

VERTA MARY CANNON,

Plaintiff

 ∇S

L. J. EARLY,

Defendant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW.

INTERROGATORIES FILED BY THE PLAINTIFF TO THE DEFENDANT.

Now comes the plaintiff and files the following interrogatories to the defendant, to be answered in writing under oath by him, fully and not evasively, within the time required by law:

- 1. State your name.
- 2. Are you the L. J. Early who operates L. J. Early Lumber Company?
- 3. Do you operate a saw mill?
- 4. Did you operate a saw mill in Baldwin County during the period January 2nd through February 10, 1950?
 - 5. Did you employ Harry Burrell Cannon during this period?
 - 6. What work was Harry Burrell Cannon employed by you to do?
- 7. In addition to this work already stated, what other work did Harry Burrell Cannon do while employed by you?
 - 8. What did you pay the said employee for each type of work done?
- 9. Who did you employ to assist said Harry Eurrell Cannon in his work for you?
- 10. Who else worked with him or assisted him in his work while employed by you?
 - 11. At what location was the said Cannon employed by you?
 - 12. State the name of the foreman or supervisor at said location.
- 13. State the name of the supervisor to whom the said Cannon reported for work.
 - 14. State the day the said Cannon reported as injured to you.
- 15. State the name of the doctor to whom the said Cannon was sent for medical treatment.
- 16. State whether or not you paid the said doctor for medical attention to the said employee Harry Burrell Cannon.

- 17. State whether you were informed of the death of said Harry Burrell Cannon.
- 18. State whether you were informed of the cause of his death and the source of this information.
- 19. Did you exclude the mill where Harry Burrell Cannon was employed from the Workmans Compensation Act?
- 20. Was any statement made to you by the said Harry Burrell Cannon as to his injury while on the job in this employment?
- 21. Did you make any payment to the said Harry Burrell Cannon under the Workman's Compensation Act in lieu of salary or wages during the period following his injury in January, 1950 and prior to his death?
 - 22. State the amount paid, if any.
 - 23. Did you write a letter to Mrs. Frank Knowles, Bay Minette, Alabama?
- 24. If you wrote a letter to Mrs. Frank Knowles, was it dated May 12, 1950?
- 25. What did you state in this letter to Mrs. Knowles concerning the said Harry Burrell Cannon?
 - 26. Did you carry Workman's Compensation Insurance on your employees?
- 27. If you did, did you report this injury of the said Cannon to an Insurance Company covering your employees?
- 28. Do you have any knowledge of the death of the said Harry Burrell Cannon and when it occurred?
 - 29. During the month of January 1950 did you employ over eight men?
- 30. Did he drive a truck as an employee during the term of his employment?
 - 31. Petween what points did he operate this truck?
 - 32. Did he haul logs while employed by you?
 - 33. Did he have occasion to use a peavey while hauling logs?
 - 34. Was Harry Burrell Cannon injured while in your employment?
 - 35. State how he was injured.
 - 36. State who worked with him at the time of his injury.

ATTORNEY FOR PLAINTIFF.

STATE OF ALABAMA

BALDWIN COUNTY

Refore me,

A Notary Public, in and

A Notary Public, in and

for said County in said State, personally appeared C. LeNoir Thompson,

for said County in said State, personally appeared C. Lenoir Thompson,

for said county in said State, personally appeared C. Lenoir Thompson,

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for said County in said State, personally appeared C. Lenoir Thompson,

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Sworn to and subscribed before me this day of March, 1951.

NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA.

RECORDED

VERTA MARY CANNON

PLAINTIFF

vs

L. J. EARLY,

DEFENDANT

INTERROGATORIES FILED BY THE PLAINTIFF TO THE DEFENDANT.

FILED

MAR 27 1951

ALICE J. DUCK, Clock

From the law offices of C. LeNoir Thompson Eay Minette, Alabama VERTA MARY CANNON,

Plaintiff,) (

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

L. J. EARLY,

Defendant.) (

Comes the defendant in the above styled cause and demurs to the bill of complaint and separately and severally to each count thereof and for grounds of demurrer assigns separately and severally the following:

1.

