

3322

L. D. OWEN, doing business
as Builders Hardware & Supply
Company,

Plaintiff,

vs.

GEORGE RANKIN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

Now comes the Plaintiff in the above styled cause and amends the Complaint heretofore filed in this cause so that as amended, the said Complaint will read as follows:

COUNT ONE:

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

One (1) eight inch Black & Decker Saw and cord,
with the value or use thereof from, to-wit, August 23, 1957.

COUNT TWO:

The Plaintiff claims of the Defendant Sixty-eight and 97/100 Dollars (\$68.97) damages for the conversion by him on the 23rd day of August, 1957, of the following chattel:

One (1) eight inch Black & Decker Saw and cord,
the property of the Plaintiff.

COUNT THREE:

The Plaintiff claims of the Defendant the sum of Sixty-eight and 97/100 Dollars (\$68.97) due from him by contract entered into by the Plaintiff and the Defendant on to-wit, June 6, 1957, under the terms of which the Defendant purchased from the Plaintiff One (1) eight inch Black & Decker Saw and cord, for which he promised to pay the sum of Eighty-six Dollars (\$86.00) in four equal monthly installments of \$22.99 commencing on the 6th day of July 1957, and on the same date of each successive month thereafter. The Plaintiff avers that Defendant has failed and refused to make the said payments as provided for in said contract. Plaintiff

further avers that the Defendant agreed that in the event the said contract was placed in the hands of an attorney for collection that he would pay fifteen percent of the amount then due under the said contract as attorney's fee and Plaintiff further avers that fifteen percent of the amount due is \$10.35, which the Plaintiff hereby claims.


Attorney for the Plaintiff.

RECORDED
AMENDED COMPLAINT

L. D. OWEN, doing business as
Builders Hardware & Supply
Company,

Plaintiff,

vs.

GEORGE RANKIN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW. NO. 3322.

*Filed 10/2/07
1/10/08
JRS*

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

6897

L. D. OWEN, doing business
as Builders Hardware &
Supply Company,

Plaintiff,

vs.

GEORGE RANKIN,

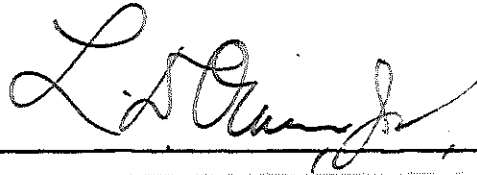
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

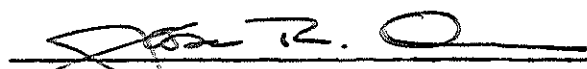
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared
L. D. Owen, Jr., who, being duly sworn, deposes and says, that
the property sued for in the Complaint of L. D. Owen, doing
business as Builders Hardware & Supply Company, Plaintiff, vs.
George Rankin, Defendant, belongs to L. D. Owen, doing business
as Builders Hardware & Supply Company, the said Plaintiff.



Sworn to and subscribed before
me on this the 28th day of
August, 1957.



Notary Public, Baldwin County, Ala.

FILED

AUG 29 1957

ALICE J. DUCK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, L. D. Owen, as Principal, and L. D. Owen, JR and F. B. Newton, as Sureties, are held and firmly bound unto George Rankin, in the sum of One Hundred Dollars (\$100.00) to be paid to the said George Rankin, 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 28th day of August, 1957.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That Whereas the above bound L. D. Owen, on the day of the date hereof, has obtained at the suit of L. D. Owen, doing business as Builders Hardware & Supply Company, Plaintiff, vs. George Rankin, Defendant, a summons and complaint, for the recovery of personal property in specie against said defendant, and asked an endorsement by the Clerk of this Court "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, Alabama, 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.

L. D. Owen (SEAL)
L. D. Owen.

L. D. Owen, Jr. (SEAL)

F. B. Newton (SEAL)

Approved this 29 day of August, 1957.

George J. Newton
Clerk.

FILED
AUG 1 29 1957
Baldwin County, Ala.

STATE OF ALABAMA

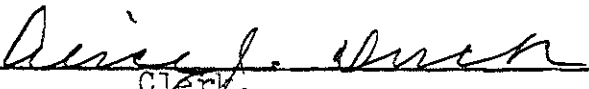
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon GEORGE RANKIN to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of L. D. OWEN, doing business as Builders Hardware & Supply Company.

You are hereby commanded to execute this process instantler and make return as required by law.

WITNESS my hand this 29 day of August, 1957.


Clerk.

L. D. OWEN, doing business as
Builders Hardware & Supply
Company,

Plaintiff,

vs.

GEORGE RANKIN,

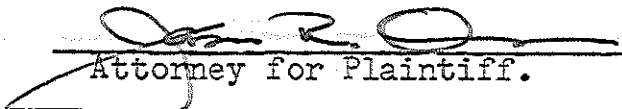
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

COMPLAINT:

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

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with the value or use thereof from, to-wit, August 23, 1957.


Attorney for Plaintiff.

L. D. OWEN, doing business as
Builders Hardware & Supply
Company,

Plaintiff,

vs.

GEORGE RANKIN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

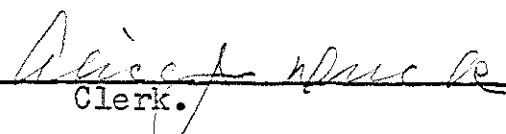
STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint in your possession, unless the Defendant give bond payable to the Plaintiff with securities in double the value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

Witness my hand this 29 day of August, 1957.


Clerk.

SUMMONS AND COMPLAINT

L. D. OWEN, doing business as
Builders Hardware & Supply
Company,

Plaintiff,

vs.

GEORGE RANKIN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

FILED

AUG 129 1957

ALICE J. DUCK, Clerk

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Received 27 day of Aug 1957
and 29 day of Aug 1957
I served a copy of the within S/C &
on George Rankin Detinue
By service on _____

TAYLOR WILKINS, Sheriff

By W. A. Tolbert D,
0 mi

*no property
found on the
Detinue, this
29th day of Aug.*

W. A. Tolbert

*This property is
in Mobile Co.*