

644

J. S. LOWERY,

Plaintiff,

VS.

EDNA JACKSON, BILL
JACKSON and ROSCOE
JACKSON,

Defendants.

IN THE CIRCUIT COURT OF

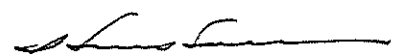
BALDWIN COUNTY, ALABAMA,

AT LAW.

INTERROGATORIES PROPOUNDED TO THE DEFENDANTS, SEPARATELY AND SEVERALLY, IN ACCORDANCE WITH ARTICLE 10, CHAPTER 290 OF THE 1923 CODE OF THE STATE OF ALABAMA:

1. Please state your name, age and place of residence.
2. Please state whether or not you know the tract of land, in Baldwin County, Alabama, described as the West half of the Southeast quarter of the Southeast quarter of Section 7, Township 7 South, Range 4 East.
3. Please state whether or not you are in possession of said land, and if so, under and by what authority.
4. Please state whether or not you have a deed to said land, and if so, the date thereof and from whom. Attach a copy of your deed to your answer to this interrogatory.
5. Please state whether or not you have a contract to purchase said land, and if so, from whom and the date thereof. Attach a copy of said contract to your answer to this interrogatory.
6. Please state whether or not you are occupying the said property as tenant, and if so, through whom and whether or not your contract of occupancy is oral or in writing, and the date thereof.
7. Please state how long you have been in possession of said property.
8. Please state whether or not you have assessed and paid taxes on said land. If so, for what years and what amount for each year.

BEEBE & HALL,

By: 
Attorneys for Plaintiff.

INTERROGATORIES:

J. S. LOWERY,

Plaintiff,

VS.

EDNA JACKSON, BILL
JACKSON and ROSCOE
JACKSON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

STATE OF ALABAMA,)

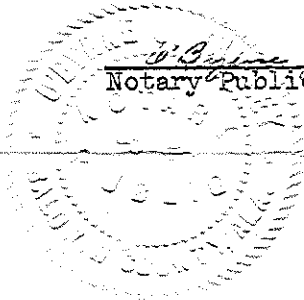
BALDWIN COUNTY.)

Before me, the undersigned authority, in and for said County, and said State, personally appeared HUBERT M. HALL, who being by me first duly sworn, deposes and says, that he is one of the attorneys of record for the Plaintiff in the above styled cause; that answers to the above interrogatories will be material testimony for the Plaintiff in said cause.

Hubert M. Hall

Sworn to and subscribed before me
this 17th day of February,
1941.

W. B. Smith, Jr., Notary Public
Notary Public, Baldwin County, Ala.



INTERROGATORIES:

J. S. LOWERY,

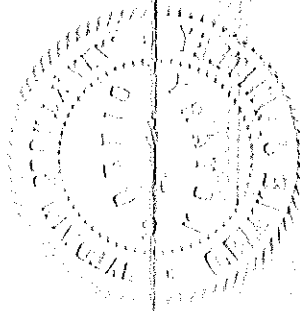
Plaintiff,

VS.

EDNA JACKSON, BILL
JACKSON and ROSCOE
JACKSON,

Defendants.

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



Filed February 17, 1941
R.S. Dusk, Clerk

Received in Sheriff's Office
this 17 day of Feb, 1941
W. R. STUART, Sheriff

Examined this the
19th day of Feb 1941
by serving copies of
Within interrogatories
on
Edna Jackson
Bill Jackson and
Roscoe Jackson

W. R. Stuart
Sheriff

By G. G. Hall

J. S. LOWERY,

Plaintiff,

VS.

EDNA JACKSON, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

And now comes the Plaintiff and demurs to Pleas First and Second, separately and severally, of the Defendant, and as ground of such demurrer, says:

ONE:

That said plea sets out no facts which constitute a defense to the Plaintiff's cause of action.

TWO:

That said plea presents no issues in this cause.

THREE:

That said plea sets out no facts which cannot be shown under the general issue.

Becky Lee
by *[Signature]*
Attorneys for Plaintiff.

RECORDED

DEMURRER TO PLEAS

J. S. LOWERY,

Plaintiff,

VS.

