

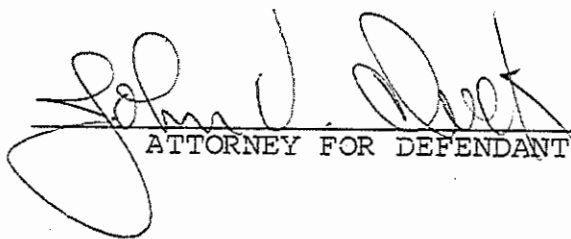
ROBERT E. STACEY,)
Plaintiff,)
-vs-)
L. B. GUESS,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

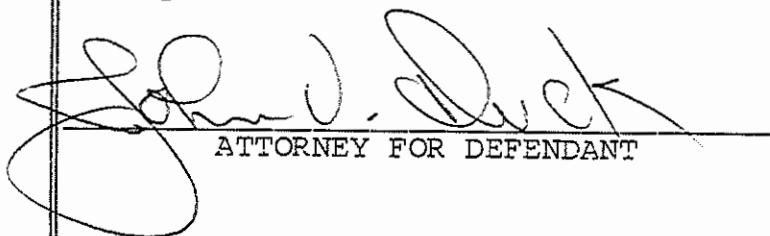
6467

Comes now the Defendant in the above styled cause, and
for answer to the Bill of Complaint filed herein says:

1. Non Detinet.
2. For further answer to the Bill of Complaint filed
herein, the Defendant says that the Plaintiff herein is claiming
the property under a mortgage and that said mortgage debt was not
due at the time said suit was filed.


ATTORNEY FOR DEFENDANT

Defendant respectfully demands a Jury
to try this cause.


ATTORNEY FOR DEFENDANT

FILED
APR 30 1965
ALICE I. DUCK, CLERK
REGISTER

Plaintiff vs. Defendant

IN THE CIRCUIT COURT OF

FLORIDA

DADE COUNTY, FLORIDA

J. E. GROSS,

Plaintiff

vs. LEO, INC.

The Plaintiff claims of the Defendant the following described personal property, to-wit:

12 Tables	5 Tables and Misc. Chairs
100 Chairs	1 Electric Food Warmer (Club Room)
2 Stoves	
1 Kitchen Range	
3 Cash Registers	
1 Candy Case	
1 Filing Cabinet	
1 Typewriter	
12 Window Air-Conditioners	
1 25 case Drink Box	
1 Deep Fry Unit (gas)	
1 9 Door Refrigerator Unit	
2 Deep Fry Units (Electric)	
1 2 Door Refrigerator	
1 5' Refrigerator	
2 20' Chest Freezers	
1 16' Upright Freezer	
2 Free Brand Warmers	
1 4 Slice Toaster	
1 2 Compartment Sink	
1 5 Ton Air Conditioner	
Various Neon Signs	
1 20' Counter with 11 Stools	
1 12' Counter with 5 Stools	
1 Cola-Cola Cooler	
2 Window Fans	
1 Kenmore Vacuum Cleaner	
6 Fluorescent Lights	
1 Coffee Urn (Cecilwear) 8 Gal. (double)	
1 Steam Table	
1 Electric Meat Slicer and Table	
1 Electric Meat Grinder	
1 Wall French Fry Slicer	
1 Penny Scale	
1 Electric Grill	
1 Single Milk Shake Machine	
1 Two-Burner Slot Coffee Maker (Silent)	
1 Raffle Item	
1 Kitchen Window Fan	
3 Wall Hooks	
7 Stove Chairs (upstairs)	
Miscellaneous Pots and Pans, Dishes	
1 Ice Machine	
1 Floor Fan with Shield	
1 Wall Clock (club room)	
1 Cabinet (club room)	
and all fixtures and furniture contained in and incidental to the Gateway Hotel	

The State of Alabama, {
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, _____

Robert E. Stacey

and _____

are held and firmly bound unto L. B. Guess

in the sum of Eleven Thousand Five Hundred Fifty _____ Dollars, for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated this 16 day of April 1965

The condition of the above obligation is such that whereas the said _____

Robert E. Stacey did, on the 8 day of April 1965 sue out of the Circuit Court of Baldwin

_____ 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: _____

that certain property described on the list
attached hereto

which said writ was placed in the hands of Taylor Wilkins, Sheriff of Baldwin County, Alabama, on the 8 day of April 1965, and executed by him on the 9 day of April 1965, by taking into his possession the following property, to-wit: _____

that certain property described on the list hereto attached

And whereas the said L. B. Guess, 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 Robert E. Stacey 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.

