

as soon as I eat my supper, or before I eat it, I fall asleep. I have written you a very long letter as it has been raining all day.

I would like to get a little money together now that you have a good place. I would try too, if I did not have this trouble. Mr. Merzeros has not returned those few dollars, although they were among the first to take their potatoes to the society and they got five or six dollars.

The little pigs are growing fine; they go down to the garden, and the old ones are fine too. The young ones come home at 5 o'clock but the old ones stay away until ten o'clock. There is no use in my calling them, for that⁶⁰⁰ is their regular time, and although they are full, they insist upon getting their slop.

Now I want to let you know that I have only ~~shined~~ shined the old stove once since you left, but I have baked many fine loaves of bread in it, neither you nor my first wife ever baked any better. I even baked a cheese cake, as there is plenty of milk. Lilli and Zira give two gallons of milk daily, they seem to give much more than they did last year.

I will let you know that Flora is a nice horse, much better than Billy, he always was a crazy fool.

Comptantworth Exhibitió

1920 6. hó 3. en
Aztal is bizonyos tudatokat hogy
a nagy hazai feladat levelet mely
kiszárm megkül meg egyben minden
a nagy mitkésen Szolgálat nekem a
Szerepese most pedig tudatokat
hogy mint nem is volt levelet sürü-
hen elküszöris az oszt megyon jól tud
ot hogy sejelem se nyaralom niesen
ment jól tudat hogy enyi soksza
szolgálat egyenben nek esoks magy
avál is elég dolag valna ha most
kann is kerets ment diszmut 42
Doroch van most a Gizi pour
magy magy elik a diszmut sasozs
okhom elefani a a szirke z okhom
om kelen fejés az elérés most
ha az a okomom hogy kin is biryok
dolgomni akon mi is en vege 4 on
kon kelpont fel berri ment egy
magam guesz szefes fel az egyen
nyalul de onnak is fele el rohat

oldni is or ejrias kuyshilul is
nem tudom hogyoké so talán
hoc megvár edes Bogni ti volis
igy jövels okon hejeren tön
ne meggy minnen gienk is or
utain mehetek in is a gako
ldom inen de mit esinölök
of its ha nem hivats Jalyoz
ni meg it is hoc dözé volak
it volt or a gennet szölü me
öröbent most nyatrigisig
nö hene hoc volde medig nem
hivom meg tisztitani ony
van rajta hogy meg sakti
ben oc bukssal is ki bussal
oc pors L hül mond holom
hogy nemek egyik láke egy
münl oc mozsals meg rakor
mies egy hujon se regy el pus
fildom medig anfi vult h
horevonta sakt de nem sakti

elég mélyre a mulasztás le járhat a kímle
te mind 5 orokor mind éltam van és szépség
vagy öregék is mindig nagyon nagy el nek orok
mindég este 10 orokor jó nek hozzá hozzá
hivem önkéntes orokor, idjűts de nagy,
jó van azok lakása mint a föld a te orokor
musszák a muskétát. Vagy a szíri orokor
mert elég nem nagy, azok látsát most
pedig tudatnak hogy a russ spornhet el
még nem puerol born esokt egy orokor
mijába el metél de olyan kemény
szűlök bene nagy, sok se orokor sü
felcsés em nem süti bene mint or

mitent én a most sültök hennel meg
kuros leprés a most fej over eliz mer
a lili meg a kina minden nap 2 galon
ad nagy meg jól esetjük hogy lükel
adsvets minth a mult évben a pulvris
meg hóipatam oja Szep hogy szeh min
a hils meg juh is nem oja halassd nem
lesz kuzsa nem lesz kuzsoneza
nem lesz koch és man 7 dolon egy
kórák koch man 250 dolon el gazon
lotam a konyk hül de arént magy ki
kürdöm gazon hogy esak az okaj hogy
oja derék konyk ön nem hogy eliz

örög meg veszenek a sokszor
meg nem is tudam meg
esni a veszenek ment el
alszak nem hogy levelet is
jass eszt is ugy intam most
igen sokat ment egész nap
eset anesä szert nem ha ju
hulud van honnal egy kis pénz
is esimilni en is unom a
val nek a csupa ha bajom ne
lene rosznak mindig most is
eleg rossz meg a meszvoiros
unom is most se olok meg
azza a joir dolait mindig el
sok voltak heviszmi oir an
egy egyet her 7 es 6 dolait
porek az nekis oir oir
szilok a fogukal mikor is
meg keszt es a honkor men
let meg

penz hül de tehet hogy juk
han lesnek most is a müll
hiben meg is a jó pajent
vinni meg sose bele legyél em
egy rossz óis was szög he ugy he
lemerül hogy fogorvól telet
ki turni de amilyen pajidal
most én avól szennvel em hogy
az honhoz ha vult hóivom
nyorog meg az étel se esel jó
mentha zabam valna hesz
elni mindig az or vas hún
mentem volna ösre dogol
az egész loiham kényez az
az vult mint egy fa most
az de meg is esinöl ha
csut az az vas ögöl és hár
m nap eltelivel kerdel
gyógyulni de meg paj oról
de linokt mon dolgarzni

esokt most meg a derék
az van rajt om honnan ly hór
en nem szümits meg okon
nem tudom hogy mit esz ve
em ment okon nem sok okun
ok dolgarzni is nem tess okun
széna mit etetek vele tehoit
jól meg gondaly mindent és
ingal oronol hogy hogy van
lene job de a teledet a me
hoit odig meg én nem is
om hogy nem kiralat semit
setenszi ment il el hogy a
penz és tess kézesel okon
mit tess velünk tehoit ha
rosszobul lesnek ok tudol
loik oronol ha nem irat
hannar level foit nyugol
tehet el hogy jobon vagy
ak ment jóvan nagyon nem
er kének inni este meg mit

