

JOE H. HUNT.
PLAINTIFF.

VS.

J. D. HALL.
DEFENDANT.

INTERROGATORIES PROPOUNDED BY PLAINTIFF TO DEFENDANT UNDER
SECTION 4049 ET SEQ OF THE CODE OF ALABAMA.

1. Did you ever have any business dealings with plaintiff; if so state when and what those dealings were? Did you ever rent the property described in the complaint from the plaintiff, if so state when you made such rental contract and during what period of time you occupied the premises? What rent did you agree to pay? Please state what rent you did in fact pay? To whom were such payments made? In what manner was such payments made? Give the date of each payment made and state who was present at the time? Did the plaintiff owe you anything; if so attach to your answers and mark Exhibit A, a full statement of said indebtedness, giving the dates and etc.

2. Did you not purchase certain goods, merchandise and chattels from plaintiff? State when such purchases were made. State over what period of time such purchases were made. Attach to your answers and mark Exhibit B, a true statement of all such purchases made by you. Did he not furnish you merchandise for your household expenses? What was the aggregate value of such merchandise so furnished by him? Did you not go over his books with him and agree that the amount shown thereon was correct? Are you not indebted to plaintiff for such purchases at the present time; if so in what amount and how long have you been so indebted?

Wm. McMillan & Grayson
ATTORNEYS FOR PLAINTIFF.

STATE OF ALABAMA.
COUNTY OF MOBILE.

Before me, Marie Huet, a Notary Public, in and for said State and County, personally appeared B.F. McMillan, Jr., who being sworn says on oath that he is one of the members of the firm of McMillan & Grayson, attorneys for plaintiff in the foregoing cause; that as such attorney he has propounded to the defendant the foregoing interrogatories and that the answers thereto will be material testimony for plaintiff in the trial of said cause.

Sworn to and subscribed before
me this 28th. day of July, 1916.

Marie Huet
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

STATE OF ALABAMA

BALDWIN COUNTY

Joe H Hunt, vs J D Hall,

Answers to Interrogatories propounded by Plaintiff to Defendant, in the above mentioned cause:

1.
 - a. Yes; from the Fall of 1910 to the Spring of 1916: purchasing goods and renting his place.
 - b. Yes: he offered to rent me his place in November 1912, and I occupied part of said premises until February 1916.
 - c. \$75 per year.
 - d. \$75 per year.
 - e. Mr. J. H. Hunt.
 - f. Mr. Hunt boarded with us from November 1912 to and December 1913, and from April 1915 to November 1915; also at various times he had his children boarding with us.
 - g. Yes, the difference between the amount we owed him for rent, and what he owed us for board. of himself and children.
2.
 - a. Yes.
 - b. From the Fall of 1910 until his store burned and in the Fall of 1913.
 - c.
 - d. Mr. Hunt never gave me a statement of my store account from November 1912 until his store burned, although requested repeatedly to do so.
 - e. I purchased articles in Mr. Hunt's store.
 - f. Mr. Hunt never gave me a statement of my account with him.
 - g. No: Mr Hunt asked me to look over an account book but the majority of the items were blurred and impossible to make out.
 - h. I have never had a statement of the store account from Mr. Hunt. I owe him nothing.

J D Hall

STATE OF ALABAMA

BALDWIN COUNTY:

Before me David D Hall, a Notary Public, ex officio Justice of the peace, in and for said County and State, personally appeared before me, J. D. Hall, who being sworn, answered the interrogatories attached hereto, and that the above are true, answers to the same, to the best of his knowledge and belief.

Witness my hand and seal, this the 21 day of September, 1916.

David D Hall Notary Public
Baldwin County

THE STATE OF ALABAMA.
BALDWIN COUNTY.

CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:

You are hereby commanded to summon J. H. Hunt,at the instance of the Deft

if he shall be found in your County, personally to be and appear before the Circuit Court of said County, on the 24th, of May day of the next term thereof, to be holden at the

Court House in and for said County, to-wit: on the 24th, day of May

1916 and to bring with him and produce at the time and place aforesaid, to be used as

evidence a certain instrument of writing, purporting to be

the original ledger kept in lead showing the open account that was made between J. D. Hall and J. H. Hunt,

bearing date on or about the 1st day of December 1912 to Dec 1915, in the year of our Lord One Thousand Nine Hundred and 1915 then and there to testify, and the truth to speak, concerning all and singular those things of which he may have knowledge, of the said instrument of writing doth import of, and concerning a certain suit now pending and undetermined in the said Court, wherein

H. H. Huntis

Plaintiff and

J. D. Hallis

Defendant

And this he shall in nowise omit, under penalty of what the law directs; and have you then and there this Writ, with an endorsement thereon in what manner you shall have executed the same.

