

361

BALDWIN LAND HOLDING
COMPANY,

vs

C. S. DUBOSE

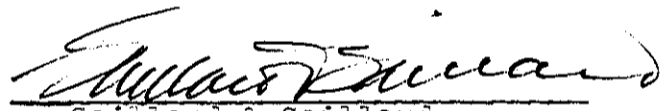
I
I
I
I

CIRCUIT COURT OF
BALDWIN COUNTY, ALA-
BAMA.

The plaintiff sues to recover the pos-
session of the following tract of land in Baldwin
County, Alabama, to-wit:

The west half of the south-
east quarter, the southwest quar-
ter of Section 24, Township 6
South, Range 4 West,

of which he was in possession and upon which, pend-
ing such possession and before the commencement of
this suit, the defendant entered and unlawfully
withholds, together with Fifty (\$50.00) Dollars
for the detention thereof.


Gaillard & Gaillard,
Attorneys for plaintiff.

RECORDED

8-82

Filed May 28 1934
R. H. H. H.
Cliff

THE STATE OF ALABAMA,
Baldwin County.

No. _____ CIRCUIT COURT

May 2nd 1937

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon C S Dubose

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

C S Dubose.

Defendant by Baldwin Land Holding. Co.

Plaintiff

Witness my hand this 28th day of May 1937.

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Gaillard. & Gaillard.

Plaintiff's Attorney.

No. _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Baldin Land Walder
Co

PLAINTIFF

VS.

C. S. Dease

DEFENDANT

Summons and Complaint

Filed, *5/28* 193*7*

R. S. Dyer, Clerk.

Defendant Lives at

Summerville

Gallard

Plaintiff's Attorney.

Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

155796
RECORDED

Duch
8-81

RECEIVED IN OFFICE

, 193

, Sheriff

I have executed this Writ

this *15th* of *June*, 193*7*

by leaving a copy of the within Summons and Complaint with

C. S. Dease

M. H. Wilkins, Sheriff.

John R. Davis, Deputy Sheriff.

| | | |
|----------------------------------|---|-------------------------|
| BALDWIN LAND HOLDING COMPANY, | : | Civil No. 361 |
| | : | |
| Plaintiff, | : | IN THE CIRCUIT COURT OF |
| vs. | : | |
| | : | BALDWIN COUNTY, ALABAMA |
| C. S. DUBOSE, | : | |
| Defendant. | : | AT LAW. |

Defendant's Demurrers to Complaint as Amended

Comes now the Defendant in the above-styled cause and demurs to the Complaint as Amended, and assigns as grounds therefor:

1. That for aught that appears in the Complaint as Amended, the possession of some third person intervened between the possession of the plaintiff and the entry of the Defendant upon the premises sued for.
2. That for aught that appears in the Complaint as Amended, the Plaintiff's alleged possession had ceased prior to the entry of the Defendant upon the premises sued for.
3. That for aught that appears in the Complaint as Amended, the Defendant entered upon the premises pending the possession of some third person.
4. That for aught that appears in the Complaint as Amended, the Defendant's entry upon the premises sued for was not made pending the alleged possession of the Plaintiff.
5. That for aught that appears in the Complaint as Amended, the Plaintiff had no possession of the premises sued for at the time of the entry of the Defendant thereon.
6. That for aught that appears in the Complaint as Amended, some third person, and not the plaintiff, is entitled to possession of the premises sued for.
7. That there is nothing in the Complaint as Amended to show that the Plaintiff is entitled to possession of the premises sued for.



 LESLIE HALL, Attorney for the Defendant.

~~RECORDED~~

BALDWIN LAND HOLDING
COMPANY,
Plaintiff,

vs.

C. S. DUBOSE,
Defendant.

Defendant's Demurrers to
Complaint as Amended

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

Filed in Office this
24th day of June, 1937.

R. S. Dubose
Clerk.

BALDWIN LAND HOLDING
COMPANY,

Plaintiff,

vs.

C. S. DUBOSE,

Defendant.

Civil No. 361.

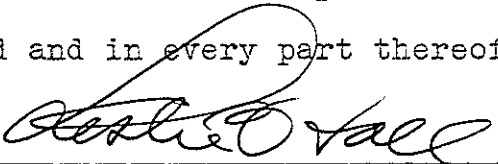
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Plea of Disclaimer

Comes now the Defendant in the above styled cause, and for answer to the Complaint therein filed says that he does not know that he, this Defendant, to his knowledge or belief, ever had, nor did he claim or pretend to have, nor doth he now claim any possession or right of possession of, in, or to the premises sued for, as in the said Complainant's Bill of Complaint set forth, or any part thereof; and this Defendant does now disclaim possession to the said estate and premises in the said Complainant's Bill of Complaint mentioned and in every part thereof.


LESLIE HALL, Attorney for the Defendant.

RECORDED
BALDWIN LAND HOLDING
COMPANY, Plaintiff,
vs.
C. S. DUBOSE, Defendant.

Plea of Disclaimer

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Filed in Office this 18.
day of June, 1937.

W. S. Dyer
Clerk.

LESLIE HALL
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

BALDWIN LAND HOLDING
COMPANY,

Plaintiff,

versus

C. S. DUBOSE,

Defendant.

CIVIL NO. 361.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Comes the plaintiff in the above styled cause and amends the complaint by correcting the typographical error contained in the description of the property sued for so that the said complaint shall read as follows, to-wit:

The plaintiff sues to recover the possession of the following tract of land in Baldwin County, Alabama, to-wit:

The West Half of the Southeast
Quarter of the Southwest Quarter of Sec-
tion 24, Township 6 South, Range 4 East,

of which he was in possession and before the commencement of this suit, the defendant entered and unlawfully withholds, together with Fifty (\$50.00) Dollars for the detention thereof.


