

NIC KRUMP, a non compos mentis,
by Matt Krump, as his guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1472

Comes John Chason as administrator cum testamento annexo of the estate of Nic Krump, deceased, and shows unto the court that Nic Krump died on the 17th day of February, 1951, leaving a last will and testament which has been duly admitted to probated by the Probate Court of Baldwin County, Alabama; that letters of administration have been issued to him as administrator cum testamento annexo upon the estate of said Nic Krump deceased.

WHEREFORE, petitioner moves the court to enter an order reviving the above styled suit in the name of John Chason as administrator cum testamento annexo of the estate of Nic Krump, deceased, plaintiff, and that he as such administrator be substituted as party plaintiff in lieu of the present named plaintiff therein.

James H. McCall
John Chason, as administrator cum testamento annexo of the estate of Nic Krump, deceased.

STATE OF ALABAMA
COUNTY OF BALDWIN

Before me the undersigned Notary Public in and for said State and County, personally appeared John Chason, who, being by me duly sworn on oath, deposes and says that he is one of the solicitors for John Chason, as administrator cum testamento annexo of the estate of Nic Krump, deceased; and affiant further states that the facts stated in the foregoing petition are true.

Subscribed and sworn to before me
on this 2nd day of January, 1952.

Alvin L. Miller
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

MOTION TO REVIVE

NIC KRUMP, A non compos mentis,
by Matt Krump, as his guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 1472.

Filed: January 4th, 1952.

Reice J. Houch
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

MOTION TO REVIVE

NIC KRUMP, A non compos mentis,
by Matt Krump, as his guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

NO. 1472.

Filed: January 4th, 1952.

Alice J. Hirsch
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

NIC KRUMP, a non compos mentis,
By: Matt Krump, as his
guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY,
ALABAMA
LAW SIDE.

AFFIDAVIT:

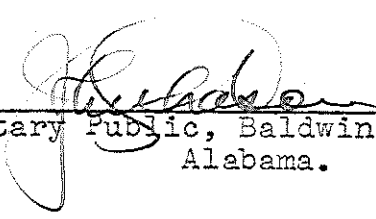
Before me, John Chason, a Notary Public, in and for Baldwin County, Alabama, personally appeared Matt Krump, who is known to me and who after being by me first duly and legally sworn doth depose and say as follows:

That his name is Matt Krump; that he is the guardian of Nic Krump, a non compos mentis, having been appointed as such by the Probate Court of Baldwin County, Alabama, on March 4, 1950, and as such he is duly authorized to make this affidavit; that the following described property, viz:

One (1) 1950 Model Delux Packard automobile,
Serial #2372-3642, Motor #H 406617,

for the recovery of which he has this day instituted suit in the Circuit Court of Baldwin County, Alabama, against the above named Defendant, is the property of the Plaintiff.

Sworn to and subscribed before
me, this 6 day of March, 1950.


Notary Public, Baldwin County,
Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, that Nic Krump, a non compos mentis, by Matt Krump, as his guardian, as principal, and Herbert Krump, as surety, are held and firmly bound unto Mildred Casey, in the sum of Twenty-five and no/100 Dollars (\$25.00) for the payment of which we bind ourselves, our and each of our heirs, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated this 6th day of March, 1950.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the above bound Nic Krump, a non compos mentis, by Matt Krump, as his guardian, has on the 6 day of March, 1950, sued out from the office of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue, returnable to said Circuit Court against Mildred Casey, as Defendant, for the recovery of the following described personal property, viz:

One (1) 1950 Model Delux Packard automobile,
Serial #2372-3642, Motor #H 406617,

NOW, if the said Plaintiff shall fail in said suit and shall pay to the said Mildred Casey all such costs and damages as she may sustain by the wrongful suing out of said writ, then this obligation to be void, otherwise to remain in full force and effect.

NIC KRUMP

By: Matt Krump SEAL
As his guardian.

Taken and approved

this 6th day of March, 1950.

Nic Krump
Clerk.

Herbert Krump SEAL

AFFIDAVIT AND BOND

NIC KRUMP, a non compos mentis,
By: Matt Krump, as his
guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

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

Filed March 6th, 1950.

Reichmann
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

MATT KRUMP and
HERBERT KRUMP,

Plaintiffs,

vs

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

No. 1472.

Come now D. R. Coley, Jr. and Chris C. De Laney,
and appear for the Defendant in the above entitled cause,
and reserve the right to plead, answer or demur further.