örög meg veszonolats sakszo
meg nem is tudam meg
esni a veszonomul ment el
alszok nem hogy levelet in
jaks eszt is egy irtam most
igen saksal ment egész nap
eset arisa szert nem ha ju
helyed van honnal egy kis piri
ut esimilai en is unom
vol nek arisa ha hajom ne
lene rosszra gredig most is
eleg rossz meg a meszros
unom nek most se odoit meg
ossza gair dolait gredig el
saksallats hevissimi oir an
egy egyet nek 7 es 6 dolait
pirelekaf nekits oirtoim
szilok a fogubas mitonit
meg keszlet a honkoron
ted meg

June 25th, 1920.

My dear Hermin:

I want to let you know that I got your letter and that I understood everything you wrote. I am glad that you are so stout and that you have such a good place. Take good care of it, as I do not see anything promising here. The Irish potato crop yielded practically nothing, and I haven't any better hope for the sweet potato crop, as there are no potatoes visible. I do not expect to have any difficulty shipping them.

It is raining all the time. My health is some better. You can be assured that I have enough trouble with the stock, as they eat a lot, and I have not realized one cent from them as I have been unable to sell a single one. Graham is \$5.00 a sack.

m If I have time and the grapes ripen, I will send you a box of them; perhaps you would be better able to sell the farm.

I remain,

Complamvont's Exhibit 'D'

Field 1920 6 W 25 in

Redves hermin budolum
velat hugg oc Leneled
meg kroya kom megintus
ben belule mindent
magyan orulats hugg aj
on kovin gugg hugg
ujan ju helgne jul oil
esak beesit men aju
helget ment il nekem
nem mulokvont's semi
ment az epirt krasli magid
semise adal de az eider
se hisetol ment krasli
nem laerit esak oc

Kövezzem id nem csak
hajam lester a szatirias
al mindegy esuk or esu' amu
ossz ilchi most egy kies
it jul esu' nem magyom
nyugut letreer ment van
nekem eleg hajam eset
a sok jussigot ment ped
esz nek minden gennel
es nem hink eladni egyel
se a kungra s doloer egy
tsuik ha meg juts a szula
hacsak idomdesz ma dkiul
dük egy ha gssol hialho
mojt zuloer eladud a ped
manuak gmaritok

My dear Hermin:

I want to let you know that early Monday morning we had such a terrible storm that the hail and rain tore up the ground; it makes one shudder to think of it. It was fortunate that all of the stock were under ~~was under~~ roof, or the Lord only knows where they might have been driven. It ruined the entire crop. Now I can begin planting again. It is so cold that one feels it even in an overcoat. But be careful and don't talk about it, because you know I want to sell the farm. If the weather keeps on like this I wont know what to do. There wont be any oats, wheat or corn, and oats is \$7.00 a sack. I spent \$250.00 out of the bank, but I will fight it through if only my back would not ache so. I can hardly draw a bucket of water; no wonder for all the work that I have done on the farm. I have done all the planting at night by moonlight, so it is no use for you to pester me about writing. It is ten o'clock when I eat my supper, and I fall asleep as I eat, as I am so fearfully tired, and when I write, it is twelve o'clock when I go after the cows.

You are to blame for all these things. If only I could find a purchaser so that I could leave here too, for I am afraid I will get sick and all the livestock will starve with me. No one comes here, so you had better see to it that we sell this place. If I can't raise anything, the livestock will eat up every cent. I planted eight acres of corn, but I cannot tell what became of it.

I remain,

Your unhappy husband

Tonkracht minder weten
enyl moet meer weten
polderaan es vanden
van hogg keti kadwit
is moij hogg men polder
overenher. De viggier hogg
ne besmet gesd men hogg
hoggel sereb, aientis voss
men hogg viggier over
okten men dudar mit

hivok egy kórtól vízzel felhúrní de
nem is eszda a mil meg időjézt
paldon tábor majd mind éra kórt men
napot szodlessi és éjtel meg kírak
bom a haldriloz máit így a levél
irozol híjónom traktóla hal man
este mikorom meg rosz vilat 10 11
ora és honá fogat a levél híróis kór de
meg szakszon a gyés néi is el a szekt
ment korra kórt porsot voigat de meg a
behenekel meg éjtel kór kórt kórt kórt
ijer el a szekt kórt kórt kórt kórt kórt

ment eszt. mind te neked közzönhetem
Te eszokt soványt hinni és szerezni hogy
én is meg hinnék innen szabadul
ni mert ottul felekvőz helyzetek és
ez a sok jószág éhen tűzlik meg vel
em együtt ment ide szemjón senki se
behozt eszokt nérd hogy elhíjult a darsi
ment ha nem terem semmi akon minden
jérend fel emi sztezo sok jószág
& akon kutyori ezöl vel em de nem
Andam hogy majd nyitessék ki a
Érel marocdoks kedvelten fegyű
éhen a világhon

