#### ALLAN R. CAMERON

ATTORNEY AT LAW
407-408 ANNEX FIRST NATIONAL BANK BUILDING
P. O. BOX 115
MOBILE 1. ALABAMA
August 18, 1952

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

Re: Paul Kaiser, Sr., v. George W. Hollick. No. 1832

Dear Mrs. Duck:

As attorney for the defendant, I enclose herewith and respectfully request that you accept for filing pleas by the defendant and interrogatories propounded by the defendant to the plaintiff in this action.

You will note that demand for jury trial has been made by endorsement at the bottom of the pleas which are being filed.

I shall appreciate your letting me know as soon as possible the trial date of this action.

Thanking you for your assistance, I remain

Yours very truly

Allan R. Cameron.

arc/mra

Enclosures.

PAUL KAISER SR.,		Ŏ		
	PLAINTIFF	Ŏ	IN THE CIRCUIT COURT OF	
VS		x X	BALDWIN COUNTY, ALABAMA,	
		¥	AT LAW	
GEORGE W.	HOLLICK	Ď	NO 7620	
	DEFENDANT	Ž,	NO. 1832	

Now comes the Plaintiff and for answer to interragotaries propounded by the Defendant Says:

1.

The Defendant came to my place in 1935, when he was a boy of lh years. I accepted him as a member of the family and as a matter of fact adopted him except that no legal adoption proceedings were instituted. I treated the Defendant exactly as one of my own children; I have for many years from time to time meposited in the bank monies to the credit of my children, on saving account, so that they would have nest egg at the time they reached sufficient age and were ready to go into business for themselves. I followed this same procedure with the Defendant. The monies placed in the bank were mine and with the understanding that they would remain mine until the Defendant was old enough and went into business for himself. I made the deposits and had entries made on the pass book and have at all times retained possession of the pass book. The Officers of the bank knew that I was making deposits to the credit of the Defendant just as I had done with my children. I continued to make deposits in the bank and just as I had done with my children, and from time to time when in need of funds I would withdraw them and then later place the funds back in the bank to the credit of my respective children. I continued this practice until I had deposited in the State Bank of Elberta \$2886.98 which included interest in the time deposit. This money did not belong to the Defendant and has remained my funds at all times.

The Deposits in the State Bank of Elberta were conditioned that the Defendant remain with me until he went into business at Elberta and with the further condition that when I saw fit I would withdraw the funds and deliver to the Defendant as I saw fit. The funds in the bank did not ever at any time belong to the Defendant.

that time to carry on his work in accordance with our plans.

3.

I have in the above answer included the answer to interrogatories numbered 1, 2 and 3.

1.

I give you beow, a statement of the account as from the Savings

Department Pass Book which is now and has at all times remained in my

possession:

No. 1080, George Hollick C/A Paul Kaiser, In Account with State Bank of Elberta, Elberta, Alabama:

Deposits

	Te5027.02
10/14/41	100.00
12/31/42	200.00
7/1/43	6 <b>.</b> 69
9/11/43	500.00
10/13/43	6.69
	493.31
1/1/46	1.88
4/17/46	100.00
6/25/46	100.00
7/1/46	<b>.</b> 08
7/19/46	100.00
8/6/46	199•33
8/ <b>16/</b> 46	140.00
9/11/16	115.00
10/11/46	100.00
11/2/46	100.00
12/11/46	400.00
1/3/47	100.00
2/11/47	100,00
1/1/47	7.01
5/3/47	100.00
6/6/147	100.00
6/6/47	100.00
6/18/47	100.00
7/1/47	23,13

Date:

Date	Deposits	
7/7/48	100.00	
8/1/47	100.00	
1/1/18	26.70	
71/48	27.13	
an annual faith a faith de deimean airsean ann an an an an an ann an an an an an	<del></del>	
7/1/49	27.67	
1/1/51	63.314	
7/1/52	28.31	
Date	Withdrawal	
10/13/43	\$800.00	
1/4/61	1000.00	
9/29/51	1000.00	!
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# STATE OF ALABAMA

## BALDWIN COUNTY

Before me the undersigned authority, in and for said County, in said State, personally appeared Paul Kaiser Sr., who is known to me and who having been by me first duly sworn, deposes and says: that the foregoing answer to interrogatories propounded by the Defendant are true and correct.

Hand Karrer St

Sworn to and subscribed before me on this the V day of September,

Notary Public, Baldwin County, Alabama

SEP 20 1952 MICE & MICK, CHECK PAUL KAISER, SR., IN THE CIRCUIT COURT OF

Plaintiff, I BALDWIN COUNTY, ALABAMA.

