

1617

VIOLA FLOWERS)	IN THE CIRCUIT COURT OF
PLAINTIFF)	BALDWIN COUNTY, ALABAMA
VS)	IN EQUITY
GEORGE GRAHAM)	NO. 2145
DEFENDENT)	

Now comes the Defendant and demurs to the Plaintiff's complaint, and to each count thereof separately and severally says:

1.

Said count does not state a cause of action.

2.

Said Count sets out no facts entitling the Plaintiff to the relief prays for.

Shirley
Attorney for Defendant

The defendant demands a trial by jury.

Shirley
Attorney for Defendant

RECORDED

VILA FLOWERS)	IN THE CIRCUIT COURT OF
PLAINTIFF)	BALDWIN COUNTY, ALABAMA
VS)	IN EQUITY
GEORGE GRAHAM)	NO. 2145
DEFENDENT)	

Now comes the Defendent and for answer to the Plaintiff's complaint, and to each count thereof, seperately and severally says:

1.

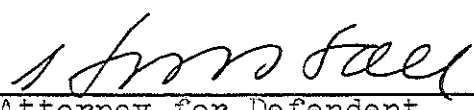
That he is not guilty.

2.

The the facts therein alleged are untrue.

3.

The the account sued on was paid before the commencement of the suit.


Attorney for Defendent

RECORDED

Filed
9-27-48
Alice J. Smith
Reg

VIOLA FLOWERS
Plaintiff
VS
GEORGE GRAHAM
Defendent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
IN EQUITY.

-1-

The Plaintiff claims of the defendant the following personal,
Viz: Four Hundred Dollars (\$400) in money, with the value of the hire
or use thereof during the detention, Viz: from the 1 day of September, 1947.

-2-

The Plaintiff claims of the Defendant Four Hundred Dollars
(\$400) due for money paid by one Calvin McCullough to the Defendant on
to-wit, September 1, 1947 to the account of the Plaintiff, said money
with interest thereon is still due and unpaid.

Viola Flowers
PLAINTIFF

C. R. [Signature]
ATTORNEY FOR THE PLAINTIFF

RECORDED IN VOLUME
C. R. [Signature]
IN THE OFFICE OF

RECORDED IN VOLUME
C. R. [Signature]
IN THE OFFICE OF

VIOLA FLOWERS
VS.
GEORGE GRAHAM

COMPLAINT

In Law Offices Of
C. LeNOIR THOMPSON
BAY MINETTE, ALABAMA

FILED

RECEIVED BY THE CLERK OF THE COURT

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-3-

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SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 194____

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon George Graham

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

George Graham _____, Defendant _____

by Viola Flowers _____, Plaintiff _____

Witness my hand this 27th day of August 1948

Wesley Smith _____, Clerk.

RECORDED

No. 2145

Page _____

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Viola Flowers

Plaintiffs

vs.

George Graham

Defendants

SUMMONS and COMPLAINT

Filed 8-27, 1948

Reice J. Hucy Clerk

We the jury
find for the
Defendant
George Graham
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

Aug 27, 1948

Taylor Wilkins, Sheriff

I have executed this summons

this 9-2, 1948
by leaving a copy with

George Graham

Taylor Wilkins Sheriff

H. F. Hall Deputy Sheriff

AMENDED COMPLAINT

VIOLA FLOWERS
Plaintiff

VS.

GEORGE GRAHAM
Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA,

IN EQUITY

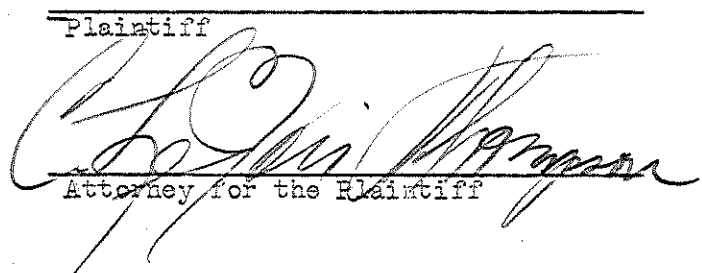
-1-

The Plaintiff claims of the defendant four hundred dollars, (\$400) damages for the conversion by him, on the 1st day of September, 1947 of the following chattels: Four hundred dollars (\$400), the property of the plaintiff.