My dear beloved Hermin:

You ask me how I am. That is easy found out. I am in such a miserable condition that there cannot be another like me in this world. I am the only one that God has cursed, and you are to blame for this, as I would never have come to this place if you and Barna had not persuaded me; and I can thank you for all of this suffering which I have undergone. If I can come through it and retain my health; you must know how much work there is to do in planting two acres of sweet potatoes and one acre of Irish potatoes. And on the 8th there was such a frost that the plants were all ruined. Today it is just as cold and I must work in my overcoat. It is fortunate that I have enough plants; so many in fact that I can afford to sell about thirty thousand, but nobody wants to buy them although I never had better plants.

Now I know how I stand with the Mezaros family. I went to ask them to help me with the planting for a day. Charãie came to see me one day to get the planting machine, and told me that their plants were just coming up, and that he and his mother would come for a day and help me. When I asked them his wife repaid me very well. She asked me why did I want to do my planting so early. I told her I had to, as the plants were too big to keep covered. Then she said why did you keep heating them so much? And then she said they could not come as they wanted to plant corn that day, and I said they could do this tomorrow, and she could come and help me take the plants from my hot-bed. But I think they were afraid that I would indulge myself with that pretty little woman, but they never said a word about their money. Since then they have not come near me, damn it. But enough of this.

The news here is that Milek burned to the ground; even their potato plants were burned. Harry sold his store, Redly sold his farm, and Tennessee sold too, and Herman Lorence, your good friend, is building a nice home in Elberta.

I am lucky with poor Lassa, as he comes to see me
sometimes, and Saturday was in Foley. Cantri talked about
cleaning velvet beans, well, Zimmerman wont do it this
year, I got three bushels.

Adit le nakt az ember es egy
aker ejnits kumpit es most
8 on oje otkar volt hogy
mind lönkore ment ment
ma is ojan hider von hogy
keli koldokat kelet bel ven
ni meg oca szerezese hogy
galaibaim van elig meg
elg othot nek vagy 30 eury
csokt kele ne valaki nek de most
ar se kel a kutyainak se ojan
galaibaim meg 150 eury mint
most van de mit ei ha mes
ivó noi a miszovasek od is
venc he vagy uti entük mentem
hogy jöss nek el egy nap noi
galaibaimi ment a csali
it volt a vetä gese oszt mond
a hogy meg on övék csokt meg
hujt ki felé behoit a jgg el
ma melletten anyavol de

nikun idommentem kolt szep
en ki kireket a bele sege men
monha hogy mi nek naktom
meg ki kiser hider von en
meg mondom hogy miszoy
ki nakt mi ment most nem
lehet le koldozasi megyse es
ara oszt pelet se hogy mi
nek kikel se ojan staggan
mint nem mehetünk meg
van meg egy kis kutyainca
oszt osztogit ma el vel mi
es en mondom hogy oszt el
veti a kelt ember is es o jö jö
el szed mi de hisz basom
akul felt halom hogy en
ha ide jön mingyoi meg
hoztam oszt a szép kis
osztogy koi de a pénz mit
kesit kutyainca

arabai felintéssel a fele
ne, az egye meg a két erül
eleg most ha az nagy mi
nyiság az a mitet, paroi
ezet es az a ha az ma az
meg meg az edes kungati
pala toja is meg egy a ha
el az az a solnyat redi az az a
parnyat is fenesre is fenesre a
ha az az az az az az az az
ha az elherben szeneses nagy
ok szegény ha az ha az az az
a, meg is meg loita az az ma
val szegény pali kungati fenesre
szegény a velvel ha az az
ki es az az az az az az az
az az az az az az az az az
nem es az az az az az az az
az az az az az az az az az
az az az az az az az az az

My dear Hermin.

I want to let you know that this letter came back, as I forgot to write the house number on the envelope. If you get this letter, write to me immediately and send me the contract, so that I can give it over to the real estate company so that they can sell this farm if possible. I want to get rid of this awful living. And you see to it that you make some money, as I do not know whether the early sweet potatoes will bring a hundred dollars. I dug up about twenty hills and did not get a half peck from, so there is nothing else for you to do but continue working there, as all the money goes to feed the stock, and I have not been able to make a cent. If you could sell the farm, I would go to you, If I stay here much longer I'll go daffy. But I will stand it until then. You should not think of returning here to this awful misery, but see to it that you make money, as we must leave this.

I await your answer immediately.

Comptantonts Exhibit "L"

Kereses Kemény Ádámnak hogy
 én a Kénel vívni jöttem
 in tompoci a hátr. nomenoit
 hanem ha meg kapod okon
 ol, irjál is küld el a szent
 Jézus hogy őt ahasam a föld
 eladói komparia nek hogy
 ha birjálk őt adja k el hogy
 én is meg szachvint haszok
 elöl a nyomorult elthöl is
 te meg nérd hogy jénál esinél
 mert én is a konaji edes
 kinyitál but nem tudom hogy
~~szent~~ volaint esinél oké
 mert meg nérdem moir

egy kicsi maletani mint hogy
fe. csak dolgoz. A munka ment
a pennt fel emi esli era
sok jussraig ami hól egy cment
bel se tud adenyker bevenni
es ha el kene a panni okun
en is min jont ad a panyk
menit hól ad ment hól ad
keleni alkot en esokugyjan
meg hól hól ad esok hól
ak adig minent ne aron
hól ad fejed hogy mig egy
esen ide jössen esen a hól ad nyo
monusag han hól emi ment
hogy ment esin alj ment
imen musraig jussatol ne elöl
a monusag hól hól választ

Wednesday.