Witness T. W. Richerson this 16th, day of

May 1916.

T. W. Richerson Clerk.

Copy

State of Alabama,

BALDWIN COUNTY.

CIRCUIT COURT

A. Hunt

Plaintiff

vs.

J. Hall

Defendant

pena Duces Tecum.

16th day of

May 191*4*
W. B. Williams Clerk.

BALDWIN TIMES PRINT

_____ served

the within by _____

the _____ day of

_____ 191_____

Sheriff.

The State of Alabama, }
 Baldwin County. }

KNOW ALL MEN BY THESE PRESENTS, That we

J. D. Hall

Mrs. E. C. Hall, and R. H. Hall

are held and firmly bound unto

Jos. H. Hunt

in the sum of One Hundred and ninety nine & 20/100 Dollars,

for the payment of which well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors and administrators, jointly and severally, and we each of us waive our rights to exemption under the Constitution and Laws of Alabama, as against this bond.

The Condition of the above obligation is such, that if the above bound

J. D. Hall

shall prosecute to effect an appeal by him taken this day to the next term of the Circuit Court of Baldwin County, Ala from a judgment rendered against him in favor of said

Jos. H. Hunt

by H. W. Slaughter, a Justice of the Peace for said County,

for the sum of ninety nine Dollars

debt, and ten Dollars cost; or, if he fail in said

appeal, shall pay such judgment, both as to debt and costs, as may be rendered against him by the said

Circuit Court of Baldwin County Ala, then, in either

of said events, this obligation to be void; otherwise to remain in full force and effect.

Given under our hands and seals, this the 18 day of February, 1906

J. D. Hall

(L. S.)

Mrs. E. C. Hall

(L. S.)

R. H. Hall

(L. S.)

(L. S.)

Approved:

Feb 19th / 06

H. W. Slaughter

Justice of the Peace.

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State of Alabama,
Baldwin County.

JUSTICE COURT OF
W. Slaughter
APPEAL BOND

for H. Hunt
Plaintiff.

vs.

D. Hall

Defendant.

and may 16/91 &
W. Reilman
clerk

JOE H. HUNT.
PLAINTIFF.

VS.

J. D. HALL.
DEFENDANT.

IN THE JUSTICE COURT OF E.W. SLAUGHTER, ESQ.

Plaintiff claims of defendant \$99.00 for the use and occupation by him of the following tract of land and premises: viz; *the premises known as the Joseph Selover Residence, at Tensaw Ala, being in the W² of S10T Sec 8-7² R3 E*

during the year 1915.

Plaintiff claims of defendant \$99.00, balance due for the rent of a tract of land and premises described in the first count hereof, demised by plaintiff to defendant on to-wit: December 1912, and ending in December 1915.

Plaintiff expressly remits from this claim all over and above the sum of \$99.00

Joe H. Hunt

STATE OF ALABAMA.

COUNTY OF BALDWIN.

TO ANY LAWFUL OFFICER OF THE COUNTY OF BALDWIN:

Summon J.D. Hall to appear before me on the 14 day of January, 1916 next, at Tensaw, in Baldwin County, Alabama, to answer the complaint of Joe H. Hunt and there make return of this summons.

Witness my hand this the 28 day of January, 1916.

E. W. Slaughter
JUSTICE OF THE PEACE.

*Cause of action
suit for Rent*

Rec in office Jan 28th 1912 and Executed
the same day By serving a copy of
the within Summons and Complaint
on J D Hall

C E Leubanks Sheriff

By O B Richardson D.S.

James J. Leubanks
J. D. Hall

STATE OF ALABAMA.

COUNTY OF BALDWIN.

