

The State of Alabama,  
Baldwin County

CIRCUIT COURT

No. Raymond Alabama 7 1931

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon T. A. Wilson

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 J. B. Wilson, individually and doing business as Wilson Transfer Company.

Witness my hand this \_\_\_\_\_ day of August 1931

T. W. Richardson Clerk.

## COMPLAINT

J. B. WILSON, individually and doing business as Wilson Transfer Company.

T. A. WILSON

Plaintiff versus

Defendant..

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

One 1929 Model Stake Body Reo Automobile Truck, Two Ton Capacity, Serial No. 3224, Motor No. 6F12035

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

from August 1st 1931, to August 7th 1931

Robert Head & Son Plaintiff's Attorney.

Original

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

The State of Alabama,

BALDWIN COUNTY

CIRCUIT COURT

*J. B. Wilson*

PLAINTIFFS

VS.

*T. A. Wilson*

DEFENDANTS

Detinue Summons and Complaint

Filed

*Aug 7th*

193

*W. B. Wilson*

Clerk

*Copy for*

*W. B. Wilson*

*W. B. Wilson*

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co. 1111 Bay Minette, Ala.

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.

*W. B. Wilson*

Clerk

Defendant lives at \_\_\_\_\_

Received in office \_\_\_\_\_

\_\_\_\_\_, 193

Sheriff

I have executed this summons

this \_\_\_\_\_ 193

by leaving a copy with \_\_\_\_\_

*Executed this 7th*

*day of Aug 1931 by*

*J. B. Wilson*

*Plaintiff*

*W. B. Wilson*

*04 12 033*

*W. B. Wilson*

*Sheriff*

*W. B. Wilson*

Sheriff

Deputy Sheriff

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

No. \_\_\_\_\_ 1931

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon T. A. Wilson

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 J. B. Wilson,  
individually and doing business as Wilson Transfer Company.

Witness my hand this 7th day of August 1931D. W. Williams Clerk.

## COMPLAINT

J. B. WILSON, individually and do- T. A. WILSON  
ing business as Wilson Transfer  
Company, Plaintiff... versus Defendant..

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

One 1929 Model Stake Body Reo Automobile Truck, Two Ton  
Capacity, Serial No. 5224, Motor No. CF12053

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

from August 1st 1931 to August 7th 1931Hyatt, Hays & Chesser Plaintiff's Attorney.

Deputy Sheriff

STATE OF ALABAMA,  
BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS, That We, Baldwin County Bank, a Corporation, as Principal, and the undersigned, as Sureties, are held and firmly bound unto Robert A. Smith and Sue B. Smith, their heirs, executors and administrators, in the sum of Fifty and no/100 (\$50.00) Dollars, for the payment of which, we bind ourselves, our and each of our heirs, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated this 15th day of August, A. D. 1931.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That where- as the above bounden Baldwin County Bank, a Corporation, has, on the 15th day of August, 1931, sued out from the office of the Clerk of the Circuit Court of Baldwin County, in the State of Alabama, a writ of Detinue, returnable to said Circuit Court of Baldwin County against the said Robert A. Smith and Sue B. Smith, for the recovery of the following described property, to-wit:

Twenty-four (24) head work oxen, being all the oxen owned by Robert A. Smith and Sue B. Smith on the 27th day of August, 1926. Also, two log carts, two eight wheel Hemming Log Carts; Also, all yokes, bows, chains and all other equipment used in connection with said teams,

NOW, if the said Baldwin County Bank, a Corporation, shall fail in said suit, and shall pay to the said Robert A. Smith and Sue B. Smith, the defendant in said writ, all such costs and damages as he may sustain by the wrongful suing out of said Writ of Detinue, then this obligation to be void, otherwise to remain in full force and benefit.

*Taken and  
Approved  
August 15th/1931  
J. W. Rice  
Clerk,*

BALDWIN COUNTY BANK,  
A Corporation,

By *[Signature]* (L.S.)

*[Signature]* (L.S.)

*[Signature]* (L.S.)

STATE OF ALABAMA,  
BALDWIN COUNTY.

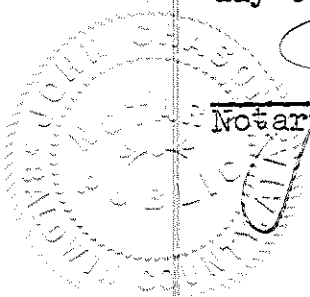
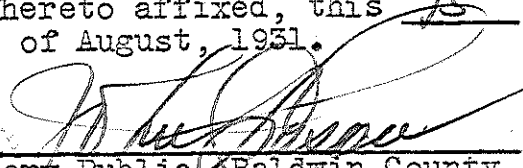
Before me, the undersigned authority in and for said County in said State, personally appeared W. D. Stapleton, who is known to me and who, after being by me first duly and legally sworn, both depose and say under oath as follows:-

That his name is W. D. Stapleton; that he is the President of the Baldwin County Bank, a Corporation, and as such is duly authorized to make this affidavit; that the property sued for in the Complaint of Baldwin County Bank, a Corporation, Plaintiff, vs. Robert A. Smith and Sue B. Smith, Defendants, viz:-

Twenty-four (24) head work oxen, being all the oxen owned by Robert A. Smith and Sue B. Smith on the 27th day of August, 1926. Also, two log carts, two eight wheel Hemming Log Carts; Also, all yokes, bows, chains and all other equipment used in connection with said teams,

belongs to the Baldwin County Bank, a Corporation, the said Plaintiff.

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 15 day of August, 1931.

  
  
Notary Public, Baldwin County,  
State of Alabama.