My dear Hermin:

I write to let you know that we had another big storm Wednesday; it was so fearful that it shook the home. The weather continues so cold that I still wear my big coat. 780
The weather ruined everything. I do not know whether I shall be able to make any money, although I work day and night. I want you to know that the big hog has six little pigs; the other hog will have her pigs in a day or two, so you see how much trouble I will have. But that is nothing so long as I have my health. The Hagendorfer's hogs have twelve little pigs, and Mr. Sneider's has eight pigs.

Dont bother me about writing; I write once a week. I am falling asleep, and I close my letter.

I remain your affectionate husband

legyen a legizest Dur. D. S. K. ma
molekulat püjöröl a szövegben
szöveg 8. szel molekulat püjöröl
harmadik arko ne molokis a levél es
invasok ment es sz. is egy költiy indom
ment elodszok chel zonom sarogim
mon-ovot "meredő" peres

My dear Hermin:

I have received your letter and understood everything, and I am glad that you got a good place, even if you must do more than you are supposed to do. The main thing is to have a good place, even though you earn less than you would in a factory, this place is more permanent if you do your work satisfactorily.

And now I will let you know about the news here. Kalmar came here to beg a ton of hay, and said I will ask you, Mr. Hegedus, to wait two weeks for payment, as I have a good cabbage crop and will take it to Pensacola to sell, and bring you the money. I could not refuse him, and gave him a wagon-load for \$20.00. At the end of the two weeks, I went to visit him, and nearly fainted when they told me he had sold everything and left the place, but they could not tell me where he had gone. His son went to Canton, but he said he did not know whether he would go to Canton or Detroit. And he told Mr. Masternelli that he would not pay Hegedus for the hay, but that he could take what was left in the attic, as half of it was moldy, anyway. There was some left, but he sold it with the farm, and that is what I got for entertaining him; he also took a big bunch of grape props, the dirty scoundrel was like a gipsy magician. So far, Masternelli had not said anything about Kalmar, but now they tell me that he cheated them out of one hundred dollars, which he still owed on the horse, so they took the good horse and wagon for the \$100.00 that he owed them, but he will write to Mr. Dusras, and Mr. Dusras son will send us his address, as he asked for the son's address in Detroit, so he could go there. I will find it out too.

Poor Mrs. HERNICCY was very sick last Sunday and the doctor was with her when I got there. I have not been anywhere since you went away; this was the first time that I took a walk. You know there is so much to do here, as I

planted four bushels of Irish potatoes in rows. I have plowed all the ground except two acres. I can plow this up in a day with the horses, even if I have a lot of trouble with them. We quarrel and then we make up again. My plants are so fine that no one has the equal, although it was freezing cold until March 10th; the ice was an inch and three quarters thick in the cistern in the morning. I had to plow the ground with overcoat and gloves on, the weather was terrible. The banker, Joe Langer, is his name, planted his potatoes during the first week in January, and they are just coming up; they are wonderful potatoes. Mine have come up too, and they are still coming, but the banker has used the cultivator already. Charlie and his mother are coming next week to help me plant them, as their's are just starting to come up in the hot-house.

Well my dear Hermin, you must save some money, as the livestock eat up every cent; oats are \$6.50 a bag and graham dear that one gets dizzy to pay for it.

The big four hog will have little pigs soon; there will be enough to feed the four of them, but no one wants them even free, because they say they do not want another to feed, and the small pigs are growing fine. But if you would know it or see it, I have no rest day or night, but I would not mind if only the cows would come home. I have to go and get them at 10 o'clock when I can hardly crawl. There is only one good thing, I am healthy, and thank the good Lord for that.

I close my letter. I received the tablets

Your faithful husband,

50 Felt 1920 3/10 2401 Compliments Exhibit 1/18

Érdemes Hermin levelét megkapni
sőt, mely hát meg értelem
mindent azért is hogy jó helyre
juttatott nagyon örülök nek
ki csak annyit mondok hogy
csak kezdte meg a jó hely
el meg ha egy kicsit több
kel is lenne mint amennyit
Jutott rá ment az a jó ha jó
meg ha egy kicsivel kevesebb
keveset is mint ha egy órán
járna de ez hiteltől és
folytató ha hü ségesen lesz
el meg mindent most pedig
budaörs az is való igaz
akárul elössz is a ked minden
jól hamar kán...

