

STATE OF ALABAMA }
BALDWIN COUNTY }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. D. Grantham to appear within THIRTY DAYS (30 days) from the service of this writ in the Circuit Court to be held for said County at the place of holding same then and there to answer the Complaint of L. Irwin and F. L. Irwin, copartners under firm name and style of L. Irwin and Son.

WITNESS MY HAND this 29 day of September, 1934.

W. D. Stone
CLERK

L. IRWIN & F. L. IRWIN, CO-PARTNERS
UNDER THE FIRM NAME AND STYLE OF
L. IRWIN & SON,

PLAINTIFFS

- vs -

H. D. GRANTHAM,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT

Plaintiffs claims of the Defendant the following personal property, viz.:

1 gray mare
1 cow
2 heifers
6 hogs
1 cultivator
1 disk
1 auto wagon

1 riding plow
1 walking plow
1 middle buster
1 ford sedan
1 chevrolet automobile
200 bushels of corn in crib
2 bales of cotton

together with the value of the hire or use thereof during the detention, viz.: From the 1st day of June, 1934.

W. D. Stone
ATTORNEY FOR PLAINTIFF

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

84

L. IRWIN and F. L. IRWIN,
co-partners under the firm
name and style of L. IRWIN
& SON,

Plaintiffs,

-VS-

H. D. GRANTHAM,

Defendant.

SUMMONS AND COMPLAINT.

The plaintiffs having given
bond as required by law, the
Sheriff is commanded to take
into his possession the prop-
erty described in the Complaint.

M. A. Stone
Clerk of the Circuit Court.

Lloyd A. Magney,
Attorney for Plaintiffs.

Filed - 9/27/34 -
M. A. Stone

Executed *9/29/34* 193 *4*
by serving copy of within Summons and
Complaint on

H. D. Grantham
Taking into my possession
All of the property herein
described

W. R. Stuart Sheriff

By _____ Deputy Sheriff

Circuit Court, Baldwin County

#814

L. Irwin + F. J. Irwin

VS.