D. R. Coley Jr.

Chris C. De Laney

D. R. Coley, Jr. and Chris C.
De Laney, Attorneys for
Defendant.

7201472

FILED

AUG 19 1953

ALICE J. DICK, Registrar

NIC KRUMP, a non compos mentis,
by Matt Krump, as his guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 1472

ORDER OF REVIVAL

It appearing to the court that Nic Krump died on the 17th day of February, 1951, leaving a last will and testament which has been duly admitted to probate by the Probate Court of Baldwin County, Alabama, and that letters of administration have been issued to John Chason as administrator cum testamento annexo upon the estate of said Nic Krump, deceased;

It is therefore ORDERED, ADJUDGED and DECREED by the court upon petition of said John Chason as administrator cum testamento annexo of the estate of Nic Krump, deceased, that said above entitled suit be and the same is hereby revived in the name of the said John Chason as administrator cum testamento annexo of the estate of Nic Krump, deceased, as plaintiff therein, and that said John Chason be and he is hereby substituted as such plaintiff in lieu of the present named plaintiff.

ORDERED, ADJUDGED and DECREED this the 4th day of January, 1952.

Fair J. Madubury, Jr.
JUDGE

FILED 1952
JAN 4
ALICE J. DICK, Registrar

NIC KRUMP, a non compos mentis,
By: Matt Krump, as his guardian,

Plaintiff,

vs

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NUMBER


Comes the defendant in the above styled cause and
answering plaintiff's complaint and every allegation therein
made says:

FIRST:

The matters therein alleged are untrue.

SECOND:

That she is not guilty of the matters therein alleged.


Attorney for Defendant.

NIC KRUMP, a non compos mentis
By Matt Krump, guardian
Plaintiff

vs

MILDRED CASEY,
Defendant.

Answer

FILED

MAY 17 1950

ALICE J. DUCK, Clerk

W. C. Beebe, Attorney

NIC KRUMP, a non compos mentis,
By: Matt Krump, as his guardian,
Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA


AT LAW

NO. _____

Comes the Plaintiff in the above styled cause and files
this his demurrer to plea second filed by the Defendant in said
cause and assigns the following separate and several grounds, viz:

1. That said plea does not state a defense to the
cause of action.

2. That said plea is not the general issue in defense
to a detinue suit.


Attorneys for Plaintiff.

1472

DEMURRER

NIC KRUMP, a non compos mentis,
By: Matt Krump, as his
guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

NO: _____

FILED

MAY 17 1950

ALICE J. DUCK, Clerk

NIC KRUMP, a non compos mentis,
by Matt Krump, as his guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

Nic Krump, plaintiff in the above entitled cause, having died on the 14th. day of February, 1951, and an order of court having been entered herein on the 4th. day of January, 1952, reviving the above entitled cause in the name of John Chason as administrator cum testamento annexo of the estate of Nic Krump, deceased, as plaintiff, and substituting said party as plaintiff therein, now comes said plaintiff and amends the complaint filed herein so that the same shall read as follows:

JOHN CHASON, as Administrator
Cum Testamento Annexo of the
Estate of Nic Krump, deceased,

Plaintiff,

vs.

MILDRED CASEY,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

AMENDED COMPLAINT

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

One (1) 1950 Model DeLuxe Packard automobile
Serial #2372-3642, Motor #H 406617,

together with the value of the hire or use thereof during the detention, to-wit: since January 10, 1950.

John Chason
John Chason, M. C. Hall & John
Attorneys for Plaintiff

1472

RECORDED

AMENDED COMPLAINT

JOHN CHASON, as Administrator
Cum Testamento Annexo of the
Estate of Nic Krump, deceased,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

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

Filed: January 22nd, 1952.

Alicia J. Renner
Clerk.

LAW OFFICES

~~HYBART~~ CHASON & STONE

BAY MINETTE, ALABAMA

STATE OF ALABAMA)
) IN THE CIRCUIT COURT - LAW SIDE.
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mildred Casey 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 the same, then and there to answer the Complaint of Nic Krump, a non compos mentis, by Matt Krump, as his guardian.

Witness my hand this 6th day of March, 1950.

Nice J. Luck
Clerk.

COMPLAINT:

NIC KRUMP, a non compos mentis,
By: Matt Krump, as his guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY,

ALABAMA

LAW SIDE.

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

One (1) 1950 Model Delux Packard automobile,
Serial #2372-3642, Motor #H 406617,

together with the value of the hire or use thereof during the detention, to-wit: since January 10, 1950.

Sharon Stone
Attorneys for Plaintiff.

Received in Sheriff's Office
this 6 day of Mar 1950
TAYLOR WILKINS, Sheriff

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
requested to take the property
described in the Complaint into
your possession unless the De-
fendant 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 shall cast in the suit
she will, within thirty days
thereafter deliver the property
to the Plaintiff and pay all
damages and costs which may
accrue from the detention there-
of.

Alice Luck
Clerk.

RECORDED
1472

SUMMONS AND COMPLAINT

NIC KRUMP, a non compos
mentis,
By: Matt Krump, as his
guardian,

Plaintiff,

vs.

MILDRED CASEY,

Defendant.

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

Filed March 6th, 1950.

Alice Luck
Clerk.

LAW OFFICES
WHYBART, CHASON & STONE
BAY MINETTE, ALABAMA

Executed by serving a copy of the
within summons & Complaint on
Mildred Casey this 20th day of April 1950.
The within described property was not
found.
Taylor Wilkins Sheriff