

STATE OF ALABAMA.

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon SARAH VALREE 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 the same, then and there to answer the complaint of ED VALREE.

Witness my hand, this 11th day of August, 1931.

*D. M. [Signature]*  
Clerk.

ED VALREE,

Plaintiff,

vs.

SARAH VALREE,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

1. Plaintiff claims of the Defendant the sum of Three Hundred Nineteen Dollars (\$319.00) due from her by account on, to-wit, the first day of August, 1931, which sum of money, with interest thereon, is still due and unpaid.

2. The plaintiff further claims of the defendant the sum of Three Hundred Nineteen Dollars (\$319.00) due from her for work and labor done for the defendant by the plaintiff on, to-wit, during the months of January, February, March, April, May, June and July, 1931, at her request, which sum of money, with interest thereon, is still due and unpaid.

3. The plaintiff further claims of the defendant the sum of Three Hundred Nineteen Dollars (\$319.00) for money paid by the plaintiff for the defendant on, to-wit, the first day of August, 1931, at her request, which sum of money, with interest thereon, is still due and unpaid.

*Biehe & Hall*  
Attorneys for Plaintiff.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, W. C. BEEBE, a Notary Public in and for said State and County, this day personally appeared ED VALREE, who being duly sworn doth depose and say, that SARAH VALREE is justly indebted to the said Ed Valree in the sum of Three Hundred Nineteen Dollars (\$319.00) and that the said Sarah Valree is a non-resident of the State of Alabama, her place of residence and post-office address being unknown to the affiant; that he has made diligent search and inquiry and that he has been unable to ascertain the same, and that this attachment is not sued out for the purpose of vexing or harrassing the said Sarah Valree, defendant.

The plaintiff elects to sue out this attachment without giving bond.

Sworn to and subscribed before  
me, this 10<sup>th</sup> day of August, 1931.

W. C. Beebe  
Notary Public, Baldwin County,  
Alabama.

<sup>his</sup>  
Ed Valree  
mark

# Circuit Court, Baldwin County

#9524

Ed Valree

VS.