The nature of the alleged injury is not set out with sufficient certainty.

2.

The place of injury is not alleged with sufficient certainty.

3 ·

No injury is set out as being a proximate result of the death of the decedent.

4.

The nature of the employement of the decedent is not set out with sufficient certainty.

5.

The nature of the business of the defendant is not set out.

6.

No facts are alleged showing plaintiff's right to enter suit against the defendant.

7.

The wages or salary being paid to the decedent are not shown.

8.

No facts are alleged which would indicate that the deceden was injured under the workman's compensation act.

9.

The circumstances relating to employment at the time of injury are not alleged.

10.

The full description and nature and extent of injury are not alleged.

11.

The complaint does not state a cause of action.

12.

The bill of complaint does not allege sufficient facts to show the plaintiff is entitled to any compensation as a result of the death of her husband.

13.

The bill of complaint does not set out the number of dependants of the decedent.

Attorney for Defendant

RECORDED

VERTA MARY CANNON,

Plaintiff,

-VS-

L. J. EARLY,

defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

AUG 12 1950

ALICE J. DUCK, Clerk

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STATE OF ALABAMA V BALDWIN COUNTY V

TO THE HONORAPLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY:

Now comes Verta Mary Cannon and shows unto your Honor that her husband was an employee as defined by the Workmen's Compensation Laws of Alabama, that his employer was L. J. Early, that he suffered an injury, causing his death, while acting in the line and scope of his employment, that the wife of said employee, Verta Mary Cannon, has been unable to reach settlement with said employer and that she prays for permission to secure the services of an attorney to represent her in said matter. She requests permission to secure the services of C. LeNoir Thompson, an attorney at law at Bay Minette, Alabama.

Verta Mary Cannon

Order

The foregoing having been submitted and the court being of the opinion that said permission should be granted, the said Verta Mary Cannon is hereby permitted and authorized to employ C. LeNoir Thompson, an attorney at law, to represent her in a claim for death compensation arising out of an accident sustained in the line and course of her husband's employment while employed by L. J. Early, Robertsdale, Alabama.

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201522

VERTA DE CANNON

Plaintiff

Vs.

L. J. EARLY

Defendant

Petition for Permission to Employ an Attorney

JUN 27 1950

ALICE J. DUCK, CIEN

From the law office of C. LeNoir Thompson Bay Minette, Alabama

VERTA MARY CAMMON

PLAINTING

VS

L. J. MARIY,

-DEPENDANC

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

AMENDIENT

Now comes the Plaintiff in the above styled cause and amends her complaint heretofore filed in this cause by adding after the second paragraph the following paragraph.

"Plaintiff avers that at the time of said accident she and their seven children were wholly dependent upon her deceased husband, Harry Burrel Cannon, for their maintenance and support."

ATIORIES FOR MAINTIFF

I hereby certify that a copy of the foregoing was mailed to C. G. Chason, attorney for L. J. Early, at his address, Foley, Alabama, postage duly prepaid, this the 2/2 day of 2/4, 1951.

John Thompson

1622 RECORDED

VERTA MARY CAIMON

PLAINTLEF

.. VS :

L. J. ENRLY

DEFEIDAIT

AMENDISHT TO COMPLAINT

FEB 27 1951

ALICE L DUCK, Clerk

From the law offices of C. LeNoir Thompson Eay Minette, Alabama

COMPLAINT AS AMENDED

VERTA MARY CANNON,

Plaintiff

V.S

L. J. BARLY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. 1522.

Defendant

Comes now the Plaintiff in the above styled cause and amends her complaint to read as follows:

