

3520

HENRY MEANS

PLAINTIFF

VS

W. O. WIGGINS

DEFENDANT

\* IN THE CIRCUIT COURT OF  
\* BALDWIN COUNTY, ALABAMA.  
\* AT LAW.  
\* CASE NO. 3620  
\*

Comes the Defendant in the above styled cause and for answer to said complaint filed in said cause shows as follows:

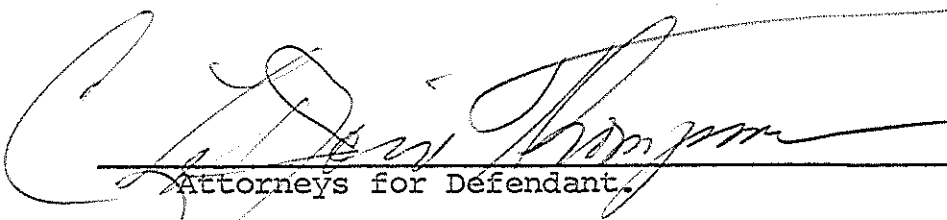
1. As to count one of said complaint non-detinet.
2. As to count two of said complaint not guilty.
3. As to count three of said complaint not guilty.

THOMPSON & WHITE.

BY:

  
Attorneys for Defendant.

Defendant demands trial by jury.

  
Attorneys for Defendant.

*Filed Sept. 9/1908*

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 W. O. Wiggins 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 Henry Means.

Witness my hand this the 24 day of July, 1958.

Reing J. L. Lusk  
Clerk

Defendant resides at Hurricane, Ala.

|                |   |                         |
|----------------|---|-------------------------|
| HENRY MEANS,   | X |                         |
| Plaintiff,     | X | IN THE CIRCUIT COURT OF |
| vs.            | X |                         |
|                | X | BALDWIN COUNTY, ALABAMA |
| W. O. WIGGINS, | X |                         |
| Defendant.     | X | AT LAW                  |
|                | X |                         |

COUNT ONE

The Plaintiff claims of the Defendant the following personal property, viz:

One (1) 1948 Chevrolet Skidder, Motor #FEAL28745  
with the value of the hire or use thereof during the detention, viz:  
from the 17th day of July, 1958.

COUNT TWO

The Plaintiff claims of the Defendant Five Hundred Dollars (\$500.00) for wrongfully taking the following goods and chattels, the property of the Plaintiff, viz:

One (1) 1948 Chevrolet Skidder, Motor #FEAL28745

COUNT THREE

The Plaintiff claims of the Defendant the further sum of Five Hundred Dollars (\$500.00) damages for the conversion by him, on the 17th day of July, 1958, of the following chattels:

One (1) 1948 Chevrolet Skidder, Motor #FEAL28745.

CHASON & STONE

By: *Malcolm S. Stone, Jr.*  
Attorneys for Plaintiff

*Executed July 25, 1958*

Adm 362-2

Received 24 day of July 1958  
and on 25 day of July 1958  
served a copy of the within W. O. Wiggins  
on W. O. Wiggins W. O. Wiggins

By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By W. A. Galloway D. S.  
Humane

Sheriff claims 20 miles at  
Ten Cents per mile Total \$ 2.00  
TAYLOR WILKINS, Sheriff  
BY Galloway  
DEPUTY SHERIFF

HENRY MEANS,  
Plaintiff,  
vs.  
W. O. WIGGINS,  
Defendant

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

\*\*\*\*\*

SUMMONS AND COMPLAINT

\*\*\*\*\*

FILED  
JUL 24 1958  
ALICE J. DUCK, Clerk

LAW OFFICES  
CHASON & STONE  
BAY MINETTE, ALABAMA