Sarah Valree

PLAINTIFF

DEFENDANT

## BILL OF COST

CLERK'S FEES		Dollars	Cts.	AMOUNT BROUGHT FORWARD		\$	Cts.
Issuing Summons and Complaint	\$1 25	1	25	Transcript to Supreme Court, 15c per hundred words			
Copies of same, when over 200 words, 15c per 100	30		30	Copies, 5c per hundred words			
Issuing Alias Summons and Complaint	1 25			Citation to Appellee in Appeal, 20c per hundred words			
Entering Sheriff's Return on Summons and Complaint	20		20	Certificate with Seal, 50c. Without Seal	25		
Docketing Cause 25c. Ent. Appearance, 20c	45		45	Witness Certificate	25		
Subpoena for Witness	30			Taking Bond Not Above Mentioned	75		
Making Certificate of Judgment	50			Entering Order of Court not above named	30		
Filing	10	1	10	Administering Oath	25		
Trial and Incidents	75			Taking Bond for Costs of Non-Resident Plaintiff	75		
Entering Judgment, or copy of same	30			Copy of any paper not above named, 15c per hundred words			
Order for Continuance	10		40	Filing Writ of Prohibition and Entering Return	15		
Issuing Execution	50			Issuing Writ of Prohibition	75		
Docketing Execution	25			Issuing copies of same, 15c per 100 words	15		
Issuing copy of same <i>Order of Pet.</i>	150		100	Filing Mandamus and Entering Return	75		
Entering Sheriff's Return on Execution, 15c per hundred words	20			Issuing Writ of Mandamus	75		
Final Record, 15c per hundred words <i>St. 281.00</i>	30	2	60	Issuing copies of same, 15c per 100 words			
Order for Alias Summons and Complaint	30		30	Total Clerk's Fees			
Order to Dismiss Cause	30			SHERIFF'S FEES			
Order to Set Aside Dismissal	30			Serving and Returning Summons	\$1 50	1	50
Order Overruling Motion to Set Aside Dismissal	75			Serving and Returning Subpoenas	65		
Order Granting New Trial	30			Collecting Execution for Costs	1 50		
Order Overruling Motion for New Trial	30			Serving and Returning Sci. Fa. Notice, etc.	65		
Order Overruling Motion for Continuance	30			Executing Writ of Possession	2 50		
Order Overruling Motion to Set Aside Default	30			Levyng Attachment	3 00	3	00
Order for Notice to Non-Resident Defendant	30			Entering and Returning Attachment	25		
Issuing Notice for Publication and Copy 20c per hundred words	30			Entering and Returning Execution	25		
Order to Give Security for Costs	30			Summoning and Returning Garnishee	1 50		
Order to Give Additional Bond	30			Taking and Approving Garnishee Bond	75		
Order to Execute Writ of Inquiry	30			Serving and Returning Writs <i>Inter.</i>	1 50	1	50
Order of Sale in Attachment	30			Serving and Returning Summons on Forcible Entry	1 00		
Order for Leave to Amend Complaint	30			Executing Writ of Restitution in such cases	2 00		
Order for Leave to Amend Pleas	30			Taking and Approving Bonds of Every Kind	1 00		
Order for Leave to Amend Writ of Process	30			Taking and Approving Claim Bond	1 00		
Order for Attachment for Witness	30			Taking and Approving Forthcoming Bond	1 00		
Filing Deposition	10			Taking and Approving Bail Bond	1 00		
Issuing Commission to Take Deposition	75			Taking and Approving Plaintiff's Detinue Bond	1 00		
Issuing copy of same, per hundred words	15			Taking and Approving Defendant's Detinue Bond	1 00		
Issuing Copy of Interrogatories, 15c per hundred words, but not less than	50		50	Making Deed	2 50		
Endorsing each Pet. Deposition Opened	10			Serving Attachment for Contempt of Court	1 50		
Taking Bond in Garnishment on Summons	75			Collecting Money on Execution			
Summons to Garnishee	50			Empanelling Jury	75		
Copies of same, 20c per hundred words				Sheriff's Commission for Property Sold under Attachment			
Notice to Defendant in Garnishee on Summons, and copy, per hundred words	20			Seizing Personal Property on Writ of Detinue	3 00		
Swearing Garnishee and Recording Answer, 15c per hundred words, but not less than	50			Total Sheriff's Fees			
Filing Attachment	10		10	RECAPITULATION			
Issuing Attachment Writ and Taking Bond	1 00	1	00	Judgment			
Issuing Copies of Attachment Writ, 15c per hundred words				Interest <i>Stonl</i>		1	30
Filing Certiorari and Entering Return	15			Clerk's Fees <i>I. M. R.</i>		7	30
Taking Certiorari Bond and Filing Same	75			Sheriff's Fees		6	00
Issuing Writ of Certiorari	75			Justice's Fees			
Issuing copies of same, 15c per 100 words				Constable's Fees			
Issuing Writ of Scieri Facias, or Notice in Nature of	75			Witnesses' Fees			
Issuing copies of same, 15c per 100 words				Commissioners' Fees			
Taking Supersedeas Bond and Filing same	75			Printer's Fees <i>Baldwin Times</i>		9	99
Taking Appeal Bond and Filing same	75			Stenographer's Fees	5 00		
				Answer of Garnishee		3	00
				Trial Tax	3 00		
TOTAL FORWARDED		8	60	Total	\$	27	59

Received payment this..... day of ..... 193.....

ATTEST

Clerk Circuit Court, Baldwin County, Ala.

8/20/34 - "Dismissed for want of prosecution."

EDWARD VALREE  
Plaintiff.

AT LAW.

VS

SARAH P. VALREE  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

INTERROGATORIES PROPOUNDED BY THE DEFENDANT TO THE  
PLAINTIFF:

1. Please furnish a detailed statement showing the items constituting the indebtedness which you claim of the defendant, giving dates and amounts and state what same is for.
2. Please furnish a list of all credits showing monies paid by defendant to you and in your behalf.
3. Is it not a fact that defendant paid Mr. George Perrin of Robertsedale \$41.00 as balance due on a horse that you purchased from Mr. Perrin and which you would have lost but for this payment? If this amount is not correct, state just what amount she paid for you and what was the total cost of the horse?
4. Is it not a fact that defendant paid Jake Morse \$30.00 for your account on a horse that Morse had let you have and that you swapped off for another? Is it not a fact that Morse wanted to take the horse you traded for his debt and your wife paid the \$30.00 to keep him from doing this?
5. If you have not already given a careful, detailed statement of all of the indebtedness of your wife to you please furnish this.