PLAINTIFF

H. D. Grant

DEFENDANT

BILL OF COST

CLERK'S FEES		Dollars	Cts.	AMOUNT BROUGHT FORWARD		\$	Cts.
Issuing Summons and Complaint	\$1 25	1	25	Transcript to Supreme Court, 15c per hundred words			
Copies of same, when over 200 words, 15c per 100	30		30	Copies, 5c per hundred words			
Issuing Alias Summons and Complaint	1 25			Citation to Appellee in Appeal, 20c per hundred words			
Entering Sheriff's Return on Summons and Complaint	20		20	Certificate with Seal, 50c. Without Seal	25		
Docketing Cause 25c. Ent. Appearance, 20c	45		25	Witness Certificate	25		
Subpoena for Witness	30			Taking Bond Not Above Mentioned	75		
Making Certificate of Judgment	50			Entering Order of Court not above named	30		
Filing	10		30	Administering Oath	25		
Trial and Incidents	75			Taking Bond for Costs of Non-Resident Plaintiff	75		
Entering Judgment, or copy of same	30			Copy of any paper not above named, 15c per hundred words			
Order for Continuance	10			Filing Writ of Prohibition and Entering Return	15		
Issuing Execution	50			Issuing Writ of Prohibition	75		
Docketing Execution	25			Issuing copies of same, 15c per 100 words	15		
Issuing copy of same	50			Filing Mandamus and Entering Return	75		
Entering Sheriff's Return on Execution, 15c per hundred words	20			Issuing Writ of Mandamus	75		
Final Record, 15c per hundred words	30	1	50	Issuing copies of same, 15c per 100 words			
Order for Alias Summons and Complaint	30		30	Total Clerk's Fees			
Order to Dismiss Cause	30			SHERIFF'S FEES			
Order to Set Aside Dismissal	30			Serving and Returning Summons	\$1 50	1	50
Order Overruling Motion to Set Aside Dismissal	75			Serving and Returning Subpoenas	65		
Order Granting New Trial	30			Collecting Execution for Costs	1 50		
Order Overruling Motion for New Trial	30			Serving and Returning Sci. Fa. Notice, etc.	65		
Order Overruling Motion for Continuance	30			Executing Writ of Possession	2 50		
Order Overruling Motion to Set Aside Default	30			Levying Attachment	3 00		
Order for Notice to Non-Resident Defendant	30			Entering and Returning Attachment	25		
Issuing Notice for Publication and Copy 20c per hundred words	30			Entering and Returning Execution	25		
Order to Give Security for Costs	30			Summoning and Returning Garnishee	1 50		
Order to Give Additional Bond	30			Taking and Approving Garnishee Bond	75		
Order to Execute Writ of Inquiry	30			Serving and Returning Writs	1 50		
Order of Sale in Attachment	30			Serving and Returning Summons on Forcible Entry	1 00		
Order for Leave to Amend Complaint	30			Executing Writ of Restitution in such cases	2 00		
Order for Leave to Amend Pleas	30			Taking and Approving Bonds of Every Kind	1 00		
Order for Leave to Amend Writ of Process	30			Taking and Approving Claim Bond	1 00		
Order for Attachment for Witness	30			Taking and Approving Forthcoming Bond	1 00		
Filing Deposition	10			Taking and Approving Bail Bond	1 00		
Issuing Commission to Take Deposition	75			Taking and Approving Plaintiff's Detinue Bond	1 00		
Issuing copy of same, per hundred words	15			Taking and Approving Defendant's Detinue Bond	1 00		
Issuing Copy of Interrogatories, 15c per hundred words, but not less than	50			Making Deed	2 50		
Endorsing each Pet. Deposition Opened	10			Serving Attachment for Contempt of Court	1 50		
Taking Bond in Garnishment on Summons	75			Collecting Money on Execution			
Summons to Garnishee	50			Empanelling Jury	75		
Copies of same, 20c per hundred words				Sheriff's Commission for Property Sold under Attachment			
Notice to Defendant in Garnishee on Summons, and copy, per hundred words	20			Seizing Personal Property on Writ of Detinue	3 00		
Swearing Garnishee and Recording Answer, 15c per hundred words, but not less than	50			Total Sheriff's Fees			
Filing Attachment	10			RECAPITULATION			
Issuing Attachment Writ and Taking Bond	1 00			Judgment			
Issuing Copies of Attachment Writ, 15c per hundred words				Interest			
Filing Certiorari and Entering Return	15			Clerk's Fees			
Taking Certiorari Bond and Filing Same	75			Sheriff's Fees			
Issuing Writ of Certiorari	75		75	Justice's Fees			
Issuing copies of same, 15c per 100 words				Constable's Fees			
Issuing Writ of Scieri Facias, or Notice in Nature of	75			Witnesses' Fees			
Issuing copies of same, 15c per 100 words				Commissioners' Fees			
Taking Supersedeas Bond and Filing same	75			Printer's Fees			
Taking Appeal Bond and Filing same	75			Stenographer's Fees	5 00		
TOTAL FORWARDED		5	05	Answer of Garnishee			
				Trial Tax	3 00		
				Total	\$	3	10

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13.35

Received payment this _____ day of _____ 1934

ATTEST

Clerk Circuit Court, Baldwin County, Ala.

W. P. Street Paid Oct. 16, 1934

LLOYD A. MAGNEY
LAWYER
FOLEY, ALABAMA

October 8, 1934.

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

RE: L. Irwin & Son vs. H. D. Grantham

Dear Mrs. Stone:-

Please send me a cost bill in this
case on the basis of a dismissal, as I think
that it will be compromised and settled shortly.

