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STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

YOU ARE HEREBY COMMANDED to summon HENRY KAEMMERER and FLORA KAEMMERER COWEN 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 complaints of Mrs. John T. Johnson.

WITNESS MY HAND this the 23 day of February, 1943.

R. A. Luch
Clerk, Circuit Court

MRS. JOHN T. JOHNSON, PLAINTIFF,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

HENRY KAEMMERER and FLORA KAEMMERER
COWEN, DEFENDANTS

AT LAW.

The PLAINTIFF claims of the DEFENDANTS Eight Hundred Forty (\$840.00) Dollars, due by promissory note made by then on the fifth day of July, 1923 and payable on or before five (5) years after date.

The PLAINTIFF alleges that the DEFENDANTS have from time to time paid interest on the said note as follows:

August 29, 1923; February, 1924; December 8, 1924;
July 5, 1929; October, 1933; October 10, 1939.

The PLAINTIFF alleges that said note together with interest thereon at the rate of 6% per annum from October 10, 1939 is still due and unpaid.

The PLAINTIFF alleges that the DEFENDANTS agreed to pay a reasonable attorney's fee in the collection of said debt. The PLAINTIFF claims of the DEFENDANTS the further sum of One Hundred Fifty (\$150.00) Dollars as reasonable attorney's fee.

BEEBE & HALL

By: [Signature]
Attorneys for the Plaintiff

I have specified
with by handing a copy
to the defendant
Henry Kaemerer - this
the 9th day of March 1943
W.R. Stuart Sheriff
By John R Davis D.S.

12099

MRS. JOHN T. JOHNSON, PLAINTIFF

VS.

HENRY KAEMERER, et al

SUMMONS AND COMPLAINT

Filed Feb 23 1943
Produced -
Chad

Received in Sheriff's Office
this 24 day of Feb., 1943
W. R. STUART, Sheriff

MRS. JOHN T. JOHNSON,

Plaintiff,

Vs.

HENRY KAEMMERER AND FLORA
KAEMMERER COWEN,

Defendants.

IN THE CIRCUIT COURT OF

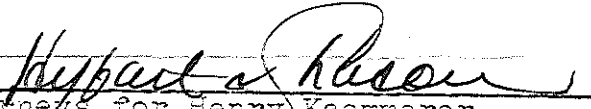
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

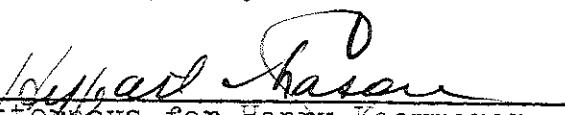
Comes the Defendant, Henry Kaemmerer, in the above styled cause and demurrs to the Complaint filed in said cause and to each and every count thereof, separately and severally, and as grounds therefor, says: -

FIRST:

That said Complaint does not state a cause of action.


Attorneys for Henry Kaemmerer.

Henry Kaemmerer, one of the Defendants in said cause, demands a trial by Jury.


Attorneys for Henry Kaemmerer.

James

DEMURRER.

MRS. JOHN T. JOHNSON,
Plaintiff,

VS.

HENRY KAEMMERER AND FLORA
KAEMMERER COWEN.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

FILED APRIL 8, 1943.

H.S. Duncker
Clerk.
By Anne J. Duncker

MRS. JOHN T. JOHNSON,

Plaintiff,

Vs.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

HENRY KAEMMERER AND FLORA
KAEMMERER COWEN,

LAW SIDE.

Defendants.

Comes the Defendant, Henry Kaemmerer, in the
above styled cause and demurs to the Complaint filed in said
cause and to each and every count thereof, separately and severally,
and as grounds therefor, says: -

FIRST:

That said Complaint does not state a cause of
action.

Hubert A. Rason
Attorneys for Henry Kaemmerer.

Henry Kaemmerer, one of the
Defendants in said cause, demands
a trial by Jury.

Hubert A. Rason
Attorneys for Henry Kaemmerer.

VERIFICATION FOR HENRY KAMMERER.

is filed by plaintiff.

Defendants in this case, demands

HENRY KAMMERER, one of the

VERIFICATION FOR HENRY KAMMERER.

section.

There is no complaint does not state a cause of

DEMANDER.

MRS. JOHN T. JOHNSON,
plaintiff,

HENRY KAMMERER AND FLORA
KAMMERER COWEN.

HISSE:

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

FILED APRIL 8, 1943.

H. S. Alcock

Clerk.
By Alice J. Duke

Defendants.

HENRY KAMMERER AND FLORA
KAMMERER COWEN.

A.

BY PLAINTIFF

MRS. JOHN T. JOHNSON.

VERIFICATION FOR HENRY KAMMERER.

