

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT--LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon B. T. Childress 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 same, then and there to answer the complaint of International Agricultural Corporation, a Corporation.

Witness my hand this 6th day of September, 1935.

R. R. L. L. L.
Clerk.

COMPLAINT.

INTERNATIONAL AGRICULTURAL
CORPORATION, a Corporation,

Plaintiff,

-vs-

B. T. CHILDRESS,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

The Plaintiff claims of the Defendant the following described personal property, to-wit:-

One red horse mule eight years old; ^{red} one black horse mule named George, nine years old; ^{red} one black mare mule named Ada nine years old; ^{red} Two cream colored cows three years old; one black cow four years old; 1 Hovey Potato Digger; One 14 inch Sully plow; 1 International Cultivator; Also, all other personal property not herein named owned by B. T. Childress on January 20th, 1932;

with the value of the hire or use thereof during the detention, viz, from, to-wit, June 1st, 1932, to September 8th, 1935.

Hyatt & Chassee
Attorneys for Plaintiff.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Whereas, the Plaintiff in the within stated cause has made Affidavit and given Bond as required by law, you are hereby commanded to take the property set out in the Complaint into your possession unless the Defendant gives Bond payable to the Plaintiff, with sufficient surety, in double the amount of the property set out, with condition that if the Defendant is cast in 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.

Robert L. Duck
Clerk.

SUMMONS & COMPLAINT.

INTERNATIONAL AGRICULTURAL
CORPORATION, a Corporation,

Plaintiff,

-VS-

B. T. CHILDRESS,

Defendant.

IN THE CIRCUIT COURT--AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Filed September 6, 1935

Robert L. Duck
Clerk.

LAW OFFICES
HYBART, HEARD
& CHASON
BAY MINETTE, ALABAMA

190 RECORDED
7-30546
Duck

¹⁴⁸
Rec in office
9/7/35
M. H. Wilkins
Sheriff

Executed this 13th day of Sept.
by serving a copy of the within
writ on B. T. Childress and
taking into my possession the
following.

One black horse mule named George
One black cow
one brown cow
One Hoover potato Digger
One 14 inch sulky plow
One International Cultivator.

M. H. Wilkins, Sheriff

By *C. N. Anderson*
D.S.

The State of Alabama

Baldwin County

CIRCUIT COURT

No. 196 Feb Term, 1936

To Any Sheriff of the State of Alabama--Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of _____

B I Chelise Defendants,

you cause to be made the sum of the Rapports as Shanks Return Dollars,

which International Agricultural Corp Plaintiffs

recovered of Hiss on the 4 day of February 1936 by

the Judgment of our Circuit Court, held for the County of Baldwin, besides the sum of _____

Seven and no/100 Dollars

costs of suit, and have the same to render to the said _____

and make return of this Writ and the execution thereof, according to law.

Interest from _____, 193____, to date of collection.

Witness my hand, this _____ day of _____ 193____

Robert Dees Clerk

CLERK'S FEES	AMOUNT	SHERIFF'S FEES	AMOUNT
For every Summons & Complaint \$1.25	1 25	For Levying an Attachment \$3.00	
Each copy thereof 30	30	Entering and Returning Attachment 25	
Entering a Sheriff's Return 20	20	Summoning Garnishee 1.50	
Docketing 25	25	Serving Summons on Writ 1.50	1 50
Entering Appearance 20		Serving Notice Sci. Fa. Notice, etc. 65	
Filings 10	30	Serving Subpoenas 65	
Every order made in Court 30	30	Empanelling Jury 75	
Copy thereof 25		Entering and Returning Execution 25	2 50
Every Trial with or without Jury 75		Collecting Cost Execution 1.50	
Entering up Judgment or copy thereof 30	30	Executing a Writ of Possession 2.50	
Issuing Execution 50	50	Taking and Approving Bonds 1.00	1 00
Docketing Execution 25	25	Commissions	
Entering Return on Execution 20	20	Sheriff's Commission for Property	
Issuing Subpoenas 30		Sold under Attachment	
Administering Oath 25		Seizing Personal Property on Writ	
Issuing each Attachment, taking bond 1.00	1 00	of Detinue 3.00	3 00
Filing Attachment 10	10		
Each Summons for Garnishee 50		RECAPITULATION	6 75
Each Copy 50		Judgment for <u>Property</u> for \$	
Notice to Deft. in Garnishee on Summons and copy, per 100 words 20		Interest from	
Commissions to take Depositions or Copy 75		Damages	7 95
Order to Execute Writ of Inquiry 30		Clerk's Fees	5 75
Copy of Interrogatories. 15c per hundred words or 50		Sheriff's Fees	
Filing each Deposition and endorsing same 20		Justice of Peace Fees	
Final Record, per hundred words 15	2 00	Witness Fees in Justice of Peace Court	
Every Certificate 50		Constable's Fees	
Taking Bond not Otherwise Provided for 75		Commissioner's Fees	
Witness Certificates 25		Printer's Fees	
Continuance 10		Witness Fee in Circuit Court	
Certificate of Judgment 50	50	Former Clerk's Fee	
Order of Publication 1.00		Stenographer's Fee \$5.00	
		Trial Tax \$3.00	3 00
	7 95		16 70

INTERNATIONAL AGRICULTURAL CORPORATION, a Corporation,

Plaintiff,

-VS-

B. T. CHILDRESS,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

REPLEVIN BOND OF PLAINTIFF.

STATE OF ALABAMA,

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS: That the International Agricultural Corporation, a Corporation, as principal, and the undersigned, as Sureties, are held and firmly bound unto B. T. Childress in the sum of Five Hundred Dollars (\$500.00), for the payment of which well and truly to be made we jointly and severally bind ourselves, and each of us, our successors, assigns, heirs, executors and Administrators firmly by these presents.

