

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA

CHARLOTTE G. SCHOWALTER,

Plaintiff

vs.

EDWARD A. ROBERTS, et al.

Defendants

AT LAW

NO.

1278

PLAINTIFF'S ANSWER TO INTERROGATORIES

Plaintiff's answer to interrogatories propounded by Defendants attorney to her on the 20 day of January 1949, the Plaintiff answers Defendants interrogatories heretofore filed to her in the above styled cause on the said day says:

Answering interrogatory No. 1 she says: I acquired the property sued for in the Spring of 1926.

Answering interrogatory No. 2 she says: I acquired possession of such lands from my husband Dr. V. McR Schowalter, who owned the land and was in possession thereof at the time of his death. He acquired the lands from his father in 1890. The land had been in the possession of his father E. R. Schowalter since his purchase in 1881. My husband Dr. V. McR Schowalter purchased the interest of the other heirs, after his father's death. I, and those through who I claim the property, have been in continuous possession of these lands since 1881 up to the time, until the defendant, without right or interest, unlawfully took possession and commenced committing depredations thereon.

Answering interrogatory No. 3, 4, and 5, she says: E. R. Schowalter bought the property in 1881. He cut timber therefrom and cultivated the lands from his purchase to the time of his death. The land was soon thereafter acquired by my husband, Dr. V. McR Schowalter. When I married Dr. V. McR Schowalter in 1903, he was in possession of this land and had enclosed it, within a fence. He cultivated it each year until his death in the Spring

of 1926. After his death I went into possession of it and remained in possession until the defendant unlawfully went into possession. To my own personal knowledge Dr. V. McR Schowalter had a fence around the lands and cultivated it each year and assessed and paid taxes thereon each year from date of our marriage to his death, a period of more than twenty years.

Answering interrogatory No. 6 she says: I do claim title to the land involved in this suit and attach herewith a list of deeds through which I claim. I also claim title through possession for more than ten years under color of title. I also claim title through and by possession for more than ten years and annually assessing the same for taxes and paying taxes thereon. I also claim title by actual possession and cultivation by myself and predecessors in title for more than twenty years continuously under fence. The fence enclosed the lands sued for and completely encircled the same.

Answering interrogatory No. 7 she says: The deeds and instruments through which she claims title are listed on Exhibit A attached hereto and made a part of her answer.

Answering interrogatory No. 8 she says: I do not at this time know the exact number of trees, there were magnolia, poplar, pine, oak and gum trees cut, in my best judgment the aggregate number being approximately 150 trees.

(b) I remember particularly two large magnolia and two large poplar trees and numerous pine trees of various sizes, besides the pulpwood.

(c) I do not know the value of each timber, as I do not know into what dimensions the trees were cut.

Answering interrogatory No. 9 she says: See answer to interrogatory No. 8.

Answering interrogatory No. 10 she says:

- (A) I do not know the exact number of saplings cut.
- (B) I cannot describe in detail each sapling cut.
- (C) I do not know the value of each sapling.

Answering interrogatory No. 11 she says: I do not know the exact number of shrubs removed from the land.

(b) I cannot describe in detail shrub removed.

(c) I do not know the market value of each shrub.

Answering interrogatory No. 12 she says: I am unable to state the amount of dirt excavated or removed from the land.

Answering interrogatory No. 13 she says:

(a) \$15,000.00 to \$20,000.00.

(b) Yes

(c) Colonel Rawlings offered to buy the property in 1946 for \$15,000.00 which I refused. During the year, 1944 or early in 1945, Mr. Joe Pose wanted to buy the land for Mr. Ed Roberts. He offered me \$300.00 for the property, I told him I did not consider that to be an offer for the property.

Answering interrogatory No. 14 she says:

(a) Yes, I offered to sell the land.

