

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, \_\_\_\_\_, a Notary Public in and for said County, personally appeared C. H. Matthews who being by me duly sworn deposes and says that the property sued for in the complaint of C. H. Matthews d/b/a Matthews Furniture Co. vs John Rees filed in said Court, to-wit:

belongs to C. H. Matthews d/b/a Matthews Furniture Company, the plaintiff.

Sworn to and subscribed before me this 19<sup>th</sup> day of March, 19 69

W. L. Hay  
Notary Public

C. H. Matthews

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we, C. H. Matthews, Principal, and \_\_\_\_\_, Sureties, are held and firmly bound unto C. H. Matthews, his heirs, executors and administrators in the sum of Fifty (\$50.00) Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the \_\_\_\_\_ day of March, 19 69

The condition of the above obligation is such that whereas, the above bound C. H. Matthews d/b/a Matthews Furniture Company has on the \_\_\_\_\_ day of March, 19 69 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said John Rees for the recovery of the following described property, to-wit:

1 Walthan Watch; 1 Pair of lamps; 1 G. E. used automatic washer  
1 Used Hot Point Refrigerator; 1-7 Piece Dinnette Suit  
1 Bed Frame; 2 Mattresses

Now, if the said C. H. Matthews shall fail in said suit and shall pay to the said John Rees, 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 19<sup>th</sup> day of March, 19 69  
\_\_\_\_\_ (SEAL)  
\_\_\_\_\_ (SEAL)  
\_\_\_\_\_ (SEAL)  
Clerk, Circuit Court

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, \_\_\_\_\_, a Notary Public in and for said County,  
personally appeared C. H. Matthews who being by me  
duly sworn deposes and says that the property sued for in the complaint of C. H. Matthews  
d/b/a Matthews Furniture Co. vs John Rees filed in said Court, to-wit:

belongs to C. H. Matthews d/b/a Matthews Furniture Company, the plaintiff.

Sworn to and subscribed before me this 19<sup>th</sup>  
day of March, 19 69

W. L. Hay  
Notary Public

C. H. Matthews

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we, \_\_\_\_\_

C. H. Matthews, Principal, and

\_\_\_\_\_, Sureties, are held and

firmly bound unto C. H. Matthews, his heirs, executors and admin-  
istrators in the sum of Fifty (\$50.00) Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the \_\_\_\_\_ day of March, 19 69

The condition of the above obligation is such that whereas, the above bound C. H. Matthews

d/b/a Matthews Furniture Company has on the \_\_\_\_\_ day of

March, 19 69 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said John Rees

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

1 Walthan Watch; 1 Pair of lamps; 1 G. E. used automatic washer

1 Used Hot Point Refrigerator; 1-7 Piece Dinnette Suit

1 Bed Frame; 2 Mattresses

Now, if the said C. H. Matthews shall fail in said suit

and shall pay to the said John Rees, 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 19<sup>th</sup> day of \_\_\_\_\_ (SEAL)

March, 19 69 \_\_\_\_\_ (SEAL)

Richard R. Rouse \_\_\_\_\_ (SEAL)  
Clerk, Circuit Court

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, \_\_\_\_\_

~~xxxxxx~~ C. H. Matthews d/b/a Matthews Furniture

and \_\_\_\_\_

are held and firmly bound unto John Rees

in the sum of Nine hundred \_\_\_\_\_ 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 \_\_\_\_\_

C. H. Matthews \_\_\_\_\_ did, on the 19th day  
of March 19 69 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 Waltham Watch, One pair of lamps, One G.E. Used automatic Washer,

One, Used Hot point Refrigerator, One 7 piece Dinnette Suit, One 2 pc.  
Sofa Bed Suit, One Bed Frame, Two Mattresses

which said writ was placed in the hands of Taylor Wilkins  
Sheriff of Baldwin County, Alabama, on the 19th day of March 19 69,  
and executed by him on the 19th day of March 1969, by taking into his  
possession the following property, to-wit:

same as above

And whereas the said John Rees  
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 C. H. Matthews 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.

Matthews Linn 6 (SEAL)

C. H. Matthews (SEAL)

(SEAL)

Taken and approved this 26th day of March 19 69

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. 8615

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon John Rees

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

C. H. Matthews d/b/a Matthews Furniture Company

Witness my hand this 19 day of March 19 69

Alvin J. Rees, Clerk

COMPLAINT

C. H. MATTHEWS d/b/a JOHN REES

MATTHEWS FURNITURE CO. Plaintiff Versus Defendant

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

- 1 Waltham Watch
- ✓ 1 Pair of lamps
- 1 G. E. used automatic Washer
- ✓ 1 Used Hot Point Refrigerator
- ✓ 1 7 Piece Dinnette Suit
- ✓ 1 2 Piece Sofa Bed Suit
- 1 Bed Frame
- 2 Mattresses

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

from March 1 19 69, to March 19 19 69  
and the alternate value of \$415.00

Wilson Hayes Plaintiff's Attorney.  
Wilson Hayes

State of Alabama

Baldwin County

CIRCUIT COURT

C. H. Matthews, et al  
Matthews Furniture

Plaintiff--

VS.

John Rees

Defendant--

Detinue Summons and Complaint

Filed 3-19, 1969

Alice Duck Clerk

W. Hayes

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

Defendant lives at

Mango Street

Received in office

March 19, 1969

Taylor Wilkins, Sheriff

I have executed this summons

this March 19, 1969

by leaving a copy with

John Rees  
One Pair of Lamps

one G.E. cased Automatic Washer

one used Hot points Refrigerator

7 Piece Dennette Suit

2 Mattresses

2 Piece Sofa Bed Suit

Stored at Matthews Furniture

Plt made Bond 4/26/69  
By C. H. Matthews

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff