

D. R. COLEY, JR.,
PLAINTIFF,
VS.
M. J. JANSEN,
DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.
NO. 1391

INTERROGATORIES PROPOUNDED TO THE DEFENDANT BY THE PLAINTIFF
IN THE ABOVE ENTITLED CAUSE:

1. Please state whether or not under date of February 4th, 1947, you issued check payable to D. R. Coley, Jr. in the sum of \$126.76 drawn on the Bank of Fairhope, Alabama and signed by you as M. J. Jansen?

2: Is it not a fact that this check was tendered in payment of the stumpage for 6337 feet of pine logs at the rate of \$20.00 per thousand.

3: Is it not a fact that these logs were cut by you? If you state that it was not given in payment for timber, please state for what purpose the check was issued. If you state that it was issued in payment for timber, state what was done with the timber for which the check was given.

4: Has this check ever been charged to or paid from your account in the Bank of Fairhope?

5: Please state how or in what manner payment has been made of the account for which this suit was brought.

6: Was it paid in cash? If so, when, where, to whom, was the money given?

7: Do you have any receipt or other evidence of payment? If so, attach the same or an exact copy thereof to your answers to these interrogatories.



STATE OF ALABAMA,)
COUNTY OF MOBILE.)

Before me, the undersigned authority, personally appeared this day D. R. Coley, Jr. who, being by me first duly sworn, deposes and says that the answers to the foregoing

interrogatories, if truthfully made, will be material evidence for the plaintiff on the trial of the cause.

D. P. Dudley

Subscribed and sworn to before me
this the 29 day of October, 1949.

D. P. Dudley
Notary Public, Mobile County, Alabama.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. No. 1391

D. R. COLEY, JR.,
Plaintiff,

vs.

M. J. JANSEN,
Defendant.

INTERROGATORIES PROPOUNDED
TO THE DEFENDANT.

FILED
OCT 31 1949
AUCIE A. DUCK, Clerk

D. R. Coley, Jr.
Attorney for Plaintiff

SYDNEY S. PFLEGER
CHRIS C. DELANEY

LAW OFFICES OF
D. R. COLEY, JR.
302-6 FIRST FEDERAL SAVINGS BUILDING
106 ST. JOSEPH STREET
MOBILE 12, ALABAMA

August 11, 1949

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

Dear Mrs. Duck:

I hand you herewith suit against M. J. Jansen
of Barnwell, which I will appreciate your filing for
me.

If it will not be asking too much, when the
Sheriff reports to you that Jansen has been served,
I would also appreciate it if you will advise me.

Very truly yours,


D. R. Coley, Jr.

C/D

no 1391

D. R. Coley
vs.

M. J. Jansen

Suit on account
filed 8-13-49

Signed
by
D. R. Coley

771391

RECEIVED
JUL 21 1949

TO THE HONORABLE
MEMBERS OF THE
HOUSE OF REPRESENTATIVES
WASHINGTON, D. C.
FROM THE
UNITED STATES DEPARTMENT OF AGRICULTURE
WASHINGTON, D. C.
SUBJECT: [Illegible]

FILED
AUG 13 1949
ALICE J. DUCK, Clerk

Barnwell

No. 1391

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

D. R. COLEY, JR.

Plaintiffs

vs.

M. J. JANSEN

Defendants

SUMMONS and COMPLAINT

Filed 8-13, 1949

Alice J. Leuch Clerk

RECORDED

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Barnwell

RECEIVED IN OFFICE

8-13, 1949

Taylor Wilkins, Sheriff

I have executed this summons

this Aug. 18, 1949
by leaving a copy with

M. J. Jansen

Taylor Wilkins Sheriff
Edleigh Steadman Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1391

TERM, 1949

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon M. J. Jansen

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 M. J. Jansen

, Defendant.

by D. R. Coley, Jr.

, Plaintiff.

Witness my hand this 13th day of August 1949.

Arice J. Leach, Clerk

D. R. COLEY JR.,

PLAINTIFF

VS.

M. J. JANSEN

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1391

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

1.

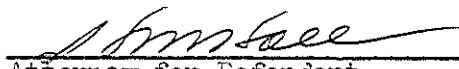
The facts therein alleged are untrue.

2.


That he is not indebted to the Plaintiff in the manner and
form alleged.

3.

That the account sued on was paid in full before the commence-
ment of this suit.


Attorney for Defendant.

The Defendant demands a trial by jury.


Attorney for Defendant.

D.R. COLEY JR.

PLAINTIFF

VS

M.J. JANSEN

DEFENDANT

RECORDED

1391

Copy made to
Hof Seidner
B. J. J. J.
Filed 9-27-49
Alice J. J. J.
J. J. J. J.