COUNT ONE: Plaintiff claims of the Defendant benefits under the Workman's Compensation Laws of Alabama due and owing under the following statement of facts; on to-wit, January 23, 1950, the relation of employer and employee, or master and servant, existed between Defendant, L. J. Early and deceased husband of your fetitioner, and Defendant, L. J. Early, and Plaintiff were subject to the Workman's Compensation Laws of Alabama, and while so employed and engaged in the business of the Defendant, L. J. Early, and while acting in line and scope of his employment with the said L. J. Early, Plaintiff's husband, Harry Bunell Cannon, suffered an accident on January 23, 1950 which arcse out of and in the course of said employment. As the proximate result of said accident Plaintiff's husband died on February 6, 1950. A controversy has arisen as to the benefits under the Workman's Compensation Law of Alabama.

Plaintiff's name is Verta Mary Cannon and she resides at Bay Minette, Alabama, Route and the Defendant's name is L. J. Early and he resides at or near Robertsdale, Alabama.

At the time of the said accident on, to-wit, January 23, 1950, Plaintiff's husband was driving an automobile log truck which was owned by the Defendant, E. J. Early, in the line and scope of his employment and while so engaged, at a point in the woods near the L. J. Early Mill, which is West of Magnolia Farm in Paldwin County, Alabama, he was injured on or about said truck by receiving a blow on his left testicle, whereby blood clots were formed thereby causing decendent's death.

Plaintiff avers that Defendant, L. J. Early, had prompt and immediate notice of said accident and that the said L. J. Early, or its insurer, the Employer's Insurance Company of Alabama, paid the doctor bill of Plaintiff's

husband at which time payments were stopped at his death.

Plaintiff alleges that said employer did not pay the funeral expenses of her deceased husband, but only arranged for him to have medical treatment in the Mospital of W. C. Holmes in Foley, Alabama.

Plaintiff alleges that at the time of the accident her husband was receiving a salary of to-wit, the sum of THIRTY (\$30.00) DOLLARS a week. Plaintiff further alleges that her husband was not able and did not work from time of accident until the dat of his decease.

Plaintiff avers that at the time of the said accident she and her seven minor children, all of said children being under eighteen years of age were wholly dependent upon her deceased husband, Harry Bunell $C_{\rm a}$ nnon, for their maintenance and support.

COUNT TWO: Plaintiff claims of the Defendant benefit under the Workman's Compensation Law of Alabama due and owing under the following statement of facts:

- l. That she is the wodow of Harry Bunell Cannon who on the 23rd day of January, 1950, was a citizen and resident of Baldwin County, Alabama, and a workman employed by L. J. Early who was doing business in the said county and state.
- 2. That on January 23, 1950, while operating a truck for the said L. J. Early at or near his mill which is located West of Magnolia Farm, Alabama, Harry Eunell Cannon, the deceased husband of your petitioner was hurt by being struck a blow on his left testicle, whereby blood clots were formed thereby causing the said Harry Eunell Cannon to die on February 5, 1950. Your petitioner avers that her deceased husband's injury arose out of and on account of his employment by the said L. J. Early and who, was subject to the Workman's Compensation Act of Alabama at the time of said accident.
- 3. That your petitioner and her seven children who are all under the age of eighteen years were wholly dependent upon the said Harry Bunell Cannon, at the time of his death, and that his average wage was at the time of the accident not less than THIRTY (\$30.00) DOLLARS per week.

Wherefore, Plaintiff claims of the Defendant, L. J. Early, such benefits as she is entitled to receive under the Workman's Compensation Laws of Alabama, and she prays that notice may be given the Defendant and that

hearing may be had, all in accordance with the laws and rules of this Honorable Court.

Westa Mary Cannon

Attorney for Plaintiff.

STATE OF ALABAMA BALDWIN COUNTY

Defore me, C. LeNoir Thompson, a Notary Public in and for said State and County, personally appeared Verta Tary Cannon, who is known to me, and who being first duly sworn, deposes on oath and says: That she has read the foregoing petition and the statements made therein are true and correct and that she knows of her own knowledge that they are correct.