-2-

The Plaintiff claims of the Defendant Four Hundred Dollars (\$400) due for the money paid by one Calvin McCullough to the Defendant on to-wit, January 15, 1948 to the account of the Plaintiff, said money with interest thereon is still due and unpaid.

Plaintiff



Attorney for the Plaintiff

VIOLA FLOWERS

Plaintiff

vs

GEORGE GRAHAM

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes the Plaintiff in said cause and amends her complaint as to
Count one as heretofore filed to read as follows:

-1-

The Plaintiff claims of the Defendant Four Hundred (\$400.00) Dollars
for money on to-wit, January 15, 1948, received by the Defendant to the
use of the Plaintiff, which sum of money with interest thereon, is still
unpaid.


Attorney for Plaintiff.

VIOLA FLOWERS

Plaintiff

vs

GEORGE GRAHAM

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes the Plaintiff in said cause and amends her complaint as to
Count one as heretofore filed to read as follows:

-1-

The Plaintiff claims of the Defendant Four Hundred (\$400.00) Dollars
for money on trust Jan 15, 1948
received by the Defendant to the use of the Plaintiff, which sum of
money with interest thereon, is still unpaid.

Attorney for Plaintiff

AMENDED COMPLAINT

VIOLA FLOWERS

Plaintiff

VS

GEORGE GRAHAM

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes the Plaintiff in said cause and amends her complaint as heretofore filed to read as follows:

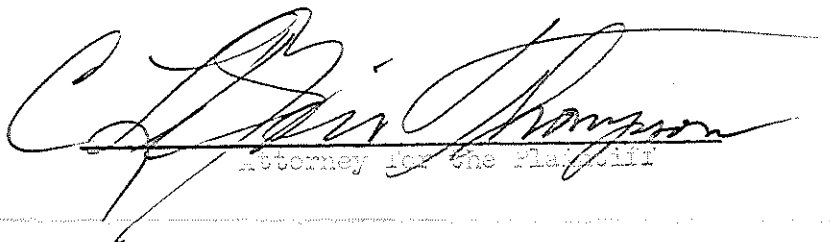
-1-

The Plaintiff claims of the Defendant Four Hundred (\$400.00) Dollars, damages for the conversion by him, on the 1st day of September, 1947 of the following chattels: Four Hundred (\$400.00) Dollars, the property of the Plaintiff.

-2-

The Plaintiff claims of the Defendant Four Hundred Dollars (\$400.00) due for the money paid by one Calvin McCullough to the Defendant on to-wit, January 15, 1948 and by one Sam Pope to the Defendant on to-wit the 25th day of October, 1949, all to the account of the Plaintiff, said money with interest thereon is still due and unpaid.

Plaintiff


Attorney for the Plaintiff

RECORDED

Filed: October 22, 1951.

Telfair J. Macomber, Jr.
Judge.

VIOLA FLOWERS

Plaintiff

vs

GEORGE GRAHAM

Defendant

IN THE CIRCUIT COURT OF

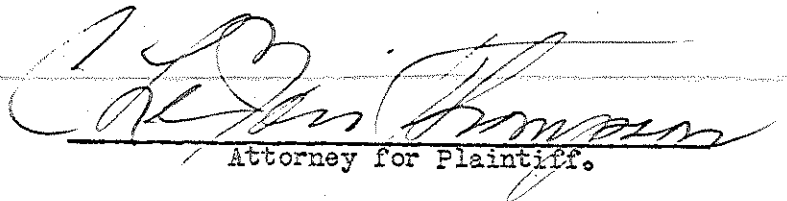
BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes the Plaintiff in said cause and amends her complaint as to
Count one as heretofore filed to read as follows:

-1-

The Plaintiff claims of the Defendant Four Hundred (\$400.00) Dollars
for money on to-wit, January 15, 1948, received by the Defendant to the
use of the Plaintiff, which sum of money with interest thereon, is still
unpaid.


