, the defendant in the above styled cause, and shows unto this Honorable Court:

1. That the plaintiff in this suit was, at the time of the commencement of said suit, and ever since has been and now is, a resident and citizen of the State of Alabama; that at the time of the commencement of this suit, and ever since, your petitioner, Mary Knight Hunter, was and still is a citizen of the State of Florida, with her residence in said state, and that she is a non-resident of the State of Alabama; that the amount in dispute in the above entitled cause exceeds the sum of Three Thousand Dollars ($3,000.00), exclusive of costs and interest, and that the suit as to your petitioner and plaintiff was at the time of the filing thereof and still is between citizens of different states;

2. That the time required by law for answering and pleading to the complaint in said cause, under the laws of the State of Alabama and the rules of the Circuit Court of Baldwin County, Alabama, has not yet expired.

Your petitioner herewith tenders good and sufficient bond, as is required by law to remove said cause, and has given the adverse party, through his attorney of record, due notice of his intention to file this petition; WHEREFORE, your petitioner prays that this Honorable Court will proceed no further herein, except to make an order of removal as is required by law and to accept and approve the surety bond herewith tendered, and to cause the record herein to be filed in the District Court of

Deck

RECORDED

8-109

Filed 2-11-27 1439
139 pm
Resolution
Clerk

the United States for the Southern District of Alabama, Southern Division, at Mobile, Alabama, in which said district the County of Baldwin, in the State of Alabama, is embraced.

Smith & Johnston
Attorneys for Defendant

STATE OF ALABAMA)
)
COUNTY OF MOBILE)

Before me, Genevieve G. Greenwood, a Notary Public in and for said County, in said State, personally appeared Dan T. McCall, Jr., who, being by me first duly sworn, deposes and says that he is one of the attorneys for the petitioner in the above styled cause, and, as such, is duly authorized to make this affidavit on her behalf, and that the statements contained in the foregoing petition are true.

Dan T. McCall Jr.

Subscribed and sworn to before me
this 27 day of ~~March~~ Feb, 1937.

Genevieve G. Greenwood
Notary Public, Mobile County, Alabama

Deck

RECORDED

8-109

Filed Aug. 27 1939
1:39 pm
Presidents
Clerk

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW - NO. 296

GODFREY KLUMPP,

Plaintiff,

versus

MARY KNIGHT HUNTER,

Defendant.

P E T I T I O N

for

REMOVAL

Filed Feb 27 1957
at 3 10
R S Duck
Clerk

SMITH & JOHNSTON

Attorneys for Petitioner

GODFREY KLUMPP,
Plaintiff,

versus

MARY KNIGHT HUNTER,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW - NO. 296

STATE OF ALABAMA)
COUNTY OF Mobile)

KNOW ALL MEN BY THESE PRESENTS THAT Mary Knight Hunter, a resident and citizen of the State of Florida, as principal, and The Fidelity & Deposit Company of Md., as surety, are held and firmly bound unto Godfrey Klumpp, plaintiff in the above styled cause, in the sum of $500.00, for the payment of which well and truly to be made we bind ourselves, our successors and assigns, jointly and severally, firmly by these presents.

The condition of the above obligation is such that, whereas, Mary Knight Hunter, the defendant in the above entitled cause, has filed her petition in this court for removal of said above entitled cause to the District Court of the United States for the Southern District of Alabama, Southern Division, at Mobile, Alabama, now, if the said Mary Knight Hunter shall enter in the said District Court of the United States, at Mobile, Alabama, within 30 days after filing said petition a copy of the record in said suit, and shall well and truly pay all costs that may be awarded by the District Court of the United States, if said court shall hold that said suit was wrongly or improperly removed thereto, then this obligation to be void; otherwise, it shall remain in full force and effect.

WITNESS our hands this 17th day of ~~March~~ Feb., 1937.

Mary Knight Hunter
Principal
By Smith & Johnston Her Attorneys

Fidelity & Deposit Co., of Md.
Surety
By [illegible]
ATTORNEY IN FACT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW - NO. 296

GODFREY KLUMPP,

Plaintiff,

versus

MARY KNIGHT HUNTER,

Defendant.

B O N D

Filed Feb 27 1937
at 3:10 1937
R L Duck
Clerk

GODFREY KLUMPP,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
versus	)	BALDWIN COUNTY, ALABAMA
	)	
MARY KNIGHT HUNTER,	)	AT LAW - NO. 296
	)	
Defendant.	)	

The defendant herein having within the time provided by law filed her petition for removal of this cause to the District Court of the United States for the Southern District of Alabama, Southern Division, and having at the same time offered his bond in the sum of $500.00 with The Fidelity & Deposit Company of Md., good and sufficient surety, pursuant to the statute, and conditioned according to law;

NOW, THEREFORE, this Court does hereby accept and approve said bond and accepts said petition and does order that this cause be removed for trial to the District Court of the United States for the Southern District of Alabama, Southern Division, pursuant to the statute of the United States, and that all other proceedings of this court be stayed, and the Clerk is hereby directed to make up a certified copy of the record in said cause for transmission to the District Court forthwith.

DATED this 4th day of March, 1937.

F. W. Hare
JUDGE

new - 382

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW - NO. 296

GODFREY KLUMPP,

Plaintiff,

versus

MARY KNIGHT HUNTER,

Defendant.

ORDER

Filed March 4, 1937.
R. L. Duck, Clerk.

GODFREY KLUMPP, Plaintiff,	)	IN THE CIRCUIT COURT OF
versus	)	BALDWIN COUNTY, ALABAMA
MARY KNIGHT HUNTER, Defendant.	)	AT LAW - NO. 296

The defendant herein having within the time provided by law filed her petition for removal of this cause to the District Court of the United States for the Southern District of Alabama, Southern Division, and having at the same time offered his bond in the sum of $500.00 with The Fidelity & Deposit Company of Md., good and sufficient surety, pursuant to the statute, and conditioned according to law;

NOW, THEREFORE, this Court does hereby accept and approve said bond and accepts said petition and does order that this cause be removed for trial to the District Court of the United States for the Southern District of Alabama, Southern Division, pursuant to the statute of the United States, and that all other proceedings of this court be stayed, and the Clerk is hereby directed to make up a certified copy of the record in said cause for transmission to the District Court forthwith.

DATED this _____ day of March, 1937.

_____

J U D G E