-vs.- I AT LAW

GEORGE W. HOLLICK, NO. 1832

Defendant. [

# INTERROGATORIES PROPOUNDED TO THE PLAINTIFF BY THE DEFENDANT.

- 1. Please state in detail the account sued on in the above styled cause.
- 2. Please state in detail the consideration of each and every item of account sued on in the above entitled cause.
- 3. Please state in detail the transaction or transactions out of which you allege arose an account between the plaintiff and the defendant, whereby you allege the defendant owes the plaintiff \$2,886.98.
- 4. Please attach to your answer to these interrogatories a complete itemized statement of the account sued on in the above entitled cause.

Attorney for Defendant

STATE OF ALABAMA, )

COUNTY OF MOBILE.

Before me, Megan Russell Allen, a Notary Public in and for said State and County, personally appeared Allan R. Cameron, who being by me first duly sworn, deposes and says that he is the attorney for the defendant in the above styled cause, and that the answers to the above interrogatories, if truthfully made, will be material testimony for the defendant in said cause.

Attorney for Defendant

Subscribed and sworn to before me this the 1/8 day of August, 1952.

Notary Public, Mobile County, Alabama.

FILED

8-19-53

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FILED
AUG 19 1952
ALICE A DUCK, Clerk

PAUL KAISER, SR.,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA.

-vs.-

AT LAW.

GEORGE W. HOLLICK,

No. 1832

Defendant.

x

## PLEA

Comes the defendant in the above entitled cause, and for answer to the plaintiff's complaint and each and every count thereof, files the following separate and several pleas:

- 1. Not guilty.
- 2. That the allegations contained in each and every count are not true.

Attorney for Defendant

The defendant demands a trial by jury of the above entitled cause.

FILED

8-19-52

ALICE 1. BUCK, Glerk

Attorney for Defendant.

FILED
AUG 1919:2

ALICE 1. DUCK, Clark

STATE OF ALABAMA BALDWIN COUNTY

TO THE STAWE BANK OF ELBERTA, A CORPORATION:

You are hereby commanded to be and appear before the next term of the Circuit Court of Baldwin County, Alabama, then and there to answer as Garnishee within the first three days of said court in an attachment, at the instant of Paul Kaiser Sr., against the estate of George W. Hollick, whether at the time of services of this garnishment or at the time of making your answer, you are indebted to the defendant by a contract then existing and whether by a contract then existing you are liable to the Defendant for the delivery of personal property, for the payment of money which may be discharged by the delivery of personal property, and whether you have in your possession, or under your control, money or effects belonging to the Defendant, and this you shall in no wise omit.

Witness my hand this the // day of July

TAYLOR WILKINS, Sherill

Executed July 19, 1952 The within Hamidmin Jarkier Rank of Elberta

Taylor Wilhim Skeriff 147 Hall D.S.

STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WHEREAS, Paul Kaiser Sr., has complained on oath to me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, that George W. Hollick is indebted to him, the said Paul Kaiser Sr., in the sum of \$2886.98, and affidavit having been made as required by law, the Defendant being a non-resident of the State of Alabama, and the Plaintiff electing not to give bond.

You are hereby commanded to attach any property of the said George W. Hollick in Baldwin County, Alabama, or so much thereof as will be of value to satisfy the said debt and costs according to the complaint, and such property, unless replevied so to secure that the payment may be liable to further proceedings thereon, to be had at the next term of the Circuit Court of Baldwin County, Alabama, when and where you must make known how you have executed this writ.

Witness my hand this the // day of July, 1952.

FILED 7-18-52

ALIGE L BOOK, Joseph

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attachment

Executed by Serving notice of Garnistoment on the State Beauty on affect herman as casher Japa July 19-1958 Joylor Wilkering Sherf By It I Half Di

FILED

JUL 18 1952

ALICE J. DUCK, Clark

STATE OF ALABAMA

BALDWIN COUNTY

Before the undersigned, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared H. M. Hall, as Attorney for Paul Kaiser Sr., who being duly sworn, on oath, says that he is informed and believes that George W. Hollick, who resides at 1129 West Drummond Place, Chicago, Illinois, isindebted to Paul Kaiser Sr., in the sum of TWO THOUSAND EIGHT HUNDRED EIGHTY SIX AND 98/100 (\$2886.98) DOLLARS for money due from the said George W. Hollick to the said Faul Kaiser Sr.; that said George W. Hollick is a non-resident of the State of Alabama, and that attachment is not sued out for the purpose of vexing or harrassing the said George W. Hollick.

The said Paul Kaiser Sr., elects to sue out this attachment without making bond.