*Rickaby & Lebb*  
Attorneys for Defendant.

STATE OF ALABAMA.  
BALDWIN COUNTY.

Before me, the undersigned Notary Public, personally appeared this day ELLIOTT G. RICKABY, who being duly sworn says thatt he is of counsel for defendant in the foregoing cause and that the answers of plaintiff to the interrogatories set out above if true will be material evidence for the defendant. *Elliot G. Rickaby*

Subscribed and sworn to before me this 26th day of September, 1931

*Bernice S. Folmar*  
Notary Public, Baldwin County  
Alabama

We hereby acknowledge receipt of a copy of the foregoing  
interrogatories on this, the 28 day of September, 1931.

Beebe Hall

Attorneys for Plaintiff.

Received  
Sept 28 1931  
Beebe Hall

RECEIVED

SEP 28 1931

RECEIVED

RECEIVED

1865

BAY MINETTE, ALA.

10/1/37

M. J. W. Richardson

# THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE  
ADVERTISING RATES GIVEN ON APPLICATION

Beebe Hall

9/17. Ed Valrie vs J Valrie - run 9/17-24 '07-8-  
222 runs 2 1/2

999

EDWARD VALREE  
Plaintiff.

VS

SARAH P. VALREE  
Defendant.

L A W .

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Comes the defendant and for plea to each count of  
the Complaint says:

That she is not indebted to the plaintiff in  
manner and form as alleged.

RICKARBY & COBB

Attorneys for Defendant.

RECORDED

RECEIVED FOR THE DIRECTOR

RECEIVED FOR THE DIRECTOR

Filed Sept 18/1931  
D. C. Miller  
Clerk

RECEIVED FOR THE DIRECTOR

RECEIVED FOR THE DIRECTOR

RECEIVED FOR THE DIRECTOR

RECEIVED FOR THE DIRECTOR

EDWARD VALREE  
Plaintiff.

VS

SARAH P. VALREE  
Defendant.

L A W .

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Comes the defendant and for plea to each count of  
the Complaint says:

That she is not indebted to the plaintiff in  
manner and form as alleged.

*Risley & Cobb*  
Attorneys for Defendant.

RECORDED

EDWARD VALLEE  
Plaintiff.

VS

SARAH POLK VALLEE  
Defendant.

PLEA OF GENERAL ISSUE.

*Filed Oct 18/98*  
*of Mr. [illegible]*

RICKARBY & COBB

EDWARD VALREE  
Plaintiff.

VS

SARAH P. VALREE  
Defendant.

L A W.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Comes the defendant and for plea to each count of  
the Complaint, says:

That she is not indebted to the Plaintiff in  
manner and form as alleged.

*Reinhardt & Cobb.*  
Attorneys for Defendant.

EDWARD VALREE  
Plaintiff.

VS

SARAH VALREE  
Defendant.

PLEA OF GENERAL ISSUE.

*Filed Sept 28/931*  
*T W Ricker*  
*Clerk.*

EDWARD VALREE,  
Plaintiff,

vs.

SARAH P. VALREE,  
Defendant.

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

The plaintiff, answering interrogatories propounded  
by the defendant to him in the above styled cause, says:

1. To the construction of a house:	
Labor and material,	\$120.00
Shingles,	13.00
Labor,	144.00
Taxes,	12.00
Money,	30.00
Total,	<u>\$319.00</u>

2. None.

3. No. No money was paid by her; total cost of  
horse was \$115.00.

4. No; he took the horse.

5. The defendant took \$550.00 of my money when she  
ran away over a year ago.

Edward <sup>his</sup> Valree  
mark -

STATE OF ALABAMA.  
BALDWIN COUNTY.

Before me, the undersigned, a Notary Public in and  
for said County, in said State, this day personally appeared  
Edward Valree, who being by me first duly sworn, deposes and  
says that he has had read to him, understands and knows the con-  
tents of the foregoing answers to the interrogatories addressed  
to him in the said cause, and that the answers given herein are  
true.

Edward <sup>his</sup> Valree  
mark

Sworn to and subscribed before  
me, this the 12th day of December,  
1931.

