

GEORGE STOUGH,  
Plaintiff

vs.

THEODORE R. MULLEN,  
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO.

4411

Plaintiff claims of the defendant Two hundred and seventy-five and no/100(\$275.00)Dollars as damages for the conversion by him on the 5th day of March, 1960, of the following chattels:

RCA Whirlpool Air Conditioner  
Model C8100-3  
S. N. 466386

the property of the plaintiff.

*James Owen Jr.*  
Attorney for Plaintiff

FILED

AUG 11 1960

ALICE J. DUCK, CLERK  
REGISTER

Returned 29 day of Aug 1960  
Not found in my county after diligent search and in-  
quiry.

Taylor Wilkins, Sheriff

By Ballert  
Deputy Sheriff

George Stough

VS.

Theodore R. Mullin

PAID  
AUG 30 1960  
ALICE J. DUCK, CLERK

Rec'd 10-11-60  
am to dept 10-11-60  
1 copy Pub  
2- " court  
3- " attachment

The State of Alabama,  
Baldwin County

No. 4411

CIRCUIT COURT

Term, 19\_\_

GEORGE STOUGH

PLAINTIFFS

vs.

THEODORE R. MULLEN

DEFENDANTS

ATTACHMENT

WHEREAS, George Stough

as Plaintiff in said cause, has obtained an Attachment out of this Court, issued the 29  
day of August 19 60, against the estate of the said defendant

Theodore R. Mullen

which Attachment has been levied upon the following described property

as the property of the said defendant, to-wit:

One 40 4400 Series Chevrolet Truck with gasoline  
tank mounted Tag No. 57 1058 N. 4B56#220601

and whereas, it appears that the said Theodore R. Mullen

Defendant as aforesaid is non-resident of the State of Alabama and his last known  
address was Freehold, New Jersey

NOW, THEREFORE, the said Theodore R. Mullen

wherever he may reside is hereby notified of the levy and pendency of said Attachment.

Witness my hand, this 11 day of October, 19 60

Clerk

J. Connor Owens  
Saf For Court Plaintiff 201

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA,**  
**BALDWIN COUNTY.**

**CIRCUIT COURT**

Plaintiffs

vs.

Defendants

**NOTICE TO NON-RESIDENTS**  
**OF ATTACHMENT**

Issued \_\_\_\_\_, 19\_\_\_\_

Clerk.

GEORGE STOUGH, PLAINTIFF

VS

THEODORE R. MULLEN, DEFENDANT

VS

GEORGE P. WOOLF, CLAIMANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the Claimant, George P. Woolf, and files the following affidavit for the purpose of instituting a claim to the property attached in this cause by the Plaintiff:

STATE OF ALABAMA  
BALDWIN COUNTY

Personally appeared before me, Tolbert M. Brantley, a Notary Public in and for said county and state, who being by me first duly sworn, deposes and says that the following described property to-wit:

One 1½ ton, 1957, Chevrolet Truck together with a 975 gallon gasoline tank, Truck motor number 4V56H-020601.

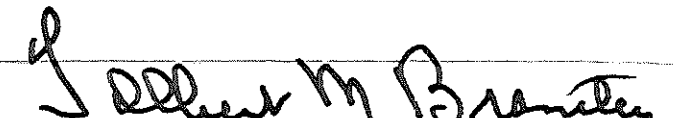
It is not the property of the defendant, but belongs to your Claimant,

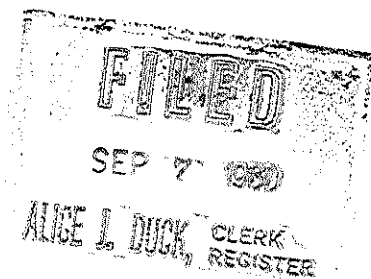
George P. Woolf.

The Claimant says further that the aforesaid property has been attached by the Sheriff of this county at the request of the Plaintiff in this cause. The Claimant further says that he purchased the aforesaid truck from Theodore R. Mullen on the 1st day of January, 1960.

  
George P. Woolf, Claimant

Sworn to and subscribed before me this 7th day of September, 1960.

  
Notary Public, Baldwin County, Alabama



44 11

GEORGE STOUGH, PLAINTIFF

VS

THEODORE R. MULLEN, DEFENDANT

VS

GEORGE P. WOOLF, CLAIMANT

AFFIDAVIT

FILED  
SEP 7 1960  
ALICE J. DUCK, CLERK  
REGISTER

GEORGE STOUGH,  
Plaintiff

vs.

THEODORE R. MULLEN,  
Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

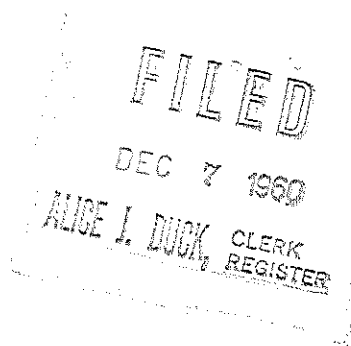
IN LAW NO. \_\_\_\_\_.

Now comes the plaintiff, by his attorney, and for answer to the claim filed by George Wolfe in this matter, says as follows:

1. That he denies the allegations of the claimant's Bill.

2. In further answer, he alleges that if the claimant, George Wolfe, is a holder of a bill of sale for said motor vehicle, then said sale is void as to the plaintiff for want of consideration.

3. For further answer, the plaintiff alleges that no bill of sale from Theodore R. Mullen to any third party is of record in the Office of the Judge of Probate of Baldwin County, Alabama, and that since November, 1959, said motor vehicle was parked and left unattended upon a public parking lot in Bay Minette, Alabama, and said motor vehicle remained so parked until attached by the plaintiff in this cause.



*James Owen, Jr.*  
Attorney for Plaintiff

THE STATE OF ALABAMA,  
Baldwin County.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, George Stough, acting by and through his  
attorney, J. Connor Owens, Jr.

hath complained on oath to me, ALICE J. DUCK, Clerk of Circuit Court of Baldwin County, Ala., that  
Theodore R. Mullen, who resides in Freehold,  
New Jersey

Elton - Adelphe Rd Rt 3

is justly indebted to the Plaintiff George Stough

in the sum of Two hundred and seventy-five and no/100 (\$275.00) Dollars, and  
J. Connor Owens, Jr. having made affidavit and given bond  
as required by law, in such cases, you are hereby commanded to attach so much of the estate of

Theodore R. Mullen

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so  
attached unless replevied, so to secure, that the same may be liable to futher proceedings thereon to be  
had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said  
within thirty(30)days thereof  
County, ~~on~~ Monday of ~~19~~ 19  
next; when and where you must make known to said Court how you have executed this Writ.

WITNESS, my hand, this 24 day of August 60 A. D., 1960

4400 Series Chev. Truck  
with Gasoline Tank mounted  
Tag No. 5H2-1058  
No. 4B56H020601

Alice J. Duck Clerk.



No. 4411

## ATTACHMENT

*George Stough*

Vs. } ATTACHMENT

*Therese R. Mullen*

Issued *8-29*, 19*46*

Moore Printing Co.

*Attached are 4400 series  
Chw. Truck with gasoline  
Tank mounted tag No. 57  
1058 N. 4 B 56 H 020601  
Truck placed in jail  
yard  
8-29-40*

THE STATE OF ALABAMA }  
Baldwin County }

CIRCUIT COURT AT BAY MINETTE, ALABAMA

Before me, Alice J. Duck, Clerk Circuit Court  
in and for said County, personally appeared J. Connor Owens, Jr., attorney for  
George Stough  
who, being duly sworn, on oath saith that Theodore R. Mullen  
is justly indebted to  
George Stough

in the sum of Two hundred and seventy-five and no/100(275.00) Dollars,  
which said amount is justly due after allowing all just offsets and discounts, and that the said  
Theodore R. Mullen has moved to New Jersey  
and left the State of Alabama, moving all of  
his personal property excepting a Chevrolet truck,  
and does not intend to return

and that this Attachment is not sued out for the purpose of vexing or harassing the Defendant, or other improper motive.

J. Connor Owens, Jr.

Subscribed and sworn to before me this 29 day of August, 1960.

Alice J. Duck

No. _____	Page _____
STATE OF ALABAMA Baldwin County	
CIRCUIT COURT At Bay Minette, Ala.	
TO	
ATTACHMENT BOND AND AFFIDAVIT	
Filed this the _____ day	of _____, 19 _____
Clerk	
Attorney	

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. ....

August TERM, 1960

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Theodore R. Mullen

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Theodore R. Mullen, Defendant

by George Stough

, Plaintiff

Witness my hand this 30 day of August 1960.

Beir French, Clerk