

# CONSOLIDATED DOCKET AND FEE BOOK, CIVIL DIVISION, CIRCUIT COURT

COUNTY, ALABAMA

CASE NO. 1674  
JURY—NON-JURY

12123 MARSHALL & BRUCE-NEWELL FORM 7—ALA. C. C.—Revised Aug. 1937.

## ATTORNEYS

*Eugene R. Nelson*  
RICKARD

*Chas. F. Stone*

## PARTIES

DORA W. BASS & LESTER L. BASS

VS.

JERRY VASKO *file*

## ACTION (If Transferred or Appealed from another Court, state other Court's Name and Case No.)

EJECTMENT

## DATE SET FOR HEARING

2-29-52

## PAPERS FILED AND ORDERS AND DECREES OF COURT

## MINUTES Book Page

Summons and Complaint Filed 8-16-51

Executed 8-29-51

*Plea in Abatement 10-1-51*

*Motion to Strike Plea 10-6-51*

*Answers to Plea 10-6-51*

*Motion for Judgment 11-2-51*

*Ans- 11-2-51*

*Objections to Introduction 1-14-52*

*2-25-52 Amended Complaint*

*1-29-52 Continued at the request of the Defendant because illness in attorneys family.*

*6-27-52 Judgment in favor of the Plaintiffs and against the Defendant for the lands sued for in the Complaint. Defendant taxed with the costs.*

*J. Fair J. Mashburn, Jr.  
Judge.*

*J. Fair J. Mashburn, Jr.  
Judge.*

*J. Fair J. Mashburn, Jr.  
Judge.*

*532*

*533*

*11 35*

*1694*

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

TO

JERRY VASKO

You are hereby notified to appear and plead, answer or demur within thirty days of the receipt hereof to the Bill of Complaint filed in this Court at Bay Minette, Alabama, against you as Defendant by Luster L. Bass and Dora W. Bass, as Plaintiffs.

WITNESS my hand this the 16<sup>th</sup> day of ~~July~~<sup>Aug</sup>, 1951.

*Archie J. Lucke*  
Clerk, Circuit Court.

DORA W. BASS  
and  
LUSTER L. BASS,  
Plaintiffs

I A W

vs

CIRCUIT COURT OF

JERRY VASKO,  
Defendant

BALDWIN COUNTY, ALABAMA.

The Plaintiffs sue to recover possession of the following tract of land:

From a point on the Section Line dividing Sections 31 and 32, that is 417 feet North of the SE corner of Sec. 31, all in Township Six South, Range Three East, and which point is on the West bank of Fish River, run West 972 feet to a point on the East side of a 30 foot road, said point being located 22 feet North of the Northwest corner of Lot 4, Block D, of Fish River Shores Subdivision; thence run North 300 feet; thence run North 61° West, along the north side of a 30 foot road, 1580 feet, to the Southeast corner of the lot heretofore conveyed by H. W. Eraham and wife to Jackson F. Beaty; thence run North 04° 30' East, 717.5 feet to the Juniper tree on the South Bank of Cowpen Branch which marks the division corner between the said Beaty property, now Bass's property, and land of Jerry Vasko; thence continuing N 04° 30' East, across the head of a small bayou, of Cowpen Branch bounded on the North by the peninsula here in question, and across said peninsula, 131 feet to a point on the North bank of said Peninsula, and on the South bank of Cowpen Branch, for a point of beginning; thence run Southeastwardly and Southerly, along the bank of Cowpen Branch, to a point on the Eastern extremity of said peninsula, S 34° E, 125 feet from the point of beginning; thence running Southerly and Northwestwardly, along the bank of Cowpen Branch and the South bank of said peninsula, to a point that is on said bank and is S 04° 30' W, 31 feet, from the point of beginning; thence run N 04° 30' E, 31 feet, to the point of beginning.

Of which they were in possession and upon which, pending such possession, and before the commencement of this suit, the Defendant entered and unlawfully withholds, together with Two Hundred Dollars for the detention thereof.

*Rickards + Rickards*  
Attorneys for Plaintiff

101694

RECORDED

LAW NO.