Sealed with our seals and dated this the 19th day of September, 1935.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH: That whereas, the International Agricultural Corporation, a Corporation, did on the 6th day of September, 1935, sue out of the Circuit Court of Baldwin County, Alabama, a Writ in Detinue directed to any Sheriff of the State of Alabama, directing him to take into his possession the following described personal property, viz:-

One red horse mule eight years old; one black horse mule named George, nine years old; one black mare mule named Ada nine years old; Two cream colored cows three years old; one black cow four years old; 1 Hovey Potato Digger; One 14 inch Sulky Plow; 1 International Cultivator; Also, all other personal property not herein named owned by B. T. Childress on January 20th, 1932;

which said Writ was placed in the hands of M. H. Wilkins, as Sheriff of Baldwin County, Alabama, on September 7th, 1935, and was executed by him on September 15th, 1935, by taking into his possession the following described personal property, viz:-

One Black Horse Mule named George; One Black cow; One Brown Cow; 1 Hovey Potato Digger; One 14 inch Sulky Plow; One International Cultivator.

AND WHEREAS, the said B. T. Childress, the Defendant in said Writ, has failed and neglected for the space of five days from the taking into possession of said property by said Sheriff, as aforesaid, to give Bond and take possession of said property as authorized by law;

NOW, THEREFORE, if the said International Agricultural Corporation, a Corporation, as Plaintiff in said suit, shall deliver the above described property to the said B. T. Childress, as Defendant in said suit, within thirty days after judgment, together with damages for the detention of said property and costs in said

(page two)

suit, in case it shall fail to recover the same in said suit, then in that event this obligation to be void, otherwise to remain in full force and effect.

INTERNATIONAL AGRICULTURAL CORPORATION, a Corporation,

By J. J. Stough SEAL
As its Asst. Dir. Credit Mgr.

W. E. School SEAL

W. A. Stough SEAL

J. J. Stough Seal

Taken and approved this
19th day of September,
1935.

W. H. Wilkins
Sheriff of Baldwin County,
State of Alabama.

INTERNATIONAL AGRICULTURAL
CORPORATION, A Corporation,

Plaintiff,

-VS-

B. T. CHILDRESS,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, John Rason, a Notary Public
in and for said State and County, personally appeared J. F. Stough,
who is known to me, and who, being by me first duly sworn, doth
depose and say under oath as follows:-

That his name is J. F. Stough; that he is Assistant
Division Credit Manager of the above named Corporation, and is also
an agent of said Corporation, and as such is duly authorized to
make this Affidavit; that the following described property, to-wit:-

One red horse mule eight years old; One black
horse mule named George, nine years old; 1 black
mare mule named Ada nine years old; Two cream
colored cows three years old; One Black cow four
years old; 1 Hoyer Potato Digger; One 14 inch
Sulky Plow; 1 International Cultivator; Also, all
other personal property not herein named owned by
B. T. Childress on January 20th, 1932;

for the recovery of which it has instituted suit this day in the
Circuit Court of Baldwin County, Alabama, is the property of said
Corporation.

Sworn to and subscribed before
me, a Notary Public whose seal
is hereto affixed, this 16th
day of September, 1935.

John Rason
Notary Public, Baldwin County,
State of Alabama.

J. F. Stough

STATE OF ALABAMA,

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS:- That the International Agricultural Corporation, a Corporation, as principal, and the undersigned, as Sureties, are held and firmly bound unto B. T. Childress, his heirs, executors and administrators, in the sum of Twenty-five Dollars (\$25.00), for the payment of which, well and truly to be made, as bind ourselves, our and each of our heirs, successors, executors and administrators, jointly and severally, firmly by these presents;

Sealed with our seals and dated this 6th day of September, 1935.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH: That whereas, the above bound International Agricultural Corporation, a Corporation, has on this day sued out from the Office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue returnable at the next term of the Circuit Court of said County, in said Court, against the said B. T. Childress, for the recovery of the following described property, viz:-

One red horse mule eight years old; One black horse mule named George, nine years old; One black mare mule named Ada nine years old; Two cream colored cows three years old; One black cow four years old; 1 Hover Potato Digger; One 14 inch Sulky Plow; 1 International Cultivator; Also, all other personal property not herein named owned by B. T. Childress on January 20th, 1932.

NOW, if the said International Agricultural Corporation, a Corporation, shall fail in said suit, and shall pay to the said B. T. Childress, the Defendant in said suit, all such costs and damages as he may sustain by the wrongful complaint, then this instrument to be void, otherwise to remain in full force and effect.

Taken and approved this
16 day of Sept., 1935.

Robert L. Quirk
Clerk Circuit Court, Baldwin County, Alabama.

INTERNATIONAL AGRICULTURAL CORPORATION,
A Corporation,

By J. J. Stough
As Agent of said Corporation.

SEAL

SEAL

SEAL

190! **RECORDED**
Such
7-327

REPLEVIN BOND OF PLAINTIFF,

INTERNATIONAL AGRICULTURAL
CORPORATION, a Corporation,

Plaintiff,

-VS-

B. T. CHILDRESS,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed September 21, 1935

Robert S. Deas
Clerk.

LAW OFFICES
HYBART, ~~HEARD~~
& CHASON
BAY MINETTE, ALABAMA

RECORDED

Dick
7-306

AFFIDAVIT & BOND.

INTERNATIONAL AGRICULTURAL
CORPORATION, a Corporation,

Plaintiff,

--VS--

B. T. CHILDRESS,

Defendant.

IN THE CIRCUIT COURT--AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Filed September 6th, 1935

Ruth S. Welch
Clerk.

LAW OFFICES

HYBART, ~~BEARD~~
& CHASON

BAY MINETTE, ALABAMA