

CARLTON J. MARTIN, AN INDIVIDUAL
TRADING AS MARTIN AUTOMOTIVE SUPPLY
COMPANY,

PLAINTIFF,

VS

OSCAR MIXON AND J. R. JOHNSON,
INDIVIDUALLY AND AS CO-PARTNERS
TRADING UNDER THE FIRM NAME AND STYLE
OF JOHNSON & MIXON GARAGE,

DEFENDANTS.

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

Now comes the defendant and for answer to Plaintiff's complaint,

says:

1.

The facts alleged herein are untrue.

Oscar Mixon
Defendant

Defendant demands a trial by jury.

Oscar Mixon
Defendant.

CARLTON J. MARTIN, AN INDIVIDUAL
TRADING AS MARTIN AUTOMOTIVE SUPPLY
COMPANY,

PLAINTIFF,

VS

OSCAR NIXON AND J. R. JOHNSON,
INDIVIDUALLY AND AS CO-PARTNERS
TRADING UNDER THE FIRM NAME AND STYLE
OF JOHNSON & NIXON GARAGE,

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT-LAW.

Now comes the defendant and for answer to Plaintiff's complaint,
says:

1.

The facts alleged herein are untrue.

J. R. Johnson
Defendant

Defendant demands a trial by jury.

J. R. Johnson
Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. _____

CARLTON J. MARTIN, AN INDIVIDUAL
TRADING AS MARTIN AUTOMOTIVE SUPPLY
COMPANY,

()

PLAINTIFF, ()

-VS-

OSCAR MIXON AND J. R. JOHNSON,
INDIVIDUALLY AND AS CO-PARTNERS
TRADING UNDER THE FIRM NAME AND STYLE
OF JOHNSON & MIXON GARAGE,

()

DEFENDANTS. ()

COUNT ONE.

Comes the Plaintiff and claims of the Defendants, jointly and severally, the sum of \$130.46 due by them to the Plaintiff on account by and between Plaintiff and Defendants on and between May 9, 1953 and September 22, 1953, as shown by itemized statement of account, verified by affidavit hereto annexed and made a part hereof, which said sum with the interest thereon is still unpaid.


A. S. WHITING, ATTORNEY FOR PLAINTIFF
708-09 Annex, 1st Nat'l Bank Building
Mobile, Alabama.

Note: The defendants are said to reside on the White House Fork Road between Bay Minette and Stapleton, Alabama on rural route #1.

STATE OF ALABAMA

BALDWIN COUNTY

IN THE PROBATE COURT OF

BALDWIN COUNTY, ALABAMA.

TO THE HONORABLE W. R. STUART, JUDGE OF PROBATE OF BALDWIN COUNTY,
ALABAMA:

Your petitioner, the County of Baldwin, in the State of Alabama, by R. J. Robertson, its agent, as chairman of the County Commission, duly elected, qualified and authorized hereto, respectfully shows unto your Honor as follows:

FIRST: That under the laws of the State of Alabama, your petitioner, Baldwin County, Alabama, is charged with the duty of providing rights of way for roads constructed within said county; that the said Baldwin County, acting through and by the State Highway Department, has surveyed and adopted and proposes to construct a public road over and across the lands hereinafter described and the said lands are needed and desired by the County for public purposes, namely, as a right of way for a public road; that it is necessary and proper and to the best interest of said county, and the State Highway Department has approved, that the county acquire for a right of way for public road purposes the lands described as follows, to-wit:

Parcel 1, owned by Rose Worcester and Olive Worcester:
As shown by the right of way map of Projects No. F. I. 346 (1) and (F)S-635 (1) as recorded in the office of the Judge of Probate of Baldwin County:

Beginning at approximate Station 17+50 where the center line of the line that connects the center line of Project No. F. I. 346 (1) with the center line of Federal Project No. S-635 (1) becomes 85 feet southerly of the present North right of way line of U. S. Highway Nos. 31 and 90 as measured at right angles to said center line; thence northeasterly along a curve to the left (concave northwesterly) having a radius of 1432.69 feet, a distance of 171.7 feet; thence North 82° 12' East, a distance of 53.3 to the point of ending at Station 19+75, the east property line;

Said strip of land being 85 feet wide on the north side of the center line of the line that connects the center lines of said Projects; lying in the Northeast quarter of Southeast quarter of Section 25, Township 4 South, Range 1 East, and containing 0.15 acres in addition to that part occupied by the present right of way of U. S. Highway Nos. 31 and 90;

Parcel 2: As shown by right of way map of Federal Project No. S-635 (1), as recorded in the office of the Judge of Probate of Baldwin County:

Beginning at Station 60/76 where the center line of Federal Project No. S-635 (1) intersects the North property line; thence South 7° 25' East, a distance of 461 feet to the point of ending at Station 65/37 where said center line intersects the South property line;

Said strip of land being 90 feet wide on each side of the center line of said Project; lying in the East half of Northwest quarter of Section 31, Township 4 South, Range 2 East, and containing 1.90 acres, more or less;

Parcel 3: As shown by the right of way map of Federal Project No. S-635 (1), as recorded in the office of the Judge of Probate of Baldwin County;

Beginning at Station 59/48 where the center line of Federal Project No. S-635 (1) intersects the North property line; thence South 7° 23' East, a distance of 128 feet to the point of ending at Station 60/76 where said center line intersects the South property line;

Said strip of land being 110 feet wide on the East side and 90 feet wide on the West side of the center line of said project; lying in the Northeast quarter of Northwest quarter of Section 31, Township 4 South, Range 2 East, and containing 0.59 acres, more or less;

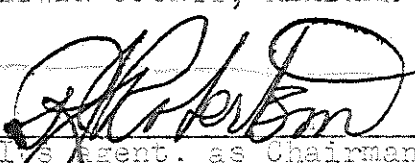
SECOND: That Rose Worcester and Olive Worcester, who are each over the age of twenty-one years, and whose post office address and place of residence are as follows: Rose Worcester, Fairhope, Alabama, Olive Worcester, 8128 Cookacre Avenue, Compton, California, are the owners of and are in the peaceable possession and control of the lands described as Parcel 1; that Maude L. Manci, L. T. Rhodes, Jr., J. F. B. Lowrey, Eloise Martin, Clara R. Bolon, and L. T. Rhodes, Jr., and Maude L. Manci, as administrators of the estate of J. S. Lowrey, deceased, who are each over the age of twenty one years, and whose places of residence and post office addresses are as follows: Maude L. Manci, Bay Minette, Alabama; L. T. Rhodes, Jr., Bay Minette, Alabama, Clara R. Bolon, Bay Minette, Alabama, J. F. B. Lowrey, Burnt Corn, Alabama; Eloise Martin, Dothan, Alabama, are the owners of and are in the peaceable possession and control of the lands described as parcels 2 and 3;

THIRD: That the said Baldwin County further alleges, and the State Highway Department approves, that it is necessary and

proper and to the interest of the County of Baldwin that this County have and own the said lands for the purpose of a right of way for a road and this petitioner desires to have said lands condemned for and as a road for the use of the said county as a right of way for a public road.

PREMISES Considered, your petitioner prays this Honorable Court will make an order appointing a day for the hearing of this petition; that due and legal notice of the same be given to the said Rose Worcester, Olive Worcester, Maude L. Manci, L. T. Rhodes, Jr., J. F. B. Lowrey, Eloise Martin, Clara R. Bolon, and L. T. Rhodes, Jr. and Maude L. Manci as administrators of the estate of J. S. Lowrey, deceased, and that such other, further and general orders and decrees be made in the premises as may be necessary and proper for the acquirement by the petitioner of the property herein described for the purposes herein stated.

BALDWIN COUNTY, ALABAMA:

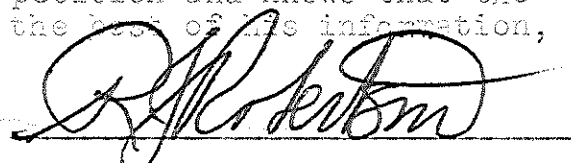
BY 

Its agent, as Chairman of the
County Commission of Baldwin
County, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me G. M. McPherson, a Notary Public in and for said State and County, R. J. Robertson, who being by me first duly sworn upon oath, says that he is the agent for the County of Baldwin, State of Alabama, and Chairman of the County Commission of Baldwin County, Alabama, duly elected, qualified and authorized; that he has carefully read and understands the facts alleged in the foregoing petition and knows that the facts alleged therein are true, to the best of his information, knowledge and belief.



Sworn to and subscribed before me this the 21 day of April, 1954.

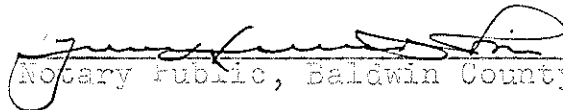
STATE OF ALABAMA, BALDWIN COUNTY

Filed April 24, 1954 M

Recorded P. O. & Min book 4 page 196

W. R. Stuart

Judge of Probate ND


Notary Public, Baldwin County, Ala.