Legyenek aja Strives legyadjak
meg egy tan Strenoit de mezejre
fel kérem Hegedűs unok hogy
csokt két hélig, legyen Strives
voinni or oiroie ment nagyon
Szegre Kozvostoin von és vish
em preme kulcina és oronod
meg hozom tehát nem hirtam
hőle Strachodulni így atam
neki egy fivesi va 20 dolcin
és két két mulva el mem
em meg latogalni hoi csokt
lehadtom mikor mondják
hogy el adat foveral min
eresztül és moim el is men
h De nem tudják hogy
hova ment a fije Centon
ha ment de ő oszt mo

ha hogy nem tudja hogy can
tonha megye vagy detrojitha
és a mester neijek monkoit
nek hogy a Hegedűs nek nem
finet meg a Strenoije oron
csokt onyit mondak hogy
voin meg a a paoloisan
vigye el egy is fele preme sz
esvold is oszt is el adta
a parmal ezé vendigelhet
em el vit egy nagy esam
szalöveszüt ajam vult min
egy vovoislu Origoing or
shembelen Nuszpoi orig
a mester neijek be moim
ak noi semisse de moim
mondják hogy

szete a gazemben a miley
meg nyugta ment onak is
Lombokot a lo cirviban 100
duloinak is igy onak vele
on goli fuvall meg a kacsit
a moir duloinkon Te majd
in ez a Juszajekonak
vogy a Juszajekonak
igye a Chinnu ket ment
el kente a piye Chinnu
hogy adoc metesem deha
jitho igy majd meg
Indon en is es fel tiszta
belent a pulnok meg hoigo
Lomb a milek ket a Hen
meg no szajem nagyon

hetez vult a mult voroimnoyr ar onyos vult
ezen okon ot mikon adoc menpenn ment
mator el mentel meg esock most vultoun
kin setoil ni ment tudod hogy it nem sok
doloz vonn ment el veleyn meg husel ejnis
knyrdit is 8 okon bukonicroit most esi
malom ar edes knyrditovok a sorvorkol main
mind fel szoinbalom a fődél esock kőit
aker vonn meg szoinbalom de egy
nagy ossz is fel noim joik a szoinas
esikok ha soft hajani is vonn velük
de orien kibekülünk meg ösne vessünk

az én szépségem valószínűleg volt hogy az én
miesem szerkei nekem pedig monerius
kire. Jikig az én hozzájárulok hogy
még egy és főként megged ismerjék
vált minden, pedig a szerkei hán
még a kukorica és a olaj is nagy koch
a hán és kesztyűben szan. Tolam
hogy az a idő jövös volt és a hán
hán el a. hán a jövös kinyitil még
jövös el a hán és most kel ki
De mi eroda nemek kinyitilje van

Boornboom

Drenthe jonged' of d'ne
 jaks moet meginne ineg' pij' d'its
 az a ney d'izand lesen ev' elij de
 nem lets sendi' met se me' inggen
 se menl oerst mond jits hogg ev' nem
 kel moet maen sneggets q' mouto' erats
 is de hou te oerst hndrow vogg lo' bawey
 d' hogg se ejelen se woyrodan de me'z
 minne me'z jair noiesock a teheretk
 jone' meti' h'odna de lijn o'oe kon me'z
 ek is h'its jaedig alig h'iro'k' men
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COMMISSIONER'S CERTIFICATE

I, K. C. Cuthbert, Commissioner under the Commission heretofore issued out of the Circuit Court of Baldwin County, Alabama, sitting in Equity in said cause, do hereby certify that under the power conferred upon me by said Commission, I caused the said Mrs. Hermina Hegedus, a witness for the complainant in said cause, who is known to me to be the identical witness named in said deposition, to come before me at No. 420 First National Bank Building, Mobile, Alabama, at four o'clock P. M., Tuesday, July 21st, 1925; that said witness was first duly sworn by me before testifying, as aforesaid, and that she was then orally examined by Jesse F. Hogan, Esq., of counsel for complainant, and cross-examined by Norborn Stone, Esq., of counsel for respondents, and testified in response thereto as hereinabove written, and that her testimony was by me reduced to writing as given by the said witness, and as near as might be in the identical language of said witness; and that said deposition was read over by said witness and signed by her in my presence.

I further certify that I am not of counsel or of kin to any of the parties to this cause, and am not in anywise interested in the result thereof.

K. C. Cuthbert

Commissioner

HERMINA HEGEDUS,
Complainant,

-vs-

PAUL HEGEDUS, SR., JOHN HEGEDUS,
JOSEPH HEGEDUS & PAUL HEGEDUS, JR.)
Defendants.

)
)
) IN THE CIRCUIT COURT-EQUITY
) SIDE, STATE OF ALABAMA,
) BALDWIN COUNTY.
)
)

INTERROGATORIES PROPOUNDED BY DEFENDANTS TO:-

Joseph Hama, whose address is 1537 E. Broadway Street,
St. Louis, Missouri.

Louis Alt, whose address is U. S. Post Office, St.
Louis, Missouri,

and who are witnesses for defendants in this cause.

Stephen F. Pinter, Federal Commerce Trust Building,
St. Louis, Missouri, suggested by defendants as a
suitable person to act as Commissioner.

Robertson
Solicitor for Defendants.

We hereby accept service and waive notice of the fil-
ing of these interrogatories.

This 7 day of October, 1926.

Hogan & Mitchell
Solicitors for Complainant.

INTERROGATORIES PROPOUNDED TO JOSEPH HANNA:

1. Please state your name, age and address. What is your occupation? How long have you been engaged in your present occupation?

