

4942

H. R. HALL,

Plaintiff,

VS.

ANN R. HALL, also known as  
Ann Haas,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

DEFENDANT'S REPLEVY BOND

STATE OF ALABAMA )  
                          \*  
BALDWIN COUNTY    )

KNOW ALL MEN BY THESE PRESENTS: That we, Ann Haas, as principal and the undersigned, as sureties, are held and firmly bound unto H. R. Hall in the sum of \$1000<sup>00</sup> for payment of which well and truly to be made, we bind ourselves and each us, our and each of our heirs, executors and administrators, jointly, severally and firmly by these presents.

Sealed with our seals and dated this 28th day of November, 1961.

The condition of the above obligation is such, that whereas, the said H. R. Hall did on the 16<sup>th</sup> day of November, 1961, sue out of the Circuit Court of Baldwin County a writ of detinue directed to any Sheriff of the State of Alabama, and commanding him to take into his possession the following property sued for in said action of detinue, to-wit:

One hotel serving table,  
One pool table,  
One hand carved ship model, together with  
certain other personal property.

Which said writ was placed in the hands of the Sheriff of Baldwin County on the 16<sup>th</sup> day of November, 1961, and executed by him on the 22nd day of November, 1961, by taking into his possession the following property to-wit:

One hotel serving table,  
One pool table,  
One hand carved ship model,

And whereas, the above bound Ann Haas, Defendant in said suit, has within five days from the execution of said writ, entered

into this bond, as required by Law, and thereby obtained possession of said property levied on:

Now, if the said Ann Haas shall defend said suit to effect, or if being cast therein she shall, within thirty days after judgment, deliver the property aforesaid to the Plaintiff and pay all such costs and damages as may be accrued from the detention thereof, then, in either of said events, this obligation to be null and void otherwise to remain in full force and effect.

ANN HAAS

By *[Signature]*  
As her Attorney

Principal

*[Signature]*  
*F.B. Newton*  
Sureties

Approved on this 28<sup>th</sup> day of November, 1961.

*[Signature]*  
Sheriff

H. R. HALL,

Plaintiff,

VS.

ANN R. HALL, also known as  
ANN HAAS,

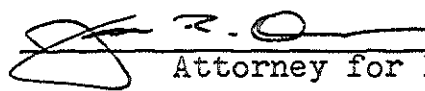
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 4947

DEMURRER

Now comes the Defendant in the above styled cause and demurs to the complaint as last amended and to each count thereof heretofore filed in said cause and as grounds for said demurrer assign the following separately and severally:

1. It does not state a cause of action.
2. The property sued for is not described with sufficient certainty.
3. It affirmatively appears from the complaint that the chattel sued for cannot be distinguished from other chattels of the same kind and nature.
4. The personal property described in the complaint is not sufficiently identified.
5. There is a misjoinder of causes of action.
6. The time when the Defendant allegedly received money from the Plaintiff is not alleged.



Attorney for Defendant

FILED

JUN 19 1962

ALICE L. DUCK, CLERK  
REGISTER

H. R. HALL,

Plaintiff,

VS.

ANN R. HALL, also known as  
Ann Haas,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA


AT LAW

NO. 4947

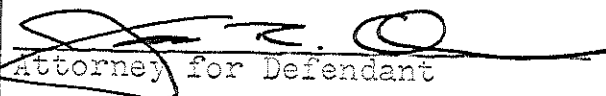
DEMURRER

Now comes the Defendant in the above styled cause and demurs to the complaint heretofore filed in said cause and as grounds for said demurrer assign the following separately and severally:

1. It does not state a cause of action.
2. The property sued for is not described with sufficient certainty.
3. It affirmatively appears from the complaint that the chattels sued for cannot be distinguished from other chattels of the same kind and nature.
4. The personal property described in the complaint is not sufficiently identified.

  
Attorney for Defendant

Defendant respectfully demands a trial  
by Jury of said cause.