Attorneys for Plaintiff.

Civil No. 361,
In the Circuit Court of Baldwin
County, Alabama, At Law.

BALDWIN LAND HOLDING COMPANY,
PLAINTIFF,
versus
C. S. DUBOSE,
DEFENDANT.

AMENDED COMPLAINT

RECORDED

Filed June 22 1931
R. S. Church
Clk

Gaillard & Gaillard,
Attorneys-at-Law,
Mobile, Alabama.

Duck
8-84

THE STATE OF ALABAMA,
Baldwin County.

No. 361 **CIRCUIT COURT**
Fall Term, 1939

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of

Baldwin Land Holding Company Plaintiff in the suit,
 you cause to be made the sum of \$12.30 Dollars,

costs of suit, created by said Plaintiff, for that, whereas, on the 21st day of

August 1939, the said Plaintiff dismissed for want of prosecution
~~recovered by the judgment of the said Circuit Court~~

of said County, against ~~William H. H. H. H. H.~~ C. S. Debose

Defendant.

to the suit, the sum of _____ Dollars,

besides _____ Dollars, costs of suit;

~~upon which Judgment an Execution has been issued and returned by the Sheriff, "No property found."~~

AND HAVE YOU THAT MONEY ready to render to _____

Clerk of said Court, and make return of this Writ and the Execution thereof, according to law.

Witness my hand this 16 day of Oct. 1939

R. S. Deub Clerk

| CLERK'S FEES | | Dollars | Cts | SHERIFF'S FEES | | Dollars | Cts |
|---|--------|---------|-----|--|--------|---------|-----|
| For every Summons and Complaint | \$1 25 | 1 | 25 | For Levying an Attachment | \$3 00 | | |
| Each copy thereof | 30 | | 30 | Entering and Returning Attachment | 25 | | |
| Entering a Sheriff's Return | 20 | | 20 | Summoning Garnishee | 1 50 | | |
| Docketing | 25 | | 25 | Serving Summons on Writ | 1 50 | 1 | 50 |
| Entering Appearance | 20 | | 20 | Serving Notice Sci. Fa. Notice, etc. | 65 | | |
| Filing | 10 | 1 | 40 | Serving Subpoenas | 65 | | |
| Every Order made in Court | 30 | | | Empanelling Jury | 75 | | |
| Copy thereof | 25 | | | Entering and Returning Execution | 25 | | |
| Every Trial with or without Jury | 75 | | | Collecting Costs Execution | 1 50 | 1 | 50 |
| Entering up Judgment or copy thereof | 30 | | | Executing a Writ of Possession | 2 50 | | |
| Issuing Execution | 50 | | 50 | Taking and Approving Bonds | 1 00 | | |
| Docketing Execution | 25 | | 20 | Commissions | | | |
| Entering Return on Execution | 20 | | | Sheriff's Commission for Property Sold | | | |
| Issuing Subpoenas | 30 | | | Under Attachment | | | |
| Administering Oath | 25 | | | Seizing Personal Property on Writ of | | | |
| Issuing Each Attachment Taking Bond | 1 00 | | | Detinue | 3 00 | | |
| Filing Attachment | 10 | | | | | | |
| Each Summons for Garnishee | 50 | | | | | | |
| Each copy | 50 | | | | | | |
| Notice to Deft. in Garnishee on Sum- | | | | | | | |
| mons and Copy, per 100 words | 20 | | | | | | |
| Commissions to take Depositions or copy | 75 | | | | | | |
| Order to Execute Writ of Inquiry | 30 | | | | | | |
| Copy of Interrogators, 15c per hundred | | | | | | | |
| words or | 50 | | | | | | |
| Filing each Deposition and endorsing | | | | | | | |
| same | 20 | | | | | | |
| Final Record, per hundred words | 15 | 3 | 00 | | | | |
| Every Certificate | 50 | | | | | | |
| Taking Bond not otherwise provided for | 75 | | | | | | |
| Witness Certificates | 25 | | | | | | |
| Continuance | 10 | | | | | | |
| Certificate of Judgment | 50 | | | | | | |
| Order of Publication | 1 00 | | | | | | |
| | | 6 | 30 | | | 12 | 30 |

No. 361

Page

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT

*Baldwin Land Holding Co -
S. M. Hahn & M. M. Adger,*

Plaintiff

vs.

*William Mercantile Co.**C. S. Dubose*

Defendant

Civil Execution for Costs
Against Plaintiff

Costs - - - - \$ 12.30

Civil Fee Book *Cont'd* Page 361

Execution Docket - " Page - "

Filed *Oct. 16,* 193*9**R. S. Duck* Clerk.*Gailard & Gailard*

Plaintiff's Attorney

Leslie Hale

Defendant's Attorney

S. P. Kullback

COLLECTION COSTS FROM

The State of Alabama, {
BALDWIN COUNTYI hereby certify that the within
and costs in this case are correct, and there was
waiver of exemption as to personal pro-
perty under the Constitution and Laws of Ala-
bama.

This _____ day of _____ 193_____

Clerk.

Received in office *October**16th* 193*9**W. R. Stuart*

Sheriff

Sheriff's Execution Docket, Page _____

Sheriff's Fee Book, _____ Page _____

*Returned Dec 4-1939
No property of Baldwin
Land Holding Co found in
Baldwin Co
W. R. Stuart Sheriff
By *M. M. Hahn* D.S.*

Sheriff

THE STATE OF ALABAMA,
Baldwin County.

{ By virtue of the within execution, I have at _____

o'clock, --- M., this --- day of --- 193--- levied