

528

FISHER-BROWN INSURANCE AGENCY, INC.

GENERAL INSURANCE

PHONES 918-919

THEISEN BUILDING

HUNTER BROWN
PRESIDENT

PENSACOLA, FLA.

October 12th, 1926.

IN REPLY REFER FILE NO.....

ATTENTION J.C. Hilliard.

Clerk of Circuit Court,
Baldwin County, Ala.

Dear Sir:

RE: REPLEVIN BOND - NO. S-635050-25 -
MULDON MOTOR CO. INC. -VS- AUSTIN MILLS.

Under date of October 1st, Mr. J. B. Mare, Treasurer of the Muldon Motor Company, Inc., wrote you requesting a release for the above captioned bond so as to cancel all liability under this bond with the bonding company.

We were today furnished with this release signed by you under date of October 8th, in which you state that this certifies that the replevin in the case of the State of Alabama vs Williams has been released and sureties discharged.

However, the correct title of this case is State of Alabama vs Austin Mills, and we would greatly appreciate you furnishing us with a new release terminating all liability under our bond in the above styled case.

We would greatly appreciate you letting this release come direct to us as we have advised the Muldon Motor Company, that we will handle this matter direct with you.

Thanking you to give this matter your good usual prompt attention, and greatly oblige,

Yours very truly,

FISHER-BROWN INSURANCE AGENCY

By: *J.C. Hilliard*
Policy Department.

JCH:MB

P.S Release forwarded the Muldon Motor Co. by you is herewith enclosed.

Motor # 7307815-

STATE OF ALABAMA.

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS That whereas, on the 25th day of August, 1925, one William Mills was arrested for violating the prohibition law and was then and there possessed of one Ford Roadster car and whereas, the Ford Roadster was claimed by Muldon Motor Car Company, of Pensacola, Fla., a corporation under the laws of the State of Florida.

Now therefore, the Muldon Motor Car Company as principal and United States Fidelity and Guaranty Company as sureties acknowledge themselves firmly bound unto the State of Alabama in the penal sum of One Hundred Fifty Dollars (\$150.00) upon condition that if said car is condemned by proceedings in the Courts of Alabama that when notified, the said Muldon Motor Car Company will deliver the same to W. R. Stuart, Sheriff for the State of Alabama and to pay all costs of said delivery. As to collection of this bond the principal and sureties hereby severally waive all rights of exemption under the constitution of the United States and of the State of Alabama.

Signed and seal this 1st. day of October, 1925.

Muldon Motor Company,

By J. H. Shreve SEAL

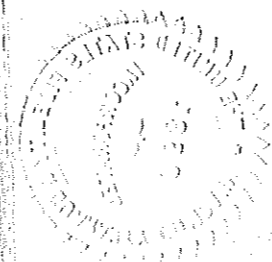
United States Fidelity & Guaranty Company SEAL

W. R. Stuart SEAL
as it's attorney

Taken and approved
this 3rd day of Oct.
1925
W. R. Stuart
Sheriff



2



Filed Oct 3rd 1925—
T. W. Rieunor
Register

RECORDED

State of Alabama,
ex rel H. M. Hall,
Deputy Solicitor,
Baldwin County, Alabama,
Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

vs

William Mills, et als,

Comes the State of Alabama, by H. M. Hall,
Deputy Solicitor of Baldwin County, Alabama, and asks that
the above styled cause be dismissed, and for grounds thereof
says, that the car seized was at the time of the seizure
the property of Muldon Motor Company, which held a conditional
sales contract on said car.

H. M. Hall



Deputy Solicitor of Baldwin
County, Alabama.

Grand Oct 4/26
W. M. M. M.
Register

STATE OF ALABAMA,
Complainant.

vs.

William Mills and one Ford
roadster automobile, Motor
No. 7507615.
Respondents.

In the Circuit Court of
Baldwin County, Alabama.

In equity.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

The State of Alabama by Hubert M. Hall, Deputy Solicitor
of Baldwin County, Alabama, respectfully represents unto your Honor
as follows:

FIRST.

That Hubert M. Hall is Deputy Solicitor of Baldwin County,
Alabama, and as such Deputy Solicitor is authorized under and by
virtue of Chapter 167, Article 11 of the Code of Alabama of 1925, to
file this bill for and on behalf of the State of Alabama.

SECOND.

That on or about, to-wit the 25th day of August, 1925, in
Baldwin County, Alabama, the said Respondent, William Mills, being the
owner and having in his custody and under his control did willfully
use one Ford roadster automobile, Motor No. 7507615 for the use and
purpose of illegally transporting prohibited liquors or beverages
from one point in Baldwin County, Alabama, to another point within
said State and County.

THIRD.

That on or about the said date, to-wit the 25th day of August,
1925, the said William Mills, being the owner and having in his custody

and under his control did willfully and knowingly use or permit to be used, one Ford roadster automobile. Motor No. 7507815 for the purpose of illegally conveying prohibited liquors or beverages from one point in Baldwin County, Alabama, to another point within said State and County.

FOURTH.

That on or about to-wit the 25th day of August, 1925, one Ford roadster automobile, Motor No. 7507815 was used for the purpose of illegally conveying prohibited liquors or beverages from one point in Baldwin County, Alabama, to another point within said State and County.

PRAYER FOR PROCESS.

Premises considered the Complainant prays that William Mills be made party respondent to this bill of complaint by the usual process of this Honorable court and that he be required to plead, answer or demur to the same within the time required by law and under the penalties prescribed by law and this Honorable court.

PRAYER FOR RELIEF.

Complainant prays that upon the final hearing of this cause your Honor will adjudge, order and decree that the property described herein be condemned and forfeited to the State of Alabama; that your Honor will make an order or decree directing the sale of such Ford roadster automobile as above described in accordance with law.

Complainant further prays that your Honor will grant unto it such other, further, different and general relief as it may in equity and justice be entitled to and the Complainant will forever pray, etc.

Hubert M. Hall,
Deputy Solicitor,
Baldwin County, Alabama.

FOOT NOTE.

Respondent, William Mills, is required to answer each and every paragraph contained in the foregoing bill of complaint numbered one to four, inclusive, but not under oath. Oath is hereby expressly waived.

Hubert M. Hall,
Deputy Solicitor,
Baldwin County, Alabama.

100 #3528
Original Bill

State of Ala
vs

William Mills

Filed Sept 15/925.
D. Williams
Register

RECORDED

The State of Alabama }
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon William Mills,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

State of Alabama, By Hubert M. Hall, Deputy Solicitor, for
Baldwin County, Alabama.

against said William Mills,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 15th day of Sept.

1925.

T. W. Richerson
Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Original

Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

State of Alabama,

vs.

William Mills,

H.M. Hall, Solicitor.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192

Sheriff.

Executed this _____ day of

192

by leaving a copy of the within summons with

Defendant.

Sheriff.

By _____ Deputy Sheriff.

*Returned Oct.
12th 1925 will
Mills not found
in Baldwin Co
W.R. Sumner
Sheriff*

The State of Alabama }
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

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State of Alabama, By Hubert M. Hall, Deputy Solicitor, for
Baldwin County, Alabama.

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Copy

Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

State of Alabama,

vs.

William Mills,

H.M. Hall, Solicitor.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192 _____

Sheriff.

Executed this _____ day of _____
192 _____
by leaving a copy of the within summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.