

240

LILLIE SMITH,

Plaintiff,

VS.

BOATYARD TIMBER COMPANY,
a Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. ____.

Now comes Lillie Smith, the original Plaintiff in this
cause, and demands a jury trial of this said cause.

J. B. Blackburn
Attorney for Lillie Smith.

RECORDED

Duck
7-412

DEMAND FOR TRIAL BY JURY.

LILLIE SMITH,

Plaintiff,

VS.

BOATYARD TIMBER COMPANY, a
Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO. 239.

Filed Jul 10 1936
Rates Duck
Chick

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, W. C. BEEBE, a Notary Public in and for
said County, in said State, this day personally appeared W. D.
OWENS, who being by me duly sworn, deposes and says that the
following described property, to-wit:

All paper wood or pulp wood that has been cut and
all timber suitable for pulp wood that will measure
6 inches in diameter 14 feet above the ground that
is now located on the following described property
in Baldwin County, Alabama, to-wit:

SW $\frac{1}{4}$ of NE $\frac{1}{4}$, NE $\frac{1}{4}$ of NE $\frac{1}{4}$, NW $\frac{1}{4}$ of NW $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$,
SE $\frac{1}{4}$ of SE $\frac{1}{4}$ of Section 9; W $\frac{1}{2}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$ of Section
11; SE $\frac{1}{4}$ of NW $\frac{1}{4}$ and E $\frac{1}{2}$ of SW $\frac{1}{4}$ of Section 20; SE $\frac{1}{4}$ of
SE $\frac{1}{4}$ of Section 21; NE $\frac{1}{4}$ of NE $\frac{1}{4}$, SE $\frac{1}{4}$ of NW $\frac{1}{4}$, NW $\frac{1}{4}$ of
SW $\frac{1}{4}$ of Section 22; All Fractional NW $\frac{1}{4}$ of Section
24, North of Turkey Branch, excepting therefrom
twenty acres described as follows:- Beginning at
the Northwest corner of Section 24, Township 7
South of Range 2 East, thence running South 30 rods,
thence East and parallel with the North line of said
Section 24 to Turkey Branch, thence along said branch
East to the West bank of Fish River, thence Northerly
along the Bank to the North line of Section 24, thence
West to beginning; all in Township 7 South, Range 2
East;

upon which an execution from the Circuit Court of Baldwin County,
Alabama, bearing date of issuance the 21 day of December
1935, in favor of Lillie Smith and against W. D. Owens, for the
sum of Three Hundred & No/00 Dollars, has been levied
by M. H. Wilkins, Sheriff of said County, to satisfy the same,
is not the property of the said W. D. Owens, but is the property
of the Boatyard Timber Company, and that the said Boatyard Timber
Company has a just claim to the property levied on.

Affiant further says that he is President and General
Manager of the Boatyard Timber Company.

Sworn to and subscribed before
me, this the 10 day of January,
1936.

W. C. Beebe
Notary Public, Baldwin County, Ala.

RECORDED

Book

7-411

Filed this *15* day *Jan* 19*34*

Robert S. Lueck
Clerk-Register

State of Alabama BALDWIN CountyCIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon W. A. Thompsonto appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint ofGerlach Motor Company, a partnership composed of Theo Staff, Joe Gerlach, Eddie Staff and Lawrence StaffWitness my hand, this 18th day of January, 1936, 19R. L. Luck, Clerk.

If the Defendant fails to appear and plead or demur within thirty days after service, the Plaintiff may take judgment by default.

COMPLAINT

Gerlach Motor Company, a partnershipcomposed of Theo Staff, JoeGerlach, Eddie Staff and Lawrence Staff
Plaintiff

VS.

W. A. Thompson

Defendant

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

one 1931 6 cylinder chevrolet sedan automobile bearing motor no. 2702256with the value of the hire or use thereof during the detention—to-wit, from the 15th day of December, 1935, 19Frank L. Hume, Plaintiff's Attorney.

RECORDED

Book No. 240

7-430

The State of Alabama

County

CIRCUIT COURT

Plaintiff

vs.

Defendant

Summons and Complaint in Detinue

Filed this 20 day of

1936

Clerk.

Francis H. Hume
Plaintiff's Attorney.

Received this day

of 19

Sheriff.

Executed this day

of 19

leaving a copy of the within Summons and Complaint with

Defendant

Sheriff.

The State of Alabama,

COUNTY

To the Sheriff of Baldwin 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 the 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

cost in the suit, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

Robert L. Hunt, Clerk.

