

JOE SCHNEIDER,
Plaintiff

2048
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

-vs-

T. A. McKENZIE, also known as
TURNER McKENZIE
and
MARGARET McKENZIE, his wife,
Defendants.

COMPLAINT

The Plaintiff claims of the Defendants the sum of Six Hundred Twelve and 50/100 (\$612.50) for work and labor done by the Plaintiff at the request of T. A. MCKENZIE individually and as agent for MARGARET McKENZIE, on improvements on the following described property, viz:


Farm Numbered 43 Southland Farms, which is also described as the South half of the Southwest Quarter of Section Eleven (11), Township Seven (7) South, Range Two (2) East, except for fourteen (14) acres off the Southeast corner which was deeded to William Moore and wife, containing sixty-six (66) acres, more or less.

which said indebtedness accrued on to-wit, the 26th day of January, 1953, and is now due and unpaid.

The Plaintiff alleges that the above described property is the property of the Defendants, T. A. McKenzie and Margaret McKenzie; that said work or labor was done or performed on improving said land under and by virtue of a contract with the said T. A. McKenzie individually and as agent for Margaret McKenzie, the owners or proprietors thereof; that within six months after the said indebtedness had matured, on, to-wit, the 26th day of July, 1953, Plaintiff did file in the office of the Judge of Probate of the County wherein said land is situated, a verified statement as required by law, a copy of which is attached hereto, made a part hereof, and marked Exhibit "A";

WHEREFORE Plaintiff claims a lien for said amount upon said land and buildings and improvements situated thereon.

RICKARBY & RICKARBY

By: 
E. G. Rickarby, Jr.,
Attorney for Plaintiff

Joe Schneider,
Plaintiff

VS.

T. A. McKenzie, also known as
Turner McKenzie
and
Margaret McKenzie, his wife,
Defendants.

Complaint

EXHIBIT "A"

STATE OF ALABAMA:

COUNTY OF BALDWIN:

Joe SCHNEIDER files this statement in writing, verified by the oath of MADELINE SCHNEIDER, who has personal knowledge of the facts herein set forth:

That said Joe Schneider claims a lien upon the following property situated in Baldwin County, Alabama, to-wit:

Farm numbered 43 Southland Farms, which is also described as the South half of the Southwest Quarter of Section Eleven (11), Township Seven (7) South, Range Two (2) East, except fourteen (14) acres off the Southeast corner which was deeded to William Moore and wife, containing sixty-six (66) acres more or less.

This lien is claimed, separately and severally, as to both the buildings and improvements thereon, and the said land.

That said lien is claimed to secure an indebtedness of SIX HUNDRED TWELVE and 50/100 (\$612.50) with interest, from to-wit, the 26th day of January, 1953, for material and labor furnished.

The name of the owner or proprietor of said property is T. A. MCKENZIE, also known as TURNER MCKENZIE and MARGARET MCKENZIE, his wife.

JOE SCHNEIDER

by:

Before me, E. G. Rickarby, Jr., a Notary Public in and for the County of Baldwin, State of Alabama, personally appeared Madeline Schneider, who being duly sworn, doth depose and say: That she has personal knowledge of the facts set forth in the foregoing statement of lien, and that the same are true and correct to the best of her knowledge and belief.

Affiant

Sworn to and subscribed before me this the 25th day of July, 1953, by said affiant.

Notary Public, Baldwin County, Alabama.

RICKARBY & RICKARBY

By:

E. G. Rickarby, Jr.,
Attorney for Plaintiff.

2048

AMERICAN TO BE
COMMITTEE TO BE

...and ...
...and ...
...and ...

Joe Schneider,
Plaintiff
-vs-
T.A. McKenzie, also known
as
Turner McKenzie
and
Margaret McKenzie, his wife
Verified Statement of Lien

...and ...
...and ...
...and ...

...and ...
...and ...

...and ...
...and ...
...and ...

...and ...
...and ...
...and ...

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 T. A. MCKENZIE also known as TURNER
MCKENZIE, and MARGARET MCKENZIE, his wife

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 T. A. McKenzie
also known as Turner McKenzie, and Margaret McKenzie, Defendant S--
by JOE SCHNEIDER

_____, Plaintiff____
Witness my hand this 27th day of July 1953.

W. J. Duck, Clerk

RECORDED
No. 2048 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Joe Schneider

Plaintiffs

vs.

T.A. McKenzie, also known as
Turner McKenzie, and Margaret
McKenzie

Defendants

SUMMONS and COMPLAINT

Filed 7-27, 1953

Dee J. Wack Clerk

Rickarby & Rickarby
Plaintiff's Attorney

Defendant's Attorney

10-24-53

Defendant lives at

Fairhope, Ala.

RECEIVED IN OFFICE

July 29, 1953
Taylor Wilkins Sheriff

I have executed this summons

this 5 August, 1953
by leaving a copy with

T.A. McKenzie 8-5-53

Margaret McKenzie 10-27-53

Taylor Wilkins Sheriff
Edw. Steadman Deputy Sheriff