Verta Mary Cannon

Sworn to and subscribed before me this the day of 2, 1952.

ctary Public, Belowin County, Alabama.

From the law offices of G. LeNoir Thompson

HEB 5 1952 Aug J. Digg, Clark

VICTA BARY CARROTT

Plaintiff

VS

L. J. MARRY

Defendant

IN THE CIMOUIT COURT OF EALDERN COUNTY, ALARAM. AT LAW.

MOTION TO REQUIRE DEFENDANT

TO LISWER INTERROG. TORIES

Now come the plaintiff in the above styled cause and show unto the Court that the plaintiff have heretefore filed interrogatories in said cause propounded by the plaintiff to the defendant, and that said interrogatories were served on defendant more than sixty (60) days ago, and the plaintiff further show unto the Court that, although the time allowed by law for the answering of interrogatories has more than elapsed, the defendant has failed to file any answers to said interrogatories.

AND FURTHER that cral motion was made before this Honorable Court on September 24th in the presence of attorney for the defendant to require the defendant to answer said interrogatories within a reasonable time from the making of said oral motion and that the defendant has failed to file any answers to said interrogatories.

WHEREFORE the plaintiff moves the court to impose upon the defendant such penalties as are provided by law for defendant's failure to answer said interrogatories; or in thealternative to direct a judgment by default to be entered, or render such judgment or decree as would be appropriate if the defaulting party offer no evidence.

Attorney for Plaintill /

I hereby certify that I have mailed a copy of the foregoing motion to defendant's attorney of record this 20 day of October, 1951.

Jew Mandan

RECORDED

HORING YERY CAMION

Plaintilf

VS

I. J. BARDY

Defendant

FILED
OCT 25 1951
ALICE J. DUCK, Clerk

From the law offices, of C. LoNoir Thompson Thy Kinette, "labama



VERTA MARY CANNON		ğ			
	Plaintiff	Ž	IN THE	CIRCUIT	COURT OF -
. 7	s	Ž ,	BALDWIN	COUNTY,	ALABAMA
L. J. EARLY	.	Ŏ		AT LAW	
•	Defendant	Q			

Plaintiff claims of the Defendant benefits under the Workmen's Compensation Laws of Alabama due and owing under the following statement of facts; on to-wit, February 2, 1950, the relation of employer and employee, or master and servant, existed between Defendant, L. J. Early and deceased husband of your Petitioner for said deceased, and Defendant, L. J. Early, and Plaintiff were subject to the Workmen's Compensation Laws of Alabama, and while so employed and engaged in the business of the Defendant, L. J. Early, and while acting in line and scope of his employment with said company, Plaintiff's husband, Harry Bunell Cannon, died on February 6, 1950, which arose out of and in the course of said employment. As the proximate result of said accident, Plaintiff died on said date. A controversy has arisen as to the benefits to be paid under the Workmen's Compensation Laws of Alabama.

Plaintiff's name is Verta Mary Cannon, Bay Minette, Route, Alabama, and the Defendant's name is L. J. Early, at or near Robertsdale, Alabama.

At the time of the said accident, on to-wit, February 2, 1950, Plaintiff's husband was driving an automobile log truck which was owned by the Defendant, L. J. Early, in the line and scope of his employment, and while so engaged was injured on or about said truck, receiving bruises and contusions, whereby blood clots were formed and caused the deceased's death.

Plaintiff avers that Defendant, L. J. Early, had prompt and immediate notice of said accident and that the said L. J. Early, or its insurer, the Employer's Insurance Company of Alabama, paid the Boctor bill of Plaintiff's husband at which time payments were stopped at his death.

Plaintiff alleges that said employer did not pay the funeral expenses of her deceased husband, but only arranged for him to have medical treatment in the Hospital of W. C. Holmes in Foley, Alabama.