Ida M. Turnbull  
Notary Public, Baldwin County,  
Alabama.

Edward Valree

vs.

Sarah Valree

Answers to Interrogatories.

Filed December 12th, 1931.

*J. M. Richardson*  
Clerk.

Beebe & Hall;  
Solicitors for plaintiff



The State of Alabama, }  
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, Ed Valree,

hath complained on oath to me, T. W. RICHESON, Clerk of Circuit Court of Baldwin County, Ala., that Sarah Valree,

is justly indebted to the Plaintiff Ed Valree,

in the sum of Three hundred nineteen, ( \$319.00) Dollars, and  
elected not to give  
having made affidavit and ~~given~~ bond

as required by law, in such cases, you are hereby commanded to attach so much of the estate of  
Sarah Valree,

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such  
estate, so attached unless replevied, so to secure, that the same may be liable to further pro-  
ceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be  
held at the Court House of said County, on 3rd Monday of August  
1931, next; when and where you must make known to said Court how  
you have executed this Writ,

WITNESS, my hand, this 11th day of August, A. D. 1931.

T. W. Richeson  
Clerk.

RECORDED  
No. ....

ATTACHMENT

Ed Valree

Vs. } Attachment

Sarah Valree,

Issued August 11th, 1931

Moore Printing Co. .... Bay Minette, Ala.

Received in office August 11th, 1931, and executed on August 11th, 1931 by levying on the following described real estate situated in Baldwin County Alabama, as follows:-  
a Six (6) acre Tract in square Twenty-five (25) in the Village of Montrose, according to a plat made by Gavin Yuille Jr., recorded in Deed Book "E", page 388, of the Baldwin County Records said six acre tract being bounded on the North by Lee Street, on the West by 3rd Street, on the South by lands this day deeded to Nellie Valree, and on the East by lands of G. B. Stapleton, as the property of Sarah Valree, Defendant.

*W. R. Stuart*  
Sheriff, Baldwin County, Alabama.

5775

The State of Alabama, }

Baldwin County.

## CIRCUIT COURT AT BAY MINETTE, ALA.

Before me, W.C.Beebe, Notary Public,  
in and for said County, personally appeared Ed Valree  
who, being duly sworn, on oath saith that Sarah Valree  
justly indebted to  
the said Ed Valree

in the sum of Three Hundred Nineteen & 00/100 Dollars, which said  
amount is justly due after allowing all just offsets and discounts, and that the said  
Sarah Valree is a non-resident of the State of Alabama, her place  
of residence and post office address being unknown to the affiant;  
that he has made diligent search and inquiry and that he has been  
unable to ascertain the same;

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or  
other improper motive.

Eddie x Valree  
his mark

Subscribed and sworn to before me this 10th day of August 1951.

W.C.Beebe, Notary Public  
Baldwin County, Alabama.

No.

The State of Alabama,

Baldwin County.

CIRCUIT COURT

AT BAY MINETTE, ALA.

TO

Attachment Bond and Affidavit

Filed this the day

192

of

Clerk.

Attorney.

STATE OF ALABAMA)

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS that we ED VALRIE and

Lee Simmons

and

J. R. Stapleton

a re

held and firmly bound unto SARAH VALRIE in the sum of Six Hundred Thirty-Eight Dollars, to be paid to the said SARAH VALRIE, her heirs, executors, administrators or assigns, for the payment of which well and truly to be made we bind ourselves and each of us, our heirs, executors and administrators jointly, severally and firmly by these presents.

The right of exemption under the Constitution and the laws of the State of Alabama is hereby waived.

Sealed with our seals and dated this the \_\_\_\_\_ day of October, 1951.

The condition of the above obligation is such that whereas, the above bound ED VALRIE has, on the 7th., day of August, 1951, prayed an attachment to the suit of ED VALRIE against the estate of the above named SARAH VALRIE for the sum of Three Hundred Nineteen Dollars and has obtained the same, returnable to the Circuit Court of Baldwin County, Alabama, within thirty days from the service of the writ of attachment in the said cause,

Now if the said ED VALRIE shall prosecute said attachment with effect and pay said Defendant for such damages as she may sustain from the wrongful and vexatious suing out of the said attachment, then the above obligation to be void, otherwise to remain in full force and effect.

