

41436

THOMAS L. POGUE

Plaintiff

-VS-

WILLIAM E. JACKSON

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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\* \* \* \* \*  
\* \* \* \* \*  
\* \* \* \* \*  
\* \* \* \* \*

Before me, Gordon Davis, a Notary Public in and  
for said County and said State personally appeared Thomas  
L. Pogue, who is known to me and who after being by me first  
duly and legally sworn, deposes and says under oath as follows:  
That property sued for in that certain action wherein he is  
the Plaintiff and William E. Jackson is the Defendant, belongs  
to him the said Plaintiff.

Thomas L. Pogue

Sworn to and subscribed before me  
on this the 22 day of September,  
1960.

Gordon Davis  
Notary Public, Tuscaloosa County  
State of Alabama

AFFIDAVIT

\*\*\*\*\*

THOMAS L. POGUE

Plaintiff

VS

WILLIAM E. JACKSON

Defendant

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE

\*\*\*\*\*

Defendant

WILLIAM E. JACKSON

AT LAW

Plaintiff

THOMAS L. POGUE

BALDWIN COUNTY, ALABAMA  
IN THE CIRCUIT COURT OF

on this the 28 day of September,  
1960, and subscribed before me

State of Alabama  
Notary Public, In and for Baldwin County

*William E. Jackson*  
1960

*Thomas L. Pogue*

6/11/36

**CECIL G. CHASON**

ATTORNEY-AT-LAW

FOLEY, ALABAMA

Sept. 24, 1960

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

Dear Mrs. Duck:

I am enclosing herewith Summons and Complaint,  
Affidavit, and Bond in the case of Thomas Pogue  
vs William E. Jackson.

Jackson's residence is Route 2, Box E, Foley,  
Alabama.

Yours very truly,

  
C. G. Chason

CGC:dc

Encls.

THOMAS L. POGUE

Plaintiff

-vs-

WILLIAM E. JACKSON

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

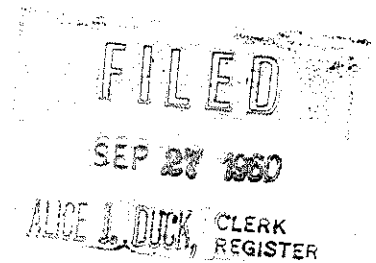
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Before me Arby Rivers a Notary Public in and  
for said County and said State personally appeared Thomas  
L. Pogue, who is known to me and who after being by me first  
duly and legally sworn, deposes and says under oath as follows:  
That property sued for in that certain action wherein he is  
the Plaintiff and William E. Jackson is the Defendant, belongs  
to him the said Plaintiff.

Thomas L. Pogue

Sworn to and subscribed before me  
on this the 22 day of September,  
1960.

Arby Rivers  
Notary Public, Tuscaloosa County  
State of Alabama



AFFIDAVIT

\*\*\*\*\*

THOMAS L. POGUE

Plaintiff

VS

WILLIAM E. JACKSON

Defendant

\*\*\*\*\*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

\*\*\*\*\*

FILED  
SEP 27 1900

ALICE L. DUCK, CLERK  
REGISTER

STATE OF ALABAMA )  
BALDWIN COUNTY ) . . . IN THE CIRCUIT COURT . . LAW SIDE . .

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:-

You are hereby commanded to summon William E. Jackson to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding same, within thirty (30) days from the service of this summons and complaint, then and there to demur to or to plead to the complaint of Thomas L. Pogue.

You are hereby commanded to execute this process instanter and make return as required by law.

WITNESS my hand this 27 day of September, 1960.

Alice J. Duck  
Clerk

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\* COMPLAINT \*

THOMAS L. POGUE	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
vs	)	BALDWIN COUNTY, ALABAMA
WILLIAM E. JACKSON,	)	LAW SIDE
Defendant.	)	

COUNT I

The Plaintiff claims of the Defendant, William E. Jackson, the following described personal property, to-wit:

- ✓ 1 metal tripod
- ✓ 1 Rembrant 5 x 7 portrait camera equipped with lens and Packard shutter
- ✓ 1 flood light reflector
- 3 ~~26~~ 5x7 cut film holders
- 2 ~~4~~ Heiland speed lights
- ✓ 3 light stands
- ✓ 1 camera case

all of a value of Four Hundred Ninety-nine Dollars (\$499.00) with the value of the use thereof, from, to-wit, the 11th day of May, 1960.

W. E. Jackson  
Attorney for Plaintiff

FILED

SEP 27 1960  
C.G.C.

ALICE J. DUCK  
CLERK  
REGISTER

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF SAID COUNTY, GREETINGS:-

The Plaintiff having given Bond and made Affidavit as required by law, you are hereby required to take the property mentioned in the Complaint into your possession, unless the Defendant gives Bond payable to the Plaintiff, with security double the value of the property, conditioned that if the Defendant, William E. Jackson, is cast in the suit, he will, within thirty (30) days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand this the 27 day of September, 1960.