Plaintiff alleges that at the time of the accident her husband was receiving a salary in the sum of \$\sqrt{\sq}}}}}}}}}}}} \signt{\sqrt{\synt}}}}}}}}}}}} \sqirat{\sqrt{\sqrt{\sq}}}}}}}} } } } } } } } } } } } }

Wherefore, Plaintiff claims of the Defendant, L. J. Early, such benefits as she is entitled to receive under the Workmen's Compensation Laws of Alabama, and she prays that notice may be given the Defendant and that hearing may be had, all in accordance with the laws and rules of this Homorable Court.

Attorney for Plaintiff

STATE OF ALABAMA (

BALDWIN COUNTY (

Before me, C. LeNoir Thompson, a Notary Public in and for said State and County, personally appeared Verta Mary Cannon, who is known to me, and who being first duly sworn, deposes on oath and says: That she has read the foregoing petition and the statements made therein are true and correct and that she knows of her own knowledge that they are correct.

Verta mary Cannon

Westa Mary Connon

Sworn to and subscribed before me this the 27th day of June, 1950.

Notary Public, Baldwin County, Alabama.

this 2 day of Wars 1950 TAYLOR WILKINS, Sheriff

101522 RECORDED

VERTA MARY CANNON

Plaintiff

٧s

L. J. Early

Defendant

SUMMONS AND COMPLAINT

FILED JUN 27 1950 ALICE J. DUCK, Clerk

From the law office of C. LeNoir Thompson Bay Minette, Alabama

Shaff Bickery Comments

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VERTA MARY CANNON,

Plaintiff,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

L. J. EARLY,

Defendant.

CASE NO. 1522.

Now comes the defendant in the above styled cause and for answer to the complaint therein filed says;

- 1. He denies that the relation of employer and employee or master and servant existed between the deceased husband of the plaintiff, Verta Mary Cannon and the defendant, L. J. Early, on the 23rd of January, 1950.
- 2. He neither admits or denies that the deceased husband of the plaintiff suffered an accident on January 23, 1950, having no knowledge of the same.
- 3. He denies that the deceased husband of the plaintiff had any accident on January 23, 1950, which arose out of and in the course of, his employment with the defendant, the said deceased husband of the plaintiff not being employed at that time.
- 4. He denies that on January 23, 1950, the deceased husband of the plaintiff was driving a log truck owned by him in the line and scope of his employment.
- 5. He neither admits or denies the cause of the death of the husband of the paintiff, having no knowledge thereof.
- 6. He denies that he paid any doctor bill for the husband of the plaintiff.
- 7. He denies that Harry Bunell Cannon was receiving an average wage of not less than \$30.00 per week, inasmuch as Harry Bunell Cannon was only employed for three (3) days.
- 8. He denies that any report of injury allegedly occuring during the time that Harry Bunell Cannon was employed by him was ever made, to him.
- 9. He neither admits nor denies that plaintiff's husband was able to work from and after the 23rd of January, 1950, having no knowledge of the same, the plaintiff's husband's employment having

previously been severed by plaintiff's husband while in good health

- 10. He neither admits or denies that plaintiff's husband died on February 6, 1950, having no knowledge thereof.
- ll. He neither admits or denies that plaintiff's husband's death occurred as a result of blood clots, having no knowledge thereof, except a knowledge later acquired, that plaintiff's husband had a severe syphilitic condition.
- 12. He denies that he received any notification of injury from Plaintiff's husband.

Wherefore, defendant says that the plaintiff is not entitled to maintain or prosecute this action under the Workman's Compensation Act of the State of Alabama, and that plaintiff ought not to have and recover anything of this defendant in this cause.

Attorne for Defendant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, <u>rec.</u> Fig. Alson, a Notary Public in and for said County and State, personally appeared L. J. Early, who is known to me and who, after being by me first duly and legally sworn, deposes and says; that he is the defendant in the above styled cause; that he has knowledge of the facts set out in the foregoing answer and that the matters and things therein alleged are true according to his best information, knowledge and belief.