2. Do you know Hermina Hegedus, Paul Hegedus, Paul Hegedus Jr., John Hegedus and Joseph Hegedus? If your answer is that you do know these parties please state how long you have known each of them.

3. Were you ever an employee of or in any way connected with the Baldwin County Colonization Company? If you answer in the affirmative, please state your connection with this Company, giving dates and duration of same. Have you ever represented Paul Hegedus Sr., as his attorney? If so, please give the dates and duration as near as you can.

4. As attorney for Mr. Paul Hegedus Sr., did you have to do or render any services for him or as agent for the Baldwin County Colonization Company in connection with the east half of the northeast quarter of the northwest quarter of section thirty-three in township seven south of range three east in Baldwin County, Alabama. If your answer to the last question is in the affirmative, please state your connection and the extent of your services with regard to the same.

5. Did Paul Hegedus Sr. ever turn over to you any monies to be remitted to the Baldwin County Colonization Company as part payment on this property? Did you ever remit for him such monies to this Company as part payment on lands that he was then purchasing in Baldwin County, Alabama, from said Company. Please state the extent of your services with regard to making remittances for Paul Hegedus Sr. in connection with his purchase of the property from the Baldwin County Colonization Company in Baldwin County, Alabama, giving amounts and dates as near as you can.

6. Did Hermina Hegedus ever deliver monies to you for transmission to other parties. If your answer is in the affirmative to this last question please state as near as you can the dates and amounts of such monies delivered to you by Hermina Hegedus together with the names and addresses of parties to whom remitted.

7. Did Hermina Hegedus at any time deliver to you or make remittance through you of any monies to be applied on the purchase price of the above described property in Baldwin County, Alabama?

8. Of the monies delivered to you by Paul Hegedus, Sr., did you have knowledge of the source of which he derived the same? If your answer to this question is in the affirmative, please state the source or sources from which you knew Paul Hegedus derived such money.

9. Did Hermina Hegedus at any time turn over to you monies to be remitted to the Baldwin County Colonization Company as part payment on the purchase price of the above described property with instructions to have the deed for the same made in her name or in the joint name of herself and Paul Hegedus Sr. ?

10. State whether or not Paul Hegedus Jr., John Hegedus and Joseph Hegedus had any monies during the period covered by your foregoing testimony which belonged to them in their own right. If your answer to the last question is in the affirmative, please state the source of your knowledge and also how and when these three parties came into such money. Was any part of this money belonging to these three parties turned over to you by Paul Hegedus, Sr.

(page two)

and applied as a part of the purchase price on the above described property?

11. Did Hermina Hegedus know of the sources of the money remitted for the purchase of this property?

12. If you have answered that you were the agent of or represented the Baldwin County Colonization Company in connection with the above property, please state if, during this time, Hermina Hegedus ever claimed that her money was paying for this property.

13. Please state whether or not Hermina Hegedus came to you in the fall of 1912 and brought the deed from the Baldwin County Colonization Company covering this property and stated that the same was in the name of Paul Hegedus and claimed that it should have been made in her name.

14. Please state whether or not you did remit to the Baldwin County Colonization Company for Paul Hegedus Sr. monies totaling \$205.00 during the month of March, 1912. If your answer to this question is in the affirmative please state how this money was remitted and in whose name.

15. Prior to Mr. Hegedus receiving the deed for this property did he consult you as his attorney as to the manner and method of purchasing the same? If your answer to the last question is in the affirmative please state the substance of such consultation. Did you advise Paul Hegedus Sr. to take the deed to this property in his name?

16. Do you know of your own knowledge to whom the money belonged that was remitted through you for the purchase of this property?

17. Please state what part of the purchase price of this property was handled through you.

Norborn Stone
Attorney for Defendant

INTERROGATORIES PROPOUNDED TO LOUIS ALT:

1. Please state your name, age and address. What connection or office do you hold with the U. S. Post Office at St. Louis, Missouri at this time?

2. If you answer that you are connected with or hold some office with the Post Office at St. Louis, please state whether or not as such officer you have the custody and control of the records of said U. S. Post Office at St. Louis, Mo. Are these records under your control the official records of the transactions of this office?

3. Please examine the records under your control in your capacity above named and state whether or not these records disclose the dates, amounts and names of remitters of U. S. Post Office money orders numbered 29180, 29181 and 29182.

4. If your answer to the last question is in the affirmative, please state the date of issuance, the amount covered or remitted and the name of the remitter for each of the money orders whose numbers are given above.

5. Are your answers relative to the above money orders taken from the official records of the U. S. Post office on file with you and under your control and custody as U. S. Post Master at St. Louis, Mo.? If your answer to this last question is in the affirmative please attach a copy of such records covering the above money orders, attaching your certificate as Post Master to the same.

Norborn Stone
Salvator for Defendants

HERMINA HEGEDUS,

Complainant,

-vs-

PAUL HEGEDUS, Sr., JOHN HEGEDUS,
JOSEPH HEGEDUS & PAUL HEGEDUS, Jr.,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. _____

OBJECTIONS TO INTERROGATORIES PROPOUNDED TO JOSEPH HANNA,
A WITNESS FOR RESPONDENT.