Robert E. Stacey (SEAL)

Mr. St. Smith (SEAL)

Natalie L. Stacey (SEAL)

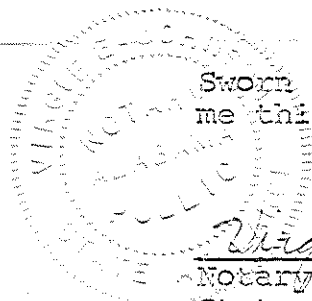
Taken and approved this 16th day of April 1965
Sheriff, Baldwin County, Ala.

ROBERT E. STACEY,	)	IN THE CIRCUIT COURT OF
	)	
PLAINTIFF	)	BALDWIN COUNTY, ALABAMA
	)	
VS	)	
	)	
L. B. GUESS,	)	
	)	
DEFENDANT	)	AT LAW, NO. 6467

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, the undersigned Notary Public in and for said State and County, personally appeared Robert E. Stacey, who, being duly sworn, deposeth and saith, That the property sued for in the complaint of ROBERT E. STACEY vs L. B. GUESS, belongs to ROBERT E. STACEY, the said plaintiff.

Robert E. Stacey
ROBERT E. STACEY



Sworn to and subscribed before me this 6th day of April, 1965.

Virgie E. Johnson
Notary Public
State of Alabama at Large

FILED
APR 8 1965
MAE J. DICK, CLERK
REGISTER

Attached the following described property:

- 11 Tables
- 2 chairs
- 1 Kitchen Range
- 2 Cash registers
- 1 Typewriter
- 10 Window air conditioners
- 1 25 case drink box
- 1 deep fry unit(gas)
- 2 deep fry units (electric)
- 1 2 door refrigerator
- 1 5 foot refrigerator
- 2 20 foot chest refrigerators
- 1 16 foot upright freezer
- 1 5 ton air conditioners
- various neon signs
- 1 20 foot counter with 11 stools
- 1 coke cola cooler
- 2 window fans
- 1 Kenmore vacuum cleaner
- 8 fluorescent lights
- 1 coffee urn (Cecilware) 8 gal
- 1 Electric Meat Slicer and Table
- 1 Wall french fry slicer
- 1 Penny scale
- 1 Electric Grill
- 1 Single Milk Shake Machine
- 1 Waffle Iron
- 3 Hall trees
- 7 Straw chairs (upstairs)
- Miscellaneous pots, pans, and dishes
- 1 Ice Machine
- 1 floor fan with shield
- 1 Wall Clock (club room)
- 1 Cabinet (club room)

The balance of the property listed on this detinue was attached on the original straight attachment.

Bond made 4/16/65 by R. E. Stacey, W. W. Smith, Natalee P. Stacey
Property released to Flt.

STATE OF ALABAMA)
COUNTY OF BALDWIN)

KNOW ALL MEN BY THESE PRESENTS, That we, Robert E. Stacey, as principal, and R. T. Godsey, as surety, are held and firmly bound unto L. B. Guess in the sum of \$5775.00, to be paid to the said L. B. Guess, his heirs, executors, administrators or assigns; for which payment well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals, and dated this 6th day of April, in the year of our Lord, one thousand nine hundred and sixty-five.

The condition of the above obligation is such, That whereas the above bound Robert E. Stacey, on the day of the date hereof hath obtained at the suit of Robert E. Stacey vs. L. B. Guess, a summons and complaint for the recovery of personal property in specie against said defendant and asks an endorsement by the Clerk of the Circuit Court of Baldwin County, "That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of Baldwin County, and and which said endorsement is made upon the Plaintiff entering into this bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

Robert E. Stacey SEAL
R. T. Godsey SEAL

Approved this _____ day of _____,

1965.

Clerk

ROBERT E. STACEY,
PLAINTIFF

vs

L. B. GUESS,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW, NO. 6467

The Plaintiff claims of the Defendant the following described personal property, to-wit:

- 11 — 33 Tables — 11
- 2 — 106 Chairs — 2
- original 3 Heaters
 - 1 Kitchen Range
- 2 — 3 Cash Registers
- original 1 Candy Case BR.
- original 1 Filing Cabinet
- 1 Typewriter
- 10 Window Air-conditioners
- 1 25 case Drink Box
- 1 Deep Fry Unit (gas)
- original 1 9 Door Refrigerator Unit BR.
- 2 Deep Fry Units (Electric)
- 1 2 Door Refrigerator
- 1 5' Refrigerator
- 2 20' Chest Freezers
- 1 16' Upright Freezer
- original 2 Tray Bread Warmers
- original 1 4 Slice Toaster
- original 1 2 Compartment Sink
- 1 5 Ton Air Conditioner
- Various Neon Signs
- 1 20' Counter with 11 Stools 11
- original 1 12' Counter with 5 Stools 5 BR.
- 1 Cola-Cola Cooler
- 2 Window Fans
- 1 Kenmore Vacuum Cleaner
- 3 Fluorescent Lights
- 1 Coffee Urn (Cecilwear) 8 Gal. (double)
- original 1 Steam Table
- 1 Electric Meat Slicer and Table
- original 1 Electric Meat Grinder
- 1 Wall French Fry Slicer
- 1 Penny Scale
- 1 Electric Grill
- 1 Single Milk Shake Machine
- original 1 Two-Burner Slot Coffee Maker (Silex)
- 1 Waffle Iron
- original 1 Kitchen Window Fan
- 3 Hall Trees
- 7 Straw Chairs (upstairs)
- Miscellaneous Pots and Pans, Dishes
- 1 Ice Machine
- 1 Floor Fan with Shield
- 1 Wall Clock (club room)
- 1 Cabinet (club room)

