

recall
EX ^{07/09}

9670

HARVEY D. KRUMM,
-VS-
JANIE P. KRUMM, Also known
as JANIE P. SHOENIGHT,
Defendant

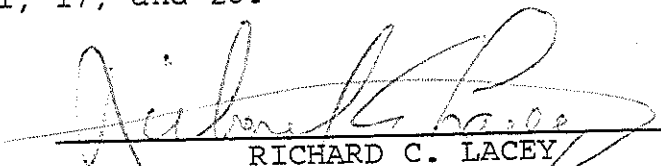
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

9670

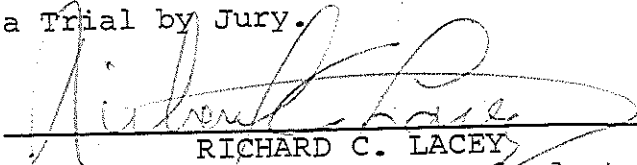
ANSWER OF DEFENDANT

Comes now the Defendant in the above style cause and files this, his answer to said Bill of Complaint and each and every count thereof:

1. Not guilty.
2. The general issue.
3. The Defendant is not guilty of the matters alleged in said Bill of Complaint.
4. The Defendant sayeth that all of the Chattels set forth in said Bill of Complaint, with the exception of Items 3, 7, 11, 17, and 20 are being used by his children who are in custody of the Defendant; and that the Plaintiff gave these items to the Defendant's children.
5. The Defendant sold Item 3 in the amount of Thirty-Two (\$32) Dollars and applied the money toward back child-support owed by the Plaintiff to the Defendant.
6. The Defendant has no knowledge of the whereabouts of Items 7, 11, 17, and 20.

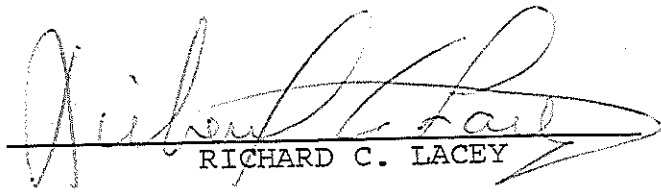

RICHARD C. LACEY
Attorney for Defendant

The Defendant demands a Trial by Jury.


RICHARD C. LACEY
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 19 day of Feb., 1971, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first-class postage prepaid.


RICHARD C. LACEY

FILED

FEB 23 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

9620

EUNICE B. BLACKMON CIRCUIT
CLERK

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Eunice Blackmon
Bay Minette, Ala.

DATE Febraury 3, 1971

Re: Harvey D. Krumm vs. Janie P. Krumm,
a/k/a Janie P. Shoeknight

Dear Mrs. Blackmon:

Enclosed please find Bill of Complaint to
be filed, together with copy of same and
Summons to be served.

Sincerely,

John V. Duck
(24)

SIGNED

DATE

9670

FILED

FEB 5 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

SIGNED

HARVEY D. KRUMM,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JANIE P. KRUMM, also known)	9670
as JANIE P. SHOENIGHT,)	
Defendant.		

COUNT ONE

Plaintiff claims of the Defendant FOUR THOUSAND (\$4,000.00) DOLLARS, damages for the conversion by her, from on, to-wit: the 16th day of February, 1970 until on, to-wit: the 18th day of September, 1970, of the following chattels:

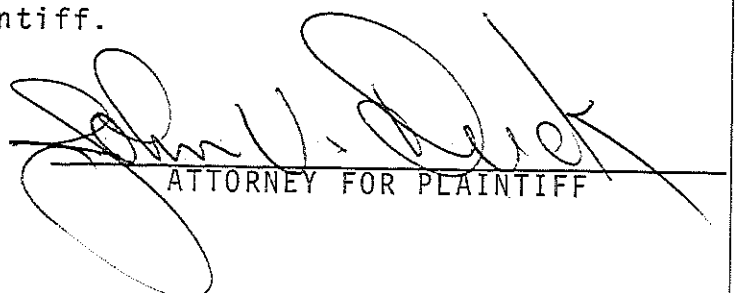
1. One Arabian Stallion "Amir Kris".
2. One 1958 Pontiac four-door hardtop, Serial #A558A5772.
3. One bedroom suite with vanity and dresser.
4. One set of box springs and six inch foam rubber mattress.
5. One sofa bed and matching chair.
6. One 21" T.V. end stand.
7. One lot indoor-outdoor carpet.
8. One end table.
9. One coffee table.
10. One table lamp.
11. Two bath tubs.
12. One steel lawn set - settee and two swinging chairs.
13. One lot of insullation.
14. One lot of plywood.
15. One set of gun racks.
16. One night stand with bookcase compartment.
17. One chest of drawers
18. One lantern.
19. One early American light fixture with lamp and chain.
20. One automatic washer.

all the property of the Plaintiff.

FILED

FEB 5 1971

EUNICE B. BLACKMON CIRCUIT CLERK


ATTORNEY FOR PLAINTIFF

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9670

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JANIE P. KRUMM, a/k/a JANIE P. SHOENIGHT

.....
.....
.....
to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette against.....

JANIE P. KRUMM, a/d/a JANIE P. SHOENIGHT....., Defendant.....

by HARVEY D. KRUMM.....
....., Plaintiff.....

Witness my hand this 5..... day of Feb..... 19 21

Ernie B. Blackburn, Clerk

No. 9670

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HARVEY D. KRUMM

Plaintiffs

vs.

JANIE P. KRUMM, a/k/a
JANIE P. SHOENIGHT Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

FEB 5 1971

Clerk

EUNICE B. BLACKMON CIRCUIT
CLERK

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Route 1, Silverhill, Ala.

Received In Office

Feb 5 1971

Taylor Wilkins Sheriff

I have executed this summons

this 2/17 1971

by leaving a copy with

BR

Janie P. Krumm

Sheriff claims 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

BY Brown
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. J. Brown Deputy Sheriff

60 mi R.T.
S-Help