JOHN P. BEEBE ATTORNEY AT LAW ROBERTSDALE, ALABAMA



January 19th, 1960.

Mrs. Alice J. Duck, Clerk, Circuit Court, Baldwin County, Bay Minette, Alabama.

Re: Matthews Furniture Company vs
H. E. Barganier.

Dear Mrs. Duck:

I enclose Detinue Summons and Complaint in duplicate in the matter of the above named.

The defendant lives on Route One, Robertsdale.

This is in connection with the matter we discussed yes-terday.

Sincerely yours,

The State of Alabama, Baldwin County

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THE STATE OF ALABAMA, BALDWIN COUNTY. Circuit Court, Baldwin County REPLEVY BOND OF PLAINTIFF Taken and approved this-

MOORE FRINTING CO., DAY MINETTE, ALA.

MATTHEWS FURNITURE COMPANY, a corporation, Plaintiff.

IN THE CIRCUIT COURT OF

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BALDWIN COUNTY, ALABAMA

H. E. BARGANIER,

Defendant.

AT LAW

BOND

We, J. R. Matthews,	W. L. Hammond and	
are	bound unto H. E. Barganier, in	
the sum of $\frac{3}{100}$, for the payments	ent of which we, jointly and	
severally bind ourselves, our heirs	, executors and administrators.	
Sealed with our seals and dated this	s the 15th day of January. 1960	٥,

The condition of the above obligation is such that the above bound J. R. Matthews, as President of Matthews Furniture Company, a corporation, the plaintiff, has this day commenced suit in the Circuit Court of Baldwin County, Alabama, against H. E. Barganier, the defendant, for the recovery of the following described property, to-wit: One Hideaway Bed, Two Platform Rockers, One Fiber Rug 9X15, and one Felt Base Rug; and having made affidavit that the said property sued for belongs to the Plaintiff, and entered into bond, has obtained an order requiring the Sheriff of Baldwin County, Alabama, to take the said property sued for into his possession; if the said Plaintiff shall succeed in the said suit, or if it shall fail in said suit and pay the Defendant all such costs and damages he may sustain by the wrongful complaint, then this obligation to be void, otherwise to remain in full force and effect.

S. C. (SEAL)

(SEAL)

(SEAL)

Taken and approved, this the 18 day of January, 1960.

Clerk, Baldwin County, Alabama,

Circuit Court

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4142

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MN 18 1960

EVENING CLERK

MATTHEWS FURNITURE COMPANY, a corporation, Plaintiff, BALDWIN COUNTY, ALABAMA

H. E. BARGANIER, AT LAW

Defendant.

STATE OF ALABAMA

BALDWIN COUNTY

Public in and for said State and County, personally appeared J. R. Matthews, who having been by me duly sworn, deposes and says that he is the President of Matthews Furniture Company, the plaintiff, and that the following property, to-wit: One Hideaway Bed, Two Plat Form Rockers, One Fiber Rug 9X15, and One felt base Rug, for the recovery of which suit was this day instituted in the Circuit Court, Baldwin County, Alabama, is the property of the Plaintiff.

Subscribed and sworn to before me, this the 15 day of January, 1960.

Notary Public

Marchen

no. 4142

FILED

JAN 18 1960

ALICE J. DUCK, CLERK REGISTER

The State of Alabama, No	
)1919	
T A Clariff of the State of Alabama Creations	
To Any Sheriff of the State of Alabama—Greetings:	
You Are Hereby Commanded to Summon H. E. BARGANTER	,
Tou Are Hereby Commanded to Summon	
The state of the s	water state of the
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 MATTHEWS FURNITURE	
COMPANY, a corporation	
Witness my hand this day of	
Telecate herens, Clerk	
COMPLAINT	,
Commercial Control of the Control of	
MATTHEWS FURNITURE COMPANY, H. E. BARGANIER,	
a corporation, Plaintiff VersusDefendant	
COUNT ONE	
The plaintiffclaims of the defendant the following personal property, to-wit:	
One Hideaway Bed, Two Platform Rockers, One Fiber Base Rug 9X15,	
and Onexhelt Base Rug	
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with the value of the hire or use thereof during the detention, to-wit:	
with the value of the hire or use thereof during the detention, to-wit: from January 14th 1957, to 19	
from January 14th 19 57, to 19	

No.4/42	_
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State of Alabama

Baldwin County

CIRCUIT COURT

Mutthews Furniture Co

Plaintiff___

VS.

H-E. Burgineux

Defendant__

Detinue Summons and Complaint

Filed 1-18 , 1960

Ucicef. hluckcherk

Plaintiff's Attorney

Defendant's Attorney

141. Robertsdalella

To the Sheriff of said County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the 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.

Ming functe. Clerk

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Defendant	lives	a

Received in office

1/20 19.60

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I have executed this summons

this 8-17, 19 600

by leaving a copy with

HE Barginear and attaching the Within described

One Fideway bed Two platform Racker and Storing at

Reid Matthews

Sheriff claims___

Iniles at

TAYLOR WILKINS, Sheriff

DEPLY SHERIFF

Printed by Moore Printing Ca.

JOHN P. BEEBE ATTORNEY AT LAW ROBERTSDALE, ALABAMA

January 15th, 1960

Mrs. Alice J. Duck, Clerk, Circuit Court, Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose summon and complaint in duplicate, affidavit and bond in the matter of Matthews Furniture Company, a corporation, vs. H. E. Barganier. (Detinue Suit)

Please file the matter and place in the hands of the Sheriff for service and levy on the personal property listed in the affidavit and bond.

Should the defendant fail to post bond within the time allowed by the statute the plaintiff shall post the second bond and obtain through the Sheriff the property listed.

Yours very truly,