

W. Austin Brothers
Mill Company, Plaintiff
vs

In Court
of Baker County,
Alabama

Laura Jeffers and
Hendry Hurdickes
Defendants

1st. Comes the defendant and pleads in
objection to the General Issue

2nd The Defendants for first causes
to the Complaint, say that Otto
Jeffers in a joint name in the
property in which a lien is attempted
to be attached in this suit, and he is
at present in the United States, and
for that reason a stay of these proceedings
is asked of the Court on this suggestion

J. C. Jenkins,
Attorney for Defendants,
and for Otto Jeffers.

In Circuit Court of
Baldwin County, Alabama

Seaworth Bros

Spring Term 1918

"

Laura Zippers +
Henry Handbolls
Defendants

I appear generally for the
defendants reserving the right to
plead specially any matters of special
defense and file herewith a
demand in writing for a trial by
jury -

W. J. Jenkins
Attorney for Defendants

C. SWANSTROM and A.G. :
 SWANSTROM, co-partners doing :
 business under the firm and :
 style of SWANSTROM BROTHERS : IN THE CIRCUIT COURT
 MILL COMPANY, PLAINTIFFS, :
 : OF BALDWIN COUNTY,
 VS :
 : ALABAMA.
 LAURA ZEEFERER AND HENRY :
 HENDRICKS, DEFENDANTS. :

COUNT ONE: The Plaintiffs claim of the De-
 fendants the sum of ONE HUNDRED NINETEEN and 67/100ths
 DOLLARS, (\$119.67), with interest thereon from, to-wit,
 February Nineth, Nineteen Hundred Eighteen, due from
 defendants to plaintiffs for goods, wares, and merchan-
 dise sold by plaintiffs to defendants on, to-wit,
 February Nineth, Nineteen Hundred Eighteen, at defend-
 ants' request, which sum of money, with interest there-
 on, is still due and unpaid.

COUNT TWO: The plaintiffs claim of the defend-
 ants the further sum of ONE HUNDRED NINETEEN and 67/100ths
 DOLLARS, (\$119.67), with interest thereon, from, to-wit,
 February Ninth, Nineteen Hundred Eighteen, due for mater-
 ials and supplies furnished by the plaintiffs to the de-
 fendants for the construction of a barn built by the de-
 fendants in the Northwest Quarter of the Southeast Quarter
 of Section Thirty-three in Township Seven South of Range
 Four East, in Baldwin County, Alabama. Said materials
 and supplies being furnished by the plaintiffs as orig-
 inal contractors, for which the defendants did agree to
 pay plaintiffs the sum of ONE HUNDRED NINETEEN and 67/100
 ths DOLLARS (\$119.67).

Plaintiffs now allege that said materials and
 supplies were furnished by the plaintiffs in accordance
 with their contract and that the reasonable value thereof,
 was, to-wit, ONE HUNDRED NINETEEN and 67/100ths DOLLARS,
 (\$119.67), but that the defendants, though offer re-

quested, have failed and refused and still fail and refuse to pay plaintiffs for said material and supplies.

Plaintiffs further allege that it has heretofore on, to-wit, the 10th day of April, 1918, filed in the Probate Court of Baldwin County, Alabama, a true and just account, itemized and verified as required by statute, showing said materials and supplies, and the amount due after all just credits had been given together with a description of the property upon which Plaintiffs hereby seek to enforce their lien; account being in words and figures as follows:

SWANSTROM BROTHERS MILL COMPANY hereby claims a lien upon the following described property in the County of BALDWIN, State of ALABAMA, to-wit:

One acre of land, with improvements thereon, situated in the Northwest Quarter of the Southeast Quarter of Section Thirty-three, Township Seven South of Range Four East, the center of which is the geometrical center of that certain barn situated on said premises recently built by Zeperer & Hendricks.

To secure payment of \$119.67, with interest thereon, being for material furnished in the construction of said barn and used thereon, after deducting all just credits and payments made therefor, said claim being for and according to the following just and proper account for material furnished by SWANSTROM BROTHERS MILL COMPANY to ZEPPERER & HENDRICKS, a partnership composed of LAURA ZEPPERER and HENRY HENDRICKS.

January 17th, 1918, to material	\$12.49
January 18th, 1918, to material	6.50
January 24th, 1918, to material	78.15
February 6th, 1918, to material	13.93
February 9th, 1918, to material	6.50
Total,	\$119.67

That the said LAURA ZEPPERER is the owner of said premises and the said SWANSTROM BROTHERS MILL COMPANY is the contractor who furnished the material in constructing the aforesaid barn.

(Signed) SWANSTROM BROTHERS MILL COMPANY

By C. Swanstrom.

STATE OF ALABAMA :
:
BALDWIN COUNTY. :

Before me, the under signed Notary Public, this day personally appeared C. Swanstrom, who is known to me and who being by me first duly sworn deposes and says that he is the manager of Swanstrom Brothers Mill Company, and of his own personal knowledge says that the foregoing statement of account is true and that the sum of \$119.67 is justly due after deducting all credits, set offs and counter claims.

C. Swanstrom.

Sworn to and subscribed before me on this the 9th day of April, 1918.

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

and herein declare their intention to claim a contractor's lien for said materials and supplies upon the following described property of the defendants, to-wit:

One acre or land, with improvements thereon, situated in the Northwest Quarter of the Southeast Quarter of Section Thirty-three, Township Seven South of Range Four East, the center of which is the geometrical center of that certain barn situated on said premises recently built by Zeperer & Hendricks.

WHEREFORE, plaintiffs pray that this Court in its verdict will determine and establish a contractor's lien upon said property in favor of the plaintiffs for the amount herein claimed, and order and condemn to sale said property for the satisfaction of said lien.

Richard A. Steele
Attorneys for Plaintiffs.

Original
Complaint

Filed 7/15-1918
J. W. McInnis
Register

The State of Alabama
Baldwin County

No.

Circuit Court

.....Spring.....Term, 1918

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon Laura Zeperer and Henry Hendricks,

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 them

.....the Defendant..... by C. Swanstrom and A. G. Swanstrom, co-partners doing
business under the firm ~~name~~ and style of Swanstrom Brothers Mill
Company, Plaintiff s

Witness my hand this 15th day of April 1918.

J. W. Anderson Clerk.

Complaint

.....
..... Plaintiff Versus

The plaintiff claims of the defendant

.....Dollars due by

.....
Plaintiff's Attorney.

120 Original

No. 1441

State of Alabama
Baldwin County
CIRCUIT COURT

Swanstrom Bros

vs.

Plaintiffs

Laura Zeperer and Henry
Hendricks.

Defendants

Summons and Complaint

Filed April 15th 1918.

Clerk.

Defendant lives at

Foley, Ala.

Rickarby Austill and Bebee
Plaintiff's Attorney

Defendant's Attorney

Times Print—Bay Minette.

Received in office

April 15th 1918.

Sheriff

I have executed this Writ

this April 19 1918.

by leaving a copy of the within summons and com-
plaint with

Laura Zeperer
Henry Hendricks

Sheriff.

Deputy Sheriff.