

HUGH ROZELLE
ATTORNEY-AT-LAW
ATMORE, ALABAMA 36502

PHONES { OFFICE 368-3549
RESIDENCE 368-2676

June 1, 1967

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Re: P. P. Hastings vs.
Lucille M. Davidson

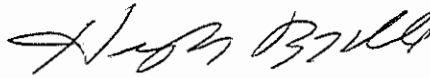
Dear Mrs. Duck:

I am enclosing, herewith, original and copy of
Summons and Complaint in Detinue and original and copy of
Detinue Affidavit and Bond which I desire filed.

The defendant resides at Powell Heights, Bay
Minette, Alabama.

Thanking you, I am

Sincerely,



HUGH ROZELLE

HR/mm

Enclosures

State of Alabama

ESCAMBIA COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

~~ESCAMBIA~~ COUNTY

Before me, Hugh E. Agallo, a Notary Public in and for said County,
personally appeared P. P. Hastings who being by me

duly sworn deposes and says that the property sued for in the Complaint of

P. P. Hastings

filed in said Court, to-wit:

One 1964 Fridgerdaire Freezer, Serial #48AA2121, Model #CFB-20; to-wit,
500 ft. of 2x4 lumber; and to-wit, 800 ft. of sheeting, all of said
property being located on the premises occupied by the defendant at
Powell Heights, Bay Minette, Alabama

belong to P. P. Hastings, the plaintiff.

Sworn to and subscribed before me this 12th

day of June, 19 67

Hugh E. Agallo

Notary Public

My Commission Expires Feb. 5, 1968

State of Alabama

BALDWIN

~~ESCAMBIA~~ COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

~~ESCAMBIA~~ COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, P. P. Hastings and the

undersigned sureties

Principal, and

Sureties, are held and

firmly bound unto Lucille M. Davidson, his heirs, executors and admin-

istrators in the sum of One Hundred (\$100.00) Dollars,
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-

trators.

Sealed with our seals and dated the _____ day of _____, 1967.

The condition of the above obligation is such that whereas, the above bound

P. P. Hastings

has on the _____ day of

_____, 1967 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said

Lucille M. Davidson

for the recovery of the following
described property, to-wit:

One 1964 Fridgerdaire Freezer, Serial #48AA2121, Model #CFB-20; to-wit,
500 ft. of 2x4 lumber; and to-wit, 800 ft. of sheeting, all of said
property being located on the premises occupied by the defendant at
Powell Heights, Bay Minette, Alabama

Now, if the said P. P. Hastings shall fail in said suit

and shall pay to the said Lucille M. Davidson, 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 _____ day of _____ (SEAL)

_____, 19 67 (SEAL)

_____, (SEAL)

Clerk, Circuit Court

No. _____

The State of Alabama

ESCAMBIA COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue – Affidavit and Bond

Filed this _____ day of _____, 19____.

Clerk

P. P. HASTINGS,

Ø

Plaintiff,

Ø

VS.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LUCILLE M. DAVIDSON,

Ø

AT LAW

NO. 7573

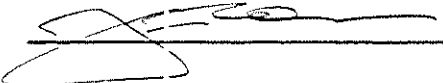
Defendant.

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PLEA

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

1. Not guilty.
2. The allegations of the complaint are untrue.


Attorney for Defendant

FILED

JUL 12 1957

CLERK
REGISTER

BALDWIN
The State of Alabama, Escambia County

BALDWIN
 THE CIRCUIT COURT OF ESCAMBIA COUNTY

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Lucille M. Davidson

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 P. P. Hastings

Witness my hand this 20th day of June, 1967

Code 1940 Tit. 7, Sec. 183, 184.

Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE
 THE PLAINTIFF MAY TAKE JUDGEMENT BY DEFAULT.

7573
COMPLAINT

P. P. HASTINGSLUCILLE M. DAVIDSON

vs.

Plaintiff

Defendant

The Plaintiff claim of the Defendant the following personal property—to wit:

One 1964 Fridgerdaire Freezer, Serial #48AA2121,
 Model #CFB-20; To-wit, 500 ft. of 2x4 lumber;
 and to-wit, 800 ft. of sheeting, all of said
 property being located on the premises occupied
 by the defendant at Powell Heights, Bay Minette,
 Alabama,

with the value of the hire or use thereof during the detention—to wit, from the 24th day of
September, 1965

FILED

JUN 20 1967

ALICE L. BUCK, CLERK
REGISTERHugh Powell

Plaintiff's Attorney

RECEIVED

Received this _____ day of

JUN 20 1967, 196

TAYLOR WILKINS, Sheriff

Executed this 21 day of

June, 1967

by leaving a copy of the within Summons and

Complaint with

Lucille M. Davidson

Defendant

Taylor Wilkins
W. A. Walker Sheriff.

attached one

Fredgerdanie Freepier

48 # 21 21 model # CFB

- 20- 500 ft of 2 x 4 lumber

800 ft of sheathing

Stored at Powell Heights

Dept. made bond 6/16/67

by Lucille M. Davidson

James State Lister G. White

Property released to Dept.