FIRST. Complainant objects to the sixth interrogatory upon the following separate and several grounds, viz:

1. Said interrogatory calls for illegal, irrelevant and immaterial testimony.

SECOND. Complainant objects to the eighth interrogatory upon the following separate and several grounds, viz:

1. Said interrogatory calls for illegal, irrelevant and immaterial testimony.

2. Said interrogatory calls for hearsay testimony.

3. It does not appear that the witness has any personal knowledge of the matters inquired about.

THIRD. The complainant objects to the first question of the tenth interrogatory upon the following separate and several grounds, viz:

1. Said question calls for the legal conclusion of the witness.

2. Said question calls for illegal, irrelevant and immaterial testimony.

3. Said question calls for hearsay testimony.

FOURTH. Complainant objects to the last question of said interrogatory upon the following separate and several grounds, viz:

1. It does not appear that the witness has any personal knowledge of the matters inquired about.

2. Said question, for aught that appears, calls for immaterial testimony.

3. Said question calls for illegal, irrelevant and immaterial testimony.

HERMINA HEGEDUS,

Complainant,

-vs-

PAUL HEGEDUS, Sr., JOHN HEGEDUS,
JOSEPH HEGEDUS & PAUL HEGEDUS, Jr.,

Respondents.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. _____

OBJECTIONS TO INTERROGATORIES PROPOUNDED TO JOSEPH HANNA,
A WITNESS FOR RESPONDENT.

FIRST. Complainant objects to the sixth interrogatory upon the following separate and several grounds, viz:

1. Said interrogatory calls for illegal, irrelevant and immaterial testimony.

SECOND. Complainant objects to the eighth interrogatory upon the following separate and several grounds, viz:

1. Said interrogatory calls for illegal, irrelevant and immaterial testimony.

2. Said interrogatory calls for hearsay testimony.

3. It does not appear that the witness has any personal knowledge of the matters inquired about.

THIRD. The complainant objects to the first question of the tenth interrogatory upon the following separate and several grounds, viz:

1. Said question calls for the legal conclusion of the witness.

2. Said question calls for illegal, irrelevant and immaterial testimony.

3. Said question calls for hearsay testimony.

FOURTH. Complainant objects to the last question of said interrogatory upon the following separate and several grounds, viz:

1. It does not appear that the witness has any personal knowledge of the matters enquired about.

2. Said question, for aught that appears, calls for immaterial testimony.

3. Said question calls for illegal, irrelevant and immaterial testimony.

-2-

FIFTH. Complainant objects to the eleventh interrogatory upon the following separate and several grounds, viz:

1. Said interrogatory calls for illegal, irrelevant and immaterial testimony.

2. It does not appear that the witness has any personal knowledge of the matters inquired about.

3. Said question calls for the knowledge or mental condition of the said Hermina Hegedus.

SIXTH. Complainant objects to the twelfth interrogatory upon the following separate and several grounds, viz:

1. Said question calls for illegal, irrelevant and immaterial testimony.

2. Said question calls for hearsay testimony.

SEVENTH Complainant objects to the fifteenth interrogatory upon the following separate and several grounds, viz:

1. Said interrogatory calls for illegal, irrelevant and immaterial testimony.

2. It does not appear that Hermina Hegedus was present.

3. It does not appear that Hermina Hegedus is bound in any way by the matters inquired about.

CROSS INTERROGATORIES PROPOUNDED BY THE COMPLAINANT TO JOSEPH HANNA,
A WITNESS FOR THE RESPONDENT.

The Complainant, without waiving the foregoing objections, but expressly insisting thereon, propounds the the following Cross-Interrogatories to said witness, viz:

FIRST. If you have stated that Paul Hegedus, Sr., turned over to you monies to be remitted to the Baldwin County Colonization Company as part payment on the East half of the Northeast quarter of the Northwest quarter of Section 33, in Township 7 South of Range 5 East in Baldwin County, Alabama, please state the amounts so turned over, and the respective dates thereof; also please state whether said money was turned over to you in cash or by check, and if by check upon what bank it was drawn and the amount of each check.

SECOND. If you have stated that you remitted monies for Paul Hegedus, Sr., to the Baldwin County Colonization Company as part payment on said property, then please state when you remitted the same, whether by exchange, check, postoffice money order, express money order or cash. Attach said check or receipt for money order.

THIRD. If you have stated that you have any knowledge of the source from which Paul Hegedus, Sr. derived the monies delivered by him to you, then please state how you obtained this knowledge, from whom and in what manner?

FOURTH. If you have stated that Paul Hegedus, Jr., John Hegedus and Joseph Hegedus had any money, during the period covered by your testimony, which belonged to them, then please state how you know this to be true, from whom and in what manner you obtained your information and knowledge. If you have stated that any part of the money of these three parties was turned over to you by Paul Hegedus, Sr., to be applied as a part of the purchase price of the above described property, please state from whom and in what manner you obtained this knowledge.

FIFTH. Please state whether you have any personal knowledge as to whether Hermina Hegedus ever asserted any claim to the foregoing property, ~~and~~ whether she asserted this claim to the said Paul Hegedus, Sr., or to any other person?

Hogau & Mitchell

Solicitors for Complainant.

The State of Alabama, }
Baldwin County

CIRCUIT COURT.