DORA W. BASS  
and  
LUSTER L. BASS,  
Plaintiffs

VS

JERRY VASKO,  
Defendant

SUMMONS AND COMPLAINT

FILED

AUG 16 1951

ALICE A. DUCK, Clerk

RICKARBY & RICKARBY

LAWYERS

Fairhope, Alabama

Recorded in Sheriff's Office  
this 16 day of Aug, 1951  
TAYLOR WILKINS, Sheriff

Executed Aug. 29 1951  
by serving copy of within Summons and  
Complaint on

Jerry Vasko

Taylor Wilkins Sheriff  
By Ed Leigh Steadman Deputy Sheriff

NO. 1694

Edgar R. Nelson  
Edgar R. Nelson, Attorney for  
Plaintiffs

RECORDED

Filed: <sup>March 1, 1952.</sup>  
~~February 1~~

Jeffrey J. Marshall  
Judge

NO. 1694

Edgar R. Nelson  
Edgar R. Nelson, Attorney for  
Plaintiffs

RECORDED

1694

FILED

FEB 25 1952

ALICE J. DUCK, Clerk



LUSTER L. BASS  
and  
DORA W. BASS,  
Plaintiffs

vs

JERRY VASKO,  
Defendant

L A W No. 1695  
CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Come the Plaintiffs, LUSTER L. BASS and DORA W. BASS,  
and move to strike Defendant's plea in abatement upon the  
ground that said plea shows no legal grounds wherein the summons  
complained of is insufficient.

*Riskely & Riskely.*  
Attorneys for Plaintiffs.

RECORDED

L A W No. 1694

LUSTER L. BASS et ux

VS

JERRY VASKO

o o o o o o o o

MOTION TO STRIKE PLEA  
IN ABATEMENT

FILED

OCT 6 1951

ALICE A. DUCK, Clerk

RICKARBY & RICKARBY  
Attorneys

DORA W. BASS  
and  
LUSTER L. BASS,  
Plaintiffs

L A W No. 1645  
CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

vs

JERRY VASKO,  
Defendant

Come the Plaintiffs, DORA W. BASS and LUSTER L. BASS,  
and demur to Defendant's plea in abatement upon the following  
separate grounds:

ONE: That the summons in so many words required Defendant to answer the complaint within thirty days.

TWO: That the summons having been served upon Defendant by the Sheriff of Baldwin County complied with the law in all respects and failure to address same to any lawful officer is a matter about which only the Sheriff of Baldwin County can complain.

THREE: That exact compliance with the language of Code Section 132 of Title 7 is not required to be exact if the Defendant is advised as to the action against him, the names of the Plaintiffs and the forum in which said suit is filed.

FOUR: That the summons filed has complied with all requirements of law relating to service of notice in Civil cases.

*Rickards & Rickards*  
Attorneys for Plaintiffs.

L A W No. 1694

LUSTER L. BASS  
and  
DORA W. BASS,  
Plaintiffs

VS

JERRY VASKO,  
Defendant

-----  
DEMURRERS TO

PLEA IN ABATEMENT

RECORDED

FILED

OCT 6 1951

ALICE J. DUCK, Clerk

*Richarby & Richarby*

DORA W. BASS and LUSTER L.  
BASS,

Plaintiffs,

vs.

JERRY VASKO,

Defendant.

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

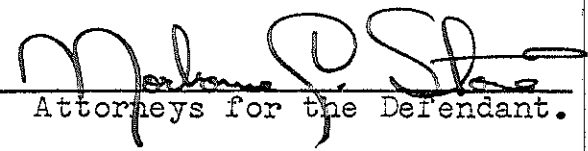
Comes the Defendant, Jerry Vasko, by his Attorneys, and appears specially for the purpose of filing this plea in abatement and for no other purpose and pleads in abatement to the complaint heretofore filed against him and assigns the following separate and several grounds in support of his plea:

1. That there is no summons requiring him to answer said complaint.
2. That there is no summons addressed to any lawful officer of Baldwin County, Alabama.
3. That there is no summons addressed to any Sheriff of the State of Alabama.
4. That this action against him was not commenced by the filing of a summons as required by Title 7, Section 182 of the Code of Alabama of 1940.
5. That said action was improperly commenced in that no summons was filed.
6. That the purported summons in this action does not comply substantially with the form prescribed by Title 7, Section 184 of the Code of Alabama of 1940.