~~BALDWIN~~
The State of Alabama, _____ County

CIRCUIT COURT

To any Sheriff of the State of Alabama—~~Greeting: Thompson~~

You are hereby commanded to summon _____

~~Baldwin~~

to appear before the Circuit Court of _____ County, Alabama, at the place of holding the same and plead, answer or demur, within thirty days from service hereof to the complaint of ~~Gerlach Motor Company, a partnership composed of Theo Staff,~~

Joe Gerlach, Eddie Staff and Lawrence Staff

Witness my hand, this 18th day of January, 1936

Robert L. Luce

Clerk.

If the Defendant fails to appear and plead or demur within thirty days after service, the Plaintiff may take judgment by default.

~~Gerlach Motor Company, a partnership~~ W. A. Thompson

COMPLAINT

~~composed of Theo Staff, Joe~~

~~Gerlach, Eddie Staff and Lawrence Staff~~ vs. _____

Plaintiff

Defendant

one 1931 6 cylinder chvrolet sedan automobile bearing motor

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

No. 2702258

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

from the 15th day of Dec, 1935

Frank E. Harn
 Plaintiff's Attorney.

No. 240

The State of Alabama

COUNTY

CIRCUIT COURT

vs. Plaintiff.

Defendant.

Summons and Complaint in Detinue

Filed this 20th day

of January, 1936

Ruth L. Dyer, Clerk.

Frank G. Harney
Plaintiff's Attorney.

Received this _____ day

of _____, 19____

_____, Sheriff.

Executed this _____ day

of _____, 19____, by

leaving a copy of the within Summons and Com-

plaint with

_____, Defendant.

_____, Sheriff.

The State of Alabama

COUNTY

To the Sheriff of Baldwin 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 the Complaint into your possession, unless the Defendant _____ give bond payable to the Plaintiff _____ with sufficient surety in double the amount of the value of the property, with condition that if the Defendant

cost in the suit, _____ within thirty days thereafter, deliver the property to the Plaintiff _____, and pay all costs and damages which may accrue from the detention thereof.

Ruth L. Dyer, Clerk.

The State of Alabama, Baldwin County

CIRCUIT COURT

Know all Men by these Presents, That we, Gerlach Motor Company, a partnership
composed of Theo. Staff, Joe Gerlach, Eddie Staff and Lawrence Staff
are held and firmly bound unto W. A. Thompson
in the sum of Two hundred and four and no/100 Dollars,
for which payment, well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors, and administrators, jointly and severally, firmly by these presents.

Sealed with our seals, and dated this 18th day of January, 1936, 19

The Condition of the above Obligation is such, That whereas, the above bound

Gerlach Motor Company

has S this day commenced its suit in the Circuit Court of Baldwin Co County, against the said

for the recovery of the following property, to wit:

One 1931 6-cylinder Chevrolet Sedan automobile
Motor No. 2702256

and having made affidavit that the property sued for belongs to it, and entering into this bond, has obtained an order requiring any Sheriff of the State aforesaid to take the said property sued for into his possession:

Now, if the said Gerlach Motor Company shall fail on said suit, and pay the Defendant 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.

(L. S.)

(L. S.)

(L. S.)

(L. S.)

Approved this 20 day of January, 1936

Robert L. Decker, Clerk.

AFFIDAVIT IN DETINUE.

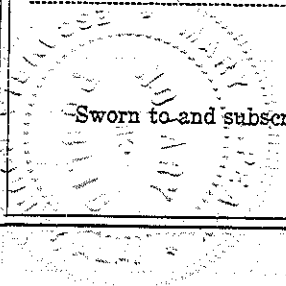
THE STATE OF ALABAMA, Escambia COUNTY

Before me, Mary R. Peavy, a Notary Public in and for Escambia County, Ala.
 personally appeared Eddie Staff, partner in Gerlach Motor Company,, who,
 having been by me duly sworn, deposes and says that the following property, to wit:

one 1931 6 cylinder Chevrolet Sedan automobile bearing motor no.
2702258

_____ for the recovery of which he have instituted suit this day in the Circuit
 Court of Baldwin County against W. A. Thompson
 _____ is the property of them, the affiant.

Sworn to and subscribed before me this 18th day of January, 1936
Mary R. Peavy



RECORDED Sub No. <u>7-431</u> No. <u>240</u>	The State of Alabama,		County.
	CIRCUIT COURT		
To			
AFFIDAVIT AND BOND IN DETINUE			
Filed <u>20</u> day of <u>January</u> , 19 <u>36</u> <u>Barth S. Shear</u> Clerk.			