

R. E. Catrett,
Plaintiff.

VS

Warren Cooper,
Defendant.

In Justice Peace Court, Baldwin County, Alabama.

P. A. Bryant, Justice of Peace.

JUDGMENT.

Came the parties on the 1st day of April, 1916, and upon evidence I find the said Warren Cooper Not Guilty of forcible entry and unlawful detainer as complained against him by R. E. Catrett, and I therefore order and adjudge that R. E. Catrett pay the costs of this proceeding.

P. A. Bryant. JO

State of Alabama,)
Baldwin County.)

We, R. E. Catrett, E. M. Richardson and G. B. Haller are bound unto Warren Cooper in the sum of Twenty-five \$(25.00) Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators. Sealed with our seals, and dated the 7th day of April, 1916.

The condition of the above obligation is such that, on the 3rd day of April, 1916, P. A. Bryant, a justice of the peace in and for said county, rendered a judgment in favor of the said Warren Cooper against R. E. Catrett in the sum of 14 45 (\$) Dollars costs, in a suit by R. E. Catrett against Warren Cooper of unlawful detainer, from which judgment the said R. E. Catrett has applied for and obtained an appeal to the Spring Term of the Circuit Court of Baldwin County; if the said R. E. Catrett shall prosecute said appeal to effect, or, if he fail in said appeal, shall pay such judgment as may be rendered against him by the said Circuit Court of Baldwin County, then in either of said events, this obligation to be void, otherwise to remain in full force and effect.

R. E. Catrett (SEAL)

E. M. Richardson (SEAL)

G. B. Haller (SEAL)

Taken and approved this 7 day of April, 1916.

P. A. Bryant
Justice of the Peace.

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

THE STATE OF ALABAMA, {
Baldwin County. }

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING.

You are hereby commanded to summon

Jim Gee

if to be found in your county, at the instance of the

Deft

to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on

the *24* day of *May* 191*6* then and there to testify,

and the truth to say, in a certain case pending, wherein

R & Calvert

Plaintiff.

Harmon Cooper

Defendant

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ.

Witness my hand

12 day of *May* 191*6*

ATTEST:

T. W. Thompson

Clerk.

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

THE STATE OF ALABAMA, }

Baldwin County. }

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING.

You are hereby commanded to summon

Willie J. Jainer Jr.,
R. J. Barrett, Robert McKeon

if to be found in your county, at the instance of the

Pest

to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on

the *24* day of *May* 191*6*, then and there to testify,

and the truth to say, in a certain case pending, wherein

R. E. Barrett

Plaintiff.

Warren M. Cooper

Defendant

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ.

Witness my hand

day of

May 191*6*

ATTEST:

J. Williamson

Clerk.

Executed in full
May 20 1911
C. E. Curbank
Sheriff
By O. B. Richardson
D. S.

Original

No. _____

THE STATE OF ALABAMA,
Baldwin County.

R. E. Leetert

Vs. {

SUBPOENA FOR

Marion M. Cooper

CIRCUIT COURT

WITNESSES:

Willie Joins Jr.
R. J. Leetert
Robert McCone

R.

SET FOR TRIAL

24 day of May 1911

Baldwin Times Print.

SUMMONS AND COMPLAINT.

State of Alabama,)
Baldwin County.)

To Warren M. Cooper:

You are hereby commanded to be and appear before me, at Stockton, Alabama, on the 1 day of April, 1916, to answer to, and make defense against a complaint exhibited to me against you by R. E. Catrett, for forcible entry and unlawful detainer.

Witness my hand this 24 day of Mar, 1916.

P. A. Bryant
Justice of the Peace.

C O M P L A I N T .

R. E. Catrett,
Plaintiff

VS

Warren M. Cooper,
Defendant.

In Justice Peace Court, Baldwin County, Alabama.

P: A. BRYANT, JUSTICE PEACE.

1. The plaintiff ~~sues to~~ recover possession of the following tract of land: Beginning at the Northwest corner of the Northeast quarter of the Northwest quarter of the Northwest quarter of Section 3, Township 1 South, Range 3 East, running thence West 165 yards to a post, thence South 880 yards to a post, thence East 165 yards to a post, thence North 880 yards to place of beginning, containing 30 acres, more or less, in Baldwin County, Alabama, of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant lawfully entered, on demise of the plaintiff ~~for one year~~, and which now the defendant, after the termination of his possessory interest, and after the plaintiff's demand in writing therefor, unlawfully detains, together with \$50.00 for the detention thereof.

2. The plaintiff ~~sues to~~ recover possession of the following tract of land: Beginning at the Northwest corner of the Northeast quarter of the Northwest quarter of the Northwest quarter of Section 3, Township 1 South, Range 3 East, running thence West 165 yards to a post, thence South 880 yards to a post, thence East 165 yards to a post, thence North 880 yards to the place of beginning,

containing 50 acres, more or less, in Baldwin County, Alabama, of which he was in possession, and upon which pending such possession, and before the commencement of this suit, the defendant forcibly entered, and now unlawfully detains.

Hall & Beebe

Attorneys for Plaintiff.

*Received of the
Attorney for the
Plaintiff the sum of
\$100.00
for the fee of the
Attorney for the
Plaintiff*

Costs bill 3524

Summons & Complaint	50
Grand	200
Docketing	25
Summons & Return	115 120
Bond	55
Set Judgment	25
Return on appeal	100
	<u>595</u>

Consulor	
Returning Summons	50
& Subpoena	200
& Witnesses 50 per	400
	<u>1975</u>

J. A. Bryant
W. B. Duff J. P.

R. E. CATRETT, Plaintiff,
VS.
WARREN M. COOPER, Defendant.

)
:
)
:
)
IN THE CIRCUIT COURT
OF BALDWIN COUNTY.

