

1102

MARGARET P. B. WILLIAMS,
Plaintiff,
VS.
RALEIGH McKENZIE,
Defendant.

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

INTERROGATORIES TO BE PROPOUNDED TO FRANK W. BOYKIN AND ALPHONSE LUCAS, MATERIAL WITNESSES FOR THE PLAINTIFF, WHO EACH NOW RESIDE IN WASHINGTON, D. C., WHOSE RESPECTIVE ADDRESSES ARE HOUSE OFFICE BUILDING, WASHINGTON, D. C.

1. Please state your name, age and place of residence.
2. Did you, at any time during the year of 1931, or during the year of 1930 or the year of 1932, have any business connection with that part of the Michael McKinsey Grant in Section 37, Township 7 South, Range 2 East, which would otherwise be described as the Fractional South Half of the Fractional Northeast Quarter of regular government Section 24, Township 7 South, Range 2 East, Baldwin County, Alabama? If so, what was your connection with the said property?
3. Did you, or the companies in which you were interested, or with which you were affiliated, work any timber on the above described property for turpentine purposes? If so, when did these turpentine operations commence, how long did they continue and when did they terminate?
4. Did you, at any time around the year of 1931, or shortly before or after the said date, or any of the companies in which you are interested or with which you were affiliated at the said time, work any timber for turpentine purposes on that part of the Michael McKinsey Grant, Section 37, Township 7 South, Range 3 East in Baldwin County, Alabama, which would be otherwise described as the South Half of the Northwest Quarter of regular government Section 19, Township 7 South, Range 3 East? If so, when did the turpentine operations commence, how long did they continue and when did they terminate?

5. Did you, the companies in which you were interested or with which you were affiliated, cut any timber at any time off of the above described tracts of land and, if so, when was this timber cut?

6. If your answers to the foregoing interrogatories disclose that you worked trees for turpentine purposes and cut and removed timber from all or any part of the property above described, from whom did you obtain the permission or right to turpentine the said trees and cut the said timber?

7. If you obtained the right to turpentine the said trees and cut the said timber under a written instrument, please attach a copy of the said written instrument or instruments to your answers to these interrogatories.

8. Did you know or become acquainted with the Defendant, Raleigh McKenzie, at any time around the year of 1931? If so, when did you become acquainted with him?

9. If your answer to the foregoing interrogatory discloses that you became acquainted with the said Defendant, Raleigh McKenzie, please state, if in a conversation or conversations with you, whether or not he told you that he was in possession of the tract of land first above described, which is situated in Township 7 South, Range 2 East in Baldwin County, Alabama, as a tenant of the Plaintiff, Margaret P. B. Williams?

10. If the said Raleigh McKenzie stated to you on more than one occasion that he was in possession of the said property as a tenant of the Plaintiff, Margaret P. B. Williams, then please give the date and substance of each one of the statements made by him.



Attorney for the Plaintiff,

STATE OF ALABAMA }
BALDWIN COUNTY }

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says: That he is the attorney for the Plaintiff in this cause; that the above named witnesses, Frank W. Boykin and Alphonse Lucas, each reside out of or are now absent from the State of Alabama; that the said parties are each material witnesses for the Plaintiff in this cause and that the Plaintiff's claim, or a material part thereof, depends on the evidence of such witnesses.

J. B. Blackburn

Sworn to and subscribed before me on
this the 29th day of March, 1950.

Mary Lou Blackburn

Notary Public, Baldwin County, Alabama.

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

*Filed 3-29-80
Alice French
Clerk*

AMENDED COMPLAINT

MARGARET P. B. WILLIAMS,)
 Plaintiff,) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA.
) AT LAW. NO. 1102.
RALEIGH McKENZIE,)
 Defendant.)

Now comes the Plaintiff and amends the Complaint heretofore filed in this cause so that, as amended, it will read as follows:

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

That part of the Michael McKinsey Grant in Section 37 in Township 7 South, Range 3 East in Baldwin County, Alabama, described as follows:

From a stake on the East bank of Fish River 30 links North from where the half section line dividing Sections 19 and 24 from East to West strikes said river, run North 84 degrees East to a point on the Range line between Township 7 South, Range 2 East and Township 7 South, Range 3 East for a point of beginning; thence continue North 84 degrees East to a point which is 40 chains from the stake on the East bank of Fish River above mentioned; thence run South to a point on the half section line of Section 19, Township 7 South, Range 3 East (which point is 2640 feet North, measured at right angles from the South line of the Michael McKinsey Grant, Section 37, Township 7 South, Range 3 East), thence run East along the half section line to the center of said Section 19; thence run North and along the half section line of said Section 19 a distance of 1320 feet, more or less, to a point on the North line of the Michael McKinsey Grant, Section 37, Township 7 South, Range 3 East, at the Southeast corner of Lot 3 of Fractional Section 19, same Township and Range, thence run West and along the North line of the said Michael McKinsey Grant to the Range line between Ranges 2 and 3 East; thence run South along the Range line to the point of beginning, containing 72 acres, more or less, and being otherwise described as the South Half of the Northwest Quarter of Section 19, Township 7 South, Range 3 East, except 8 acres in the Southwest corner,

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 \$1,000.00 for the detention thereof.