Respectfully submitted,

CHASON & STONE

By:

  
Attorneys for the Defendant.

7201694 RECORDED

PLEA IN ABATEMENT

DORA W. BASS and LUSTER L.  
BASS,

Plaintiffs,

vs.

JERRY VASKO,

Defendant.

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

*Filed 10-1-51  
Alice J. Venable  
clerk*

LAW OFFICES  
HYBART, CHASON & STONE  
BAY MINETTE, ALABAMA

EDGAR R. NELSON

ATTORNEY-AT-LAW

PITMAN BUILDING

FAIRHOPE, ALABAMA

February 23, 1952

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

Re: Bass v. Vasko  
No. 1694 at Law

~~Dear Mrs. Duck:~~

I hand you herewith an amendment to the complaint heretofore filed in this cause. Please see that Chason and Stone, attorneys for the defendant, receive a copy of this amendment.

Thank you.

Very truly yours,

*Edgar R. Nelson*  
Edgar R. Nelson

cc: Chason and Stone  
ERN/pac

ELLIOTT G. RICKARBY

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

31 October, 1951

Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

BASS vs. VASKO- no. 1695 LAW: With this find a motion for a default judgment in this case, the pleading filed by Messrs. Chason and Stone claiming that no service has been had on the defendant being a special appearance only, and thirty days having elapsed since service we are now entitled to a default judgment.

Please present this to the Judge and ask for the order.

Mr. Stone has been promising to file an answer and we have not been pushing him because we knew he was busy in court, but our client insists on immediate action. Mr. Stone will probably file a plea at once and ask that the judgment be set aside which we will not seriously resist if this is done at once.

Mr. Stone tells us that his delay is due to the fact that he wanted to look at the land involved in order to understand the merits of his case before filing a defense and this will speed his action.

Sincerely,

*Elliott G. Rickarby*

EGR:lt  
3066



ELLIOTT G. RICKARBY

LAW OFFICES

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA  
4 October, 1951

E. G. RICKARBY, JR.

Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

BASS VS. VASKO—No. 1695 LAW: With this find demurrers to the plea in abatement recently filed by Messrs. Chason and Stone, which please file.

This is the fourth demurrer that we have in pending cases and we ask that you request Judge Mashburn to set time for hearing on Tuesday, October 9 at 10 a.m., or such hour as suits him, the demurrers in the following cases:

Lucious vs. Lucious—Equity 2648, Chason and Stone  
Brooks vs. Brooks—Equity 2582, C. L. Thompson  
Allen vs. DeVan—Equity 2707, Chason and Stone  
Bass vs. Vasko—Law 1695, Chason and Stone.

If the Judge approves, please notify opposing counsel of same so that all four matters can be cared for in one trip to Bay Minette.

Sincerely,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:ms  
3066

LUSTER L. BASS, et al, plaintiffs

L A W no. 1695

VS

CIRCUIT COURT OF

JERRY VASKO, defendant

BALDWIN COUNTY, ALABAMA

Come the Plaintiffs, Luster L. and Dora W. Bass,  
and show to the court that more than thirty days have  
elapsed since service was had on the Defendant in which  
time no answer has been filed wherefore they pray that a  
judgment by default be entered against the Defendant.

*Elliott H. Rios, Esq.*  
Attorneys for Plaintiffs

LAW No. 1695

L. L. BASS, et al, Pltfs.

vs.

JERRY VASKO, Deft.

MOTION FOR DEFAULT JUDGMENT

FILED

NOV 2 1951

ALICE J. DUCK, Clerk

DORA W. BASS  
and  
LUSTER L. BASS,  
Plaintiffs

L A W  
CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

vs

JERRY VASKO,  
Defendant

Come the Plaintiffs and propound to the Defendant the interrogatories hereinafter set out and aver that the answers to same, if true, will be material testimony for them in this cause.

Dora W. Bass  
Plaintiff

Plaintiff

Subscribed and sworn to before me on this the 15th day of August, 1951.