Signed, sealed and delivered on the day and year above written.

Taken and approved this 23<sup>rd</sup> day of October, 1951.

T. M. Richmond  
Clerk of the Circuit Court of  
Baldwin County, Alabama.

Ed Valrie (SEAL)  
Lee Simmons (SEAL)  
J. R. Stapleton (SEAL)

Ed Vallee  
vs  
Arch Vallee

Bond

Filed Oct 23/1931  
T W Rice  
JCH

The State of Alabama, }  
Baldwin County

SARAH P. VALRIE

Complainant.....

vs.

~~EDWARD VALRIE~~

Defendant.....

CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA

In Equity.

The Complainant, SARAH P. VALRIE

requests the oral examination of the following named witnesses, on behalf of the

Complainant..... viz:

ROSA ROBINSON

said witnesses reside in the County of Mobile  
State of Alabama.

~~CHARLES REED HALL~~ who resides at  
Mobile, Alabama

or, The Register of this Court is suggested as a suitable person  
to be appointed Commissioner to take the deposition of said witness on such oral examination.

*Charles H. Reed Hall*  
Solicitor for Complainant.

CIRCUIT COURT OF  
Baldwin County, Alabama

IN EQUITY

SARAH P. VALRIE

Complainant..

vs.

EDWARD VALRIE

Defendant..

DEMAND FOR ORAL EXAMINATION

*Shawed May 25- 1923*

*J. W. McElum* Register.

Moore Printing Co. Bay Minette, Ala.

ELLIOTT G. RICKARBY  
Atty. for comp.

Published Every Thursday

# THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE  
ADVERTISING RATES GIVEN ON APPLICATION

R. B. Vail  
Editor and Proprietor

BAY MINETTE, ALA.

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

*R. B. Vail*, being duly sworn, deposes and says that he is  
the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay  
Minette, Baldwin County, Alabama; that the notice hereto attached of \_\_\_\_\_

*E. S. Valree*

*vs*  
*Sarah Valree*

Was published in said Newspaper for 4 consecutive weeks in the following issues:

<i>September 17- 1931</i>	Vol. <u>42</u>	No. <u>33</u>
<i>September 24- 1931</i>	Vol. <u>42</u>	No. <u>34</u>
<i>October 1- 1931</i>	Vol. <u>42</u>	No. <u>35</u>
<i>October 8- 1931</i>	Vol. <u>42</u>	No. <u>36</u>

Subscribed and sworn before the undersigned this 10th day of

*October* 1931

*R. B. Vail*  
*Clerk Circuit Court*

*R. B. Vail*  
Publisher

### ATTACHMENT NOTICE

The State of Alabama, Baldwin  
County Circuit Court, Bay Minette,  
Ala. Sept. 11, 1931.

ED VALREE, Plaintiff, VS. SARAH  
VALREE, Defendant.

WHEREAS Ed Valree, as Plaintiff  
in said cause, has obtained an Attach-  
ment out of this Court, issued the  
11th day of August, 1931, against the  
estate of the said defendant, Sarah  
Valree, which attachment has been  
levied upon the following described  
lands, as the property of said defend-  
ant, to-wit:

A six (6) acre tract in square  
twenty-five (25) in the Village of  
Montrose, according to a plat made  
by Gavin Yullic, Jr., recorded in deed  
Book E, page 388 of the Baldwin  
County Records, said six acre tract  
being bounded on the North by Lee  
Street, on the West by 3rd Street, on  
the South by lands this day decided  
to Nellie Valree and on the East  
by lands of G. B. Stapleton as the  
property of Sarah Valree, defendant,  
and whereas, it appears that the said  
Sarah Valree, Defendant as afore-  
said is a non-resident of the State of  
Alabama.

NOW, THEREFORE, the said Sarah  
Valree, wherever she may reside, be  
hereby notified of the levy and pend-  
ency of said Attachment.

Witness my hand this 11th day of  
September, 1931.

T. W. RICHESON, Clerk  
REEBE & HALL, Attorneys for Plain-  
tiff.

Date of second publication

Date of third publication

Date of fourth publication

Ed Quire

vs

Sarah Quire

Civil Case

Filed Oct 28 1931

~~W. H. Quire~~  
Clerk