

ANSWER

CHINESTER WATKINS, as Administra-)
trix of the Estate of Lucius Wat-
kins, deceased,)

Plaintiff,)

VS.)

HATTIE PETTIWAY a/k/a HATTIE
WATKINS,)

Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
CASE NO. 8506

1.

Not guilty.

2.

The property sued for is the property of the Defendant.

3.

The title to the property sued for is not vested in the
Plaintiff.

WILTERS & BRANTLEY

BY: Tolbert M. Brantley

Tolbert M. Brantley

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 1st day of July,
1969, served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United State
Mail, properly addressed, and first class postage prepaid.

WILTERS & BRANTLEY

By: Tolbert M. Brantley

FILED

JUL 1 1969

Baldwin County

Chinester Watkins
Chinester Watkins
as administratrix

Baldwin County

63 PAGE 316

The State of Alabama,
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we,

Hattie Watkins

and

~~Thomas J. Peck~~
Harford

Bella Golder

are held and firmly bound unto

Christie Watkins Adm of the Estate of Lucius Watkins Deceased

in the sum of

One 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

22nd

day of

Jan

1969

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

Christie Watkins

Adm of the Estate of Lucius Watkins

did, on the 9 day

of

Jan

1969

sue out of the

Circuit

Court of

Baldwin Co

a writ of detinue directed to any Sheriff of said State and commanding him to take into his possession the

following property, to-wit:

1 Rec. Chair, 2 pc Sofa, Refrigerator, Ch. Stove,

S. V. Coffee Maker, 4 end Tables, 3 lamps, Linen set,

3 gas heaters, window fan, bed chair, 2 Mattresses, 2 beds -

1 gas chair

which said writ was placed in the hands of

Sayles Watkins

Sheriff of Baldwin County, Alabama, on the

10

day of

Jan

1969

and executed by him on the

18

day of

Jan

1969

by taking into his

possession the following property, to-wit:

All described above except 1 bed

and mattress

And whereas the above bound

Hattie Watkins

Defendant in said suit, has, within five days from the execution of said writ, entered into and executed this bond as required by law and thereby obtained possession of said property seized under this writ.

Now if the said

Hattie Watkins

is cast in said suit and within thirty days after judgment deliver the property aforesaid to the Plaintiff and pay all costs and damages which may accrue from the detention thereof, then this obligation to be void, otherwise to remain in full force and effect.

Hattie Watkins

(SEAL)

Harford

(SEAL)

Bella Golder

(SEAL)

Taken and approved this

22nd

day of

Jan

1969

Sayles Watkins
Sheriff, Baldwin County, Ala.

ORIGINAL

Detinue Summons and Complaint

Printed by Moore Ptg. Co.

The State of Alabama,
Baldwin County

CIRCUIT COURT
No. 8506

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Hattie Pettaway a/k/a Hattie Watkins

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

Witness my hand this 9th day of January 1969

Alice J. Duck, Clerk

COMPLAINT

CHINESTER WATKINS AS HATTIE PETTIWAY a/k/a HATTIE

ADMINISTRATRIX OF THE Plaintiff WATKINS Defendant
ESTATE OF LUCIOUS WATKINS
DECEASED

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

1 Reclining chair	3 Gas heaters
1 two pc. Sofa	1 Window Fan
1 Refrigerator	1 Set Bed cloths
1 Electric Stove	2 Mattresses
1 Zenith TV	2 Beds
1 Coffee Table	1 Gold chair
4 End tables	
3 Lamps	
1 Dining room table w/4 chairs	
1 three pc. Bed room suite	

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

from June 21 1966, to January 6 1969
and of the alternate value of \$500.00

FILED

JAN 9 1969

ALICE J. DUCK

CLERK & VOL
REGISTER

63 PAGE 314

W. H. Hay Plaintiff's Attorney.

State of Alabama
Baldwin County

CIRCUIT COURT

Chenester Watkins
as Adm.

Plaintiff

VS.

Hattie Pettway aka
Hattie Watkins

Defendant

Detinue Summons and Complaint

FILED

Filed _____, 19____

JAN 9 1969

Clerk

ALICE J. DUCK
CLERK
REGISTER

W. Hays
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 Duck Clerk

Attached items & stored at
Hattie Watkins by ~~xxxxxx~~ signing
Bailees receipt.

- (1) Reclining Chair
- (1) Two pc. Sofa
- (1) Refrigerator make (Frig)
- (1) Elec Stove
- (1) Zenith T.V.
- (1) Coffee Table
- (4) End Tables
- (3) Lamps
- (1) Dining room table w/4 chairs
- (1) Three pc. bed room suite
- (3) Gas heaters
- (1) Window fan (1) Set bed cloth
- (2) Mattresses, (2) Beds, (1) Gold Chair

W. Hays made bond
1/21/69 by: Hattie Watkins
Wartford Penn. with
Goldz. Property released
to W. Hays

At 2 Bx 351

Defendant lives at

Daphne Ala.

Received in office

RECEIVED

, 19____

JAN 10 1969

Sheriff

I have executed this summons

this Jan 17, 1969

by leaving a copy with

Hattie Pettway aka
Hattie Watkins
(60 Miles)
Daphne

Sheriff claims 60 miles

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY Roy Randall
DEPUTY SHERIFF

Taylor Wilkins, Sheriff
Roy Randall, Deputy Sheriff

Printed by Moore Printing Co.

63 PAGE 315
VOL