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STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:-

You are hereby commanded to summon Jawn W. Marques and O. C. Wheeler, 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 Benjamin E. Locklier.

Witness my hand this 3 day of October, 1946.

R. S. Luck
Clerk.

COMPLAINT

BENJAMIN E. LOCKLIER,

Plaintiff,

-VS-

JAWN W. MARQUES and

O. C. WHEELER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
LAW SIDE.

COUNT 1:

The Plaintiff claims of the Defendants Fifteen Hundred Dollars (\$1500), due from them by account on, to-wit, the 22nd day of June, 1946, which sum of money, with the interest thereon is still unpaid.

COUNT 2:

The Plaintiff further claims of the Defendants Fifteen Hundred Dollars (\$1500), due from them on account stated between the Plaintiff and the Defendants on, to-wit, the 22nd day of June, 1946, which sum of money, with the interest thereon, is still unpaid.

COUNT 3:

The Plaintiff further claims of the Defendants Fifteen Hundred Dollars (\$1500), due from them for merchandise, goods and Chattels sold by the Plaintiff to the Defendants on, to-wit, the 22nd day of June, 1946, which sum of money, with the interest thereon, is still unpaid.

COUNT 4:

The Plaintiff further claims of the Defendants Fifteen Hundred Dollars (\$1500), due from them for money paid by the Plaintiff for the Defendants on, to-wit, the 22nd day of June, 1946, at their request, which sum of money, with the interest thereon is still unpaid.

COUNT 5:

The Plaintiff further claims of the Defendants Fifteen Hundred Dollars (\$1500), due from them for money on, to-wit, the 22nd day of June, 1946, received by the Defendants to the use of the Plaintiff, which sum of money, with the interest is still unpaid.

COUNT 6:

The Plaintiff further claims of the Defendants Fifteen Hundred Dollars, (\$1500), damages for the conversion by them on, to-wit, the 22nd day of June, 1946, of the following described personal property, viz:-

One (1) 1939 Buick two door automobile, motor number 43630558, Serial Number, 13453771, Alabama 1946 license tag Number, 23D343, the property of the Plaintiff.

Hybert & Parson
Attorneys for Plaintiff

Plaintiff demands a trial
by Jury.

Hybert & Parson
Attorneys for Plaintiff.

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SUMMONS AND COMPLAINT

BENJAMIN E. LOCKLIER,
Plaintiff,

-VS-

JAWN W. MARQUES and
O. C. WHEELER,
DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Filed October 3, 1946.

R. S. Welch
Clerk

[Handwritten signature]

[Handwritten signature]

Let it be known that

whereas the above named parties have been duly served with a copy of the within summons and complaint and have failed to answer the same within the time prescribed by law and the court has rendered judgment in favor of the plaintiff and against the defendants and the costs of the suit have been taxed against the defendants and the plaintiff has petitioned for an order of execution against the property of the defendants and the court has granted the same and the plaintiff has been appointed receiver of the property of the defendants and the court has ordered that the receiver do as he may think proper to collect the judgment and costs and to sell the property of the defendants and to distribute the proceeds thereof to the plaintiff and the costs of the suit and the plaintiff has petitioned for an order of execution against the property of the defendants and the court has granted the same and the plaintiff has been appointed receiver of the property of the defendants and the court has ordered that the receiver do as he may think proper to collect the judgment and costs and to sell the property of the defendants and to distribute the proceeds thereof to the plaintiff and the costs of the suit

Secretary of the Court

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

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Witness my hand this 3 day of October, 1946.

R. S. Duck
Clerk.

COMPLAINT

BENJAMIN E. LOCKLIER,

Plaintiff,

-vs-

JAWN W. MARQUES and

O. C. WHEELER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
LAW SIDE.

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The Plaintiff further claims of the Defendants Fifteen Hundred Dollars (\$1500), due from them for money paid by the Plaintiff for the Defendants on, to-wit, the 22nd day of June, 1946, at their request, which sum of money, with the interest thereon is still unpaid.

COUNT 5:

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COUNT 6:

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One (1) 1939 Buick two door automobile, motor number 43630558, Serial Number, 13453771, Alabama 1946 license tag Number, 23D343, the property of the Plaintiff.


Attorneys for Plaintiff

Plaintiff demands a trial
by Jury.


Attorneys for Plaintiff.

Executed this Oct. 5-46
by leaving a copy of
within with
O.C. Wheeler

C.E. Garrett
Sheriff
M.R.D. D.S.

Jawn W. Marques at Sea
goes to see his wife.
Said she didn't know
for how long

BENJAMIN E. LOCKLIER,
Plaintiff,

-VS-

JAWN W. MARQUES and O. C.
WHEELER,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
LAW SIDE.

Filed October 3, 1946

R.S. Duck
Clerk

LAW OFFICES
HYBART & CHASON
Bay Minette, Alabama

BENJAMIN E. LOCKLIER
Plaintiff

VS

JAWN MARQUES, et al
Defendants

LAW NO. 1000

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA

Defendant, O.C. Wheeler, shows to the Court that the Plaintiff is a non-resident of the State of Alabama and therefor moves that he be required to furnish security for the costs of this proceeding, before proceeding further in this cause. Defendant reserves the right to plead or demur if and when adequate security for costs is furnished.

Rick Carly + Rick Carly
ATTORNEYS FOR DEFENDANT
O.C. WHEELER

RECORDED 1000

BENJAMIN E. LOCKLIER
Plaintiff

vs

JAWN MARQUES, et al,
Defendants

MOTION TO REQUIRE SECURITY
FOR COSTS

FILED

NOV 2- 1946

R. S. DUCK, CLERK

RICKARBY & RICKARBY
ATTORNEYS FOR
O.C. WHEELER

BENJAMIN E. LOCKLIER
Plaintiff

LAW NO. 1000

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS

JAWN MARQUES, et al
Defendant

Comes O.C. WHEELER, Defendant in the above styled
cause and in answer to each count 1 to 5 inclusive says
that:

1. He is not indebted to the Plaintiff in manner
and form as alleged.

2. To Count 6, Defendant pleads

N O T G U I L T Y

Risley & Risley
ATTORNEYS FOR DEFENDANT

RECORDED

Law No. 1000

BENJAMIN E. LOCKLIER
Plaintiff

vs

JAWN MARQUES, et al
Defendant

PLEAS

FILED
NOV 8 1946
R. S. DUCK, REGISTER

RICKARBY & RICKARBY

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