

JOE SCHOEN,

Plaintiff,

vs.

OTTO SCHOEN, as Executor
of the Estate of Emma
Schoen, Deceased.

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

NO. _____

SECURITY FOR COSTS

The undersigned, James R. Owen, as Principal, and
Fidelity & Casualty Company of New York, a Corporation, as Surety,
does hereby acknowledge themselves as security for costs in the
appeal of this matter from the Probate Court of Baldwin County,
Alabama, to the Circuit Court of Baldwin County, Alabama, at Law.

Dated this 12th day of April, 1957.

James R. Owen
As Principal.

SEAL.

FIDELITY & CASUALTY COMPANY OF
NEW YORK, A CORPORATION.
As Surety.

SEAL.

By:

William Lindley
As its Attorney in Fact.)

ERNA SCHOEN,

Plaintiff,

vs.

OTTO SCHOEN, as Executor
of the Estate of Emma Schoen,
Deceased,

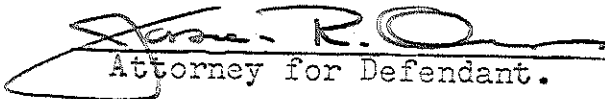
Defendant.

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

DEMURRER:

Now comes the Defendant in the above styled cause and demurs to the petition to transfer this cause to the Equity Side of the court, heretofore filed by the Plaintiff, and as grounds for said demurrer assigns the following, separately and severally:

1. There is no equity in the petition.
2. It affirmatively appears from the said petition that the Plaintiff does not have permission of this court to file a petition to transfer this cause to the Equity Side of this court.
3. It affirmatively appears from the said petition that the Plaintiff has an adequate remedy at law.
4. It affirmatively appears from the said petition that the Plaintiff does not have the right to transfer this cause to the equity side of this court.


Attorney for Defendant.