

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

Before me, WILSON HAYES

, a Notary Public in and for said County,
personally appeared CHINESTER WATKINS who being by meduly sworn deposes and says that the property sued for in the complaint of CHINESTER
WATKINS vs ADDIE MAE WATKINS filed in said Court, to-wit:

One 1966 8-cyl Buick 4-door Sedan

Serial No. 45469 6 D 102002

Motor No. 25441

belongs to CHINESTER WATKINS, Adm. of the Estate of
LUCIOUS WATKINS, DCD, the plaintiff.

Sworn to and subscribed before me this 28th

day of July, 19 67

Notary Public

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, CHINESTER WATKINS

, Principal, and
WILSON HAYES, Sureties, are held andfirmly bound unto ADDIE MAE WATKINS, his heirs, executors and admin-
istrators in the sum of \$50.00 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 28th day of July, 19 67

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

CHINESTER WATKINS has on the 28th day of
July, 19 67 sued out a writ of detinue in the Circuit Court of BALDWIN

County, returnable to the said Circuit Court against the said

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

One 1966 8-cyl Buick 4-door Sedan

Serial No. 45469 6 D 102002

Motor No. 25441

Now, if the said CHINESTER WATKINS shall fail in said suit
and shall pay to the said ADDIE MAE WATKINS, 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 28th day of July, 1967 (SEAL)

, 19 Chineseater Watkins (SEAL)

Alice J. Spuck Clerk, Circuit Court Wilson Hayes (SEAL)

No. 7653

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this _____ day of _____, 19 _____

Clerk

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, _____

Chinester Watkins, Administratrix of the Estate of Lucious Watkins, Dcd.

and Wilson Hayes

are held and firmly bound unto Addie Mae Watkins a/k/a Hattie Watkins a/k/a Hattie Pettaway

in the sum of Six thousand 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 _____ day of _____ 19____

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

Chinester Watkins did, on the 28th day

of July 1967 sue out of the Circuit Court of Baldwin County

_____ 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: _____

One 1966 8-cyl Buick 4-door Sedan

Serial No. 45469 6 D 102002, Motor No. 25441

which said writ was placed in the hands of Taylor Wilkins,

Sheriff of Baldwin County, Alabama, on the 28th day of July, 1967,

and executed by him on the 28th day of July, 1967, by taking into his possession the following property, to-wit:

same as above

And whereas the said Addie Mae Watkins ~~xxxxHattie~~ 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 Chinester Watkins 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.

Chinester Watkins (SEAL)

W. V. Hayes (SEAL)

_____ (SEAL)

Taken and approved this 7th day of August 1967

Taylor Wilkins
Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

REPLEVY BOND
Of Plaintiff

vs.

Taken and approved this

day of _____, 196_____

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 ADDIE MAE WATKINS a/k/a HATTIE WATKINS
a/k/a HATTIE PETTIWAY

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 CHINESTER
WATKINS as ADMINISTRATRIX of the estate of LUCIOUS WATKINS, decd

Witness my hand this 28th day of July 1967

Alice J. Alston, Clerk

COMPLAINT

CHINESTER WATKINS, Administratrix ADDIE MAE WATKINS a/k/a
of the Estate of LUCIOUS HATTIE WATKINS a/k/a
WATKINS, decd Plaintiff Versus HATTIE PETTIWAY Defendant

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

One 1966 8-cyl Buick 4-door Sedan
Serial No. 45469 6 D 102002
Motor No. 25441

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

from May 21 1966, to July 27 1967
and of the alternate value of \$3,000.00

W. L. Hays Plaintiff's Attorney.

State of Alabama
Baldwin County

CIRCUIT COURT

Plaintiff...

VS.

Defendant...

Detinue Summons and Complaint

Filed 7-28, 1967

Alice J. Luck 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. Luck Clerk

Defendant lives at

Received in office

19

Sheriff

I have executed this summons

this July 28, 1967
by leaving a copy with

Addie Mae Watkins A/K/A
Hattie Watkins A/K/A
Hattie Pethivay (Dyghu)
attaching on

1966 Buick 4dr. sedan
White in color stored at
Bay Minette. Towed to
St. Rys by Dick Turner
Tag # 5-10517 stored

Taylor Wilkins, Sheriff
Roy Randall, Deputy Sheriff

Printed by Moore Printing Co.

Wapke

Sheriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY Roy Randall DEPUTY SHERIFF

Pay made Bond 8/7/67
By: Christine Watkins
upon days. Property
released to Ptg.