Benjamin H. Newkirk  
Clerk

\*\*\*\*\*  
\*\*\*\*\*

Executed by serving a copy of the within summons and complaint on the Defendant this the \_\_\_\_ day of September, 1960.

\_\_\_\_\_  
Sheriff

Further executed by taking into my possession and storing property described within.

This the \_\_\_\_ day of September, 1960.

\_\_\_\_\_  
Sheriff

4436

SUMMONS AND COMPLAINT

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THOMAS L. POGUE  
Plaintiff,  
vs  
WILLIAM E. JACKSON,  
Defendant

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

\*\*\*\*\*

FILED

SEP 27 1960

ALICE J. DUCK, CLERK  
REGISTER

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

Oct 6, 1960

Executed By Taking his Possession  
and staying by Co. Jail

- 1. Metal Drip
- 1- Rembrandt 6x7 Portrait  
Camera + Equipment with  
lens and Parkers Shutter
- 1- Spotlight reflector
- 3- 15x7 Cut film holder
- 2- Neiland and light
- 1- Camera Case

Taylor Wilkins  
Charles Jackson  
D. J. C.

lived 28 day of Sept 1960  
on 6 day of July 1960  
and a copy of the within  
William E. Jackson  
service on

TAYLOR WILKINS, Sheriff  
By Charles Jackson, D. S.

Executed By Taking his  
Possession the within  
Charles Jackson

D. J. C.

Sheriff claims 72 miles at  
Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff  
BY Deputy Sheriff



STATE OF ALABAMA

BALDWIN COUNTY,

KNOW ALL MEN BY THESE PRESENTS: That we, Thomas L. Pogue, as principals, and Maryland Casualty Company, as surety are held and firmly bound unto William E. Jackson in the sum of One Thousand dollars (\$1000.00), for the payment of which well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors and administrators, successors and assigns, jointly, severally and firmly by these presents.

Sealed with our seals, and dated this, the 14th day of October, A.D. 1960.

The condition of the above obligation is such, that whereas, the said Thomas L. Pogue did, on the 25th day of September A.D. 1960, sue out of the Circuit Court of Baldwin County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding him to take in his possession the following property sued for in said action of detinue, to-wit:

- 1 metal tripod
- 1 Rembrant 5 x 7 portrait camera equipped with lens and Packard shutter
- 1 flood light reflector
- 16 5 x 7 cut film holders
- 4 Heiland speed lights
- 3 light stands
- 1 camera case

which said writ was placed in the hands of Taylor Wilkins, Sheriff of the County of Baldwin on the \_\_\_\_\_ day of September, A.D. 1960, and executed by him on the 6th day of October, A.D. 1960, by taking into his possession a part of the property hereinabove described.

And whereas the said William E. Jackson, defendant in said suit has failed and neglected, for the space of five days from the taking into possession of said property by said Sheriff aforesaid, to give bond and take possession of said property as authorized by law.

Now therefore, if the said Thomas L. Pogue, plaintiff in said suit, shall deliver the above described property to the said William E. Jackson, defendant in said suit, within thirty days after judgment, in case plaintiff shall fail to recover the same in its said suit, and pay all damages for the detention

c.g.c.

of property and costs of suit, then, in that event, this obligation to be void, otherwise to remain in full force and effect.

Thomas L. Boque  
As Principal

MARYLAND CASUALTY COMPANY A  
CORPORATION

BY James H. Fitts, Jr.

James H. Fitts, Jr.  
Attorney-in-Fact  
Power of attorney recorded in  
Bond Book 4, pages 11-12

*Seen & approved 10-15-60*  
*Jay Wilkin*  
*Shuff*

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That We, Thomas L. Pogue, as principal, and Maryland Casualty Company, as surety, are held and firmly bound unto William E. Jackson in the sum of Five Hundred Dollars (\$500.00), to be paid to the said Willaim E. Jackson, his heirs, executors, administrators or assigns; for which payment, well and truly be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals, and dated this \_\_\_\_ day of September, in the year of our Lord, one thousand nine hundred and sixty.

The condition of the above obligation is such, That whereas the above bound Thomas L. Pogue, on the day of the date hereof hath obtained at the suit of Thomas L. Pogue vs William E. Jackson, a summons and complaint for the recovery of personal property in specie against said defendant and asks an endorsement by 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 of Baldwin County for said county, and which said endorsement is made upon the plaintiff entering into this bond.

Now, if the said plaintiff shall fail in this suit, and shall pay the defendant all such 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.

Thomas L. Pogue SEAL  
AS Principal  
MARYLAND CASUALTY COMPANY  
By: J. N. Datta, Jr. SEAL  
AS Surety Attorney-in-Fact

Approved this 27 day of Sept, 1960.

David J. Buck  
Clerk

4436

BOND

\*\*\*\*\*

THOMAS L. POGUE

Plaintiff

VS

WILLIAM EL. JACKSON

Defendant

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE

\*\*\*\*\*

FILED

SEP 27 1900

ALICE J. DUCK, CLERK  
REGISTER

