

SANDRA JOHNSON,

Plaintiff,

VS.

TED RUSH,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

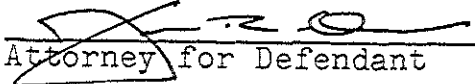
AT LAW

NO. 6176

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

1. The allegations of the complaint are untrue.


Attorney for Defendant

FILED

SEP 11 1964

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

BALDWIN

COUNTY

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

Sandra Johnson v. Ted Rush for one - 2 Dr. Hardtop Thunderbird, No. H9VH111495 year model 1958.

belongs to Sandra Johnson, the plaintiff.

Sworn to and subscribed before me this 28th Sandra Johnson

day of August

19 64

C. LeNoir Thompson
Notary Public

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

BALDWIN

COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Sandra Johnson

_____, Principal, and
_____, Sureties, are held and
firmly bound unto Ted Rush, 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 _____ day of August, 19 64

The condition of the above obligation is such that whereas, the above bound Sandra Johnson has on the _____ day of

August, 19 64 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Ted Rush for the recovery of the following described property, to-wit:

1 - 2 Dr. Hardtop Thunderbird, No. H9VH111495, year model 1958

Now, if the said Sandra Johnson shall fail in said suit

and shall pay to the said Ted Rush, 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 28 day of August Sandra Johnson (SEAL)

August, 19 64 James E. Hickory (SEAL)

Alfred D. Duck Clerk, Circuit Court Benjamin C. Bailey (SEAL)

No. 6176

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this **FILED** day of _____, 19____
AUG 25 1964

ALICE J. DICK CLERK
REGISTER

Clerk

The State of Alabama, }
Baldwin County

CIRCUIT COURT
No. 6176

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Ted Rush of General Murray Court,
Spanish Fort Community.

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 Sandra Johnson v.
Ted Rush for 1 - 2 Dr. Hardtop Thunderbird, No. H9VH111495 year
Model 1958.

Witness my hand this 28 day of Aug 1964

Alice L. Duck, Clerk

COMPLAINT

SANDRA JOHNSON

TED RUSH

Plaintiff

Versus

Defendant

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

ONE - 2 Dr. Hardtop Thunderbird, No. H9VH111495 year Model 1958
of the value of \$1,000.00.

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

from August 1 1964, to date 19

FILED

AUG 28 1964

AUG 11 1964
CLERK
REGISTER

Alice L. Duck

Plaintiff's Attorney.

State of Alabama
Baldwin County

CIRCUIT COURT

Stender Johnson
Plaintiff

VS.

Ted Rush
Defendant

Detinue Summons and Complaint

Filed Aug 28, 1964
Alice Duck, Clerk

Thompson & White
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 Duck, Clerk

432-3996

Defendant lives at

Received in office

8/28, 1964

, Sheriff

I have executed this summons

this 31st day of Aug, 1964
by leaving a copy with

Ted Rush and taking
into my possession
1- 1958 Ford T-Bird.
Neither party made
Bond. Property
is released to Off

Sheriff claims 44 miles at 4/10
Ten Cents per mile Total \$4.40
TAYLOR WILKINS, Sheriff
BY Leibert
DEPUTY SHERIFF

Taylor Wilkins, Sheriff
Fred Seibert, Deputy Sheriff

Property stored at
Wilson's Pure Service
Sp. Fort
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