

THE STATE OF ALABAMA,

Baldwin COUNTY.

CIRCUIT COURT.

Know all Men by these Presents: That we, Katie Lee White,are held and firmly bound unto Thomas A. Whitein the sum of Twenty-five

Dollars,

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, firmly by these presents.

Sealed with our seals, and dated this 16th day of August, 1918.The Condition of the above Obligation is such, That whereas, the above bound Katie Lee Whitehas S this day commenced her suit in the Circuit Court of Baldwin County, against the saidThomas A. White

for the recovery of the following property, to wit:

One Ford Automobile, 1916, model and numbered 1918.and having made affidavit that the property sued for belongs to her, and entering into this bond, has obtained an order requiring any Sheriff of the State aforesaid to take the said property sued for into his possession:Now, if the said Katie Lee White shall fail in said suit, and pay the Defendant all such costs and damages as he may sustain by the wrongful complaint, than this obligation to be void; otherwise to remain in full force and effect.Katie Lee White (L. S.)P. B. Rogers (L. S.)J. M. Hobbs (L. S.)

(L. S.)

Approved this 20th day of August, 1918.D. M. Williams, Clerk.

AFFIDAVIT IN DETINUE.

THE STATE OF ALABAMA, \_\_\_\_\_ COUNTY.

Before me, Henry D. Moorer  
personally appeared Katie Lee White, who,  
having been by me duly sworn, deposes and says that the following property, to wit:

One Ford Automobile 1916 model and numbered 1918

\_\_\_\_\_ for the recovery of which she has instituted suit this day in the Circuit Court  
of Baldwin County against Thomas A. White and Shomo White  
\_\_\_\_\_ is the property of Katie Lee White affiant.

Katie Lee White

Sworn to and subscribed before me this 16th day of August, 1918.

Henry D. Moorer

100  
No. \_\_\_\_\_

THE STATE OF ALABAMA,

County. \_\_\_\_\_

CIRCUIT COURT.

Katie Lee White

TO

Thomas A. White  
et al

AFFIDAVIT AND BOND IN DETINUE.

Filed this 26 day of Aug, 1918.

J. W. McCowan, Clerk

DETINUE SUMMONS AND COMPLAINT

The State of Alabama }  
Baldwin County

Circuit Court

\_\_\_\_\_ Fall \_\_\_\_\_ 1918

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Thomas A. White and Shomo White

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court  
of Baldwin County, State of Alabama, at Bay Minette, against them Defendant S  
by Katie Lee White

Plaintiff

Witness my hand this 20th day of August 1918.

T. W. Richardson Clerk.

COMPLAINT

Katie Lee White Thomas A. White and Shomo

Plaintiff Versus White Defendants S

The plaintiff claims of the defendant the following personal property towit:

One Ford Automobile, 1916 model and numbered 1918

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

from about the 15th day of August, 1918, to date \_\_\_\_\_ 1918

PAGE & MOORE, Plaintiff's Attorney

2<sup>nd</sup> Original

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

STATE OF ALABAMA,

BALDWIN COUNTY.

CIRCUIT COURT

Katie Lee White

vs. Plaintiff's

Thomas A. White  
et al.

Defendants

DETINUE SUMMONS AND COMPLAINT

Filed Aug 20<sup>th</sup> 1918

T. W. Pickens 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 the 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.

T. W. Pickens Clerk.

Defendant lives at

Received in office

Sept August 20 1918  
C. E. Eubanks Sheriff

I have executed this summons

this Sept 28 1918  
by leaving a copy with

Thomas A. White and  
Shomo White and  
taking into my possession  
one Ford Automobile

C. E. Eubanks Sheriff

Deputy Sheriff.

The State of Alabama,

Circuit

COURT.

Baldwin

COUNTY.

Fall

Term, 1918.

KNOW ALL MEN BY THESE PRESENTS:

That we, ~~MARY IDA WHITE~~ and Ed J Green, and Harry West  
are held and firmly bound unto

Katie Lee White

in the sum of Four Hundred Dollars,

for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators,  
jointly and severally, firmly by these presents.

Sealed with our seals and dated, this 28th day of Sept. 1918 191

The Condition of the above Obligation is Such, That whereas the said

Katie Lee White

did on the 20th day

of August 1918 191, sue out of the Circuit

Court of said County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding  
him to take into his possession the following property, sued for in action of detinue, to wit:

One Ford Automobile I9I6 Model Numbered I9I8

( 30937 )

which said writ was placed in the hands of Chas Eubanks Sheriff

Sheriff of the County of Baldwin, on the 20th day

of August 1918 191, and executed by him on the 28th day of

September 1918 191, by taking into his possession

One Ford Automobile Model I9I6 Numbered I9I8

and whereas the above bound en

she has a just claim to

sued for to wit One Ford Automobile Model I9I6 Numbered I9I8 ( 30937 )  
has within five days from the execution of said writ entered into this bond as required by law, and hereby  
obtain possession of said property.