J. B. Blackburn
Attorney for Plaintiff.

1102
RECORDED
AMENDED COMPLAINT

MARGARET P. B. WILLIAMS,

Plaintiff,

VS.

RALEIGH MCKENZIE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO. 1102.

FILED

MAR 15. 1950

ALICE J. DUCK, Clerk

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

MARGARET P. B. WILLIAMS,

PLAINTIFF

VS.

~~RAWLEIGH MCKENZIE,~~

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

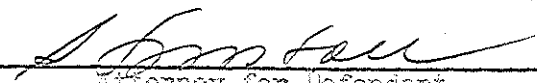
AT LAW

DEMAND FOR ABSTRACT

TO MARGARET P. B. WILLIAMS and Honorable J. B. BLACKBURN, as her Attorney.

Demand is hereby made upon you for an abstract in writing of the title or titles on which the Plaintiff will rely in this suit.

This demand is made as provided by and for the purposes stated in Title 7, Section 940 of the 1940 Code of Alabama.


Attorney for Defendant

I hereby certify that I delivered a copy of this instrument to J. B. Blackburn, Esquire, Attorney for Margaret P. B. Williams, Plaintiff, in the above entitled cause, on this the 16th day of March, 1950.


Attorney for Defendant

RECORDED

MARGARET P. B. WILLIAMS

PLAINTIFF

VS.

RAWLEIGH MCKENZIE

DEFENDANT

FILED

MAR 16 1950

ALICE J. DUCK, Clerk

MARGARET P. B. WILLIAMS,

Plaintiff,

VS.

RAWLEIGH McKENZIE,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

DEMAND FOR ABSTRACT

TO RAWLEIGH McKENZIE AND H. M. HALL, AS HIS ATTORNEY:

Demand is hereby made upon you for an abstract in writing of the title or titles on which the Defendant will rely for defense of this suit.

This demand is made as provided by and for the purposes stated in Title 7, Section 940 of the 1940 Code of Alabama.

J. B. Blackburn
Attorney for Plaintiff.

I hereby certify that I delivered a copy of this instrument to H. M. Hall, Esquire, Attorney for Rawleigh McKenzie, Defendant and in the above entitled cause, on this the 15th day of March, 1950.

J. B. Blackburn
Attorney for Plaintiff.

953

RECORDED

DEMAND FOR ABSTRACT

MARGARET P. B. WILLIAMS,
Plaintiff,

VS.

RAWLEIGH McKENZIE,
Defendant.

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

*Filed 3-15-57
Alice Jenkins
Clerk*

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Rawleigh McKenzie 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 Margaret P. B. Williams.

WITNESS my hand on this the 6th day of October, 1947.

Alice J. Smith
Clerk of the Circuit Court.

MARGARET P. B. WILLIAMS,

Plaintiff,

VS.

RAWLEIGH MCKENZIE,

Defendant.

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

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

The West Half of the Northwest Quarter of Regular Government Section 19, Township 7 South, Range 3 East,

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 \$1000.00 for the detention thereof.

J. B. Blashburn
Attorney for Plaintiff.

Plaintiff demands
a trial of this
case by Jury
J. B. Blashburn
Attorney for
Plaintiff.

RECORDED 1102
ORIGINAL

SUMMONS AND BILL OF COMPLAINT.

MARGARET P. B. WILLIAMS,
Plaintiff,
VS.
RAWLEIGH MCKENZIE,
Defendant.

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

FILED

OCT 6 1947

ALICE J. DUCK, Register

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Received in Sheriff's Office
this 6 day of Oct., 1947.
TAYLOR WILKINS, Sheriff
Executed Oct 30 1947
by serving copy of within Summons and
Complaint on

Rawleigh McKenzie

Taylor Wilkins Sheriff
By R. F. Hall Deputy Sheriff

MARGARET P. B. WILLIAMS

PLAINTIFF

VS

RAWLEIGH MCKENZIE

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

ATLAW

No. 1102

Now comes the Defendant and for answer to the Plaintiff's
complaint pleads:

Not Guilty.