To Hon. Stephen F. Pinter, Federal Commerce Trust Building, St Louis
Missouri.

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commission-
er, and by these presents do authorize you, at such time and place as you may appoint, to call before you and
examine Joseph, Hanna whose address is 1537 S. Broadway St, St Louis Missouri.
Louis Alt., whose address is U.S. Post Office, St Louis Missouri.

as witnesses in behalf of Defendants in a cause pending in our Circuit
Court of Baldwin County, of said State, wherein

Hermina Hegedus

is Complainant

and Paul Hegedus, Sr., John Hegedus, Joseph Hegedus and
Paul Hegedus, Jr.,

are Defendant,s

on oath to be by you administered, upon objections to propounded by Complainant,
to take and certify the deposition of the witness,es and return the same to our Court, with all convenient
speed, under your hand.

Witness 9th day of October 1926

T. W. Pinner
Register.

Commissioners Fee \$.....

Witness Fee's \$.....

No.

THE STATE OF ALABAMA,

Baldwin

County.

CIRCUIT COURT.

Hermina Hegedus

Complainant.....

vs.

Paul Hegedus, Sr., et al.

Filed Oct 28/92
J. M. McArthur
Defendant

COMMISSION TO TAKE DEPOSITION
ON INTERROGATORIES.

COMMISSIONER:

Hon. Stephen F. Pinter

Federal Commerce Trust Bldg.

St Louis, Mo.

WITNESSES:

Joseph Hann, 1537 S. Broadway
St. St Louis Mo.

Louis Alt, U.S. Post Office,
St Louis Mo.

Quarred at 1000



The State of Alabama, }

CIRCUIT COURT.

Baldwin County

To A. W. Thompson

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Paul Hegedus, Sr., Paul Hegedus, John Hegedus and Josef Hegedus

as witnesses in behalf of Defendants in a cause pending in our Circuit Court of Baldwin County, of said State, wherein HERRINA HEGEDUS

Complainant and Paul Hegedus, et al

Defendant,

on oath to be by you administered, upon interrogatories and oral examination to take and certify the deposition of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 8th day of Decembr 1925

T. W. Pickens Register.

Commissioners Fee \$

Witness Fee's \$

No.

THE STATE OF ALABAMA,

County.

CIRCUIT COURT.

Complainant.....

vs.

Defendant.....

COMMISSION TO TAKE DEPOSITION
ON INTERROGATORIES.

COMMISSIONER:

WITNESSES:

Commissioner

(page two)

is handed to the Commissioner and marked defendant's Exhibit "C".

Complainant objects to the introduction of this instrument on the following separate and several grounds, viz: First, it has not been shown that this instrument was ever delivered to or accepted by the Baldwin County Colonization Company. Second, this instrument has not been sufficiently identified by the witness as having been executed by him and as and for a mortgage to said Baldwin County Colonization Company and we move to exclude this instrument on the same separate and several grounds.

That paper that is shown me I got from Mr. Hanna, the Agent of the Baldwin County Colonization Company. I got the paper that you show me when I paid the \$182.00.

Defendants offer in evidence the cancelled note from Paul Hegedus to Baldwin County Colonization Company for \$182.50 dated June 1st., 1912, which is handed to the Commissioner and marked defendant's Exhibit "D".

I got the \$182.00 that I paid the Company out of the boys money. They got the money, part of it from the money left by my first wife, their mother and part of it they earned and I helped them along. Hermina Hegedus did not pay a cent of the \$182.00. Hermina Hegedus never paid any of the money at any time on this land. I have never seen any money of Hermina Hegedus and I never took any to pay on this land. I never saw Paul Jr. pay any of the money on this land. No, I and Paul Hegedus Jr. never did take any money belonging to Hermina Hegedus and pay on this land. The boys, all three of them came down on this land and cleared it and stayed there until Hermina Hegedus chased them off. The boys came down again and brought the money along and we built the place up. The boys built a barn and a big building to start a brick yard and a small house on this land. The boys were not grown but were around 14 and 16 years old when I took the deed to the land.

Q. "Did you take the deed to this land for the boys?"
We object to the question upon the following separate and several grounds, viz: First it calls for illegal, irrelevant and immaterial testimony. Second, it calls for the intention or purpose of witness. Third, it calls for the uncommunicated intention of the witness. Fourth, it seeks to make testimony for the respondents.

Ans. I took the deed to the land for my boys, Paul Hegedus, John Hegedus and Joe Hegedus.

Complainant moves to exclude the answer upon the following separate and several grounds, viz: First, it calls for illegal, irrelevant and immaterial testimony. Second, it calls for the intention or purpose of the witness. Third, it calls for the uncommunicated intention of the witness. Fourth, it seeks to make testimony for the respondents.

When I paid the \$200 to the Land Company Hermina Hegedus did say something about wishing her name in the deed. She said that she wanted her name to the deed. I told her in answer to that that I could not have her name in this deed because the money belonged to the boys and not to me. She knew where the money came from. She said when we were married that she had money in the Bank but I never did see any of it. She said she had about \$70 or \$75 in the Bank. She did not give me a penny of this to pay on the land. I remember when my wife, Hermina Hegedus left me. It will be six years this coming January. She left me. I did not tell her to leave. I do not remember how long she stayed away but about 6 months.

-page two-