Attorney for Plaintiff.

RECORDED

Filed: 10-22-57.

Jessie J. Masleberry Jr.
Judge.

167

Viola Floore.

Plaintiff

¹³
George Hogan

Defendant

In the Circuit
Court of the
County of Alabama

and Law

No. 2145-

Now Come the Defendant and
demurs to Plaintiff's amended
complaint, and to said Court
thereof, separately and severally, and
for grounds therein set forth.

1. Said Court does not state a
cause of action.

2. Said Court shows no facts
constituting a conversion by
the Defendant.

3.

Respectfully
att. for Defendant

Viola Flowers

D

Serge G. R. R.

RECORDED

Memoranda to

Amended

Complaint

Filed: 10-22-51.

Jessie J. Masliburn Jr.
Judge.

WARRANTY DEED

THE STATE OF ALABAMA
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS: That for and in consideration of the sum of Ten Dollars and other valuable considerations to us in hand paid by Sam Pope the receipt whereof is hereby acknowledged, we, George Graham and wife, Ollie Mae Graham do grant, bargain, sell and convey unto the said Sam Pope the following described lands situated in Baldwin County, Alabama, to-wit:

Beginning at the Northeast corner of the Southwest quarter of the Northwest quarter of Section 15 township 2 south, Range 3 East thence run South 640 feet for a point of beginning, thence West 210 feet to a corner, thence South 30 feet to a corner, thence East 210 feet to a corner, thence North 30 feet to the of beginning, being in the Southwest quarter of the Northwest quarter of township 2 South, Range 3 East, Baldwin County, Alabama.

TO HAVE AND TO HOLD to the said Sam Pope, his heirs and assigns forever. And we do covenant with the said Sam Pope that we are siezed in fee of the above described premises; that we have the right to sell and convey the same; that the said premises are free from all incumbrances; and that we will, and our heirs, executors and administrators shall forever WARRANT AND DEFEND the same to the said Sam Pope, heirs and assigns, against the lawful claims of all persons whomsoever.

Witness our hand and seal this 16 day of November, 1949.

George Graham L.S.
Ollie Mae Graham L.S.

STATE OF ALABAMA, BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public in and for said County and State, hereby certify that George Graham and Ollie Mae Graham, his wife, whose names are signed to the foregoing conveyances and who are known to me, acknowledged before me, on this day, that being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 16 day of November, A. D. 1949.

(SEAL)

C. LeNoir Thompson

STATE OF ALABAMA, BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public in and for said County and State, do hereby certify that on the day of November, 1949, came before me the within named Ollie Mae Graham, known to me to be the wife of the within named George Graham, who being examined separate and apart from her husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord, and without fear, constraint, or threats on the part of the husband.

In Witness Whereof, I have hereunto set my hand and official seal this 16 day of November, 1949.

C. LeNoir Thompson

(SEAL)

STATE OF ALABAMA, BALDWIN COUNTY
Filed 12-16-49 8 a.m.
Recorded Deed Book 147 Page 339-340
And I certify that the following
Privilege Tax has been paid.
Deed Tax \$.50

W. R. Stuart
Judge of Probate
By H.

THE STATE OF ALABAMA, { PROBATE COURT
Baldwin County

I, W. R. STUART, Judge of the Probate Court in and for said State and County, hereby certify
that the within and foregoing _____ pages

contain a full, true and complete copy of the Warranty Deed from
George Graham and Ollie Mae Graham to Sam Pope

as the same appears of record in my office in Deed Book No. 147
Page 339-340

Given under my hand and seal of office, this 22 day of October, 1951

W R Stuart

Judge of Probate

Quantity of "1"