Elliot G. Riss  
Notary Public, State of Alabama at Large.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to notify JERRY VASKO, the Defendant in the above styled cause that Interrogatories to him have this day been filed by the Plaintiffs in the office of the Clerk of said Court, a copy of which is hereto attached.

You are required to execute this notice and due return thereof made according to law.

WITNESS my hand this the                      day of August, 1951.

Clerk

INTERROGATORIES PROPOUNDED BY PLAINTIFF  
TO DEFENDANT

1. Is not your claim to the land here sued for based on what you consider your riparian rights appurtenant to the lot you now own on Cowpen Branch and bought from Harold W. Graham and wife January 14, 1947?
2. Is not your deed for this lot recorded in Deed Book 141, Page 414 et seq of the Probate Records of Baldwin County?
3. Is the description in this deed substantially as follows:

From a point on the Section line between Section 31 and 32, Township 6 South, Range 3 East, said point being 417 feet North of the Southeast corner of Section 31, and which point

lies on the West bank of Fish River, thence run West 972 feet to the East side of a road; thence run North 300 feet to a corner and thence run N 61° 30' W, along the North side of a 30 foot road, 1470 feet to the beginning corner of this description; thence run N 8° 0' E, 700 feet, more or less, to a corner on Cowpen Branch; thence following the meanderings of the South bank of Cowpen Branch 150 feet, more or less, to the Northeast corner of the Jackson F. Beaty lot; thence run S 4° 30' W, 615 feet to a corner on the North side of the above mentioned Road; thence run S 61° 30' E, 110 feet to the beginning corner.

Including in this conveyance all riparian rights along the frontage on Cowpen Branch and also the ingress and egress over the above mentioned roads along the back of this lot running Southeast and South to the Highway.

The above described tract containing 1.8 acres, more or less, and lying South of Cowpen Branch and West of Fish River in Section 31, Township 6 South, Range 3 East, Baldwin County, Alabama.

4. At the time you bought this land, did not Mr. Graham, the then owner, tell you in plain terms that he was not selling you any part of the peninsula here sued for, only the land from the margin of Cowpen Branch back to the road laid out on the South of your property?

5. Did Graham not tell you at the time you made your purchase that the peninsula here sued for belonged to Jackson Beaty, the party from whom the Plaintiffs later purchased?

6. Did you at any time assert any claim to this peninsula against Jackson Beaty who bought the lot now owned by Plaintiffs in 1945 and was in possession when you bought the adjoining lot in 1947? If so, what did you do or say to him in the six years to let him know you claimed the peninsula?

7. If you have any legal claim or right to this peninsula, state what this claim is with Book and Page of record of the instrument showing same.

8. Was not the strand of wire that you have erected as a purported continuation of your west boundary line into Cowpen Branch put up by you within the past sixty days and since Plaintiffs purchased their lot next west of you from Jackson Beaty?

9. Does not this wire bar Plaintiffs from 100 feet of their own water front on the bayou that you are making no pretense to claim?

10. By what right do you do this?

11. Since you put up the wire last referred to, did you not have a conversation on Sunday, July 8th with Mr. Rickarby, one of Plaintiffs' counsel about your claim to this land which conversation took place

at the juniper tree at the margin of Cowpen Branch where your west and the Bass east lines coincide and did you not tell Mr. Rickarby that this juniper tree marked the dividing line. Did not both of you examine the blazes on the west side of said tree that had been put on the indicate that the tree was a land-mark?

12. Did you not at that time tell Mr. Rickarby that your claim to the peninsula grew out of your riparian rights, that these gave you land out in the stream in front of your holding even though not connected with it by land in any way.

13. Since your conversation with Mr. Rickarby, has not the bark of the side of this juniper tree where the blazes were, been skinned off? Was the removal of the bark on the juniper tree showing on the blazes done by you or someone under your direction? If you did not, who removed such bark and blazes?

14. Is not the home in which you and your family live distant from the water front and this tree not over two hundred feet and close enough for you or people in your house to have heard the sounds of anyone removing these blazes? Do you know who skinned this tree?

