

FRED L. GAGE,

VS.

Plaintiff,

PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

DEMURRER

NOW comes the Defendant and for Demurrer to the Complaint,
says:

1. It does not state a cause of action.
2. There is a misjoinder of parties plaintiff.
3. There is a non-joinder of parties plaintiff.

J. B. Blackburn

Attorney for Defendant.

Defendant demands trial of said
cause by jury.

J. B. Blackburn

Attorney for Defendant.

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DEMURRER

FRED L. GAGE,

VS.

Plaintiff,

PAT BROCK,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

Filed March 29/1946
Revised
Clint

FRED L. GAGE

PLAINTIFF

VS

PAT BROCK

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Interrogatories propounded by the Plaintiff to the Defendant in
accordance with Article 8 Title 7 of the 1940 Code of the State of Alabama:

1.

Please state your name, age and address.

2.

Please state whether or not you are in possession of the following
described land situated in Baldwin County, Alabama, to-wit:

The southwest quarter of Section 14, township 5 south,
range 3 east, Baldwin County, Alabama, except such part
thereof as may be used for public highways.

3.

If you state that you are in possession of said land please state
when you went into possession thereof.

4.

Please state whether or not there are any other parties in
possession of said land;

5.

Please state by what authority you entered into possession of the
said land.

6.

Please state whether or not you have any authority in writing to
enter into possession of said land, if so, please attach a copy of such authority
to your answer.

7.

Please state whether or not you claim title to said land and if
so, by what instrument; attach a copy of such instrument to your answer.

8.

Please state whether or not you have paid any taxes upon said land and if so for what years. Please attach the original or a copy of said tax receipt to your answer.

9.

If you state that you are in possession of said land, then please state what acts of possession you have existed over said land and for what period of time.

BEEBE & HALL

By: J. H. Lee
Attorneys for Plaintiff.

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, in and for said County, in said State, personally appeared H. M. Hall who is known to me and who being by me first duly sworn sworn deposes and says; that he is one of the Attorneys of record for the Plaintiff in the above cause. That true answers to the above interrogatories will be material testimony for the Plaintiff in this cause.

J. H. Lee

Sworn to and subscribed Before me on this the 15th day of February, 1946.

Louise S. Wilson
Notary Public, Baldwin County, Ala.

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RECORDED

FRED L. GAGE

PLAINTIFF

VS

PAT BROCK

DEFENDANT

INTERROGATORIES

Filed Feb 19-1946
Robt Brock
Deed

BEEBE & HALL

LAWYERS

BAY MINETTE, ALABAMA

Executed this Feb. 27-46
by leaving a copy
of within with
Pat Brock

C. E. Garrett
sheriff
WHD DS

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon PAT BROCK to appear within thirty days from the service of this writ, in the Circuit Court, to be held the same, then and there to answer the Complaint of FRED L. GAGE.

WITNESS my hand this the 19 day of February, 1946.

R. L. Gage

FRED L. GAGE

PLAINTIFF

VS

PAT BROCK

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff sues to recover possession of the following tracts of land:

The southwest quarter of Section 14, township 5 south, range 3 east, Baldwin County, Alabama, except such part thereof as may be used for public highways,

of which he was in possession and upon which, pending such possession, and before the commencement of this suit, the Defendant entered an unlawful withholds, together with FIVE HUNDRED (\$500.00) DOLLARS for the detention thereof.

BEEBE & HALL

By: T. L. See
Attorneys for Plaintiff.

951 RECORDED

Fred L. Gage

Plaintiff

Vs

Pat Brock

Defendant

SUMMONS AND COMPLAINT

Filed Feb 19-1946
R. Beebe
Clerk

Looney

BEEBE & HALL

LAWYERS

BAY MINETTE, ALABAMA

Executed this Feb. 27-46
by leaving a copy
of within with
Pat Brock

C. E. Garrett
sheriff
W. B. D. S.

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