(b) In 1946 I offered to sell the land to Colonel Rawlings for \$20,000.00, he offered me \$15,000.00 which I did not accept. I also offered the land to Mr. Ed Roberts at a price of \$20,000.00. He wrote me that in his judgment that price was too much for the property and that he could not afford to pay that much. This letter was dated the latter part of 1944 or the first part of 1945. This was written after Mr. Joe Pose came to see me about buying the property for Mr. Roberts.

Answering interrogatory 15 she says: The property has not been rented for a number of years.

(b) Yes.

(c) Not recently.

(d) Mr. Godfrey Klump rented the property from Dr. Schowalter about 1916, and continued renting the said land as the tenant of Dr. Schowalter for a number of years. Prior to the tenancy of Godfrey Klump, Joe Klump rented the land from Dr. Schowalter

They rented this property on shares, paying Dr. Schowalter one-half of the crop raised thereon.

Answering interrogatory No. 16 she says: She claims damages for the difference between the value of the land before and after cutting and removing trees, saplings, and shrubs therefrom by the defendant and for the detention of the lands by the plaintiff, the amount of which she does not know.

Charlotte G. Schowalter  
Plaintiff

STATE OF ALABAMA,

BALDWIN COUNTY,

Before me the undersigned Notary Public in and for said State and County, this day personally appeared Charlotte G. Schowalter, who being by me duly sworn deposes and says that the foregoing answer to interrogatory by the defendant in the cause s are true, complete and correct.

Charlotte G. Schowalter  
Notary Public

Sworn to and subscribed  
before me on the 23 day  
of April, 1949.

Notary Public  
Notary Public, Baldwin Co., Ala.

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA

CHARLOTTE G. SCHOWALTER	!	AT LAW
Plaintiff	!	NO. _____
vs	!	
EDWARD A. ROBERTS, et al.	!	
Defendants	!	

ABSTRACT

Abstract of title furnished by Plaintiff to Defendant in compliance with Defendants demand therefor, filed in cause on the 25 day of January, 1949.

Plaintiff in her suit to recover possession of the land sued for furnishes this abstract of title, showing the deeds, conveyances and other instruments on which she will rely in the prosecution of said suit.

1.

Patent from the United States

Dated: May 28, 1840

to

Audley H. Gazzam

Recorded in the office of the Judge of Probate, Deed Book 36, pages 145-6, 37 NS, page 43, and 21 NS, pages 515-516

2.

Deed from Audley H. Gazzam

Dated: February 24, 1840

to

Charles W. Gazzam

Recorded in said office in Deed Book "D", pages 396-7

3.

Deed from Charles W. Gazzam and wife

Dated: May 3, 1842

to

Joseph P. Gazzam

Recorded in said office in Deed Book "E", pages 29-30

4.

Power of attorney from Joseph P. Gazzam

Dated: May 19, 1844

to

Charles W. Gazzam

Recorded in said office in Deed Book "E", pages 492-3

5.

Deed from Joseph P. Gatzam  
to  
Henry Meyers and Henry O.  
Brewer

Dated: April 17, 1849  
Recorded in said office in  
Deed Book "E", pages 494-5

6.

Deed from Henry O. Brewer  
and Henry Meyer  
to  
Joseph W. Lesesne

Dated: January 18, 1848  
Recorded in said office in  
Deed Book "E", pages 561-2

7.

Deed from Fanny Lesesne,  
Administratrix of the estate  
of Joseph W. Lesesne  
to  
Josiah C. Nott

Dated: April 1, 1861  
Recorded in said office in  
Deed Book "H", pages 595-6  
By order of Probate Court, Mobile  
County and the Court proceedings  
in said court leading to and  
authorizing such deed.

8.

Josiah C. Nott and wife  
to  
Fanny Lesesne

Dated: April 5, 1861  
Recorded in said Probate office in  
Deed Book "H", pages 596-8

9.

Fanny Lesesne, Louise A.  
Lesesne, Fanny C. Lesesne  
Charles L. Lesesne heirs  
of J. W. Lesesne, Deceased  
to  
John Pollard and Alice his  
wife.