J. J. J. J.
Attorney for the Defendant

RECORDED

1102
RECORDED

MARGARET P. B. WILLIAMS

PLAINTIFF

VS

RAWLEIGH McKENZIE

DEFENDANT

ANSWER

Filed 11-19-47

Alice J. Neuch
Reg.

INTERROGATORIES PROPOUNDED TO THE DEFENDANT,
AS PROVIDED BY TITLE 7, SECTION 477 OF THE
1940 CODE OF ALABAMA.

MARGARET P. B. WILLIAMS,

Plaintiff,

VS.

RAWLEIGH MCKENZIE,

Defendant.

AT LAW.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

1. Are you in possession of all or any part of the property described in the Complaint that has been filed in this cause?

2. If your answer to the foregoing interrogatory is

Yes, describe the property that is in your possession.

3. Do you claim title to all or any part of the property described in the Complaint that has been filed in this suit and, if so, how long have you claimed such title?

4. If you answer to the foregoing interrogatory is

Yes, describe the property to which you claim title and state whether you claim title in your individual capacity, or with one or more other persons and if you claim title to the said property with one or more other persons, give their name or names and the interest or interests that each of you claim in the property.

5. If you claim title to all or any part of the property described in the Complaint that has been filed in this suit, state whether you acquired title through a deed, deeds or other written instruments and attach a true and correct copy of all deeds or other written instruments through which you claim title to the said property to your answers to these interrogatories.

6. Have you assessed any part of the property described in the Complaint in this suit for taxation? If so, list the tax years when the property was assessed by you and give a correct description of the property so assessed by you for each tax year.

7. Have you paid taxes on all or any part of the property described in the Complaint in this suit? If so, attach to

your answers to these interrogatories true and correct copies of

all tax receipts issued to you, evidencing such payments.

8. Do you have any written instrument which authorized

you to take possession of all or any part of the property for which

this suit is brought? If so, attach a copy of such instrument or

instruments to your answers to these interrogatories.

Attorney for Plaintiff.

STATE OF ALABAMA
BALDWIN COUNTY

Before me the undersigned authority, within and for said

County in said State, personally appeared J. B. Blackburn, who, af-

ter being by me first duly and legally sworn, deposes and says:

That he is the Attorney for the Plaintiff in the above named cause,

that the answers to the foregoing interrogatories, if well and truly

made, will be material testimony for the Plaintiff in the said

cause.

Sworn to and subscribed before me on
this the 6th day of October, 1947.

Notary Public, Baldwin County, Alabama.

ORIGINAL
INTERROGATORIES PROPOSED TO
DEFENDANT.

MARGARET P. B. WILLIAMS,

Plaintiff,

VS.

RAWLEIGH MCKENZIE,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED

OCT 6 1947

ALICE J. DUCK, Register

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

Received in Sheriff's Office
Oct 6, 1947
TAYLOR, WILLIAMS, Sheriff

Executed Oct 30 1947
By serving copy of the within
on, or through the Sheriff
for Mr. Williams Sheriff
17.4. Hall O.S.

MARGARET P. B. WILLIAMS
PLAINTIFF

VS

RAWLEIGH McKENZIE
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 1102

Now comes the Defendant and for answer to the interrogatories
heretofore propounded by the Plaintiff says:

1.

That he is in possession of all the property described in
the complaint that has been filed in this cause.

2.

That he is in possession of all the property described in
the complaint; that he has approximately 30 acres in cultivation.

3.

That he claims title to all of the property described in
the complaint that has been filed in this suit and that he has
claimed and been in the actual possession thereof since 1933,
under color of title; that he was in possession of the same many
years prior thereto.

4.

That he claims title to the property in his individual
capacity.

5.

That he acquired title to said property through a deed;
that a copy thereof is hereto attached; that he also claims
title to the said property by adverse possession for more
than twenty years preceding the filing of this suit.

6.

That he has assessed the said property since 1933.

7.

That he has paid the taxes on the said property.

8.

That he claims title to said property, in addition to title by adverse possession, under conveyances set out in answer to interrogatory five.

Deane M. Kenzie

Sworn to and subscribed before me on this the 24 day of
November, 1947.

J. H. H. H. H.
Notary Public, Baldwin County,
Alabama.

1102

MARGARET P. B. WILLIAMS

PLAINTIFF

VS

RAWLEIGH MCKENZIE

DEFENDANT

ANSWER TO INTERROGATORIES

Filed

11-25-47

W. J. Ruck