Now, if the said Mary Ida White Claimant shall well and truly, within  
thirty days after the determination of said suit, if the said Mary Ida White  
be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for detention  
as may accrue from said detention, then this obligation to be void, otherwise to remain in full force and effect.  
And we, and each of us, hereby waive all rights of claim of exemption we or either of us have now, or may  
hereafter have, under the Constitution and Laws of Alabama, and we hereby severally certify that  
have property free from all encumbrance to the full amount of the above bond.

Witness our hands and seals, this 28th day of Sept. 1918

Taken and approved,

Sept 29<sup>th</sup> 1918  
C. E. Eubanks  
By O. B. Richerson Sheriff.

Mary Ida White (L.S.)  
Harry J. West (L.S.)  
E. J. Green (L.S.)  
(L.S.)

No. 7021  
The State of Alabama,  
Baldwin COUNTY.  
Circuit COURT.  
SHERIFF'S OFFICE.

Katie Lee White  
vs.  
Thomas A White  
Shomo White  
Mary Ida White Claimant.

DETINUE REPLEVIN BOND, DEFENDANT.

Filed Sept. 28th. 1918

O. B. Richerson  
Sheriff.

Sheriff's Execution Docket, page

Atty. for Thomas A White.

State of Alabama.

Katie Lee White

Baldwin County.

vs

Shomo White & Thomas A White .

Comes the defendant Shomo White and for plea to the complaint says

Ist. That the allegations of the complaint are untrue.

2nd.

That he does not detain the said Ford Autimobile Model 1916 Numbered  
/1918 therein specified in manner and form as the plaintiff has  
therein charged against him.

DEFENDANT DEMANDS A TRIAL BY JURY OF THE ISSUES IN THIS CASE.

Frank Stone

Atty. for Shomo White.

*Beer*  
KATIE LEE WHITE

VS

THOMAS A WHITE

&

SHOMO WHITE

PLEA OF SHOMO WHITE

FILED SEPT. 20th. 1918

*T. W. Richardson*  
-----Clk.



STATE OF ALABAMA.

BALDWIN COUNTY. Before me T W Richerson, Clerk of the Circuit Court personally appeared Mary Ida White, Atty in fact for Harvey A White, who being duly sworn doth depose and say under oath, that the following property to Wit. One Ford Automobile Model 1916 Numbered 1918 ( 30937) upon which an attachment from the Circuit Court of Baldwin County Ala. bearing date August 20th. 1918, in favor of Katie Lee White, has been levied by Chas. Eubanks, Sheriff of said County and State, is not the property of Katie Lee White, but is the property of <sup>Mary Ida White</sup> ~~Katie Lee White~~ as Attorney in fact for Harvey A White, and that affiant has a just claim to the property levied on.

Mary Ida White

Sworn to and subscribed before me this Sept. 30th. 1918.

T W Richerson

Clerk of the Circuit Court of Baldwin County. Ala.

STATE OF ALABAMA.  
BALDWIN COUNTY.

AFFIDAVIT IN CLAIM SUIT

MARY IDA WHITE

CLAIMANT.

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Filed this Sept. 30th. 1918.

*D. W. McIlwain*  
-----

Clerk Circuit Court.

STATE OF ALABAMA.

KATIE LEE WHITE

BALDWIN COUNTY.

VS

THOMAS A WHITE & SHOMO WHITE

Comes the defendant Thomas A White and for plea to the complaint  
says

1st.

That the allegations of the complaint are untrue.

2nd.

That he does not detain the said Ford Automobile Model 1916 Number 1918  
therein specified in manner and form as the plaintiff has therein charg  
ed against him.

DEFENDANT DEMANDS A TRIAL BY JURY OF THE ISSUED IN THIS CASE.

*Hampstone  
atty for def.*

KATIE LEE WHITE

VS

THOMAS A WHITE

SHOMO WHITE

PLEA OF THOMAS A  
WHITE

FILED SEPT. 30th. 19

18

*J. W. Reel*  
-----Clk.

State of Alabama.

Baldwin County. Circuit Court Fall Term.

KATIE LEE WHITE

VS

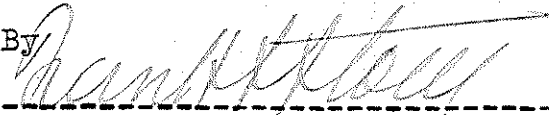
THOMAS A WHITE. SHOMO WHITE

MARY IDA WHITE CLAIMANT.

Now comes the claimant in above cause and demands that the issues  
in this cause be tried by a jury.

MARY IDA WHITE

By

A handwritten signature in cursive script, likely of the attorney, written over a dashed line.

Atty.

Circuit Court

Fall Term. 1918

Katie Lee White

vs Thomas White

Shomo White

Mary Ida White Claimant.

Demand for jury trial  
by Claimant.

Filed Sept. 28th. 1918

W. H. Harrison

Clerk.