Dated: June 12, 1872  
Recorded in said office in  
Deed Book "K", pages 301-2

10.

John Pollard and Alice Pollard  
to  
Preston C. Smith

Dated: August 13, 1881  
Recorded in said office in  
Deed Book "L", pages 595-6

11.

Preston C. Smith and wife  
to  
Emanuel R. Schowalter

Dated: September 7, 1881  
Recorded in said office in  
Book "M", pages 222-3

12.

P. R. Schowalter, L. J. Broodwood  
and his wife as heirs of Emanuel R.  
Schowalter

to

Dr. V. McR. Schowalter

Dated: Jan. 10, 1885

Recorded in said office in  
Deed Book "V", pages 387-90

13.

Will of Dr. V. McR. Schowalter  
admitted to Probate in the office  
of Judge of Probate Baldwin County,  
Alabama.

Dated: Sept. 10, 1926

Recorded in said office in  
Will Book "C", page 218  
Together with the Court pro-  
ceedings leading to and ad-  
mitting the same to probate.

14.

Plat of Township 6 South,  
Range 1 East, plat of the  
troosts survey at Point Clear

Recorded in said office in  
Deed Book "K", page 305

15.

Annual assessment and payment of taxes on said land for  
more than ten years continuously and possession of the said land,  
thereunder under claim of ownership.

16.

Possession of the said lands under color of title, and claim  
of continuously for more than 10 years.

17.

Possession of said lands for more than twenty years contin-  
uously with the whole of the same under fence and under cultivation  
for the entire twenty year period under claim of ownership.

18.

Deed of John Pollard and Alice

to

Hattie Thomas

Dated: Sept. 10, 1880

Recorded in said office in  
Deed Book "P", pages 521-2  
Explanatory of description of  
deed in claim of title relied on.

19.

Deed of John Pollard and  
Alice Pollard

to

Hattie E. Thomas

Dated: June 29, 1880

Recorded in said office in  
Deed Book "L", pages 537-8  
Explanatory of description  
in deeds relied on.

1278

Filed 4-25-49  
W.C. Beebe  
Clerk

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W. C. BEEBE  
LAWYER  
BAY MINETTE, ALA.



VICKERS, LEIGH AND THORNTON

ATTORNEYS AT LAW

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA

MARION R. VICKERS  
NORVELLE R. LEIGH, III  
J. EDWARD THORNTON

January 24, 1949

Mrs Alice J. Duck  
Circuit Clerk  
Baldwin County  
Bay Minette, Alabama

Schowalter v. Roberts

Dear Mrs Duck:

We are enclosing various papers to be filed in the above noted case. There are two copies of each paper enclosed, one for Mr. Burns and one for Mr. Beebe. The Sheriff will no doubt serve one copy of each of these on the attorneys who represent the plaintiff.

We would like to have these papers filed in the following order:

1. Motion to Quash.
2. Plea
3. Answer
4. Demand for Abstract
5. Interrogatories to Plaintiff

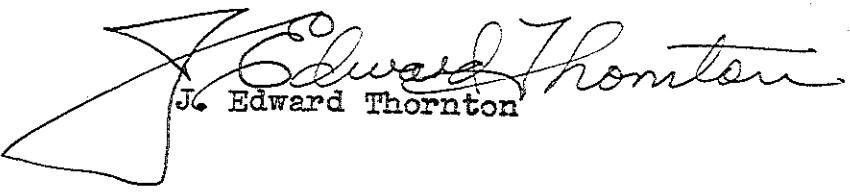
Please notify us when any matter arises concerning this case.

With kind personal regards, I am,

Very truly yours,

VICKERS, LEIGH AND THORNTON

JET:cd  
encl

  
J. Edward Thornton

*Handwritten:*  
1-25-49

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA.

