

ALEDA SHANK NASH,

Plaintiff,

vs.

M. C. SHUTT,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

EJECTMENT.

Comes the defendant in the above styled cause, and,
answering plaintiff's complaint, says: That he is not guilty
of the matters therein alleged.

Bebe Hall & Bebe
Attorneys for Defendant.

RECORDED Duck
8-4/24

Alameda Frank Nash

vs
M. C. Shutt

Suit in Ejectment

Defendants Plea
of Not Guilty

Filed March 10, 1937

A. L. Duck

Clerk

Babe Hape Bohr
for Defendant

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF

No. 343

Judgment

Term, 1938

VS.

DEAR SIRs—At the

Term, 1938

of the above Court

recovered a judgment against

for the sum of

Dollars,

besides

Dollars, costs of suit and execution

was duly issued thereon, commanding any Sheriff of the State that he cause to be made of the goods and chattels, lands and tenements of said

the amount of judgment and costs, and the Sheriff has returned said execution endorsed, "No Property Found," and the costs have not yet been paid. I herewith give below an itemized statement of the costs which have accrued in this cause, and respectfully request that you will, on receipt of this, remit the amount and save the additional expense of an execution against you. If I do not hear from you in a few days I will be forced to issue an execution for costs. Please return this with remittance. Respectfully yours,

Clerk.

CLERK'S FEES

Dollars Cts

Issuing Summons and Complaint	\$1 25
Copies of same, when over 200 words, 15c; per 100	30
Issuing Alias Summons and Complaint	1 25
Entering Sheriff's Return on Summons and Complaint	20
Docketing Cause 25c. Ent. Appearance 20c	45
Subpoena for Witness	30
Making Certificate of Judgment	50
Filing	10
Trial and Incidents	75
Entering Judgment, or copy of same	30
Order for Continuance	10
Issuing Execution	50
Docketing Execution	25
Issuing copy of same	50
Entering Sheriff's Return on Execution, 15c per hundred words	20
Final Record, 15c per hundred words	30
Order for Alias Summons and Complaint	30
Order to Dismiss Cause	30
Order to Set Aside Dismissal	30
Order Overruling Motion to Set Aside Dismissal	75
Order Overruling Motion for Continuance	30
Order Overruling Motion to Set Aside Default	30
Order for Notice to Non-Resident Defendant	30
Issuing Notice for Publication and Copy, 20c per hundred words	30
Order to Give Security for Costs	30
Order to Give Additional Bond	30
Order to Execute Writ of Inquiry	30
Order of Sale in Attachment	30
Order for Leave to Amend Complaint	30
Order for Leave to Amend Pleas	30
Order for Leave to Amend Writ of Process	30
Order for Attachment for Witness	30
Filing Deposition	10
Issuing Commission to Take Deposition	75
Issuing copy of same, 15c per 100 words	50
Issuing Copy of Interrogatories, 15c per hundred words, but not less than	10
Endorsing each Pet. Deposition Opened	75
Taking Bond in Garnishment on Summons	50
Summons to Garnishee	50
Copies of same, 20c per hundred words	50
Notice to Defendant in Garnishee on Summons, and copy, 20c per 100 words	50
Swearing Garnishee and Recording Answer, 15c per hundred words but not less than	10
Filing Attachment	1 00
Issuing Attachment Writ and Taking Bond	15
Issuing Copies of Attachment Writ, 15c per hundred words	75
Filing Certiorari and Entering Return	75
Taking Certiorari Bond and Filing Same	75
Issuing Writ of Certiorari	75
Issuing copies of Same, 15c per 100 words	75
Issuing Writ of Scieri Facias or Notice in Nature of	75
Issuing copies of same, 15c per 100 words	75
Taking Supersedeas Bond and filing same	75
Taking Appeal Bond and filing same	75

TOTAL FORWARDED

AMOUNT BROUGHT FORWARD

Transcript to Supreme Court, 15c per hundred words	
Copies, 5c per hundred words	
Citation to Appellee in Appeal, 20c per hundred words	
Certificate with Seal, 50c. Without Seal	25
Witness Certificate	25
Taking Bond Not Above Mentioned	75
Entering Order of Court not above named	30
Administering Oath	25
Taking Bond for Costs of Non-Resident Plaintiff	75
Copy of any paper not above named, 15c per hundred words	
Filing Writ of Prohibition and Entering Return	15
Issuing Writ of Prohibition	75
Issuing copies of same, 15c per 100 words	
Filing Mandamus and Entering Return	15
Issuing Writ of Mandamus	75
Issuing copies of same, 15c per 100 words	