15 Tables, Miscellaneous Charis
1 Electric Food Warmer (club room)

with the value of the use thereof, from, to-wit, the 16th
day of March, 1965.


Attorney for Plaintiff

Filed in office this _____ 1965.

Clerk

Sheriff's Return

Received in office _____ 1965.

Sheriff

Executed by serving a copy of the within Summons
and Complaint on Defendant this _____ 1965.

Sheriff

Further executed by taking into my possession the
property named in the complaint and storing at _____
_____, this the _____ 1965.

Bond filed by Plaintiff, property released. This
this _____ 1965.

Sheriff

FILED

APR 6 1965

W. L. DICK, CLERK
REGISTERED

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 _____ L. B. Guess _____

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 _____

Robert E. Stacey

Witness my hand this _____ day of April 19 45

_____ , Clerk

COMPLAINT

Plaintiff Versus Defendant

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

See List attached

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

from _____ 19____, to _____ 19____

Plaintiff's Attorney.

State of Alabama

Baldwin County

CIRCUIT COURT

ROBERT E. STAGEY

Plaintiff

VS.

L. B. GUESS

Defendant

ue Summons and Complaint

4-8-65

19

Alice 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.

Alice J. Duck Clerk

Defendant lives at

Received in office

4/8, 1965

Sheriff

I have executed this summons

this April 8, 1965
by leaving a copy with

L. B. Guess

Sheriff claims 12 miles at

Ten Cents per mile Total \$1.20

TAYLOR WILKINS, Sheriff
BY *Jm Eastman* DEPUTY SHERIFF

Bond made 4/16/65
By: R. E. Stacey,
W. W. Smith, Natalie
P. Stacey, & party
returned to Sheriff

Taylor Wilkins, Sheriff

Jm Eastman, Deputy Sheriff

C. Childress Printed by Moore Printing Co.

Foley, Ala

Attached the following descriil property:

- 11 Tables
- 2 chairs
- 1 Kitchen Range
- 2 Cash registers
- 1 Typewriter
- 10 Window Air conditors
- 1 25 case drink box
- 1 deep fry unit (gas)
- 2 deep fry units (electric)
- 1 2 door refrigerator
- 1 5 foot refrigerator
- 2 20 foot chest refrigerators
- 1 16 foot upright freezer
- 1 5 ton air conditor
- various neon signs
- 1 20 foot counter with 11 stock
- 1 coke cola cooler
- 2 window fans
- 1 kenmore vacuum cleaner
- 8 fluorescent lights
- 1 coffee urn (Cecilware)
- 8 gal. double
- 1 Electric Meat Slicer and Table
- 1 Wall French Fry Slicer
- 1 Penny scale
- 1 Electric Grill
- 1 Single Milk Shake Machine
- 1 Waffle Iron
- 3 Hall Trees
- 7 Straw chairs (unstairs)
- Miscellaneous pots and pans, Dishes
- 1 Ice Machine
- 1 Floor fan with shield
- 1 Wall Clock (club room)
- 1 Cabinet (club room)
- The balance of the property listed on this detinue was attached on the original straight attachment

Jm Eastman
4/8/65
Foley, Ala

STATE OF ALABAMA)
COUNTY OF BALDWIN)

KNOW ALL MEN BY THESE PRESENTS, That we, Robert E. Stacey, as principal, and R. E. Godsey, as surety, are held and firmly bound unto L. B. Guess in the sum of \$5775.00, to be paid to the said L. B. Guess, his heirs, executors, administrators or assigns; for which payment well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals, and dated this 6th day of April, in the year of our Lord, one thousand nine hundred and sixty-five.

The condition of the above obligation is such, That whereas the above bound Robert E. Stacey, on the day of the date hereof hath obtained at the suit of Robert E. Stacey vs. L. B. Guess, a summons and complaint for the recovery of personal property in specie against said defendant and asks an endorsement by the Clerk of the Circuit Court of Baldwin County,

"That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of Baldwin County, and and which said endorsement is made upon the Plaintiff entering into this bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

Robert E. Stacey SEAL
R. E. Godsey SEAL

Approved this 6 day of Apr,

1965.

FILED

APR 8 1965

RECORDED

204

W. L. Clark
Clerk