CHARLOTTE G. SCHOWALTER, )

Plaintiff )

AT LAW

vs. )

NO: 1278

EDWARD A. ROBERTS, et al, )

Defendants )

MOTION TO QUASH

Comes now EDWARD A. ROBERTS and, appearing specially and only for the purpose of making this Motion, moves the court to quash and vacate the service of the complaint made by the Sheriff of Mobile County, Alabama, on him as agent of Point Clear Development Company, a Corporation, and as grounds for said Motion says:

That at the time of the institution of said suit and said alleged service he was not and is not an officer, director, stockholder, agent, servant or employee of Point Clear Development Company, nor is he connected in any way with such a Corporation, nor does he know of anyone associated with said Corporation, nor has he heard of said Corporation or of anyone associated therewith.

Vickers Leigh Thornton  
Attorneys for Edward A. Roberts

STATE OF ALABAMA,  
COUNTY OF MOBILE.

Personally appeared before me the undersigned Notary Public, in and for said County in said State, J. EDWARD THORNTON, who, being by me first duly sworn deposes and says:

That he is one of the Attorneys of record in the above styled cause and as such is authorized to make this affidavit;

That he has read the foregoing Motion and that the facts alleged therein are true.

  
J. Edward Thornton

Subscribed and sworn to before me  
on this the 22<sup>nd</sup> day of January, 1949.

  
Notary Public, Mobile County, Alabama.

*Whereby accept service of  
the Motion with  
Jury 27, 1949  
H. B. Jones  
J. C. Greene (Judge)*

AT LAW NO: 1278

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CHARLOTTE G. SCHOWALTER,

Plaintiff

vs.

EDWARD A. ROBERTS, et al,

Defendants

\*\*\*\*\*

MOTION TO QUASH

FILED

JAN 25 1949

ALICE J. DUCK, Clerk

VICKERS, LEIGH AND THORNTON  
ATTORNEYS AT LAW  
MERCHANTS NATIONAL BANK BUILDING  
MOBILE, ALABAMA

STATE OF ALABAMA,

BALDWIN COUNTY:

To Any Sheriff Of The State Of Alabama:

You are hereby commanded to summon Edward A. Roberts and Point Clear Development Company, a Corporation, 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 there to answer the complaint of Charlotte G. Schowalter.

Witness my hand, this 27 day of December, 1948.

W. J. Smith  
Clerk.

CHARLOTTE G. SCHOWALTER,  
Plaintiff,

VS

EDWARD A. ROBERTS, and POINT  
CLEAR DEVELOPMENT COMPANY, a  
Corporation, Defendants,.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

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

From the Northeast corner of the Southeast Quarter of Section 36, Township 6 South, Range 1 East, run South  $35^{\circ} 20'$  West 170 feet to the North line of the Troost Survey of Point Clear, as shown by map recorded in Book K, at page 805, of the records on file in the office of the Judge of Probate of Baldwin County, Alabama, thence North  $49^{\circ} 30'$  West 1627 feet to the Northeast corner of Lot 9 of said Troost Survey for point of beginning; thence North  $36^{\circ} 30'$  East 513.5 feet to the old Point Clear Road, thence North  $20^{\circ} 35'$  West along the old Point Clear Road 487 feet, thence South  $36^{\circ} 30'$  West 755 feet to the Northwest corner of Lot 10 of the said Troost Survey, thence South  $49^{\circ} 30'$  East along the North line of Lots 10 and 9 of the said Troost Survey to the point of beginning, containing 5.9 acres, 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 Twenty Five Hundred (\$2500.00) Dollars damages for cutting and removing timbers, trees, saplings, and shrubbery therefrom, for excavation and removal of earth, and for other waste and depredations committed thereon by the Defendants, and for the detention thereof.