15. If you say that you do not know who debarked the juniper tree, have you any idea who did so or any suspicion of such person's motive in destroying a recognized land-mark?

16. Were you not at this time seeking to keep Plaintiffs off of this peninsula and claiming it as your own?

17. In erecting the wire running from the bank of the creek across the peninsula, was not the purpose of this to keep Mr. and Mrs. Bass from going on the peninsula? Did you not tear down the "No Trespass" sign posted by the Bass's prior to your putting up the wire?

18. Is not this peninsula connected with the Bass lot by a continuous neck of land?

19. Is not the normal depth of the water between your north line of water front and the peninsula in dispute range from four to twelve or more feet?

20. Is your 150 feet of shore line not open to access by water craft its entire length?

21. Is there not at least fifty feet of clear space on the water between the east tip of the peninsula and your north shore line giving

you open access to your entire one hundred fifty feet of lot frontage?

22. In barring Plaintiffs from their own and undisputed water rights are you doing this under your own idea of your rights or under the advice of legal counsel?

*Rickarby & Rickarby*  
RICKARBY & RICKARBY  
Attorneys for Plaintiffs

701694

DORA W. BASS  
and  
LUSTER L. BASS,

Plaintiffs

vs

JERRY VASKO,  
Defendant

INTERROGATORIES

FILED

AUG 16 1951

ALICE A. DUCK, Clerk

RICKARBY & RICKARBY  
Solicitors

Received in  
this day of Aug, 1951  
TAYLOR WILKINS, Sheriff

Executed Aug, 29, 1951  
By Serving Copy on

Jerry Vasko.

Sheriff  
Taylor Wilkins  
By  
Edleigh Steafham



DORA W. BASS and  
LUSTER L. BASS,

Plaintiffs,

vs.

JERRY VASKO,

Defendant.

I

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Now comes the Defendant in the above styled cause and for  
answer to the Complaint heretofore filed against him says:

1. That he is not guilty of the matters therein alleged.

Respectfully submitted,

CHASON & STONE

By:

  
Attorneys for Defendant.

FILED  
JAN 10 1964  
BALDWIN COUNTY, ALA.

RECORDED

RECORDED

FILED  
NOV 2 1951  
ALICE J. DUCK, Clerk

*[Handwritten signature]*

NOV 2 1951

RECEIVED

TO THE HONORABLE CLERK OF THE SUPREME COURT

FROM THE HONORABLE CLERK OF THE SUPREME COURT

RE: [illegible]

ALICE J. DUCK

AB

STANDARD

NOV 2 1951  
ALICE J. DUCK

RECEIVED

NOV 2 1951

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

15 August 1951

Mrs. Alice J. Duck  
Clerk  
Bay Minette, Alabama

Dear Mrs. Duck:

BASS VS VASKO: With this find Summons and Complaint and Interrogatories propounded to Defendant, with copy. Please file and place with the sheriff for service.

Vasko lives on the west side of Cowpen Branch on the north edge of Marlow. He works at Brookley Field and hence is only at home after five p.m. except Saturdays when he is supposed to be at home all day.

Sincerely,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:fc  
3066

701694

Dora W. Bass &  
Luther L. Bass

vs.

Jerry Vasko

Exhibit

1. Summary
2. Interrogatories

FILED

AUG 16 1951

ALICE J. DUCK, Clerk

Reckert

DORA W. BASS and LUSTER  
L. BASS,

Plaintiffs,

vs.

JERRY VASKO,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1694

OBJECTIONS TO INTERROGATORIES  
PROPOUNDED BY THE PLAINTIFFS  
TO THE DEFENDANT

Comes now the Defendant, Jerry Vasko, by his attorneys, and objects to the interrogatories heretofore propounded to him by the Plaintiffs and to each of said interrogatories separately and severally and assigns the following separate and several objections:

a. Interrogatory numbered "1." calls for a conclusion of law on the part of the defendant.

b. Interrogatory numbered "1." is a mere fishing expedition and is impertinent.

c. Interrogatory numbered "1." calls for information which is immaterial to the issues involved in this litigation and which can have no material effect herein.