IN THE CIRCUIT COURT OF

MRS. JOHN T. JOHNSON, PLAINTIFF

IN THE CIRCUIT COURT

VS.

OF

HENRY KAEMMERER AND FLORA KAEMMERER
COWEN, DEFENDANTS

BALDWIN COUNTY, ALABAMA

AT LAW.

And now comes the Defendant and for answer to
Plaintiff's complaint says:

The facts alleged therein are untrue.

Flora Kaemmerer Cowen

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Filed

3-5-43

R.S. Wick

Myra Wick
D.C.

MRS. JOHN T. JOHNSON,

Plaintiff,

VS.

HENRY KAEMMERER AND FLORA
KAEMMERER COWEN,

Defendants.

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

Now comes the Defendant Henry Kaemmerer and for
plea to the Complaint says:-

FIRST:

That he denies the allegations in the Complaint.

SECOND:

That he has paid the debt for the recovery of
which this suit was brought before the action was commenced.

THIRD:

That the note on which this suit is brought is
barred by the Statute of Limitations of six years.

FOURTH:

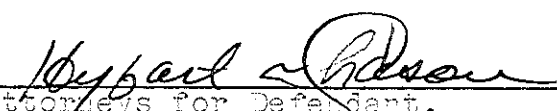
That the note on which this suit is brought is
barred by the Statute of Limitations of ten years.

FIFTH:

For plea to the Complaint the Defendant Henry
Kaemmerer says that on to-wit, April 15, 1925 that the Plaintiff
gave to the Defendants the indebtedness which is a basis of said
suit.

SIXTH:

For plea to the Complaint the Defendant Henry
Kaemmerer says that on to-wit, April 15, 1925 the Plaintiff gave
and delivered to the Defendants the note which is the basis of
this suit.


Attorneys for Defendant,
Henry Kaemmerer.

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ANSWER.

MRS. JOHN T. JOHNSON,

Plaintiff,

VS.

HENRY KATZMEYER AND FLORA
KATZMEYER COHEN,

Defendants.

IN THE CIRCUIT COURT OF
DADE COUNTY, ALABAMA.

AT LAW.

FILED AUGUST 12, 1944.

G. B. Chason
Clerk.

LAW OFFICES

HYBART & CHASON

Bay Minette, Alabama

MRS. JOHN T. JOHNSON,

Plaintiff,

VS.

HENRY KAEMMERER AND FLORA
KAEMMERER COWEN,

Defendants.

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

Now comes the Defendant, Henry Kaemmerer in the aforesaid case and propounds to the Plaintiff, Mrs. John T. Johnson, the following Interrogatories as provided for by Title 7 Section 477 of 1940 Code of Alabama, and states that the answers to said Interrogatories would be material testimony for him in this cause.

FIRST INTERROGATORY: Please state your name, age and residence. In your Complaint you state that you hold a note executed by Henry Kaemmerer and Flora Kaemmerer on to-wit, July 5, 1923. If you do claim to own such a note please attach a copy of the same together with all endorsements thereon, to your answer to this Interrogatory.

SECOND INTERROGATORY: Please state in detail as to every payment that you claim to have been made to you on said note, by whom the payments were made, whether by check or in currency and if by check on what bank was the same drawn.

THIRD INTERROGATORY: If you claim that payments have been made on the note sued on when were these payments made and where? In whose presence were such payments made if you claim such payments were made? Did you make any endorsements on the note that you claim to hold that you claim the Defendants executed? Are the endorsements made on the same and, if so, did you make the endorsements at the time that the payment was made to you?


Attorneys for Defendant,
Henry Kaemmerer.

STATE OF ALABAMA,
BALDWIN COUNTY.

Before me, Erin Stuart, personally appeared John Chason who is known to me and who being duly sworn, doth depose

and say under oath as follows:-

That he is one of the Attorneys for the Defendant Henry Kaemmerer and that the answers of the Plaintiff Mrs. John T. Johnson to the foregoing Interrogatories would be material testimony for the said Henry Kaemmerer in the trial of this cause.

John T. Johnson

Sworn to and subscribed before
me, a Notary Public, whose seal
is hereto affixed this 12 day
of August, 1944.

Erin Stewart
Notary Public, Baldwin County,
Alabama.

Executed 8-12-1944

by serving subpoena

on Herbert M. Hall

Wm. Stewart Sheriff

By Hardy Hall Deputy Sheriff

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INTERROGATORIES.

MRS. JOHN T. JOHNSON,
Plaintiff,

VS.

HENRY KAMMERER AND FLORA
KAMMERER COHEN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED AUGUST 12, 1944.

W. B. Chason

LAW OFFICES

HYBART & CHASON

Bay Minette, Alabama