H. A. Burns  
W. C. Beebe  
Attorneys for Plaintiff.

384

mv 1278

Received in Sheriff's Office  
this 27 day of Dec, 1948  
TAYLOR WILKINS, Sheriff

Charlotte E. Schowatte  
vs

Edward A. Roberts  
et al

Ex 3 Complaint  
+ 1 Ex 1  
1211. Old Shu Rd

FILED

DEC 27 1948

ALICE J. DUCK, Clerk

Filed Dec 27, 1948  
Alice J. Duck  
Clerk

W. C. BEEBE  
LAWYER  
BAY MINETTE, ALA.

Received on 5-1 7-1 1-1 2-1 3-1 4-1 5-1 6-1 7-1 8-1 9-1 10-1 11-1 12-1	Day of Dec 1948	Received on 5-1 7-1 1-1 2-1 3-1 4-1 5-1 6-1 7-1 8-1 9-1 10-1 11-1 12-1	Day of Dec 1948
I received a copy of the Complaint of the Complainant Edward A. Roberts et al			
I received a copy of the Complaint of the Complainant Edward A. Roberts et al			

Ex 3  
+ 1  
1211. Old Shu Rd

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA

CHARLOTTE G. SCHOWALTER,

Plaintiff

vs.

EDWARD A. ROBERTS, et al,

Defendants

)

)

)

)

)

AT LAW

NO: \_\_\_\_\_

INTERROGATORIES TO PLAINTIFF

Comes now EDWARD A. ROBERTS, one of the defendants in the above entitled cause, by his Attorneys, and pursuant to the provisions of Article 8, Title 7 of the Code of Alabama, 1940, propounds to the plaintiff the following interrogatories:

1. When did you first acquire possession of the lands involved in this suit?

2. From whom did you so acquire such possession?

3. Describe exactly and in detail each and every act of possession your predecessors in title, and each of them, separately and severally, exercised upon the lands involved in this suit, giving the date or dates of each such act or acts, the identity of the party or parties so exercising such act or acts, and the extent in time and area of each such act.

4. Describe exactly and in detail each and every act of possession you have exercised upon the lands involved in this suit, giving the date or dates of each such act or acts, the identity of the party or parties so exercising such act or acts for you, and the extent in time and area of each such act.

5. (a) Do you know of any other or additional acts of possession being exercised over the lands involved in this suit that you have not already set out in your answers to these interrogatories?

(b) If so, set out exactly and in detail each and every such other or additional act or acts of possession exercised over said lands, giving the date or dates of each such act or acts, the identity of the party or parties so exercising such act or acts for you, and the extent in time and area of each such act.

6. (a) Do you claim title to the lands involved in this suit?

(b) If so, list each and every deed or other instrument in your chain of title, from the United States Government to you, such list to show the date of each such instrument, the nature thereof, the parties thereto, and the book and page where the same is recorded.

7. (a) Does your claim to title to said lands arise out of any facts, circumstances or instruments not previously set out in your answers to these interrogatories?

(b) If so, set forth exactly and in detail each such fact, circumstance and instrument showing the date thereof, nature thereof, parties involved and where recorded.

8. (a) Set out the exact number of timbers you claim defendant cut or removed from the lands involved in this suit.

(b) Describe in detail each such timber.

(c) What is the fair and reasonable market value of each such timber?



9. (a) Set out the exact number of trees you claim defendant cut or removed from the lands involved in this suit.

(b) Describe in detail each such tree.

(c) What is the fair and reasonable market value of each such tree?

10. (a) Set out the exact number of saplings you claim defendant cut or removed from the lands involved in this suit.

(b) Describe in detail each such sapling.

(c) What is the fair and reasonable market value of each such sapling?

11. (a) Set out the exact number of shrubs you claim defendant cut or removed from the lands involved in this suit.

(b) Describe in detail each such shrub.

(c) What is the fair and reasonable market value of each such shrub?

12. (a) Set out the amount of earth excavated or removed from said lands.

(b) State the amount of damages sustained by you by such excavation or removal.

13. (a) What is the fair and reasonable market value of the lands involved in this suit?