d. Interrogatory numbered "4" seeks to elicit parol evidence to show an intention different from that appearing on the face of the deed when there is no inconsistency in the description contained in the deed or in the terms thereof.

e. Interrogatory numbered "4" seeks to elicit information to vary the terms and construction of a written instrument.

f. Interrogatory numbered "5" is immaterial, irrelevant and the information sought can have no possible bearing on this litigation.

g. Interrogatory numbered "6" is impertinent.

h. Interrogatory numbered "6" is immaterial and is a mere fishing expedition

i. Interrogatory numbered "7" is impertinent and is a mere fishing expedition.

j. Interrogatory numbered "10" is impertinent.

k. Interrogatory numbered "10" calls for a legal conclusion on the part of the defendant.

l. Interrogatory numbered "12" is a mere fishing expedition.

m. Interrogatory numbered "12" calls for information which is immaterial and irrelevant to the issues involved in this litigation and which can have no bearing on the title to the land in dispute.

n. Interrogatory numbered "14" is impertinent.

o. Interrogatory numbered "22" is impertinent.

ANSWERS TO INTERROGATORIES  
PROPOUNDED BY THE PLAINTIFFS  
TO THE DEFENDANT.

Without waiving the foregoing objections numbered "a" through "o", but insisting thereon, comes now the defendant and for answer to the interrogatories heretofore propounded to him by the plaintiffs says as follows;

1. No.

2. Yes.

3. Yes.

4. The peninsula was not discussed by Mr. Graham and myself.

5. No. See "4" above.

6. During the time that Mr. Beaty owned the lot now owned by Mr. and Mrs. Bass I cleaned off the peninsula in question with his knowledge and during one of several conversations which Mr. Beaty and I had regarding our land he asked me why I didn't build a way for my boats on the peninsula.

7. The defendant refuses to answer Interrogatory numbered "7".

8. The strand of wire erected by me on my West line was put up by me after Mr. Beaty sold his lot to Mr. and Mrs. Bass.

9. No.

10. The defendant refuses to answer Interrogatory numbered "10".

11. No. I told Mr. Rickarby it was a line tree.

12. Mr. Rickarby asked me if my deed called for riparian rights and I told him that it did.

13. There has been some chopping on the tree but I do not know who did it.

14. The defendant refuses to answer Interrogatory numbered "14".

15. No.

16. I do not know when the blazes were taken off this tree, but in my best judgment it was around August, 1951.

17. Yes, and to put them on notice of the location of my West line. Yes, I had placed two signs on the peninsula prior to the time that Mr. and Mrs. Bass erected their "No Trespass" sign.

18. Yes.

19. The North line of my property is the North side of the peninsula. The normal depth of the pool or bayou is approximately eight (8) feet. This is an average because there are various depths.

20. Yes.

21. See Answer number "19" above. The distance between the tip or Eastern end of the peninsula and the Northeast corner of my property is about thirty (30) or forty (40) feet.

22. The defendant refuses to answer Interrogatory numbered "22".

Respectfully submitted,

*Jerry Vasko*  
Jerry Vasko

STATE OF ALABAMA

BALDWIN COUNTY

Before me, *Alice L. Miller*, a Notary Public in and for said County in said State personally appeared Jerry Vasko whose name is signed to the foregoing Answers to Interrogatories and the objections thereto, and who after being by me first duly and legally sworn did depose and say under oath as follows;

That his name is Jerry Vasko and that he is the defendant in the cause now pending in the Circuit Court of Baldwin County, Alabama, wherein he is the Defendant and Dora Bass and Luster Bass are the Plaintiffs. That he has read the foregoing Answers to Interrogatories and that the same are true and that his name is signed thereto.

*Jerry Vasko*  
Jerry Vasko

Sworn to and subscribed before  
me on this the 12th day of Jan-  
uary, 1952.

*Alice L. Miller*  
Notary Public, Baldwin County, Ala.

1694

OBJECTIONS AND ANSWERS TO  
INTERROGATORIES

DORA W. BASS and LUSTER L.  
BASS,

Plaintiffs.,

vs.

JERRY VASKO,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW. No. 1694.

FILED  
JAN 14 1952  
ALICE L. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA