

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 ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and ELMER ALLEN, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County in the place of holding same, then and there to answer the complaint of DONALD NELSON, d/b/a NELSON MARINE SALES.

WITNESS my hand this the 12 day of Aug., 1970.

Alice J. Week
Clerk

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

vs.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN.

Defendants.

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

CASE NO. 9431

The Plaintiff claims of the Defendants the following personal property, viz: One shrimp unloading conveyor, four steel oyster shucking bins, and twenty steel oyster stools, with the value of the hire or use thereof during detention from the 31st day of July, 1970.

Attorney for Plaintiff

Defendants may be served
in the Bon Secour Area.

The above personal property to be found at the Bon Secour Shellfish Company, formerly known as MAAM Seafoods, Bon Secour, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

TO THE 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 defendants give bond payable to the plaintiff, with security in double the value of the property, conditioned that if the defendants are cast in the suit, they will, within thirty 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 20 day of August, 1970.

Alice J. Luck
Clerk, Circuit Court, Baldwin County

Further executed by taking into my possession and storing at

_____ ,
property described within.

This _____ day of _____, 1970.

Sheriff

By _____
Deputy Sheriff

1
10-1-42

DEBORA SHERIFF
BA

SHERIFF

TO THE
COUNTY OF BALDWIN, ALABAMA

DEBORA SHERIFF

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

JOHN D. SHERIFF

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

DEBORA SHERIFF

SUMMONS AND COMPLAINT and
ORDER TO SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
LAW SIDE
DONALD NELSON, d/b/a
NELSON MARINE SALES,
Plaintiff,
vs.
ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,
Defendants.

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 ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and ELMER ALLEN, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County in the place of holding same, then and there to answer the complaint of DONALD NELSON, d/b/a NELSON MARINE SALES.

WITNESS my hand this the 13 day of Aug., 1970.

Alice J. Duck
Clerk

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

vs.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

Defendants.

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) LAW SIDE
)
)
)
) CASE NO. 9431

The Plaintiff claims of the Defendants the following personal property, viz: One shrimp unloading conveyor, four steel oyster shucking bins, and twenty steel oyster stools, with the value of the hire or use thereof during detention from the 31st day of July, 1970.

[Signature]
Attorney for Plaintiff

Defendants may be served
in the Bon Secour Area.

The above personal property to be found at the Bon Secour Shellfish Company, formerly known as RAM Seafoods, Bon Secour, Alabama.

STATE OF ALABAMA
BALDWIN COUNTY

TO THE SHERIFF OF SAID COUNTY, GREETINGS:

The Plaintiff having given bond and made affidavit as required

FILED

AUG 13 1970

CLERK REGISTER
ALICE J. DUCK

by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendants give bond payable to the plaintiff, with security in double the value of the property, conditioned that if the defendants are cast in the suit, they will, within thirty 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 20 day of August, 1970.

Alice J. Luck
Clerk, Circuit Court, Baldwin County

Further executed by taking into my possession and storing at

_____ property described within.

This _____ day of _____, 1970.

Sheriff

By _____
Deputy Sheriff

DEBORA TAYLOR

WIFE

WIFE OF JAMES ALLEN

DECEASED

WIFE OF JAMES ALLEN

WIFE OF JAMES ALLEN

WIFE OF JAMES ALLEN

DECEASED

SUMMONS AND COMPLAINT and
ORDER TO SHERIFF

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

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

vs.

AIMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

Defendants.

CECIL G. CHASON

Attorney at Law

THOMAS W. UNDERWOOD, JR.
ASSOCIATE

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535
PHONE 205/943-3171

August 19, 1970

9431

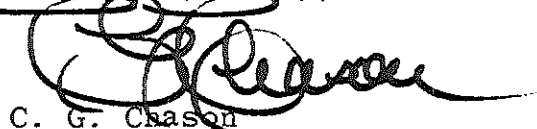
Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama 36535

Re: Donald Nelson, d/b/a Nelson Marine
Sales vs. Alma Allen, et al.
Case No. 9431

Dear Mrs. Duck:

We are returning the papers with a new bond executed
by William Fiala as surety.

Yours very truly,



C. G. Chason

CGC:jc

Encls.

STATE OF ALABAMA Ø
*
BALDWIN COUNTY Ø

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon GENE JAYE to appear within thirty days from the service of this writ in the Circuit Court to be held for said county in the place of holding same, then and there to answer the third-party complaint of ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN, and ELMER ALLEN.

WITNESS my hand this the 10 day of March, 1971.

Ernie B. Blackmon
Clerk

The said Gene Jaye resides at
Bon Secour, Alabama.

| | | |
|----------------------------|---|-------------------------|
| DONALD NELSON, | Ø | |
| d/b/a NELSON MARINE SALES, | Ø | |
| | Ø | |
| Plaintiff, | Ø | |
| VS. | Ø | IN THE CIRCUIT COURT OF |
| | Ø | BALDWIN COUNTY, ALABAMA |
| ALMA ALLEN, ET AL., | Ø | |
| | Ø | AT LAW NO. 9431 |
| Defendants, | Ø | |
| | Ø | |
| GENE JAYE, | Ø | |
| | Ø | |
| Third-party Defendant. | Ø | |

THIRD-PARTY COMPLAINT

Now come the defendants, Alma Allen, Winifred Taylor, James Allen, Leonard Allen, Orville Allen and Elmer Allen, as third-party plaintiffs, and file this third-party complaint against Gene Jaye, as third-party defendant, and show unto the court:

That on, to-wit, June 18, 1969, they entered into a written lease agreement with the said Gene Jaye, in which and by which they leased to him property at Bon Secour in Baldwin County, Alabama, which is described in the said lease, a copy of which lease is hereto attached, marked Exhibit A, and by reference made a part hereof as though fully incorporated herein.

The said lease was canceled by the third-party plaintiffs for nonpayment of rent but, because of pending litigation against these third-party plaintiffs and the third-party defendant in the Circuit Court of Baldwin County, Alabama, in Equity, in which Reynolds Brothers Lumber Co., Inc., as complainant, Case No. 11,258, and Clyde Miller as complainant, Case No. 11,357, claim liens on the property described in the said lease, the said third-party plaintiffs have been unable to use or rent the said property.

During the time that the third-party defendant Jaye was in possession of and operating a business on the said leased premises, personal property belonging to the third-party plaintiffs was removed from the premises and the property which is sued for in this

case, and which is claimed by the plaintiff Nelson, is subject to a landlord's lien in favor of the third-party plaintiffs.

On, to-wit, December 23, 1970, a building on the said leased premises was unlawfully broken into and entered and personal property, to-wit, one oyster can-capping machine, was unlawfully removed therefrom.

1. The third-party plaintiffs claim of the third-party defendant TWO HUNDRED TWENTY-FIVE DOLLARS (\$225.00), the rent of a tract of land, viz: the tract described in the attached lease demised by the third-party plaintiffs to the third-party defendant on, to-wit, the 18th day of June, 1969, said rent commencing on June 1, 1970, and ending on September 1, 1970.

2. The third-party plaintiffs claim of the third-party defendant SIX HUNDRED DOLLARS (\$600.00) for the use and occupation by him of the tract of land described in the attached lease, belonging to the third-party plaintiffs, from the 1st day of June, 1970, to the 1st day of April, 1971.

3. The third-party plaintiffs claim of the third-party defendant FIVE HUNDRED DOLLARS (\$500.00), damages for the conversion by him on, to-wit, the 1st day of March, 1970, of the following chattels: an oyster shucking bench and stools, the property of the third-party plaintiffs.

4. The third-party plaintiffs claim of the third-party defendant SEVEN HUNDRED FIFTY DOLLARS (\$750.00), as damages for wrongfully taking the following goods and chattels, the property of the third-party plaintiffs, viz: one oyster can-capping machine.

5. The third-party plaintiffs claim of the third-party defendant, Gene Jaye, and the plaintiff, Donald Nelson, the following personal property, viz: one oyster can-capping machine, with

the value of the hire or use thereof during the detention, viz:
from the 23rd day of December, 1970.

J. B. Blackburn
Attorney for Third-party Plaintiffs

I hereby certify that I delivered a copy of the foregoing
instrument to Thomas W. Underwood, Jr., Esquire, attorney for
plaintiff, on this the 11th day of March, 1971.

J. B. Blackburn
Attorney for Third-Party Plaintiffs

FILED
MAR 10 1971
EUNICE B. BLACKMON CIRCUIT
CLERK

EXHIBIT A

LEASE AGREEMENT

THE STATE OF ALABAMA)

BALDWIN COUNTY)

THIS AGREEMENT, made and entered into by and between ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN AND ELMER ALLEN, THE LESSOR, and GENE JAY the LESSEE, WITNESSTH:

The OTHERS do hereby rent and lease to the LESSEE, the PAAM SEAFOOD property, consisting of a lot, building, wharf and appurtenances on Bayou Secour River, under the following terms and conditions.

Said lease is to begin on July 1, 1969 and is to be for a period of five (5) years, to July 1, 1974. Renewal of lease will be at terms and conditions agreed upon by the LESSOR and LESSEE at the termination of this lease. The LESSEE agrees to pay a monthly rental of \$75.00 per month beginning July 1, 1969.

The LESSEE agrees to maintain said property in good operational condition and to surrender up said premises on termination of this contract in like good operational condition.

LESSEE assumes all liabilities resulting from personal injuries and/or property damages incurred on said premises. LESSEE will not sell, assign, transfer or sublet the premises or any part thereof, without written consent of the LESSOR. It is further agreed that in the event the property hereby leased shall be destroyed or made untenable by fire or the elements, this lease shall become null and void as to the unexpired term. In case of a failure to pay any installment of rent, as the same falls due, it shall be optional with said OTHERS to terminate this rent contract, in which event all of said rent installments shall become due and payable.

LEASE AGREEMENT

(Cont'd)

WITNESS our hands and seals in duplicate this the 18th day of
June, 1969.

WITNESS:

L. E. Allen
For Signatures of Owners

James W. Allen
For Signatures of Owners

Mary C. Allen
For Signatures of Owners

Frank H. Allen
For Signatures of Owners

Delvia B. Allen
For Signatures of Owners

Edna Allen
For Signatures of Owners

For Signature of Lessee

Chas. W. Allen
For Signature of Lessee

Alma Allen (Seal)
Alma Allen, Owners

Winifred Taylor (Seal)
Winifred Taylor, Owners

James Allen (Seal)
James Allen, Owners

Leonard Allen (Seal)
Leonard Allen, Owners

Orville M. Allen (Seal)
Orville Allen, Owners

Gene Jay (Seal)
Gene Jay, Lessee

9431

Donald Nelson, et al

vs.

Alma Allen, Winifred
Taylor et al

Deputy Sheriff W. L. Wilkins miles 86
Ten Cents per mile Total \$ 8.60
TAYLOR WILKINS, Sheriff
BY W. L. Wilkins
DEPUTY SHERIFF

Received 11 day of May 19 41
and on 17 day of March 19 41
I sent a copy of the within 8 & 3rd pty. comp.
on Gene J. J. J.
By service on _____

TAYLOR WILKINS, Sheriff
BY W. L. Wilkins
\$

Serve: Gene J. J. J.
Re: 3rd pty. comp.

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 ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN, and ELMER ALLEN, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County in the place of holding same, then and there to answer the complaint of DONALD NELSON, d/b/a NELSON MARINE SALES.

WITNESS my hand this 7 day of Oct., 1970.

Alice J. Luck
Clerk

| | | |
|--------------------------------|---|-------------------------|
| DONALD NELSON, d/b/a |) | IN THE CIRCUIT COURT OF |
| NELSON MARINE SALES, |) | |
| |) | BALDWIN COUNTY, ALABAMA |
| Plaintiff, |) | LAW SIDE |
| vs. |) | |
| ALMA ALLEN, WINIFRED TAYLOR, |) | |
| JAMES ALLEN, LEONARD ALLEN, |) | |
| ORVILLE ALLEN and ELMER ALLEN, |) | |
| Defendants. |) | CASE NO. 9431 |

AMENDED COMPLAINT

Comes the Plaintiff in the above styled cause and in amendment to his complaint heretofore filed says as follows:

1. That the Plaintiff has given bond and made an affidavit as required by law and based upon this bond and affidavit the Sheriff of Baldwin County has taken the possession of one shrimp unloading conveyor located at the Bon Secour Shellfish Company, formerly known as PAAM Seafoods, Bon Secour, Alabama.

2. That the shrimp unloading conveyor which the Sheriff has taken into possession is not the correct conveyor which the Plaintiff intended to have taken into possession because it does not belong to the Plaintiff and is inoperable. It is setting out of doors and is in a rusty condition.

3. That the shrimp unloading conveyor which belongs to the Plaintiff and which should have been taken into the possession of

the Sheriff under the bond and affidavit of the Plaintiff is in operating condition, and is located in the tin shop on the loading ramp and is the only other shrimp unloading conveyor located on the premises of Bon Secour Shellfish Company.

Thomas W. Underwood, Jr.
Attorney for Plaintiff

Defendants may be served in the
Bon Secour Area.

I hereby certify that I mailed a copy of the foregoing Amended Complaint to J. B. Blackburn, Bay Minette, Alabama, as Attorney for Defendants, by first class mail, postage prepaid and properly addressed, on this the 6th day of October, 1970.

Thomas W. Underwood, Jr.
Attorney for Plaintiff

FILED

OCT 7 1970

ALICE J. DUCK CLERK
REGISTER

9431

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

vs.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

Defendants.

AMENDED COMPLAINT

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

VS.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 9431

ANSWER

Now come the defendants, each separately and severally, by
their attorney, and for answer to the complaint, say:

1. Not guilty.
2. The allegations of the complaint are untrue.

J. B. Blackburn
Attorney for Defendants

I hereby certify that I mailed a copy of the foregoing
answer to Cecil G. Chason, Esquire, Foley, Alabama, by first class
mail, postage prepaid and properly addressed, on this the 28th
day of September, 1970.

J. B. Blackburn
Attorney for Defendants

FILED

SEP 28 1970

ALICE J. DICK

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

VS.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9431

REPLEVY BOND OF DEFENDANTS

STATE OF ALABAMA Ø
 *
BALDWIN COUNTY Ø

KNOW ALL MEN BY THESE PRESENTS: That we, ALMA ALLEN,
WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and
ELMER ALLEN, as Principals, and the undersigned, as Sureties, are
held and firmly bound unto DONALD NELSON in the sum of \$ 900.00
for the payment of which well and truly to be made, we, jointly
and severally, bind ourselves, our heirs, executors and adminis-
trators.

Sealed with our seals and dated this 1st day of September,
1970.

The condition of the above obligation is such that, Whereas,
the said Donald Nelson did on the 13th day of August, 1970, sue out
of the Circuit Court of Baldwin County, Alabama, a writ of detinue
directed to any Sheriff of said state, commanding him to take into
his possession the following property, to-wit:

One shrimp unloading conveyor
Four steel oyster shucking bins, and
Twenty steel oyster stools,

which said writ was placed in the hands of the Sheriff of Baldwin
County, Alabama, and was executed by him on the 29th day of August,
1970, by taking into his possession the following property, to-wit:
one shrimp unloading conveyor, four steel oyster shucking bins, and
~~twenty~~ ^{nine} steel oyster stools; and,

WHEREAS, the above bound defendants have, within five days from the execution of the said writ, entered into and executed this bond as required by law, and thereby obtained possession of the said property seized under the said writ:

NOW, if the said defendants are cast in the said suit and within thirty days after judgment deliver the property aforesaid to the plaintiff and pay all costs and damages which may accrue from the detention thereof, then this obligation to be void; otherwise, to remain in full force and effect.

Alma Allen (SEAL)
Alma Allen

Winifred Taylor (SEAL)
Winifred Taylor

James Allen (SEAL)
James Allen

Leonard Allen (SEAL)
Leonard Allen

Orville Allen (SEAL)
Orville Allen

Elmer Allen (SEAL)
Elmer Allen

J. B. Smith (SEAL)

(SEAL)

Taken and approved on this the
1st day of September, 1970.

[Signature]
Sheriff, Baldwin County, Alabama

CHASON & UNDERWOOD

Attorneys at Law

CECIL G. CHASON
THOMAS W. UNDERWOOD, JR.

May 22, 1972

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535
PHONE 205/943-3171

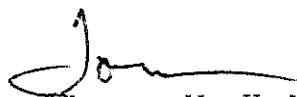
Ms. Eunice Blackmon
Clerk of the Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Donald Nelson, d/b/a vs.
Alma Allen, et al
Case Number 9431

Dear Mrs. Blackmon:

Please compute the court costs involved in this case to
date and advise me at your earliest convenience.

Yours very truly,



Thomas W. Underwood, Jr.

TWU, Jr./vd

Done
5-25-72

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 ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and ELMER ALLEN, to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said County in the place of holding same, then and there to answer the complaint of DONALD NELSON, d/b/a NELSON MARINE SALES.

WITNESS my hand this the 13 day of Aug, 1970.

Alice J. Luck
Clerk

DONALD NELSON, d/b/a
NELSON MARINE SALES,
Plaintiff,
vs.
ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,
Defendants.

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
) LAW SIDE
)
)
)
) CASE NO. 9431

The Plaintiff claims of the Defendants the following personal property, viz: One shrimp unloading conveyor, four steel oyster shucking bins, and twenty steel oyster stools, with the value of the hire or use thereof during detention from the 31st day of July, 1970.

E. P. Reason
Attorney for Plaintiff

Defendants may be served in the Bon Secour Area.

The above personal property to be found at the Bon Secour Shellfish Company, formerly known as FAAM Seafoods, Bon Secour, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

TO THE 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 defendants give bond payable to the plaintiff, with security in double the value of the property, conditioned that if the defendants are cast in the suit, they will, within thirty 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 20 day of August, 1970.

Alice J. Lusk
Clerk, Circuit Court, Baldwin County

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

This _____ day of _____, 1970.

Sheriff

By _____
Deputy Sheriff

Received 20 day of Aug 1970
and on 29 day of Aug 70
I served a copy of the within 34 C. L. Detention
for Alma Allen, James Allen
Winifred Taylor & Leonard Allen
Orville Allen, Elmer Allen
By service on 11/11

TAYLOR WILKINS, Sheriff
[Signature]

bond made 9-1-70

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

9431

DONALD NELSON, d/b/a
NELSON MARINE SALES

Plaintiff,

vs.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN AND ELMER ALLEN,

Defendants.

SUMMONS AND COMPLAINT and
ORDER TO SHERIFF

86 1/4
92 7

CECIL G. CHASON

Attorney at Law

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535

Aug .29, 1970

Executed by attaching,

4, Oyster bins,
9, Steel stools,
1, Shrimp unloading conveyor.

and locking in the building of Shell Seafood Building
and taking the key to the building.

Taylor Wilkins Sheriff,

Carole Chason D.A.

Bon Secu

Sheriff claims 3 1/4 miles @
34 1/2
Cents per mile Total \$ 1.15
TAYLOR WILKINS, Sheriff
[Signature]
DEPUTY SHERIFF

DONALD NELSON, d/b/a
NELSON MARINE SALES,

PLAINTIFF,

VS.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

DEFENDANTS.

9431

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me Janice L. Childress, a Notary Public in and
for said County in said State, personally appeared DONALD NELSON,
who being duly sworn, deposeth and saith, That the property sued
for in the Complaint of DONALD NELSON, d/b/a NELSON MARINE SALES,
VS. ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN, belongs to him, the said Plaintiff.

Donald R Nelson

Sworn to and subscribed before me

this 11 day of August, 1970.

Janice L. Childress
Notary Public, Baldwin County
State of Alabama

FILED

AUG 13 1970

ALICE J. DUCK CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

DONALD NELSON, d/b/a
NELSON MARINE SALES,

PLAINTIFF,

VS.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

DEFENDANTS.

AFFIDAVIT OF
DONALD NELSON

CECIL G. CHASON

Attorney at Law

P. O. DRAWER 458
216 W. LAUREL AVENUE
FOLEY, ALABAMA 36535

STATE OF ALABAMA
BALDWIN COUNTY

BOND

KNOW ALL MEN BY THESE PRESENTS, That we, DONALD NELSON, as principal, and ~~WILLIAM FIALA~~, as surety, are held and firmly bound unto ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and ELMER ALLEN in the sum of Five Hundred Dollars (\$500.00), to be paid to the said ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and ELMER ALLEN, their heirs, executors, administrators or assigns; 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 and firmly, by these presents. Sealed with our seals, and dated this 11th day of August, 1970, in the year of our Lord, One Thousand Nine Hundred Seventy.

The condition of the above obligation is such, that whereas the above bound Donald Nelson, on the day of the date hereof hath obtained at the suit of DONALD NELSON, d/b/a NELSON MARINE SALES vs. ALMA ALLEN, WINIFRED TAYLOR, JAMES ALLEN, LEONARD ALLEN, ORVILLE ALLEN and ELMER ALLEN, a summons and complaint for the recovery of personal property in specie against said Defendants and asks an endorsement by the Clerk of the Circuit 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 defendants all such costs and damages as they may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

Donald R Nelson (SEAL)
As Principal

William Fiala (SEAL)
As Surety

Approved this 20 day of August, 1970.

Deane J. Lucke
Clerk

C. G. C.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

DONALD NELSON, d/b/a
NELSON MARINE SALES,

Plaintiff,

vs.

ALMA ALLEN, WINIFRED TAYLOR,
JAMES ALLEN, LEONARD ALLEN,
ORVILLE ALLEN and ELMER ALLEN,

Defendants.

BOND

CECIL G. CHASON

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