TO ANY LAWFUL OFFICER OF SAID COUNTY— GREETINGS:

Joe H. Hunt having complained before me, H. W. Slaughter, that J. D. Hall is justly indebted to him in the sum of \$99.00 for rent of that certain premises described as, *the premises*

known as the Ralph Selors Residence, an
unincorporated, also being in the W² of Sec 4 Co
5 2nd N R 3E

and has made affidavit and given bond as required by law, you are hereby commanded to attach so much of the estate of J.D.Hall enjoying the protection of said premises, as will be of value sufficient to satisfy the complaint and costs, and such estate, unless replevied, you will so secure that the same may be liable to further proceedings thereon to be had before me on the 14th day of February, 1916 at Tensaw in Baldwin County, Alabama, when and where you must make return how you have executed this writ.

Witness my hand this 28th day of January, 1916.

H W Slaughter

JUSTICE OF THE PEACE.

STATE OF ALABAMA.
COUNTY OF BALDWIN.

Before me, H.W. Slaughter, a Notary Public in and for said State and County, personally appeared Joe H. Hunt, who is known to me, and who being sworn says on oath that J.D. Hall is indebted to affiant in the sum of \$99.00 for rent of those certain premises described as follows:

The Joseph Silva Residence being and situated in NW 1/4 SW 1/4 Sec 5, T 2 N R 3 E, Baldwin Co Ala
that such rent is due and said J.D. Hall fails or refuses after demand is made to pay the same.

Sworn to and subscribed before me
this the 28 day of January, 1916.

H. W. Slaughter
Justice of the Peace, BALDWIN COUNTY, ALABAMA.

STATE OF ALABAMA.

COUNTY OF BALDWIN.

KNOW ALL MEN BY THESE PRESENTS, That we Joe H. Hunt,

L. F. Warren and A. W. Slaughter are held
and firmly bound unto J.D. Hall, his heirs and assigns in the sum of
\$198.00 for the payment of which we bind ourselves, our heirs, executors
and administrators.

Sealed with our seals and dated the 28 day of January, 1916.

The condition of the above obligation is such that the
above bounden Joe H. Hunt has this day prayed an attachment at the suit
of himself against the estate of the above named J.D. Hall, in the sum of
\$99.00, and has received the same returnable before Hon. H.W. Slaughter,
a Justice of the Peace of Baldwin County, on the 15th day of July,
1916.

If said plaintiff shall prosecute his attachment to
effect, or failing therein shall pay such damages as he may sustain by
the wrongful or vexatious suing out of this attachment, then this obli-
gation to be void, otherwise to remain in full force and effect.

Joe H. Hunt (SEAL.)
L. F. Warren (SEAL.)
A. W. Slaughter (SEAL.)

Executed Jan 28th 1916

By Leavelling on and Taking into
my possession one Upright Piano
and Piano stool, 3 ~~Book~~ Book Cases 27
volumes of Encyclopedia 12 Vol Century
Dictionary 25 Vol Liberty 8 Vol 62
volumes of worlds best History
62 Vol of the worlds greatest Literature
20 Vol French Classic Romances
20 Vol of North America History
8 Vol of writings of Abraham Lincoln
12 Vol Disraeli 20 Vol Great Event
25 Vol of Bret Hart 5 Vol Erickson
- Chartrain 28 Vol Balzac 15 Vol
Stoddard's Lectures 6 Vol of Sabornie
8 Vol of Schiller 14 Vol of Thos
Roosevelt 10 Vol of Shakespeare
11 Vol of Little Master Pieces
8 Vol of Kipling 10 Vol of Great Epoch
in American History
24 volumes of Miscellaneous Books
4 Rocking chairs One Table, one Lamp
2 Dressers one Bedstead springs and
mattress one wash stand Bowl and Pitcher

C. C. Centerville Sheriff
By W. W. Richardson

Continued

J. H. Hall

J. H. Hall

Behalf and after hearing all
 other evidence by both parties
 the Court was of the opinion
 that the defendant was justly
 indebted to the plaintiff for
 the amt sued for \$99⁰⁰ and
 the cost, and gave judgment
 for such amt and condemned
 the property levied on, under
 attachment for the satisfaction
 of the judgment. The defen-
 dant asked for and obtained
 an appeal to the Circuit
 Court and on the 19th day of
 July 1916 filed Bond with
 Mrs E. B. Hall and R. H. Hall
 as sureties for the judgment
 and cost upon the
 Court ordered the property
 under attachment by Chas
 E. Embarras, released, H. W. Slaughter
 Justice of the Peace