(b) Has anyone, to your knowledge, offered to buy said lands?

(c) If so, state the exact amounts of each such

offer, with the dates thereof, and the identity of the party so offering to buy.

14. (a) Has anyone, to your knowledge, offered to sell the lands involved in this suit?

(b) If so, state the exact amounts of each such offer with the dates thereof and the identity of the party so offering to sell.

15. (a) What is the fair and reasonable rental value of the lands involved in this suit?

(b) Have these lands ever been rented?

(c) Has any effort ever been made to rent said lands?

(d) If either interrogatory 15 (b) or 15 (c) is not answered in the negative, state the amounts of such rents paid, if any, the dates when said lands were rented or sought to be rented and the identity of the parties renting or offering to rent said lands.

16. (a) Do you claim any damages by reason of the matters and things set out in the complaint which have not already been set out in the answers to these interrogatories?

(b) If so, set out exactly and in detail each such amount, for what it is claimed and when it arose.

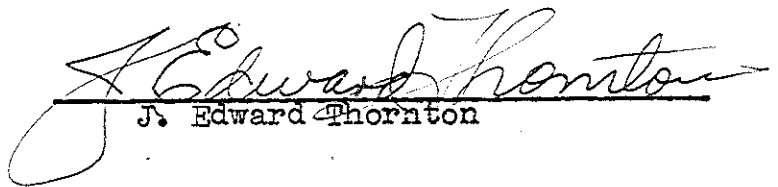
Vickers Leigh Thornton  
Attorneys for Defendants

STATE OF ALABAMA,  
COUNTY OF MOBILE.

Personally appeared before me the undersigned Notary Public, in and for said County in said State, J. EDWARD THORNTON, who, being by me first duly sworn deposes and says:

That he is one of the Attorneys of record for the defendant in the above styled cause and as such is authorized to make this affidavit;

That the answers to the foregoing interrogatories, if well and truly made, will be material testimony for defendant at the trial of said cause.

  
J. Edward Thornton

Subscribed and sworn to before me  
this the 22<sup>nd</sup> day of January, 1949.

  
Notary Public, Mobile County, Alabama.

*The heretofore receipted service of the within  
interrogatories the January 20, 1949.  
H. P. Brown  
W. C. Brown  
W. C. Brown  
W. C. Brown*

AT LAW NO: 1278

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CHARLOTTE G. SCHOWALTER,

Plaintiff

vs.

EDWARD A. ROBERTS, et al,

Defendants

\*\*\*\*\*

INTERROGATORIES TO PLAINTIFF

FILED

JAN 25 1949

ALICE J. DUCK, Clerk

VICKERS, LEIGH AND THORNTON  
ATTORNEYS AT LAW  
MERCHANTS NATIONAL BANK BUILDING  
MOBILE, ALABAMA

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA

CHARLOTTE G. SCHOWALTER,

Plaintiff

vs.

EDWARD A. ROBERTS, et al,

Defendants

AT LAW

NO: \_\_\_\_\_

DEMAND FOR ABSTRACT

Comes now EDWARD A. ROBERTS, one of the defendants in the above entitled cause, and makes this demand in writing, to the plaintiff, for an abstract in writing of the title or titles on which she will rely for the recovery of the lands sued for in this cause, at the trial of this cause, which trial is not now set and will not be had within ten days from the date of this demand.

DATED THIS the 22nd day of January, 1949.

EDWARD A. ROBERTS

BY Vickers Leigh Thornton  
His Attorneys

*Herely a copy of the  
the mother ledger and  
for abstract of the jury 77  
1949.  
H. C. Beebe, Clerk for the*

AT LAW NO: 1278

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CHARLOTTE G. SCHOWALTER,  
Plaintiff

vs.