SHERIFF'S FEES

Serving and Returning Summons	\$1 50
Serving and Returning Sci. Fa. Notice, etc.	65
Executing Writ of Possession	2 50
Levying Attachment	3 00
Entering and Returning Attachment	25
Entering and Returning Execution	25
Summoning and Returning Garnishee	1 50
Taking and Approving Garnishee Bond	75
Serving and Returning Writs	1 50
Serving and Returning Summons on Forcible Entry	1 00
Executing Writ of Restitution in such cases	2 00
Taking and Approving Bonds of Every Kind	1 00
Taking and Approving Claim Bond	1 00
Taking and Approving Forthcoming Bond	1 00
Taking and Approving Bail Bond	1 00
Taking and Approving Plaintiff's Detinue Bond	1 00
Taking and Approving Defendant's Detinue Bond	1 00
Making Deed	2 50
Serving Attachment for Contempt of Court	1 50
Collecting Money on Execution	
Empanelling Jury	75
Sheriff's Commission for Property Sold Under Attachment	
Seizing Personal Property on Writ of Detinue	3 00

Total Sheriff's Fees

RECAPITULATION

Judgment	
Interest	
Clerk's Fees	
Sheriff's Fees	
Justice's Fees	
Constable's Fees	
Witnesses' Fees	
Commissioner's Fees	
Printer's Fees	
Stenographer's Fees	5 00
Answer of Garnishee	
Trial Tax	3 00

Total

Received Payment this day of 1938

ATTEST:

Clerk Circuit Court, Baldwin County, Ala.

Foley Alabama, September 1st, 1934.

M. CLARK SHUTT

to

ALEDA SHANK NASH, Dr

Car	50.00	
Truck	15.00	
Team and harness	150.00	
Cow	35.00	
Two heifers	14.00	
Dozen hens	6.00	
3 hens	1.00	
7 white chicks at 20c	1.40	
9 brown chicks " 15c	1.40	
Potato digger	30.00	
Riding plow,	30.00	
Mower and rake	25.00	
Cultivator	20.00	
Disk cultivator	7.00	
Disk	5.00	
Fertilizer distributer	7.00	
Steel harrow	10.00	
Wagon	5.00	
Road scraper	2.00	
Scythe	2.50	
Middle buster, hampers etc	10.00	
Chick coop	3.00	
Incubator	3.00	
Milk separator	10.00	
Oil stove	2.00	
Heater	5.00	
Wash tubs and board	1.50	
Cook-stove	10.00	
Dresser	10.00	
Bedstead and springs	1.00	
Bookcase	10.00	
Lounge	3.00	
Sewing machine	15.00	
2 rocking chairs	4.00	
Stand	.50	
Dining table	1.00	
4 dining chairs	4.00	
Buffet	2.00	
Large Congoleom rug	5.00	
Dining " mats	2.00	
Bed-room rug	3.00	
Water buckets and cooking utensils	3.00	
Sad irons	2.50	\$528.80
Hay and corn crop		100.00
Rent of place Sept 1/34 to Sept 1/35		150.00
		<u>\$778.80.</u>
Credit, by cash		500.00
		<u>\$278.80</u>

STATE OF ALABAMA:
BALDWIN COUNTY:

Before me, the undersigned notary personally appeared this day Mrs Aleda Shank Nash who being sworn, says that the foregoing account and each item thereof is true and correct and that the sum of TWO HUNDRED, SEVENTY-EIGHT and 80/100 DOLLARS, after the allowance of all proper credits, is still due to her from M. C. Shutt and is unpaid.

Aleda Shank Nash

GIVEN UNDER MY HAND this the 4th day of March, 1937.

Ellie S. Richey
Notary Public, Baldwin County, Alabama.

RECORDED
Duck
8-49

ALEDA SHANK NASH
Plaintiff

VS

M. C. SHUTT
Defendant

ITEMIZED AND

VERIFIED ACCOUNT

Feldman 6/957
R. Decat
Chert

THE STATE OF ALABAMA, }
Baldwin County.