As Attorney for Paul Kaiser Sr.

Sworn to and subscribed before me on this the \_\_\_\_\_day of July, 1952.

Clerk, Circuit Court of Baldwin County,

m 1832

Paul Harser, Sr V's Verge W. Hollick

STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon GEORGE W. HOLLICK to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of PAUL KAISER, SR.

WITNESS my hand, this the 1/2 day of July, 1952.

FAUL KAISER, SR.,

PIA INTIFF

VS

GEORGE W. HOLLICK

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW
NO.

The Plaintiff claims of the Defendant TWO THOUSAND EIGHT HUNDRED EIGHTY SIX DOLJARS AND 98/100 (\$2886.98) due from him by account on to-wit: July, 1, 1952, which sum of money with the interest thereon is still unpaid.

Attorney for the Plaintiff

Received in Sheriff's Office this / Sday of JAYLOR WILKINS, Sheriff

Not found in my county after diligent search and inquiry.

-Deputy Sheriff

m 1832

Paul Karser Sen 15, George 2V. Hollick

Summer Complaint

JUL 18 1952

ALICE 1, DUCK, Clerk

STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon GEORGE W. HOLLICK to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to arswer the complaint of PAUL KAISER, SR.

WITNESS my hand, this the 17 day of July, 1952.

PAUL MAISER, SR.,

PLAINTIPF

PLAINTIPF

BALDWIN COUNTY, ALABAMA,

VS

GEORGE W. HOLLICK

DEFENDANT

1.

The Plaintiff claims of the Defendant TWC THOUSAND EIGHT HUNDRED EIGHTY SIX DOLLARS AND 98/100 (\$2886.98) due from him by account on to-wit: July, 1, 1952, which sum of money with the interest thereon is still unpaid.

Attorney for the Plaintiff

REPRESENTATION OF THE PROPERTY OF THE PROPERTY

### ALLAN R. CAMERON

ATTORNEY AT LAW
407-408 ANNEX FIRST NATIONAL BANK BUILDING
F. O. BOX 115

MOBILE 1, ALABAMA

August 18, 1952

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

Re: Paul Kaiser, Sr., v. George W. Hollick. No. 1832

Dear Mrs. Duck:

As attorney for the defendant, I enclose herewith and respectfully request that you accept for filing pleas by the defendant and interrogatories propounded by the defendant to the plaintiff in this action.

You will note that demand for jury trial has been made by endorsement at the bottom of the pleas which are being filed.

Yours verv

I shall appreciate your letting me know as soon as possible the trial date of this action.

Thanking you for your assistance, I remain

arc/mra

Enclosures.

FILED AUG 19 1952 AUGE J. 1988, OHAP STATE OF ALABAMA

BALDWIN COUNTY

Before the undersigned, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared H. M. Hall, as Attorney for Paul Kaiser Sr., who being duly sworn, on oath, says that he is informed and believes that George W. Hollick, who resides at 1129 West Drummond Place, Chicago, Illinois, isindebted to Paul Kaiser Sr., in the sum of TWO DIOUSAND RIGHT HUNDRED RIGHTY SDE AND 98/100 (\$2886.98) DOLLARS for money due from the said George W. Hollick to the said Paul Kaiser Sr.; that said George W. Hollick is a non-resident of the State of Alabama, and that attachment is not sued out for the purpose of vexing or harrassing the said George W. Hollick.

The said Paul Keiser Sr., elects to sue out this attachment without making bond.

As Attorney for Paul Kaiser Sr.

Sworn to and subscribed before me on this the  $\frac{1}{2}$  day of July, 1952.

Glerk, Carcuit Court of Baldwin County,

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Contract Contract

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STATE OF THE PER 田東門の ひのなれな 10 00 Noor (25586,00) Louis The series F3400 ALICE J. OUCH, Clerk

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TO ANY THERITT OF THE STATE OF ALABAMA, CHARTESTS:

945.

J. Dook, Clark of the Circuit Court of Raldein County, Alabama, that Courty W. Rallick is indebted to him, the said Paul Eniser Sr., in the sum of \$2086.95, and affidavit having been made as required by Pay, the Pefendant being a non-resident of the State of Alabama, and are bereby commanded to attach any property of the said Castre W. Rallick in Baldwin County, Alabama, or so much thereof as will be of value to satisfy the said debt and coats according to the complaint, and such property, unless replevied so to somewhat the payment may be liable to further proceedings thereon, to be had at the next term of the Circuit Court of Baldwin County, Alabama, when and where you must make known how you have expected

Vitages my beed this the VI day of hity, 1968.

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