

5733

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

Before me, Wilson Hayes, a Notary Public in and for said County, personally appeared Charles E. McGinn who being by me duly sworn deposes and says that the property sued for in the complaint of Charles E. McGinn as Administrator of the Estate of Peter Joseph McGinn deceased filed in said Court, to-wit: One 1963 8 cyl Ford Fairlane 2 door automobile Motor #3K31L-127956 and all the goods, chattels and papers belonging to Peter Joseph McGinn, deceased

belongs to him, the plaintiff. as the personal representative of the said Decedent.

Sworn to and subscribed before me this 1st

day of October, 1963

W. Hayes  
Notary Public

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Charles E. McGinn as Administrator of the Estate of Peter Joseph McGinn, deceased, Principal, and \_\_\_\_\_, Sureties, are held and firmly bound unto Raymond Merchant, his heirs, executors and administrators in the sum of \$50.00 Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 1st day of October, 1963

The condition of the above obligation is such that whereas, the above bound Charles E. McGinn, as Administrator of the Estate of Peter Joseph McGinn deceased has on the 1st day of October, 1963 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Raymond Merchant for the recovery of the following described property, to-wit: One 1963 8 cyl Ford Fairlane 2 door automobile Motor #3K31L-127956 and all the goods, chattels and papers belonging to Peter Joseph McGinn, deceased.

Now, if the said Charles E. McGinn as Administrator of the Estate of Peter Joseph McGinn, deceased shall fail in said suit and shall pay to the said Raymond Merchant, 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 2 day of Oct (SEAL)

1963

W. Hayes  
Clerk, Circuit Court

Charles E. McGinn (SEAL)

(SEAL)

No. 5733

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this 11 day of NOV, 19 1913

Clerk

# The State of Alabama, {

## Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, \_\_\_\_\_

Charles E. McGinn, as admin. of the Estate of Peter Joseph McGinn  
deceased  
and \_\_\_\_\_

are held and firmly bound unto Raymond Merchant

in the sum of Twenty-four Hundred - - - - - Dollars, for the payment of  
which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and ad-  
ministrators.

Sealed with our seals and dated this 7th day of Oct. 1963

The condition of the above obligation is such that whereas the said \_\_\_\_\_

Charles E. McGinn \_\_\_\_\_ did, on the 2 day  
of Oct. 1963 sue out of the Circuit Court of Baldwin County

\_\_\_\_\_ a writ of detinue directed to any Sheriff of the State of Alabama commanding him  
to take into his possession the following property, to-wit: \_\_\_\_\_

One 1963 8 cyl Ford Fairlane 2 door Automobile Motor #3K31L-127956

which said writ was placed in the hands of Taylor Wilkins,  
Sheriff of Baldwin County, Alabama, on the 2 day of Oct. 1963,  
and executed by him on the 2 day of Oct. 1963, by taking into his  
possession the following property, to-wit:

same as above

And whereas the said Raymond Merchant,  
Defendant in said writ, has failed and neglected for the space of five days from the execution of said writ  
to give bond and take possession of said property as authorized by law.

Now if the said Charles E. McGinn upon his failing  
in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay all  
damages for the detention of the property and costs of suit, then this obligation to be void, otherwise to  
remain in full force and effect.

Charles E. McGinn (SEAL)  
As Administrator of the Estate of  
Peter Joseph McGinn, deceased (SEAL)

Chas. E. McGinn (SEAL)

Taken and approved this 7 day of Oct. 1963

Taylor Wilkins  
Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA,  
BALDWIN COUNTY:

Circuit Court, Baldwin County

REPLEVY BOND  
OF PLAINTIFF

vs.

Taken and approved this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_\_

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

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

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Raymond Merchant

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 Charles E. McGinn and Administrator of the Estate of Peter Joseph McGinn, deceased

Witness my hand this 2 day of Oct 1963

Alice J. Duck, Clerk

COMPLAINT

Charles E. McGinn as Administrator of the Estate of Peter Joseph McGinn, deceased

Raymond Merchant

Plaintiff

Versus

Defendant

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

One 1963 8 cyl Ford Fairlane 2 door automobile Motor # 3K31L-127956  
and all the goods, chattels and papers belonging to Peter Joseph McGinn, deceased

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

from 30th day of Sept. 1963, to date hereof 19\_\_

FILED

OCT 2 1963

Alice J. Duck, CLERK REGISTER

Wilson Hayes

Plaintiff's Attorney.

## State of Alabama

Baldwin County

## CIRCUIT COURT

Charles E. Mc Guinn

Plaintiff

VS.

Raymond Merchant

Defendant

## Detinue Summons and Complaint

Filed 10-2, 1963

Alice J. Reese 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.

Alice J. Reese Clerk

Defendant lives at

Received in office

Oct 2, 1963

, Sheriff

I have executed this summons

this Oct 2, 1963

by leaving a copy with

Raymond Merchant

attached one  
1963 8 Cyl. Ford  
Fairlane 2 door  
Automobile Motor

# 3K1L-627956  
Buy made bond 10/1/63  
Property released to same  
Car - Stored at County Jail

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

Printed by Moore Printing Co.

Sommudak

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY J. A. Talbot DEPUTY SHERIFF

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