

Ella M. Brown
Plaintiff

vs.
Leah Service
Aunie Service
Defendants

Circuit Court
Baldwin County
Alabama
9462

Come the defendants
in the above styled case
and answering Plaintiffs
Complaint says:

The ~~are~~ not guilty of the
matters therein alleged.

Buck & Hall
attys for deft

Defendants demand a trial
by jury
Buck & Hall
attys for deft

Free Aug 17/93
J. W. Lawrence
Perk

Handwritten notes on lined paper, including the word "B" and various scribbles.

ELLA W. BROWN,
Plaintiff.

VS.

LEON DEVINE, ET AL
Defendants.

L A W.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

INTERROGATORIES PROPOUNDED BY PLAINTIFF TO
BOTH DEFENDANTS:

1. State how long you have been upon the property here sued for.
2. State by what authority you are retaining possession. If it is under a lease or sale contract, attach a copy of this to answer.
3. Give a list of the instruments by which the party under whose title you took possession claims title, stating the nature of the conveyance and respective dates and where recorded.
4. If you have not already done so, state the price you were to pay for this property and state what, if any, rent you have paid for same since you first moved thereon, also to whom.
5. State what crops are now growing upon the premises, their nature, how many acres of each and when same can be reasonably expected to mature and be harvested, also the value of said crops.
6. Is it now a fact that you have known for a number of months that Mr. Bliss, under whom you claim title, did not own this land and that he gave you a lease or sale contract on it by mistake?
7. State what date you first learned of this and whether or not you have been asked to move from the premises by some one claiming to represent the rightful owner, also when this was done.

Rickarby & Cobb
Attorneys for Plaintiff.

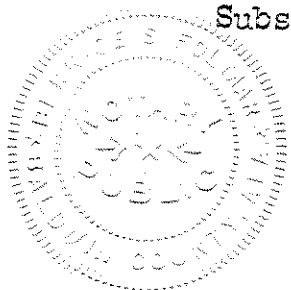
STATE OF ALABAMA.
COUNTY OF BALDWIN.

Before me, the undersigned Notary Public, personally appeared this day ~~ELLIOTT G. RICKARBY~~ who, being duly sworn, says that he is of counsel for the plaintiff and that answers to the foregoing interrogatories, if true, will be of material evidence for plaintiff.

Elliott G. Rickarby

Subscribed and sworn to before me this the 15th day of July, 1931.

Bernice S. Folman
Notary Public, Baldwin County, Alabama.



STATE OF ALABAMA. }
BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LEON DEVINE and ANNIE DEVINE 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 same, then and there to answer the complaint of ELLA W. BROWN.

Witness my hand this the 15th day of July, 1931.

J. M. McKeown
Clerk of the Circuit Court,
Baldwin County, Alabama.

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ELLA W. BROWN,
Plaintiff.

VS

LEON DEVINE and
ANNIE DEVINE
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. ____.

The Plaintiff sues to recover possession of the following tract of land situated in Baldwin County, Alabama, to-wit: The Southeast Quarter of the Southeast Quarter of Section Twenty three in Township Five South of Range Three East of the St. Stephen's meridian, of which she was in possession and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with Five Hundred Dollars for the detention thereof.

Rickard & Cull
Attorneys for Plaintiff.

THE STATE OF ALABAMA,
Mobile County

Know All Men by These Presents, That we Otto Finance Co., Inc.
J. J. Turner & Horace S. Turner
are held and firmly bound unto W. C. Beebe of Baldwin
County, in the sum of Three Hundred Eighty dollars, and costs to be paid to the said
W. C. Beebe

heirs, executors, administrators or assigns; for which payment, well and truly to be made, we bind
ourselves, and each of us, our and each of our heirs, executors and administrators, jointly, several-
ly, and firmly, by these presents. Sealed with our seals and dated this 9th day of
July, 1931.

The condition of the above obligation is such, that whereas, the above bound

Otto Finance Co., Inc.

on the day of the date hereof hath obtained at the suit of same

A Summons and complaint for the recovery of personal chattels in specie against

W. C. Beebe

and asks an endorsement on the summons, "That the Sheriff is required to take the property men-
tioned in said Complaint into his possession," as required by law in such cases, which Summons
and Complaint are returnable to the Circuit Court of Baldwin County, Ala.
on the 11th day
of July, 1931, and which endorsement is made upon the plaintiff enter-
ing into this Bond.

Now, if the said Plaintiff shall fail in this suit, and pay the Defendant all such costs and dam-
ages as he

may sustain by reason of the wrongful complaint
in said cause, then this obligation to be void; otherwise to remain in full force and effect.

Approved:

Otto Finance Co., Inc.
By E. Brigg, Secy. (L. S.)

J. S. Lunn (L. S.)

Horace S. Turner (L. S.)

E. S. Smith
Ex Officio Clerk Inferior Civil Court of Mobile
Clerk Circuit Court of
Mobile County, Ala.
Taken and Approved
July 18th 1931 G. W. Thum Clerk

THE STATE OF ALABAMA,
Mobile County

Before me, *S. H. Smith, Clerk of the Circuit Court of Mobile County*
~~E. J. Huet, Ex Officio Clerk Inferior Civil Court of Mobile~~, personally appeared

E. B. Grigg

who, being duly sworn, deposeth and saith: That the property sued for in the complaint of

Otte Finance Co., Inc. vs. *W. C. Beebe*

to-wit:

*One Ford Model A Business Coupe,
1929 Model, Motor No. 2447939*

belongs to

Otte Finance Co., Inc.

the said Plaintiff.

E. B. Grigg

(Seal)

Sworn to and subscribed before me this *9th*

day of *July*, A. D., 19*31*.

S. H. Smith
~~Ex Officio Clerk Inferior Civil Court of Mobile~~
*Clerk, Circuit Court
of Mobile County, Ala.*

RECORDED

No.

DETINUE
BOND AND AFFIDAVIT

Otte Finance Co.

VS.

W. C. Beebe

*Filed July 15th 1931
D. M. McInnis
Clerk Circuit Court*