Joe. N. Hunt

75

J. W. Hall

The plaintiff sued to recover \$492.⁰⁰ due by defendant for balance on rent and also obtained an attachment on personal property sufficient to pay the same. Notice of the Complaint was served on the defendant on the 28th day of Jan'y 1916 and the attachment levied on certain personal property by Chas. E. Eubanks, Shff., as shown and itemized return which is a part of his return to the Circuit Court. The plaintiff and defendant both appeared on the 14th day of Feb'y 1916 and the defendant made a motion for continuance, which was overruled and the case proceeded. The defendant refused to testify in his

State of Alabama,

Baldwin County

In The Justice of The Peace

Court of H. W. Slaughter:

For H. Hunt, plaintiff

J. D. Hall, defendant,

The defendant, as a defense
to the action of the plaintiff, saith
that, at the time said action
was commenced, the plaintiff was
indebted to him in the sum of
\$175. Seventy five dollars due as
board (The difference due the
defendant between \$300 Board, and
\$125. Rent) said board being for
plaintiff and at plaintiffs request
for his child or children, between

January 1, 1916. which The
defendant Henry offers as set off
against the demand of The
plaintiff, and he claims judgment
for the excess.

J. D. Hall

State of Alabama, }
Baldwin County }

In the Justice of the Peace Court
of H. W. Slaughter:

For H. Hunt, plaintiff

J. D. Hall, defendant

Comes the defendant in the above
style case and for answer avers
that the allegations set forth in the
aforementioned complaint are untrue.

J. D. Hall

Hunt

vs

Hall

1st Defendant for answer to each count of the complaint separately and severally pleads the general issue.

2 For further answer to complaint and each count thereof severally and separately ~~and~~ it says that he is, is not indebted in manner and form alleged

3 For further answer to each count of complaint separately and severally defend ant ^{all} ~~alleg~~ that before the ~~commencement~~ ^{time of the commencement} of this suit plaintiff was indebted to defendant in the sum

of three hundred and
fifty dollars ~~in the~~
~~amount to set off~~
The board reject
the hereby offers to set
off against the demand
of plaintiff and the
claimant judgment for
the excess.

Frank K. Stout
Takes for the
defendants demands a
trial by jury.

Hunt
vs
Hall

I hereby enter appearance
for defendant

Frank Stout
att'y

Joe H. Hunt, Plaintiff vs Circuit Court Badami Co
Hunt. Dept #

1. Plaintiff claims of defendant \$99⁰⁰ for the use and occupation by him of the following tract of land and premises, viz: the premises known as the Joseph Albert Residence at Turrell, also being in the West half of Sect sec 5. T² S² N R 3 E.
2. Plaintiff claims of defendant \$99⁰⁰ balance due for the rent of a tract of land and premises described in the first count hereby, claimed by plaintiff to defendant on 1st Decr 1912 and ending term in December 1915.
3. Plaintiff claims of defendant \$99⁰⁰ balance due by defendant January 1st 1916, with interest.
4. Plaintiff claims of defendant \$99⁰⁰ balance due by account stated between the plaintiff and defendant, with interest

Wm. H. Brown
attorney for plaintiff

We the jury find
for the plaintiff
under the 3rd
Count and assess
damages at
\$106.26

Geo. A. Harrison
Foreman

J. Paul "Ref" 9/16
W. H. Harrison
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

John Kinsley

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

Plff

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

J. H. Hunt
D. D. Hall

Plaintiff.

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

20 day of *May* 191*6*

ATTEST:

T. J. Williams

Clerk.

Executed
May 20/1916
C. A. Embury
Sheriff

No.

THE STATE OF ALABAMA,
Baldwin County.

J. H. Hunt

Vs. { SUBPOENA FOR

D. D. Hall

CIRCUIT COURT

WITNESSES:

John Mobley

SET FOR TRIAL

24th day of May 1916

Baldwin Times Print.

The Court charges the jury
that the merchants' Board of
accounts on prior facts
evidence of the existence
of accounts representing them.

Refused

A. E. Gable
Judge

The Court Charges the
Jury that under the
Evidence in this case
you should find a
verdict for Plaintiff.

Refused
to Answer
Jury