No. _____ CIRCUIT COURT

March 5, 1937

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon M. C. SHUTT

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

M. C. SHUTT

Defendant by

ALEDA SHANK NASH

Plaintiff

Witness my hand this _____ day of _____ 1937

R. J. [Signature]

Clerk.

COMPLAINT

ALEDA SHANK NASH

Plaintiff versus

M. C. SHUTT

The Plaintiff claims of the Defendant Two Hundred Seventy-eight and 80/100--

Dollars, due by

him by account between the defendant and her on, to-wit, the first day of September, 1934.

TWO: The Plaintiff claims of the Defendant Two Hundred Seventy-eight and 80/100 Dollars for merchandise, goods and chattels sold by Plaintiff to the Defendant on the, to-wit, first day of September, 1934.

All of which sums of money with interest thereon are still due and unpaid.

The account upon which this act is based is evidenced by itemized and verified account filed herewith.

Belmont L. [Signature]

Plaintiff's Attorney.

RECORDED

Original
Duck
8-45

No. _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

ALEDA SHANK NASH

PLAINTIFF

VS.

M. O. SHUTT

DEFENDANT

Summons and Complaint

Filed, *March 4* 193*7*

R. Duck, Clerk.

Defendant Lives at

Elliott G. Rickarby

Plaintiff's Attorney.

Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

RECEIVED IN OFFICE

, 193

, Sheriff

I have executed this Writ

this *9th Day of March*, 193*7*

by leaving a copy of the within Summons and
Complaint with

M. C. Smith

, Sheriff.

Deputy Sheriff.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned, a Notary Public in and for said County, in said State, this day personally appeared M. C. SHUTT, who being by me duly sworn, deposes and says that he is the defendant in the suit pending in the Circuit Court of Baldwin County, Alabama, filed March 6th, 1937, wherein Aleda Shank Nash is plaintiff and M. C. Shutt is defendant, said suit being on itemized, verified account; that he is informed and believes, and upon such information and belief says that the said account as itemized and verified is not correct; that he denies liability on the whole of the said account and each item therein separately and severally.

M. C. Shutt

Sworn to and subscribed before
me, this the 10th day of March,
1937.

Ida M. Turnbull
Notary Public, Baldwin County,
Alabama.



Duck
RECORDED
8-46

Almeda & Frank Nash

vs
M. C. Shutt

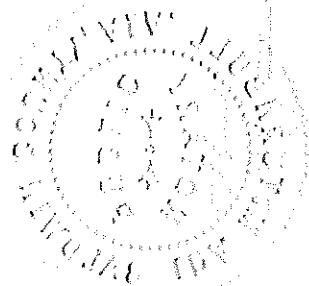
Affidavit denying
liability on account

Suit on Account

Filed March 10, 1937

A. B. Duck,

Clerk



Bebe Hall & Bebe
Plaintiffs & Defendants

THE STATE OF ALABAMA,
Baldwin County.

No. _____ CIRCUIT COURT

March 5, 1937

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon M. C. SHUTT

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

M. C. SHUTT Defendant by

ALEDA SHANK NASH Plaintiff

Witness my hand this _____ day of _____ 1937

[Signature] Clerk.

COMPLAINT

ALEDA SHANK NASH Plaintiff versus M. C. SHUTT

The Plaintiff sues to recover possession of the following tract of land: The North Half of the Southwest Quarter of Section Twenty-four, Township Eight South of Range Four East of the St. Stephens Meridian in Baldwin County, of which she was in possession, and upon which pending such possession and before the commencement of this suit, the defendant entered and unlawfully withholds together with FIVE HUNDRED DOLLARS for the detention thereof.

[Signature]
Attorney for Plaintiff.

Plaintiff's Attorney.

RECORDED
Duch
F-44

No. _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

ALEDA SHANK NASH

PLAINTIFF

VS.

M. C. SHUTT

DEFENDANT

Summons and Complaint

Filed, _____

1937

R. S. Duch

Clerk.

Defendant Lives at _____

Elliott G. Rickarby

Plaintiff's Attorney.

Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

RECEIVED IN OFFICE

, 1937

, Sheriff

I have executed this Writ

this *9th day of March*, 1937

by leaving a copy of the within Summons and Complaint with

M. C. Shutt

M. H. Wilkins, Sheriff.

By *John R. Davis*, Deputy Sheriff.