  
Attorney for Defendant

FILED

DEC 8 1961

ALICE J. DICK, CLERK  
REGISTER

|              |   |                         |
|--------------|---|-------------------------|
| H. R. HALL,  | X | IN THE CIRCUIT COURT OF |
| Plaintiff,   | X | BALDWIN COUNTY, ALABAMA |
| Vs.          | X | AT LAW                  |
| ANN R. HAAS, | X | CASE NO. <u>4947</u>    |
| Defendant.   | X |                         |

Comes now the Plaintiff in the above styled cause and amends his Complaint by striking therefrom so much of it as reads: \$1768.00 cash.

The Plaintiff further amends his Complaint by adding the following counts:

2.

Plaintiff claims of the Defendant \$1768.00, damages for conversion by her on to-wit, the 10th day of February, 1959, the following chattels, \$1768.00, property of the Plaintiff.

3.

Plaintiff claims of the Defendant \$1768.00 received by the Defendant to the use of the Plaintiff, which sum of money with interest thereon is still unpaid.

WILTERS & BRANTLEY

BY: *Robert M Brantley*  
Attorney for the Plaintiff

FILED

MAR 22 1962

ALICE J. DUCK, CLERK  
REGISTER

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

No. \_\_\_\_\_

November 3, 1961

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon

Ann R. Hall also known as

Ann Haas

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 \_\_\_\_\_

H. R. Hall

Witness my hand this 16 day of November, 1961

*Deirdre H. H. H.* Clerk.

COMPLAINT

H. R. Hall

Plaintiff

Versus

Ann R. Hall

Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

(1) \$1.00 Antique gold piece- value \$75.00 ✓

\$1768.00 cash ✓

(73) Antique Silver Dollars, value \$286.00 ✓

An old desk located in the office of the H. R. Hall and Company building, value \$20.00

(1) Thermos pitcher, value \$35.00 ✓

A collection of 50 misc. books, value \$175.00 ✓

(50) phonograph records, value \$200.00 ✓

(500) Slide Films (Photos) value \$150.00 ✓

A painting located in basement of Ann R. Hall's home, value \$40.00

Framed Cocktail recipess, value \$10.00

A Hotel serving table, value \$80.00

A Pool Table, value \$960.00

A Slide film projector, magazine type, value \$145.00 ✓

Hand carved ship's model, value \$750.00

with the value of the hire or use thereof during the detention, to-wit:

from June 10, 1959, 19, to date, 19

*William M. Brantley* Attorney.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

H. R. Hall

Plaintiff.

VS.

Ann R. Hall

Defendant.

DETINUE SUMMONS AND COMPLAINT

Filed 11-16, 1961

Deice J. Duck, Clerk.

Plaintiff's Attorney

Defendant's Attorney

To The Sheriff of Said County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Deice J. Duck, Clerk.  
Excluded 11-22-61 by  
attaching the following  
~~Hotel Sewing Table~~  
~~Pool Table~~  
~~Hand Carved Ships Model~~

Defendant lives at

Received in office

11/16, 1961

Sheriff.

I have executed this summons

this Nov 22, 1961

by leaving a copy with

Ann Hall (Haas)

And attaching

1- Hotel Sewing Table

1- Pool Table

1- Hand Carved Ships Model

And leaving with Ann R. Hall

(Haas) in I hope. Dept.

made Bond 11/28/61 by  
Ann Haas, J. W. Duck Co. J. S. Newton  
and property released to Dept.

Jaylor Wilkins, Sheriff

W. C. Garner, Deputy Sheriff

I hope

STATE OF ALABAMA

Baldwin COUNTY

IN THE CIRCUIT COURT OF

Baldwin COUNTY

Before me, \_\_\_\_\_, a Notary Public in and for said County,  
 personally appeared H. R. Hall who being by me  
 duly sworn deposes and says that the property sued for in the complaint of H. R. Hall

filed in said Court, to-wit:

(1) \$1.00 Antique gold piece, value \$75.00; \$1768.00 cash; (73) Antique Silver Dollars, value \$286.00; An old desk located in office of H. R. Hall & Co. Bldg., value \$20.00; (1) Thermos pitcher, value \$35.00; A collection of 50 misc. bks value \$175.00; (50) Phonograph records, value \$200.00; (500) Slide Films (Photos) value \$150.00; A painting located in basement of Ann R. Hall's home, value \$40.00; Framed Cocktail recipes, value \$10.00; A Hotel Serving table, value \$80.00; A Pool Table, value \$960.00; Slide film projector, magazine type, value \$145.00; Hand carved ship's model, value \$750.00.

Sworn to and subscribed before me this 13 day of November, 1961.

William M. Brantley H. R. Hall  
 Notary Public

STATE OF ALABAMA

Baldwin COUNTY

IN THE CIRCUIT COURT OF

Baldwin COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, H. R. Hall,

and \_\_\_\_\_, Principal, and

\_\_\_\_\_, Sureties, are held and  
 firmly bound unto Ann R. Hall, his heirs, executors and admin-

istrators in the sum of Two hundred fifty and 00/100 ----- Dollars,  
 for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-

Sealed with our seals and dated the \_\_\_\_\_ day of November, 1961.

The condition of the above obligation is such that whereas, the above bound H. R. Hall

\_\_\_\_\_ has on the \_\_\_\_\_ day of  
November, 1961 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Ann R. Hall

(1) \$1.00 Antique gold piece, value \$75.00; \$1768.00 cash; (73) Antique Silver Dollars, value \$286.00; An old desk located in office of H. R. Hall & Co. Bldg., value \$20.00; (1) Thermos pitcher, value \$35.00; A collection of 50 misc. books, value \$175.00; (50) phonograph records, value \$200.00; (500) Slide Films (Photos) value \$150.00; A painting located in basement of Ann R. Hall's home, value \$40.00; Framed Cocktail recipes, value \$10.00; A Hotel serving table, value \$80.00; A Pool Table \$960.00; a Slide film projector, magazine type, \$145.00; A Hand carved ship's model \$750.00. H. R. Hall shall fail in said suit

and shall pay to the said Ann R. Hall, the defendant in  
 said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to  
 be void, otherwise, to remain in full force and effect.

Taken and approved this 16 day of  
November, 1961.

Beirich J. Brantley  
 Clerk, Circuit Court

H. R. Hall (SEAL)  
R. Roy Maynard (SEAL)  
J. D. McKeen (SEAL)



|  |           |
|--|-----------|
| No. ....                               |           |
| THE STATE OF ALABAMA                   |           |
| ..... COUNTY                           |           |
| CIRCUIT COURT                          |           |
| Plaintiff                              | Defendant |
| vs.                                    |           |
| Detinue — Affidavit and Bond           |           |
| Filed this ..... day of ....., 19..... |           |
| Clerk                                  |           |

STATE OF ALABAMA

Baldwin COUNTY

IN THE CIRCUIT COURT OF

Baldwin COUNTY

Before me, \_\_\_\_\_, a Notary Public in and for said County,  
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 duly sworn deposes and says that the property sued for in the complaint of H. R. Hall

filed in said Court, to-wit:

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Sworn to and subscribed before me this

day of November, 1961.

Notary Public

STATE OF ALABAMA

Baldwin COUNTY

IN THE CIRCUIT COURT OF

Baldwin COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, H. R. Hall,

and \_\_\_\_\_,

Principal, and

\_\_\_\_\_, Sureties, are held and  
 firmly bound unto Ann R. Hall, his heirs, executors and admin-

istrators in the sum of Two hundred fifty and 00/100 Dollars,  
 for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-

Sealed with our seals and dated the \_\_\_\_\_ day of November, 1961.

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and shall pay to the said Ann R. Hall, the defendant in  
 said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to  
 be void, otherwise, to remain in full force and effect.

Taken and approved this \_\_\_\_\_ day of November (SEAL)

November, 1961. (SEAL)

Clerk, Circuit Court (SEAL)