

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

FRANKLIN OSBORNE TILTON and JAMES HUBERT PAGE

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

William E. Robinson and Alphonso P. Robinson, co-partners,
doing business as

W. E. ROBINSON & COMPANY
Witness my hand, this 8th day of

July

1931.

W. E. Robinson

Clerk.

COMPLAINT

VS.

William E. Robinson and
Alphonso P. Robinson, Co-Partners,
doing business as
W. E. ROBINSON & COMPANY.
Plaintiffs.

FRANKLIN OSBORNE TILTON
and
JAMES HUBERT PAGE,
Defendants.

FIRST: The plaintiffs claim of the defendants NINE HUNDRED DOLLARS damages for the conversion by them on, to-wit, the 10th day of March, 1931, of the following chattels:
191 cases of No. 1 canned tomatoes.
300 cases of No. 2. canned tomatoes.
12 cases of No. 6/10 canned tomatoes,
the property of the plaintiffs.

SECOND: The plaintiffs claim of the defendants NINE HUNDRED DOLLARS damages for wrongfully taking the following goods and chattels, the property of the plaintiff, viz:
191 cases of No. 1 canned tomatoes.
300 cases of No. 2 canned tomatoes.
12 cases of No. 6/10 canned tomatoes.

THIRD: The plaintiffs claim of the defendants NINE HUNDRED DOLLARS damages for that the plaintiffs were the owners of 503 cases of canned tomatoes, viz: 191 cases of No. 1 canned tomatoes, 300 cases of No. 2 canned tomatoes, 12 cases of No. 6/10 canned tomatoes, which were by written agreement stored in the warehouse of the Tilton Grocery Company, inc., in the Town of Robertsedale, Alabama, of which grocery company the defendants were at that time officers and in management and control, and which said tomatoes the defendants on, to-wit, the 10th day of March, 1931, unlawfully took and disposed of without the knowledge or consent of plaintiffs, or knowingly permitted same to be done, without accounting to plaintiffs for the proceeds, to their damage as aforesaid.

W. E. Robinson & Co.
Attorneys for Plaintiffs.

RECORDED

Received in office *July* day of

19*31*

Sheriff of *Baldwin* County, Ala.

Executed by serving cop *7*
of the within Summons and Complaint on

James Hubert Page

and

Franklin Osborne Tilton

Defendant

This the *10th* day of *July* 19*31*

W. R. Stuart

Sheriff of *Baldwin* County, Ala.

By *J. B. Wilson*
Deputy Sheriff.

No.

William E. Robinson and
Alphonso P. Robinson, co-
partners, doing business as

W. E. ROBINSON & COMPANY
Plaintiffs.

VS.

FRANKLIN OSBORNE TILTON

and

JAMES HUBERT PAGE
Defendants.

IN CIRCUIT COURT OF BALDWIN COUNTY

Term 19

SUMMONS AND COMPLAINT

Filed in office this *5th* day of

July A. D. 19

W. E. Robinson Clerk.

RICKARBY & COBB Plaintiff's Attorney.

Moore Printing Co. :::: Bay Minette, Ala.

*\$1600 deposited
costs.*

Sept 30th 1930

This is to certify that we have
stored in our Warehouse the following
which is the Property of W.E. Robinson & Co.
until note is paid at Robertdale State
Bank, Robertdale Ala October 31st 1930.
for \$900⁰⁰

200 Cases. # 1 Tomatoes

300 - # 2. - - -

17 - 6/18 Bilton Grains Co Inc

By E.M. Feltus

Pres

By J.H. Page

Secy.

Tipton Grocery Co.

20.

W. E. Robinson & Co.

9-30-30

THE STATE OF ALABAMA } PROBATE COURT
BALDWIN COUNTY }
Filed in office this 13 day of July 1931
and duly recorded in misc Book No. 3
pages 302; and I certify that it is
~~license or privilege tax, paid as required by an Act of~~
~~the Legislature, approved September 14, 1928, and~~
~~it is license or privilege tax, paid as re-~~
~~quired by an Act of the Legislature, approved August~~
~~22, 1928.~~
[Signature]
[Signature]

E. C. Richardson, Atty
Mobile

Rec 15

10am

State of Alabama

Detinue Bond and Affidavit

BALDWIN COUNTY

Know all Men By these Presents, That We,

Peoples Fertilizer Co., a Corp., as principal and the undersigned as Sureties

are held and firmly bound unto

Mrs. Sadie L. Thompson

her heirs, executors and administrators, in the sum of *Fifty a no. 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 *25* day of *February*, A. D. 19*31*

The Condition of the above Obligation is such, That whereas the above bounden *Peoples Fertilizer Co., a Corp.,*

has, on the *25* day of *February*, 19*31*, 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* ~~returnable fourth Monday in~~ *at the next term* 19*31* of said Circuit Court of Baldwin County against the said

Mrs. Sadie L. Thompson, for the recovery of the following described property to-wit: *Four (4) Cows - Star, Laisey, Speed and Red; One Grey Mare about 8 named Prince; One Black Mare about 10 years named Bess; 2 Suroc Jersey Hogs; One One-horse wagon, All farming implements of all kinds*

Now, if the said *Peoples Fertilizer Co., a Corp.,* shall fail in said suit, and shall pay to the said *Mrs. Sadie L. Thompson* the defendant in said writ, all such costs and damages as she 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.

Taken and Approved
February 26th 1931
T. M. Williamson
Clerk

Peoples Fertilizer Co. Corp.
[L. S.]
W. M. Stewart
[L. S.]
J. W. Munn
[L. S.]

State of Alabama

Detinue Affidavit

BALDWIN COUNTY

Personally appeared before me, W. M. Stuart who is known to me and who after being by me first duly and legally sworn, doth depose and ~~Baldwin County, Alabama,~~ day under oath as follows:- That his name is W. M. Stuart, that he is ~~Who, being duly sworn, deposes and says~~ President and Agent of and for the Peoples Fertilizer Company, a Corporation ~~that property sued for in the complaint of~~ ation, and as such is duly authorized to make this Affidavit. That the following described property ~~wiz. to wit:~~ Four Cows--Star, Daisy, Speck and Red; One Gray Mare about 8, named Prince; One Black Mare about ten years, named Jess; Two Bunch Jersey Hogs; One one-horse Wagon; all farming implements of all kind owned by Sadie L. Thompson on February 4th, 1930,

belongs to ~~Peoples Fertilizer company, a corporation~~ the said plaintiff Sworn to and subscribed the 25th day of Feb 1931 before me.

W. M. Stuart Clerk.
W. M. Stuart
Baldwin County, Ala

Alvinie Bond and
J. H. Davis.
Peoples Fertil. Co., a corp,
Pla.
Mrs. Sadie L. Thompson
hegts.
RECORDED
Filed Feb. 26th 1931
J. H. Davis
Clerk -