

State of Alabama

Detinue Bond and Affidavit

BALDWIN COUNTY

Know all Men By these Presents, That We,

PEOPLES FERTILIZER COMPANY, A Corporation, as Principal, and the
undersigned, as Sureties,
are held and firmly bound unto BEN CHILES

his heirs, executors and administrators, in
the sum of Fifty (\$50.00) Dollars, 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 11 day of June A. D. 1923

The Condition of the above Obligation is such, That whereas the above
bounden PEOPLES FERTILIZER COMPANY, a corporation,

has, on
the 11th day of June 1923 sued out from the office of the
Clerk of the Circuit Court of Baldwin County, in the State of Alabama, a writ
of Detinue, returnable ^{next term of the Circuit Court} ~~fourth Monday in~~ 1923 of
said Circuit Court of Baldwin County against the said

Ben Chiles, for the recovery
of the following described property to- wit:

One Ford Roadster, Model A, License No. 66292,

Now, if the said Peoples Fertilizer Company, a corporation, shall fail
in said suit, and shall pay to the said Ben Chiles
the defendant in said writ, all such costs and damages as he may sustain by the
wrongful suing out of said Writ of Detinue, then this obligation to be void,
otherwise to remain in full force and benefit.

Peoples Fertilizer Co
By *[Signature]* [L. S.]

Taken & approved
June 11/9 31
[Signature]
Clerk

[Signature] [L. S.]
[Signature] [L. S.]

State of Alabama

Detinue Affidavit

BALDWIN COUNTY

Personally appeared before me, a Notary Public in and for

Baldwin County, Alabama, W. M. Stuart

Who, being duly sworn, deposes and says,

that property sued for in the complaint of that he is the President of the
Peoples Fertilizer Company, a to-wit: corporation, and as such is duly
authorized to make this affidavit; that the property sued for in the
Complaint of Peoples Fertilizer Company vs. Ben Chiles

belongs to Peoples Fertilizer Company, the said plaintiff

Sworn to and subscribed the 11th day

of June 1923 before me.

Clerk.

Witness my hand and seal
this 11th day of June 1923.
W. M. Stuart
Notary Public

Ben Chiles

RECORDED
as
Ben Chiles

RECORDED

The State of Alabama,
Baldwin County.

No. _____

CIRCUIT COURT.

Term 1927

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon **BEN CHILES**

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

PEOPLES FERTILIZER COMPANY, A Corporation,

Witness my hand this 11th day of June 1931

W. R. Pichman Clerk.

Complaint

PEOPLES FERTILIZER COMPANY,

BEN CHILES

vs.

Plaintiff. Defendant.

The plaintiff claims of the defendant ~~XXXXXX~~ the following described personal property, viz:-

One Ford Roadster, Model A, License No. 66292, ~~XXXXXX~~

with the value of the hire or use thereof during the detention, viz, from the first day of May, 1931.

Hyatt Heard & Chocon
Attorneys for Plaintiff.

Plaintiff's Attorney

RECORDED

No.

The State of Alabama,

Baldwin County

CIRCUIT COURT

PEOPLES FERTILIZER COMPANY,

Plaintiffs,

vs.

BEN CHILES

Defendants.

SUMMONS AND COMPLAINT

Filed

James H. Stuart 1931

Defendant lives at

Clerk.

Plaintiff's Attorney.

Defendant's Attorney

Moore Printing Co. Bay Minette, Ala.

Received in Office

James H. Stuart 1931

Sheriff.

I have executed this Writ

This James H. Stuart 1931

by leaving a copy of the within summons and complaint with

Ben Chiles and

James H. Stuart

and Mod a rooster

license No A-66-292

TO W. R. STUART, SHERIFF OF BALDWIN COUNTY, ALABAMA:-

Peoples Fertilizer Company, the Plaintiff in the within cause, having made Affidavit and given Bond you are hereby commanded to take the property mentioned in the Complaint and endorsed in the Summons into your hands, unless the Defendant gives bond payable to the Plaintiff which sufficient surety in double the amount of the value of the property set out, with condition that if the Defendant is cast in suit he will within thirty days thereafter, deliver the property to the Plaintiff and pay all damages and costs which may accrue from the detention thereof.

J. M. McCremon

Clerk of the Circuit Court,
Baldwin County, Alabama.

STATE OF ALABAMA,
BALDWIN COUNTY.

REPLEVIN BOND OF PLAINTIFF IN DETINUE.

KNOW ALL MEN BY THESE PRESENTS: That the Peoples Fertilizer Company, a Corporation, as Principal and the undersigned, as Sureties, are held and firmly bound unto Ben Chiles, the Defendant in that certain cause now pending in the Circuit Court of Baldwin County, wherein the Peoples Fertilizer Company, a Corporation, is Plaintiff and Ben Chiles is Defendant, in the sum of Dollars (\$300.00) for the payment of which, well and truly to be made, we bind ourselves, our heirs, executors, successors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated this 17th day of June, 1931.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That where as, the above named Peoples Fertilizer Company, a Corporation, as Plaintiff, commenced an action of detinue against the said Ben Chiles, as Defendant, by having a writ of detinue issued from the Circuit Court of Baldwin County, Alabama, on the 11th day of June, 1931 by which, together with the endorsement thereon, any Sheriff of the State of Alabama was commanded to take into his possession the following described property, to-wit:-

One (1) Ford Roadster, Model A, License No. 66292

which said writ was, on the 11th day of June, 1931 placed in the hands of W. R. Stuart as Sheriff of said County for due execution thereof and which said writ was, by the said W. R. Stuart, Sheriff aforesaid, executed according to its mandate on June 11th, 1931, by taking possession of the following described property, to-wit:-

AND WHEREAS, the said Ben Chiles, Defendant in said suit, has failed and neglected for the expiration of five days from the said, to give Bond and take possession of said property as allowed by law.

NOW, THEREFORE, if the said Peoples Fertilizer Company, a Corporation, shall deliver the above described property to the said Ben Chiles, Defendant in said suit, within thirty days after judgment, together with damages for the detention of said property, and costs of suit in case it shall fail to recover the same in said suit, then in that event this obligation to be void, otherwise to remain in full force and effect.

PEOPLES FERTILIZER COMPANY,
A Corporation,

By W. R. Stuart

SEAL.

SEAL.

SEAL.

Taken and approved this 17 day of June, 1931.

W. R. Stuart
Sheriff of Baldwin County,
Alabama.

By W. R. Stuart S.S.

IN THE CIRCUIT COURT OF	)	PEOPLES FERTILIZER COMPANY,
BALDWIN COUNTY, ALABAMA.		A corporation,
AT LAW.		Plaintiff,
	)	vs
	)	BEN CHILES,
	)	Defendant.

Comes the Defendant in the above entitled cause
 and for answer to the Plaintiff's complaint says that the
 matters alleged therein are untrue.

Attorneys for the Defendant.

John M. Hall

Attorneys for the Defendant.

John M. Hall

Defendant demands a trial
 by jury in the above styled
 cause.