

AGNES KULICKA HORTON,
Plaintiff
vs.
ANTON KULICKA,
Defendant

1774
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

COUNT ONE

The plaintiff claims of the defendant TWELVE HUNDRED DOLLARS (\$1200) for the use and occupation by him of the following tracts of land, viz:

The South half of the Northeast Quarter of the Southeast Quarter; North Half of the North half of the Southwest Quarter of the Southeast quarter of Section 20, Township 6 South of Range 3 East in Baldwin County, Alabama.

belonging to the plaintiff, from the 12th day of February, 1951 to the present.

COUNT TWO

The plaintiff claims of the defendant TWO HUNDRED AND FIFTY DOLLARS (\$250.00), the rent of a tract of land, viz:

The South half of the Northeast Quarter of the Southeast Quarter; North Half of the North half of the Southwest Quarter of the Southeast quarter of Section 20, Township 6 South of Range 3 East in Baldwin County, Alabama.

demised by the plaintiff to the defendant on the 11th day of February, 1947, said rent commencing on the 11th day of February, 1950, and ending on the 11th day of February, 1951.

COUNT THREE

The plaintiff claims of the defendant TWELVE HUNDRED DOLLARS (\$1200) for the use and occupation by him of the following tract or tracts of land, to-wit:

The South half of the Northeast Quarter of the Southeast Quarter; North Half of the North half of the Southwest Quarter of the Southeast quarter of Section 20, Township 6 South of Range 3 East in Baldwin County, Alabama.

belonging to the plaintiff, from the 12th day of February, 1950 to the present.

COUNT FOUR

The plaintiff claims of the defendant TWELVE HUNDRED DOLLARS (\$1200) for money on the 12th day of February, 1952 received by the defendant to the use of the plaintiff, which sum of money, with the interest thereon, is still unpaid.

COUNT FIVE

THE plaintiff claims of the defendant TWELVE HUNDRED DOLLARS (\$1200) for money on, to-wit, the 12th day of February, 1952 received by the defendant to the use of the plaintiff, which sum of money, with the interest thereon, is still unpaid.

COUNT SIX

The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1000) for that the defendant, living upon and occupying under a demise from the plaintiff the following tract of land, which term or demise did end on, to-wit, the 11th day of February, 1951, did, after notice in writing from the plaintiff to the effect that his term had expired, and after demand in writing from the plaintiff for possession of said premises, remain in, on, and upon and does now remain in, on, and upon said premises; the plaintiff hereby

claiming specifically under the provisions of the Code of Alabama of 1940, Title 7, Section 977, and the plaintiff asks that the penalty therein provided for be granted to her; to-wit, double the amount of the annual rent.

COUNT SEVEN

The plaintiff claims of the defendant the sum of ONE THOUSAND DOLLARS for that on, to-wit, the 11th day of February, 1947, the plaintiff and the defendant did enter into and execute an agreement in writing, a copy of which is hereto attached and made a part of this complaint and of this count. Plaintiff claims that the term of the agreement expired on, to-wit, the 11th day of February, 1951; that she did not and has not received from the defendant any money or other valuable thing as her share of the profits of the 1950 pecan crop, although the yield from said crop has been substantial, and although plaintiff has performed in full all the requirements of said contract, and has often called upon the defendant to perform fully on his part, and to pay over to her the sum due her under the contract, which he has refused to do; therefore this complaint.

Edgar R. Nelson
Edgar R. Nelson, Attorney for the
Plaintiff

KNOW ALL MEN BY THESE PRESENTS that AGNES KULICKA HORTON for the consideration hereinafter expressed, hereby assigns and transfers to ANTON KULICKA her right to the use and occupancy of the South half of the Northeast Quarter of the Southeast Quarter; North Half of the North Half of the Southwest Quarter of the Southeast Quarter of Section 20, Township 6 South of Range 3 East in Baldwin County, Alabama, for the term of four years from this date.

As consideration for the foregoing, ANTON KULICKA agrees to reside on and cultivate such portion of above land not hitherto rented and to maintain and support the four children born to him and AGNES KULICKA. He further agrees to harvest the pecan crop growing on the place during the term of this agreement and pay to AGNES KULICKA HORTON one fourth of the net profit received from the sale of the Pecan Crop.

IN WITNESS WHEREOF, the said parties do set their hands to this instrument on this the 11th day of February, 1947.

AGNES KULICKA HORTON (S)

ANTON KULICKA (S)

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Subscribed and sworn to before me this the 11th day of February, 1947.

Notary Public, Baldwin County, Alabama

3-27-52

Received in Sheriff's Office
this 26 day of *Mar* 1952
TAYLOR WILKINS, Sheriff

Executed March 27, 1952

By sending copy to

Anton Kulicka

Sheriff

Taylor Wilkins

By

Edleigh Steadham

no. 1774

IN THE CIRCUIT COURT OF
BALDWIN COUNTY ALABAMA

AT LAW

NO.

RECORDED

AGNES KULICKA HORTON,

Plaintiff

v.

ANTON KULICKA,

Defendant

FILED

MAR 28 1952

ALICE J. DICK, Clerk

AGNES KULICKA HORTON,
Plaintiff,

vs.

ANTON KULICKA,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

NO. 1774.

Comes now the Defendant and for answer to the Complaint heretofore filed against him, says as follows:

1. The allegations of the Complaint are untrue.
2. The allegations of Count One are untrue.
3. The allegations of Count Two are untrue.
4. The allegations of Count Three are untrue.
5. The allegations of Count Four are untrue.
6. The allegations of Count Five are untrue.
7. The allegations of Count Six are untrue.
8. The allegations of Count Seven are untrue.

CHASON & STONE

By:

Malcolm P. Stone
Attorneys for Defendant.

RECORDED
PLEA

AGNES KULICKA HORTON,

Plaintiff,

vs.

ANTON KULICKA,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

NO. 1774.

FILED

APR 25 1952

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ANTON KULICKA

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 _____

ANTON KULICKA, Defendant _____

by AGNES KULICKA HORTON

_____, Plaintiff _____

Witness my hand this 26th day of March 1922

Lucy J. Smith, Clerk

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

AGNES KULICKA HORTON

Plaintiffs

vs.

ANTON KULICKA

Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

_____, Clerk

EDGAR R. NELSON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 1, Silverhill, Alabama

RECEIVED IN OFFICE

_____, 19 _____

_____, Sheriff

I have executed this summons

this _____, 19 _____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff