

ELLA MAE ROBERTS	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
WESLEY ROBERTS	X	AT LAW	NO. 16090
Defendant	X		

Comes Ella Mae Roberts in the above styled cause and by virtue of a property settlement entered into in contemplation of a divorce between the parties to this cause and in accordance with said property settlement agreement, moves the Court to dismiss her detinue suit against the defendant herein with the provision that the said car attached in said suit be delivered to her as said agreement provides.

FILED  
JUN 17 1984

Ella Mae Roberts  
By: *C. L. Don Thompson*  
Attorney for Ella Mae Roberts.

ALICE I. DUCK, CLERK  
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

For the purpose of a friendly settlement of our property problems, it is agreed between the parties to this instrument that Wesley Roberts shall have one Springfield, 20 gauge, pump, shotgun presently in the possession of Ella Mae Roberts who does not make any claim whatever to said gun.

In further settlement said Ella Mae Roberts agrees to assume and pay off the note at the First National Bank in the approximate balance of \$175.00.

The said Wesley Roberts agrees to assume and pay off the indebtedness outstanding against certain automobile tires which is owed to White's Auto Store and to Sim's Retread Shop.

The said Wesley Roberts agrees and insures that the said Ella Mae Roberts shall have the possession of her trailer and that same will be moved within ten days.

It is further agreed that the said Wesley Roberts waives all claim to the 1956 Mercury automobile presently attached by the Circuit Court of Baldwin County and agrees that the said Ella Mae Roberts may recover said automobile upon dismissing the case in the Circuit Court of Baldwin County, Alabama.

Witness our hands and seals this 16th day of June, 1964.

Ella Mae Roberts (SEAL)

Wesley B. Roberts (SEAL)

STATE OF ALABAMA  
BALDWIN COUNTY

I, Charles Thompson, a Notary Public, in and for said County, in said State, hereby certify that Wesley Roberts and Ella Mae Roberts whose names are signed to the foregoing instrument and who are known to me, acknowledged before me on this day that being informed of the contents of the said instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 16th day of June, 1964.

Charles Thompson  
Notary Public, Baldwin County, Alabama

FILED

JUN 17 1964

ALICE J. DUCK, CLERK  
REGISTEE

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

Before me, C. LeNoir Thompson, a Notary Public in and for said County, personally appeared Ella Mae Roberts who being by me duly sworn deposes and says that the property sued for in the complaint of Ella Mae Roberts vs. Wesley Roberts filed in said Court, to-wit:

1 - 1956 Mercury, 2 dr. Motor No. 56SL45179M, tag No. 5-18585

belongs to Ella Mae Roberts, the plaintiff.

Sworn to and subscribed before me this 15th

day of June, 1964

C. LeNoir Thompson  
Notary Public

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Ella Mae Roberts

\_\_\_\_\_, Principal, and \_\_\_\_\_, Sureties, are held and firmly bound unto Wesley Roberts, his heirs, executors and administrators in the sum of Fifty (\$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 15 day of June, 1964

The condition of the above obligation is such that whereas, the above bound Ella Mae Roberts

has on the 15 day of June, 1964 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said

Wesley Roberts for the recovery of the following described property, to-wit:

1 - 1956 Mercury, 2 Dr. Motor No. 56SL45179M of the value of

Three Hundred (\$300.00) Dollars

Now, if the said Ella Mae Roberts shall fail in said suit

and shall pay to the said Wesley Roberts, 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 15 day of Ella Mae Roberts (SEAL)

June, 1964 C. LeNoir Thompson (SEAL)

Henry J. Leach (SEAL)  
Clerk, Circuit Court

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 Wesley Roberts

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 Ella Mae Roberts

Witness my hand this 15 day of June 19 64

Alvin A. Duck, Clerk

COMPLAINT

ELLA MAE ROBERTS

WESLEY ROBERTS

Plaintiff

Versus

Defendant

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

1 - 1956 Mercury, 2 Dr. Motor No. 56SL45179M, Tag No. 5-18585  
of the value of \$300.00.

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

from June 9 19 64, to date 19\_\_\_\_

FILED  
JUN 15 1964

ALICE I. DUCK, CLERK  
REGISTER

Alvin A. Duck Plaintiff's Attorney.

No. 6090 Page \_\_\_\_\_

**State of Alabama**

Baldwin County

**CIRCUIT COURT**

Ella Mae Roberts

Plaintiff

VS.

Wesley Roberts

Defendant

**Detinue Summons and Complaint**

Filed 6-15, 1964

Alvin J. Kouch, 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.

Alvin J. Kouch, Clerk

Defendant lives at

Laluna St. next to  
Wesley Roberts or at his  
mother's - Mother Lillie B. Heddy next to  
Received in office after 6:00 Lee Long  
6/15, 1964

\_\_\_\_\_, Sheriff

I have executed this summons

this June 15, 1964  
by leaving a copy with

Wesley Roberts  
Attached one 1956  
Mercury 2 Dr motor  
No 565J 451794 Tag  
No 5-18585

Stored at County  
Jail. Case settled.

Taylor Wilkins, Sheriff

W. A. Zeller, Deputy Sheriff

Sheriff claims 22 miles at  
Ten Cents per mile Total \$ 2.20  
printed by Moore Printing Co.

TAYLOR WILKINS, Sheriff

BY

Zeller