Very truly yours,

Lloyd A. Magney

LAM:EP

Sent -

L. IRWIN & F. L. IRWIN, CO-PARTNERS
UNDER THE FIRM NAME AND STYLE OF
L. IRWIN & SON,

PLAINTIFFS,

- vs -

H. D. GRANTHAM,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BOND IN DETINUE

STATE OF ALABAMA)
BALDWIN COUNTY)

KNOW ALL MEN BY THESE PRESENTS, that we L. Irwin and F. L. Irwin, co-partners under firm name and style of L. Irwin & Son, as principals, and the undersigned as sureties, are held and firmly bound unto H. D. Grantham in the sum of \$50.00 for the payment of which well and truly to be made we, jointly and severally, bind ourselves and each of us our heirs, executors and administrators.

Sealed with our seals and dated this 27 day of September, 1934.

The condition of the above obligation is that, whereas, the above named Plaintiffs did on the 27th day of September, 1934, sue out of the Circuit Court, of Baldwin County, Alabama, a writ in detinue, returnable to the said Circuit Court against the said H. D. Grantham for the recovery of the following described property, to-wit.

1 gray mare
1 cow
2 heifers
6 hogs
1 cultivator
1 disk
1 auto wagon

1 riding plow
1 walking plow
1 middle buster
1 ford sedan
1 chevrolet automobile
200 bushels of corn in crib
2 bales of cotton

Now, if the said Plaintiffs shall fail in said suit and shall pay to the said defendant all such damage as he may sustain, together with the costs of suit, then this obligation to be null and void, but otherwise to remain in full force and effect.

Taken and approved this
September 27, 1934.

M. A. Stone
Clerk Circuit Court.

L. IRWIN & SON,

By L. Irwin (seal).

By L. Irwin (Seal).

(Seal).

(Seal).

(Case)
(Case)
(Case)
(Case)

Check amount paid

October 1934
Total amount due

Amount due and owing

Amount due and owing

Amount due and owing

Amount due and owing

Amount due and owing

Amount due and owing

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

84

L. IRWIN and F. L. IRWIN,
co-partners under the firm
name and style of L. IRWIN
& SON,

Plaintiffs,

-vs-

H. D. GRANTHAM,

Defendants.

BOND IN DETINUE.

Filed - 9/29/34
M. A. Stone

Lloyd A. Magney,
Attorney for Plaintiffs.

L. IRWIN & F. L. IRWIN, CO-PARTNERS
UNDER THE FIRM NAME AND STYLE OF
L. IRWIN & SON,

PLAINTIFFS

- vs -

H. D. GRANTHAM,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

AFFIDAVIT

STATE OF ALABAMA

BALDWIN COUNTY


F. L. Irwin, being first duly sworn, on his oath deposes and says that as one of the Plaintiffs herein; that the property sued for and listed in the Complaint belongs to the above named Plaintiffs, said property being as follows:

1 gray mare
1 cow
2 heifers
6 hogs
1 cultivator
1 disk
1 auto wagon

1 riding plow
1 walking plow
1 middle buster
1 ford sedan
1 chevrolet automobile
200 bushels of corn in crib
2 bales of cotton

Subscribed in my presence and sworn to before me this

27 day of September, 1934.


[Signature]
Notary Public.

84
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

RECORDED

L. IRWIN and F. L. IRWIN,
co-partners under the firm
name and style of L. IRWIN
& SON,

Plaintiffs,

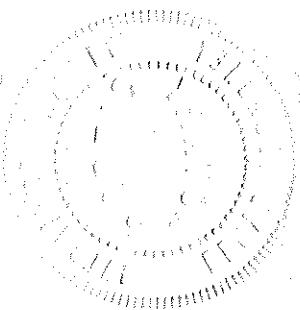
-vs-

H. D. GRANTHAM,

Defendant.

AFFIDAVIT.

Filed - 9/29/34
M. A. Stone
Lloyd A. Magney,
Attorney for Plaintiff.



IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

84

L. IRWIN and F. I. IRWIN,
co-partners under the firm
name and style of L. IRWIN
& SON,

Plaintiffs,

-vs-

H. D. GRANTHAM,

Defendants.

BOND IN DETINUE.

Filed 9/27/34
M. A. Stone

Lloyd A. Magney,
Attorney for Plaintiffs.