Interrogatories propounded by Defendant to Plaintiff.

1st Int. Did not you enter into a firm agreement with Mr. Cooper in the latter part of December, 1915 or in January, 1916 whereby you were to trade to him the thirty acres described in the Complaint in this cause for sixty acres of land in Section 34, Township 1 South, Range 3 East, and \$95.00 in money, part of which was to be secured by a mortgage?

2nd. Was not this agreement accepted by both parties, and, in pursuance thereof, did not you and Mr. Cooper about January 4th go before Justice D. C. Byrne to have the papers drawn up to carry out the trade?

3rd. Is it not a fact that Judge Byrne drew up a warranty deed from Mr. Cooper and his wife to you for the sixty acres in Section 34; which was signed by both parties?

4th. At the same time and place, was not a mortgage drawn up by Mr. and Mrs. Cooper in your favor for \$68.00 on the remaining twenty acres, which Mr. Cooper retained, in Section 20, securing two notes for \$30.00 and \$38.00 respectively, due August 20th, 1916 and January 1st, 1917?

5th. Is it not a fact that \$27.00 was to have been paid you in cash and it was agreed that, as a part of this cash, you would take a steer at a valuation of \$12.00, and did not you and Mr. Cooper spend a good part of the day on the Monday before you went to Judge Byrne hunting up this steer?

6th. Was not the record title to the land you were to trade Mr. Cooper defective in that the descriptions were wrong, requiring you to get the description cleared before the trade could be completed?

7th. To clear the record title to the land involved in this suit, did not Mr. and Mrs. Cooper sign a deed which Justice Byrne prepared in favor of a Mr. Gee and was not Mr. Gee to make another deed to you with the correct description, in order to clear up the defect, which deed was not executed at once because of the illness of Mr. Gee's wife.

8th. Did you not ask defendant to turn over to you his deed and mortgage so you could put them on record before you had straightened out your deed to him?

9th. Did not defendant tell you that he was ready to turn over the steer and make the cash payment to you just as soon as you got your deed straight, and did you not know that his deed and mortgage was ready for delivery to you as soon as you should deliver your deed? When you left Justice Byrnes' office, was it not understood that the papers were to be passed just as soon as you were ready?

10th. Was it not understood by you two in the presence of Judge Byrne that everything was agreed on between you as to price and terms and all that was necessary was for you to get your papers ready.

11th. On or about January 4th, the day that the matter was closed up in Judge Byrne's office, did you not tell Mr. Cooper that he could go ahead and go into possession of the place and did he not go into possession at once and continue there until the present time?

12th. Has Mr. Cooper ever refused to carry out the terms of the original trade agreed on between you two?

13th. Have you answered each and every one of the foregoing questions fully and truthfully?

Rickarby & Austice
Attorneys for Defendant.

STATE OF ALABAMA,)
MOBILE COUNTY.)

Before me, Blanche P. Vestal, a Notary Public in and for said State and County, personally appeared this day Elliott G. Rickarby, who, being by me first duly sworn, says that he is of counsel for defendant in the above styled cause and that he believes the answers of the defendant to the foregoing interrogatories, if true, will be material evidence for defendant.

Elliott G. Rickarby

Sworn to and subscribed before me
this the 26th day of April, 1916.

Blanche P. Vestal
Notary Public, Mobile County, Alabama.

Original

IN THE CIRCUIT COURT
OF BALDWIN COUNTY.

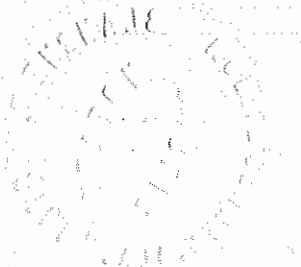
R. E. CATRETT

VS.

WARREN COOPER.

INTERROGATORIES TO
PLAINTIFF.

Rickarby & Austill,
Attorneys for Defendant.



*Free of 27/9/12
9/10/12
Caret*

R. E. Catrett,
Plaintiff.

VS.

Warren ^m Cooper,
Defendant.

In Circuit Court of Baldwin County, Alabama.

Spring Term, 1916.

The plaintiff sues to recover possession of the following tract of land: Beginning at the Northwest corner of the Northeast quarter of the Northwest quarter of the Northwest quarter of Section 3, Township 1 South, Range 3 East, running thence West 165 yards to a post, thence South 880 yards to a post, thence East 165 yards to a post, thence North 880 yards to place of beginning, containing 30 acres, more or less, in Baldwin County, Alabama, of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the defendant entered and unlawfully withholds, together with \$100.00 for the detention thereof.

Hall & Baker

Attorneys for the Plaintiff.

SUMMONS AND COMPLAINT

The State of Alabama {

Baldwin County

No.

Circuit Court

April 18th, 1916

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Warren Cooper,

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against him the Defendant.

by R.E. Catrett,

Plaintiff

Witness my hand this 18th day of April 1916.

J. W. Riccione Clerk.

COMPLAINT

Plaintiff Versus

The plaintiff claims of the defendant

.....Dollars due by

Plaintiff's Attorney.

Original

No.

STATE OF ALABAMA,
BALDWIN COUNTY.
CIRCUIT COURT

R. E. Catrett,

vs.

Plaintiffs

Warren Cooper,

Defendants

SUMMONS AND COMPLAINT

Filed April 18th, 1916

M. Ricumore Clerk

Defendant lives at

Stockton.

Hall and Bobee.

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette

Received in office

April 18th, 1916.

O. E. Eubanks Sheriff

I have executed this Writ

this April 21, 1916

by leaving a copy of the within summons and complaint with

Warren Cooper

O. E. Eubanks Sheriff

x. M. B. Stuart Deputy Sheriff.