

LUMMUS COTTON GIN COMPANY,
a Corporation,

Plaintiff,

vs

HENRY D. MOORER,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

No. _____

The plaintiff claims of the defendant the following personal property, viz:

Two-80-Saw LUMMUS Automatic Ind. Drive Ball
Brg. Brush Gins, #10172-73.

Two-80-Saw LUMMUS Automatic Big Drum Cleaning Feeders.

Two-80-S LUMMUS Special Metal Gin Hoods.
One-LH Triplex LUMMUS Belted Pump with 48" x 6" Pulleys, but less Tank.

Two-80-Saw LUMMUS Metal Pneumatic Elevator Sections and Chutes.

One-12"x12" Telescope and connection-: 33½ ft.
12" Metal Pipe.

One-12" 90 Degree Metal Elbows: One-12" 45 degree Metal Elbow.

With the value of the hire or use thereof during the detention viz: from to-wit; the first day of July, 1932.

B. F. McNeely
ATTORNEY FOR PLAINTIFF.

Filed July 13th/952
R. R. Keweenaw
Check

Receivd July 13

STATE OF ALABAMA, §
 *
COUNTY OF MOBILE. §

Before me, Ruth Macdonald, a Notary Public in and for said State and County personally appeared C. W. Cogdell, who being sworn deposes and says that he is the agent and representative of the Lummus Cotton Gin Company, a Corporation, and as such makes this affidavit;

That the property sued for in the complaint of Lummus Cotton Gin Company, a corporation, to-wit:

"Two-80-Saw LUMMUS Automatic Ind. Drive Ball Brg.
Brush Gins, #10172-73.

Two-80-Saw LUMMUS Automatic Big Drum Cleaning
Feeders.

Two-80-S LUMMUS Special Metal Gin Hoods.

One-LH Triplex LUMMUS Belted Pump with 48"x6" Pulleys,
but less Tank.

Two-80-Saw LUMMUS Metal Pneumatic Elevator Sections
and Chutes.

One-12"x12" Telescope and connection-:33½ Ft. 12" Met-
al Pipe.

One-12" 90 Degree Metal Elbows: / One-
12" 45 Degree Metal Elbow."

belongs to the plaintiff.

C. W. Cogdell

Sworn to and subscribed before me this 8th day of July, 1932.

Ruth Macdonald
Notary Public, Mobile County, Alabama.

RECORDS

Filed July 13th 1937
J.W. Williams
att

Reference to be made

W. Williams

W. Williams is the only one who has been in the office of the

W. Williams

The State of Alabama,
Baldwin County.

CIRCUIT COURT.

Raymond C. Jones 1923

To any Sheriff of the State of Alabama:

You are hereby commanded to summon Henry D. Moorer

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

LUMMUS COTTON GIN COMPANY, a corporation,

Witness my hand this

13th

day of

July

1923

D. W. Richardson

Clerk.

COMPLAINT

Plaintiff

Versus

Defendant

The plaintiff claims of the defendant the following personal property to-wit:

with the value of the hire or use thereof during the detention, to-wit:

from _____ 192____, to _____

192____

Plaintiff's Attorney.

State of Alabama,
Baldwin County.

Circuit Court

Lammie Cotton Gin
Co

vs. Plaintiffs

Henry D. Moore

Defendants

Detinue Summons and Complaint

Filed July 13th 1922

W. R. Stewart, Clerk.

B. J. McMillan Jr
Plaintiff's Attorney.

Defendant's Attorney.

MOORE PTO CO.

Docket Page 143

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

W. R. Stewart
Clerk.

Executed July 14th 1922
by serving copy of within Summons and Complaint on

H. D. Moore and
taking into my
possession the
property described
 therein W. R. Stewart Sheriff

By W. R. Stewart Deputy Sheriff

Defendant lives at

Received in office

192

Sheriff

I have executed this summons

this 192

by leaving a copy with

SHERIFF.