EDWARD A. ROBERTS, et al,  
Defendants

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DEMAND FOR ABSTRACT

FILED  
JAN 25 1949  
ALICE J. DUCK, Clerk

VICKERS, LEIGH AND THORNTON  
ATTORNEYS AT LAW  
MERCHANTS NATIONAL BANK BUILDING  
MOBILE, ALABAMA

IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
JUDICIAL CIRCUIT OF ALABAMA

CHARLOTTE G. SCHOWALTER, )

Plaintiff )

AT LAW

vs. )

NO: \_\_\_\_\_

EDWARD A. ROBERTS, et al, )

Defendants )

P-L-E-A

Comes now EDWARD A. ROBERTS, one of the defendants  
in the above entitled cause, and for answer to the complaint  
filed in this cause says:

That the defendant, POINT CLEAR DEVELOPMENT COMPANY,  
was not a Corporation at the time this suit was brought.

Vickens Leigh Thornton  
Attorneys for Edward A. Roberts

STATE OF ALABAMA,  
COUNTY OF MOBILE.

Personally appeared before me the undersigned Notary  
Public, in and for said County in said State, J. EDWARD THORNTON, who, being by me first duly sworn deposes and says:

That he has read the foregoing Plea and that the facts  
alleged therein are true.

J. Edward Thornton  
J. Edward Thornton

Subscribed and sworn to before me,  
this the 12<sup>th</sup> day of January, 1949.

Samuel D. Smith  
Notary Public, Mobile County, Alabama.

*Merely a copy of the  
petition filed the day  
of 7, 1949. A. A. Brewer,  
A. C. Blount  
Clerk of Court*

AT LAW NO: 1278

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CHARLOTTE G. SCHOWALTER,

Plaintiff

vs.

EDWARD A. ROBERTS, et al,

Defendants

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P-L-E-A

FILED

JAN 25 1949

ALICE J. DUCK, Clerk

VICKERS, LEIGH AND THORNTON

ATTORNEYS AT LAW

MERCHANTS NATIONAL BANK BUILDING

MOBILE, ALABAMA



IN THE CIRCUIT COURT FOR THE TWENTY-EIGHTH  
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CHARLOTTE G. SCHOWALTER	Ø	AT LAW
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Recorded in the office of the  
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pages 145-6, 37 NS, page 43,  
and 21 NS, pages 515-516

Audley H. Gazzam

2.

Deed from Audley H. Gazzam

Dated: February 24, 1840

to

Recorded in said office in

Charles W. Gazzam

Deed Book "D", pages 396-7

3.

Deed from Charles W. Gazzam  
and wife

Dated: May 3, 1842

to

Recorded in said office in

Joseph P. Gazzam

Deed Book "E", pages 29-30

4.

Power of attorney from  
Joseph P. Gazzam

Dated: May 19, 1844

to

Recorded in said office in

Charles W. Gazzam

Deed Book "E", pages 492-3

12.

P. R. Schowalter, L. J. Broodwood  
and his wife as heirs of Emanuel R.  
Schowalter

to

Dr. V. McR. Schowalter

Dated: Jan. 10, 1885

Recorded in said office in

Deed Book "V", pages 387-90

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Plat of Township 6 South,  
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Annual assessment and payment of taxes on said land for  
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Possession of the said lands under color of title, and claim  
of continuously for more than 10 years.

17.

Possession of said lands for more than twenty years contin-  
uously with the whole of the same under fence and under cultivation  
for the entire twenty year period under claim of ownership.

18.

Deed of John Pollard and Alice

to

Hattie Thomas

Dated: Sept. 10, 1880

Recorded in said office in

Deed Book "P", pages 521-2  
Explanatory of description of  
deed in claim of title relied on.

19.

Deed of John Pollard and  
Alice Pollard

to

Hattie E. Thomas

Dated: June 29, 1880

Recorded in said office in

Deed Book "L", pages 537-8  
Explanatory of description  
in deeds relied on.

no 1278

Filed 4-25-49  
W.C. Beebe  
Clerk