

H. KENNEDY,	ğ	IN THE CIRCUIT COURT OF
Plaintiff,	Š	BALDWIN COUNTY, ALABAMA
vs• ,	Ž	LAW SIDE
GERSTLE MADER,	Ø	
Defendant.	Ď	

Before me, C. LeNoir Thompson, a Notary Public in and for Baldwin County, State of Alabama, personally appeared Gerstle Mader, who is known to me and who by me being first duly sworn, doth depose and say that she is the defendant in the case of H. Kennedy, Plaintiff, vs. Gerstle Mader, Defendant, now pending in the Fircuit Court of Baldwin County; that no issue has been joined between the parties in said action; that she, the said defendant, does not claim title to the property sued for; but that Gro-Crop, Inc., a corporation which is not a party to this suit without collusion with affiant, the said defendant, claims the property sued for.

Defendant prays the Court to make an order requiring said Gro-Crop, Inc. to come in and defend said action.

Geretle mader

STATE OF ALABAMA BALDWIN COUNTY

Sworn to and subscribed before me this the 3rd day of November, 1953.

Notary Fublic, baldwin County, *labama

H-RECORDED

Plaintiff,

VS.

GERSTLE MADER,

Defendant.

DISCLAIMER

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NOV 3 From the Law Office of
C. LeNoir Thompson
Attorney at Law

and the state of t

CECIL G. CHASON

FOLEY ALABAMA
October 5, 1953

Mrs. Alice J. Duck, Clerk Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint, Affidavit and Bond in Detinue suit of Kennedy -vs- Mader.

Yours very truly

G. Chason

CGC:fm

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STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS:- That we, H. Kennedy, as principal, and ________, as surety, are held and firmly bound unto Gerstle Mader in the sum of Two Hundred Dollars (\$200.00), to be paid to the said Gerstle Mader, her heirs, executors, administrators or assigns; for which payment, well and truly made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals, and dated this _____ day of July, in the year of our Lord One Thousand Nine Hundred and Fifty-three.

The condition of the above obligation is such, That whereas the above bound H. Kennedy, on the day of the date hereof hath obtained at the suit of H. Kennedy -vs- Gerstle Mader, a summons and complaint for the recovery of personal property in specie against said Defendant and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of Baldwin County for said County, and which said endorsement is made upon the Plaintiff entering into this Bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages as he may sustain by reason of the wrongful compaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

__SEAL

SEAT.

Approved this 100 day of July, 1953.

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CECIL G. CHASON

ATTORNEY AT LAW FOLEY, ALABAMA

October 9, 1953

Mrs. Alice J. Duck, Clerk Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Affidavit in the suit of H. Kennedy -vs- Mader, which I failed to execute. Please insert the proper date.

Thank you very much.

Yours very truly,

C. G. Chason

CGC:fm~

encl. 1

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF SAID COUNTY, GREETINGS:-

The Plaintiff having given Bond and made affidavit 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 security in double the value of the property, conditioned that if the Defendant is cast in the suit, she will, within thirty (30) days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand this the 10k day of July, 1953.

Minif bluch

Executed by serving a copy of the within summons and complaint on the Defendant this _____ day of July, 1953.

Jaylor Wilhing Sheriff Stocker P.5.

Jay Miller Sheriff Edling & Steadfor

Further executed by taking into my possession and storing property described within.

This ____ day of July, 1953.

C, G, C.

RECORDED 2106

OCT 7 1953 ALICE I. DUCK, Clork

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

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

You are hereby commanded to summon Gerstle Mader to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding same, within thirty (30) days from the service of this summons and complaint, then and there to answer the complaint of H. Kennedy.

You are hereby commanded to execute this process instanter and make return as required by law.

WITNESS my hand this the 10 day of 2, 1953.

Aught-hours

H. KENNEDY,

Plaintiff,

-vs-

GERSTLE MADER,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

COUNT ONE

The Plaintiff claims of the Defendant the following described personal property, to-wit:- One (1) 1950 Remington Rand Typewriter, Serial Number J-175-6912, and one (1) four (4) Drawer File Cabinet of wood construction, with the value of the use thereof from to-wit, May 1, 1953.

Attorney for Plaintiff

Received in Sheriff's Office this Loday of Oct., 1983
TAYLOR WILKINS, Sheriff

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Gentle Maden

y service on_____

TAYLOR WILKINS, Sheriff
By Elling L Steadband, S.

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SUMMONS AND COMPLAINT

H. KENNEDY,

Plaintiff,

~VS~

GERSTLE MADER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

OCT 7 1953

ALICE J. BUCK, Clerk

ECIL G. CHASON ATTORNEY AT LAW FOLEY, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said County personally appeared H. Kennedy, who, being duly sworn, deposeth and saith, That the property sued for in the Complaint of H. Kennedy -vs- Gerstle Mader, belongs to him, the said Plaintiff.

State of Alabama

Sworn to and subscribed before me on this ______ day of

左 字,1953。

(affix Seal)

C. G. C.

FILED

OCT 7 1953

AUCE J. BUCK, Glerk