State of Alabama

ESCAMBIA COUNTY

THE CIRCUIT COURT OF
ESCAMBIA COUNTY

P. P. Hastings

Plaintiff

vs.

Lucille M. Davidson

Powell Heights

Bay Minnille Defendant

Summons and Complaint
in Detinue

Filed this _____ day of

196

Clerk.

Hugh Rozelle

Plaintiff's Attorney.

FILED

JUN 20 1967

ALICE I. BROWN

State of Alabama

ESCAMBIA COUNTY

BZLDWIN

To the Sheriff of Baldwin 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 _____
give _____ bond payable to the Plaintiff _____ with
sufficient surety in double the amount of the value
of the property, with condition that if the Defen-
dant _____

Lucille M. Davidson

cast in the suit, she will _____
within thirty days thereafter, deliver the prop-
erty to the Plaintiff _____, and pay all costs and
damages which may accrue from the detention
thereof.

Alice J. Duck

Clerk.

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State of Alabama

IN THE CIRCUIT COURT OF

ESCAMBIA COUNTY

BALDWIN
~~WESCAMBERG~~ COUNTY

Before me, Walter E. Bickel, a Notary Public in and for said County,
personally appeared P. P. Hastings who being by me

duly sworn deposes and says that the property sued for in the Complaint of_____

P. P. Hastings _____ filed in said Court, to-wit:
One 1964 Fridgerdaire Freezer, Serial #18AA2121, Model #CFB-20; to-wit,
500 ft. of 2x4 lumber; and to-wit, 800 ft. of sheeting, all of said
property being located on the premises occupied by the defendant at
Powell Heights, Bay Minette, Alabama
belong to _____ P. P. Hastings _____, the plaintiff.

Sworn to and subscribed before me this 14

day of June, 1967

Notary Public

My Commission Expires Feb. 5, 1960

State of Alabama

IN THE CIRCUIT COURT OF

BALDWIN
ESCAMBAUX COUNTY

BALDWIN
ESCAMBIA COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, P. P. Hastings and the
undersigned sureties, Principal, and

_____, Sureties, are held and
firmly bound unto Lucille M. Davidson, his heirs, executors and admin-

istrators in the sum of One Hundred (\$100.00) Dollars,
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-
trators.

Sealed with our seals and dated the _____ day of _____, 1967.

The condition of the above obligation is such that whereas, the above bound-----

P. P. Hastings _____ has on the _____ day of _____, 1967 sued out a writ of detinue in the Circuit Court of Baldwin

_____County, returnable to the said Circuit Court against the said_____

Lucille M. Davidson for the recovery of the following described property, to-wit:

One 1964 Fridgerdaire Freezer, Serial #48AA2121, Model #CFB-20; to-wit, 500 ft. of 2x4 lumber; and to-wit, 800 ft. of sheeting, all of said property being located on the premises occupied by the defendant at Powell Heights, Bay Minette, Alabama

Now, if the said P. P. Hastings shall fail in said suit

and shall pay to the said Lucille M. Davidson, 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 20 day of February (SEAL)

June 19 67 De Kink (SEAL)

Miss French *Elizaveta Ardes* (SEAL)

Clerk, Circuit Court

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No. _____

The State of Alabama

ESCAMBIA COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue – Affidavit and Bond

Filed this _____ day of _____, 19____.

Clerk

THE STATE OF ALABAMA,CIRCUITCOURT.BALDWINCOUNTY.Term, 19

KNOW ALL MEN BY THESE PRESENTS:

That we, Lucille M. Davidson, as Principal, and the undersigned as
are held and firmly bound unto P. P. Hastings sureties

in the sum of --TWO HUNDRED FIFTY AND NO/100 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 26th day of June 1967.

The Condition of the above Obligation is Such, That whereas the said P. P. Hastings
did on the 20th day
of June 1967, 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 1964 Fridgerdaire Freezer, Serial #48AA2121;
Model #CFB-20;

To-wit, 500 ft. of 2x4 lumber;
and to-wit, 800 ft. of sheeting,

all of said property being located on the premises
occupied by the defendant at Powell Heights,
Bay Minette, Alabama.

which said writ was placed in the hands of Taylor Wilkins

Sheriff of the County of Baldwin, on the 20th day
of June 1967, and executed by him on the 21st day of
June 1967, by taking into his possession the said
property

and whereas the above bound Lucille M. Davidson

has within five days from the execution of said writ entered into this bond as required by law, and here-
by obtain possession of said property.

Now, if the said Lucille M. Davidson shall well and truly, within thirty days after the determination of said suit, if the said Lucille M. Davidson 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 we have property free from all encumbrance to the full amount of the above bond.

Witness our hands and seals, this 26th day of June 1967.

Taken and approved,

June 26, 1967.
[Signature] Sheriff.
} Lucille M. Davidson (L.S.)
} [Signature] (L.S.)
} [Signature] (L.S.)
} [Signature] (L.S.)

No. _____

The State of Alabama,

COUNTY. _____

COURT. _____

SHERIFF'S OFFICE

Plaintiff.

vs.

Defendant.

DETINUE REPLEVIN BOND, DEFENDANT.

Filed _____ 19 _____

Sheriff.

Sheriff's Execution Docket, page _____