

CHAS. J. EBERT,

PLAINTIFF

VS

MRS. MAE BENNETT

DEFENDANT

X
X
X
X
X

IN THE JUSTICE COURT OF

T. M. MOSS, JUSTICE OF THE

PEACE, PRECINCT 14,

BALDWIN COUNTY, ALABAMA.

Now comes the Defendant and for answer to the proceedings herein filed by the Plaintiff says:

That she went into the possession of the property, the subject of this suit, on to-wit the year 1937; that she has remained in the uninterrupted possession of the premises continuously since that time; that she rented the premises on a yearly rental of ONE HUNDRED TWENTY (\$120.00) DOLLARS; that she has paid the rentals on said property, including those due for the year 1946; that she has paid the rental for the years 1940-1946, inclusive, to Chas. J. Ebert, as agent; that she offered to pay the rental for the current year, 1947, to the said Chas. J. Ebert, as agent; that she has not been served with notices required by law of the termination of her tenancy and to vacate; that her rights to possession of the property does not terminate until January 1, 1948.

Mrs Mae Bennett

THE STATE OF ALABAMA, }
BALDWIN COUNTY

1103

Before me, T. M. Moss, Justice of the Peacein and for Beat 14, Foley, Baldwin County, Alabama, personally appearedChas. J. Ebert who, having been by me first duly and legally sworn
agent for the
deposes and says: My name is Chas. J. Ebert, I am the owner of the landshereinafter described, with the improvements thereon. All Mae Bennett's
rights to said property and his rights to the possession thereof have determined and been forfeited.I have given the said Mae Bennett notice to vacate said property, but
he has failed or refused to deliver possession demanded.

The said lands being described as follows, to-wit:

Lots four (4), six (6), and seven (7), and eleven (11), of Oak River View, First Addition, according to a plat thereof recorded in the office of the Judge of Probate of Baldwin County, Alabama, in Map Book 1, page 39, and being a subdivision of Spanish Grant Section thirty-seven (37), but also being referred to by government survey as a part of sections nineteen (19), twenty (20) and twenty-nine (29), all in township eight (8), South, Range four (4) East, in Baldwin County, Alabama.

The owners of the property above described and for whom I am agent are as follows:- Helen M. Turner, Charles Turner, Howard A. Turner, Ruth M. Thomas, Ida May Percival, Bess Turner Druva, Ralph E. Lang, Bert I Lang, Helen Schuneman, and the property is under the control and management of the Continental Illinois National Bank and Trust Company of Chicago, Illinois, for whom I act as agent.

Chas. J. Ebert
Owner or Agent

Sworn to and subscribed before me this the

16 day of September, 194 7Beat, 14 Baldwin County, Alabama.

**AFFIDAVIT OF OWNER,
HIS AGENT OR ATTORNEY**

Helen M. Turner, et al Plaintiff

Vs.

Chas. J. Ebert Defendant

Filed _____, 194____

THE STATE OF ALABAMA,
Baldwin County.

That we, Mrs. Mae Bennett
are held and firmly bound unto State of Alabama
in the sum of One Hundred DOLLARS,
for the payment of which well and truly to be made, we bind ourselves and each of us, our and each of our
heirs, executors and administrators, jointly and severally. But upon condition, that if the above bound
Mrs. Mae Bennett shall prosecute to effect an appeal by him taking this day to
the next term of the Circuit Court of Baldwin County from a judgment
rendered against him in favor of said Charles J. Ebert, Agent
by T. M. Moss a justice of the peace for said county, for the
sum of No Dollars, debt
in said appeal, shall pay such judgment, both as to debt and costs as may be rendered against him by the
said Circuit Court of Baldwin County Alabama then, in either
of said event, this obligation to be void, otherwise to remain in full force and effect.

Given under our hands and seals, this the _____ day of _____ 193__

Approved:

Mrs. Mae Bennett (L. S.)

W. H. Merrill (L. S.)

J. P. (L. S.)

THE STATE OF ALABAMA, {
BALDWIN COUNTYBefore me, T. M. Moss, Justice of the Peacein and for Beat 14, Foley, Baldwin County, Alabama, personally appearedChas. J. Ebert who, having been by me first duly and legally sworn
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E. Lang, Bert I Lang, Helen Schuneman, and the property is under
the control and management of the Continental Illinois National
Bank and Trust Company of Chicago, Illinois, for whom I act as
agent.

Chas. J. Ebert
Owner or Agent

Sworn to and subscribed before me this the

14 day of September, 194 7Beat, 14 Baldwin County, Alabama.