L. J. Carly

Sworn to before me, and subscribed, on this, the 25 day of April, 1953.

Notary Public, Baldwin County State of Alabama

RECORDED

ANSWER

VERTA MARY CANNON,

Plaintiff,

-VS-

L. J. EARLY,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 1522.

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CECIL G. CHASON
4-ATTORNEY AT LAW
FOLEY, ALABAMA
ALICE J. DUCK, CIGIK

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CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

April 28, 1953

Mrs. Alice J. Duck, Clerk Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is an Answer in the case of Canon -vs-Early, a copy of which is being sent to Thompson.

Yours very truly,

C. G. Chasor

CGC:fm

encl. 1

cc: Mr. C. Lenoir Thompson Attorney at Law Bay Minette, Alabama

VERTA	MARY	CANNON,)	(
		Plaintiff,)	(IN THE	CIRCUIT	COURT OF
-vs-)	(BALDWIN	COUNTY,	ALABAMA
L. J.	EARLY	,)	(AT LAW		
•		Defendant.)	(

ANSWER TO INTERROGATORIES

Comes the defendant in the above styled cause and in answer to the interrogatories propounded therein on the 27th day of March, 1951, answers as follows:

- 1 L. J. Early, Sr.
- 2 Yes.
- 3 Yes.
- 4 Yes.
- 5 A part of the time.
- 6 Truck driver.
- 7 None to the best of my knowledge, information and belief.
- 8 75¢ an hour for driving the truck.
- 9 No one.
- 10 No one else was employed to assist him.
- 11 At the mill West of Magnolia Farm in Baldwin County.
- 12 C. R. Mitchell.
- 13 C. R. Mitchell.
- 14 He did not report to me as injured.
- 15 He was not sent to a doctor by me.
- 16 No.
- 17 Yes.
- 18 I was not informed as to the probable cause of death until after a claim was filed against me, after which time I talked to Dr. W. C. Holmes and he told me that he believed the death to have been caused by a blood clot which could have arisen from his extremely serious syphilitic condition, or perhaps by some injury.
- 19 I did not "exclude" the mill.
- 20 No.
- 21 No.

- 22 None made.
- 23 Yes.
- 24 Date unknown.
- 25 The letter itself would be the best evidence and best answer to this question.
- 26 This question is irrelevant and immaterial and is not pertinent to the issue.
- 27 This question is irrelevant and immaterial and is not pertinent to the issue.
- 28 Only by information furnished to me by others. No personal knowledge.
- 29 This question is irrelevant and immaterial and is not pertinent to the issue.
- 30 Yes.
- 31 From the source of the logs in the woods to the mill.
- 32 Yes.
- 33 This question cannot be definitely answered as he may or may not have used a peavey.
- 34 To the best of my knowledge and belief, no.
- 35 Unknown except as to statements made by Harry Burrell Cannon.
- 36 To the best of my knowledge, information and belief, and according to statements made to other of my employees by Harry Burrell Cannon, he was not working at the time of his injury.

L. Corlyd

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said County in said State, personally appeared L. J. Early, Sr., who is known to me, and who after being by me first duly and legally sworn, deposes and says that he is the person who answered the foregoing interrogatories and that the answers thereto are true and correct.

L. Darry &

) 3 (

Given under my hand and Notarial Seal hereto affixed by me on this day of October, 1951.

(affix seal)

Notary Public, Baldwin County State of Alabama 15-2 1

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ANSWERS TO INTERROGATORIES

VERTA MARY CANNON,

Plaintiff,

-VS-

L. J. EARLY,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

FILED

NOV 1.1 1951

ALICE J. DUCK, Clerk

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STATE OF ALABAMA DAIDWIN COUNTY

You are hereby commanded to summon L. J. EARLY, to appear and plead, answer or demur, within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by VERTA MARY CANNON, as Plaintiff, and against L. J. EARLY, as Defendant.

WITNESS my hand this 27 day of June, 1950.

Register Register