DEPUTY SHERIFF.

STATE OF ALABAMA, §
*
COUNTY OF MOBILE. §

KNOW ALL MEN BY THESE PRESENTS, That we, LUMMUS COTTON GIN COMPANY, a Corporation, and *United States Fidelity & Surety Co* are held and firmly bound unto Henry D. Moorer in the sum of Two Thousand and 00/100 (\$2,000.00) dollars to be paid to the said Henry D. Moorer, his heirs, executors, administrators or assigns, for which payment well and truly to be made we bind ourselves and each of us, our, and each of our heirs, executors, administrators and successors jointly and severally, firmly by these presents.

Sealed with our seals and dated this *12*th day of July, 1932.

The condition of the above obligation is such that whereas the above bounden Lummus Cotton Gin Company, a Corporation, has on the day of the date hereof obtained at the suit of itself; a summons and complaint for the recovery of personal chattels in specie against Henry D. Moore and asks an endorsement of the clerk of this court "That the Sheriff is required to take the property mentioned in said complaint into his possession" as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court for said County and which endorsement is made upon the plaintiff entering into this bond:

Now if said plaintiff shall fail in this suit and shall pay defendant all the costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

LUMMUS COTTON GIN COMPANY, (SEAL)

By *OTW McCord*

United States Fidelity & Surety Company, a corp. (SEAL)

By *Cornelia Hall, its Agent.*

*Taken & approved
this 13th day of
July 1932*

*D. W. Richardson
Clerk Circuit Court
Baldwin Co Ala.*



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[illegible]

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STATE OF ALABAMA, |
 *
COUNTY OF BALDWIN. |

KNOW ALL MEN BY THESE PRESENTS, That we, Lummus Cotton Gin Company and the United States Fidelity and Guaranty Company are held and firmly bound unto Henry D. Moorner in the sum of Two Thousand and 00/100 (\$2,000.00) dollars, for the payment of which well and truly to be made we bind ourselves, our heirs, executors, administrators and successors firmly by these presents.

Sealed with our seals and dated this 20th day of July, 1932.

The condition of the above obligation is such that Whereas the said Lummus Cotton Gin Company did on to-wit; the 14th day of July, 1932, sue out of the Circuit Court of Baldwin County, a writ of detinue directed to any sheriff of the State of Alabama, commanding him to take into his possession the following property, viz:

Two-80-Saw LUMMUS Automatic Ind. Drive Ball Brg.
Brush Gins, #10172-73.

Two-80-Saw LUMMUS Automatic Big Drum Cleaning Feeders.
Two-80-S LUMMUS Special Metal Gin Hoods.
One-LH Triplex LUMMUS Belted Pump with 48" x 6" Pulleys,
but less Tank.

Two-80-Saw LUMMUS Metal Pneumatic Elevator Sections and
Chutes.

One-12"x12" Telescope and connection-:33½ft. 12 " Metal
pipe.

One-12" 90 Degree Metal Elbows: One 12" 45 degree Metal
Elbow

Which said writ was placed in the hands of W. R. Stewart, Sheriff of Baldwin County, Alabama, on to-wit; July 14th, 1932, and executed by him on to-wit; the same date by taking into his possession the property hereinabove described; and Whereas, the said Henry D. Moorner, defendant, in said writ, has failed and neglected for the space of five days from the execution of said writ to give bond and take possession of said property as authorized by law:

NOW, if the said Lummus Cotton Gin Company shall prevail in said suit or failing therein shall deliver the said property to the defendant within thirty days after judgment and pays such damages for the detention of property and costs as may be adjudged, then this obligation to be void, otherwise to remain in full force and

effect.

LUMMUS COTTON GIN COMPANY

(Seal)

By A. S. Wrenshaw

UNITED STATES FIDELITY & GUARANTY CO., (Seal)

By Cornelia Hall, its Agent

Taken and approved this 20th day of July, 1932

W. R. Stuart
Sheriff

