

STATE OF ALABAMA)
(
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons EARL F. WHITE, JOHN FREGO and J. E. GOODEN 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 FRED MCKENZIE.

WITNESS my hand this the 19th day of December, 1931.

J. M. Rimmer
Clerk.

FRED MCKENZIE,
Plaintiff,

vs

EARL F. WHITE, JOHN FREGO
and J. E. GOODEN,
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

The Plaintiff sues to recover possession of the following tract of land:

The East half of the Northeast quarter of Section fifteen, Township seven South, Range two East, situated in Baldwin County, Alabama;

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendants entered and unlawfully withhold, together with Five Hundred Dollars for the detention thereof.

Beebe & Hare
D. R. Coley
ATTORNEYS FOR PLAINTIFF.

STATE OF ALABAMA)
BALDWIN COUNTY)

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WITNESS my hand this the 19th day of December, 1931.

J. W. Resiman
Clerk.

FRED MCKENZIE,
Plaintiff,

vs

EARL F. WHITE, JOHN FREGO
and J. E. GOODEN,
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

The Plaintiff sues to recover possession of the following tract of land:

The East half of the Northeast quarter of Section fifteen, Township seven South, Range two East, situated in Baldwin County, Alabama;

of which he was in possession, and upon which, pending such possession, and before the commencement of this suit, the Defendants entered and unlawfully withhold, together with Five Hundred Dollars for the detention thereof.

Beebe & Stace
D. R. Coley
ATTORNEYS FOR PLAINTIFF.

BAY MINETTE, ALA.,

1932

J. B. Lockman

IN ACCOUNT WITH

G. W. HUMPHRIES

JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Privilege Tax

Rec. Fee

Total

Deed Rec. Mort. from	to	Privilege Tax	Rec. Fee	Total
U. G. A.	Geo. W. Nelson	50	65	115
Exchanged from Geo. Pingen with	Earl F. White	50	75	125
" " " " " " " "	Geo. W. Sanderson to Geo. W. Sanderson	50	65	115
" " " " " " " "	Geo. W. Nelson with	50	45	95
" " " " " " " "	Geo. W. Sanderson to Geo. Pingen	50	45	95
				\$ 545
Paid				
8/19/32				
G. W. Humphries Judge				
by J. B. Lockman				

FRED MCKENZIE,

Plaintiff,

VS.

EARL F. WHITE and
JOHN FREGO,

Defendants.


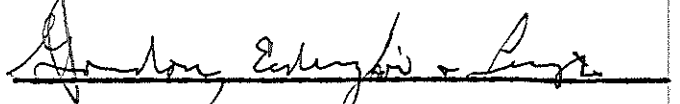
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 9565.

PLEAS.

1. In short by consent "Not Guilty."
2. The Defendants say that they and those whose possession they have, have for three years next before the commencement of the suit, had adverse possession of the land described in the Complaint, being the East Half of the Northeast Quarter of Section 15, Township 7 South Range 2 East in Baldwin County, Alabama.



Attorneys for Defendants.

FRED MCKENZIE,

Plaintiff,

VS.

JOHN FREGO and J. E.
GOODEN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____.

Comes the Defendant, John Frego, by his attorney, and
demurs to the complaint in the above entitled cause for the follow-
ing separate and several reasons to-wit:

FIRST: Because it does not state a cause of action.

SECOND: Because there is a misjoinder parties defendant.



Attorney for Defendant, John Frego.

RECORDED
ORIGINAL.

DEMURRERS.

FRED McKENZIE,
Plaintiff,
VS.

JOHN FREGO and J. E. GOODEN,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____.

Filed on this the 29th day of
January, 1932.

J. W. Pickens

Clerk of the Circuit Court.