EDNA JACKSON, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

*Filed April 18, 1941.
R. S. Dink, Clerk*

J. S. LOWERY,

Plaintiff,

Vs.

EDNA JACKSON, BILL
JACKSON AND ROSCOE
JACKSON,

Defendants.

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

Now come the Defendants and for plea to the Complaint,
say:-

FIRST:

That the title of the Plaintiff is based upon a
tax title, and defendants plead separately and severally the statute
of limitations of three years.

SECOND:

The Defendants plead the statute of limitations of
10 years.

THIRD:

The defendants plead not guilty.

Hybert Chasmon Chason
Attorneys for Defendants.

Defendants demand a trial
of this cause by Jury.

Hybert Chasmon Chason
Attorneys for Defendants.

RECORDED

PLEA

J. S. LOWERY,

Plaintiff,

Vs.

EDNA JACKSON, BILL JACKSON,
AND ROSCOE JACKSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED MARCH 17, 1941.

R. S. Duck

Clerk.

To any Sheriff of the State of Alabama, Greeting,
you are hereby Commanded to deliver
to J. S. Leary, possession of the lands
and tenements which the said J. S. Leary
recovered of Edna Jackson, Bill Jackson
and Roscoe Jackson, by the judgment of
our Circuit Court, held for the County of
Barbour, on the 4th day of November 1942,
viz:

The West half of the Southeast quarter of the
Southeast quarter of Section 7, Township 7
South, Range 4, East, in Barbour County, Alabama.

You are further directed, of the goods and
chattels, lands and tenements of the said
Edna Jackson, Bill Jackson and Roscoe
Jackson, you cause to be made ~~the sum~~
~~of~~ dollars, damages adjudged
~~to the said J. S. Leary, and also the~~
~~further sum of~~ dollars, costs of
suit, and make return of this writ and
the execution thereof according to law.
Witness my hand this day of
 , 194

Clark Lewis Court Barbour Co. Ala

Judgment.

On this the 4th day of November, 1942
Came the Plaintiff by his Attorney, and the
Defendants being solemnly called. Came not,
but made default, and it appearing to
the Court that in this cause a jury had
been waived as by the statutes in such
cases provided, and proof being made to
the satisfaction of the Court that the Defendants
were in possession of the land described in
the Complaint in this cause at the commencement
of this suit, and upon consideration of same,

It is ordered and adjudged by the Court
that the Plaintiff have and recover of the
Defendants the land sued for in the Complaint
and described as follows, to-wit:

The West half of the Southeast quarter of the
Southeast quarter of Section 7, Township 7 North,
Range 4 East, Brewin County, Alabama,
besides his Costs in this behalf expended,
for which let execution and writ of
possession issue

STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon EDNA JACKSON, BILL JACKSON and ROSCOE JACKSON 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 J. S. LOWERY.

WITNESS my hand this 17th day of February, 1941.

R. S. Dush
Clerk.

J. S. LOWERY,

Plaintiff,

VS.

EDNA JACKSON, BILL
JACKSON and ROSCOE
JACKSON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

The Plaintiff sues to recover possession of the following tract of land, to-wit:

The West half of the Southeast quarter of the Southeast quarter of Section 7, Township 7 South, Range 4 East, in Baldwin County, Alabama,

of which he was in possession, and upon which pending such possession and before the commencement of this suit, the Defendants entered and unlawfully withhold, together with Two Hundred and Fifty (\$250.00) Dollars, for the detention thereof.

BEEBE & HALL,

By: Shirley Hall
Attorneys for Plaintiff.

1644
RECORDED

SUMMONS AND COMPLAINT:

J. S. LOWERY,

Plaintiff,

VS.

EDNA JACKSON, BILL
JACKSON, and ROSCOE
JACKSON,

Defendants.

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

Filed February 17, 1941
R. S. Dorch, Clerk

Received in Sheriff's Office
this 17 day of Feb, 1941
W. R. STUART, Sheriff

Executed Feb 19th 19 41
by serving copy of within Summons and
Complaint on

Edna Jackson
Bill Jacksons and
Roscoe Jackson

W. R. Stuart Sheriff
By Andy Hall Deputy Sheriff