

IN THE BELLEFONTAINE MUNICIPAL COURT

COUNTY OF LOGAN

STATE OF OHIO

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BELLEFONTAINE
MUNICIPAL COURT

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BILLIE ADELE HORNIKEL
1553 7TH STREET
PORTSMOUTH, OH 45662

vs.

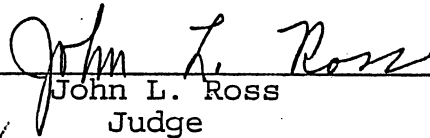
MARY WATKINS & EDWARD LITTLER
220 TERRENCE DRIVE
BELLEFONTAINE, OH 43311

Case No. 00CVF00401

JUDGMENT ENTRY

This matter came on for trial on October 12, 2000. Upon due consideration of the evidence adduced, final judgment is rendered in favor of plaintiff and against both defendants in the amount of \$10,000.00 plus court costs on plaintiff's complaint.

The court finds no credible evidence to support the cross claim (SIC) of defendants, and the same is DISMISSED.



John L. Ross
Judge

Journal No. 310, Page No. 87

(320)

CC - ATTY. KATHRYN C. DOUGHERTY
ATTY. JOHN T. LAWRENCE

IN THE MUNICIPAL COURT OF BELLEFONTANE, OHIO

BILLIE ADELE HORNIKEL
1553 7th Street
Portsmouth, OH 45662
SSN: 302-54-4811
DOB: 05/11/51

CASE NO. 00WF401

Plaintiff

vs.

JUDGE JOHN L. ROSS

MARY WATKINS
220 Terrence Drive
Bellefontaine, OH 43311
SSN: unknown
DOB: unknown

and

EDWARD LITTLER
2395 North Glen Drive
Columbus, OH 43224
SSN: unknown
DOB: unknown

Defendants.

COMPLAINT FOR REPLEVIN
COMPLAINT FOR ILLEGAL
SEIZURE OF PROPERTY

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MARY ADELE HORNIKEL
BELLEFONTANE, OH
MUNICIPAL COURT

1. Defendant, Mary Watkins, has resided in the State of Ohio for at least six (6) months prior to the filing of this Complaint, and has been a resident of the City of Bellefontaine and County of Logan ninety (90) days prior to the Complaint being filed. Additionally, the City of Bellefontaine, County of Logan, is where the defendants conducted the activity which has given rise to this claim for relief.
2. Plaintiff states that she is the owner and is entitled to possession of the following property:

1.	Berkline recliner sofa	(\$650.00)
2.	19 cu. Ft. refrigerator	(\$700.00)
3.	Frigidaire 5 cu. Ft. chest freezer	(\$350.00)
4.	One Indian picture	(\$153.00)
5.	One Southland lawn mower	(\$ 99.00)
6.	One triple oval wall mirror	(\$180.00)
7.	One end table	(\$160.00)
8.	One oval cocktail table	(\$180.00)
9.	One window air conditioner 12000 BTU	(\$510.00)
10.	One Sharp 2 head VCR	(\$139.00)
11.	One Singer 4/6 tester bed	(\$180.00)
12.	Box springs and mattress	(\$340.00)
13.	Two fishing rods	(value unknown)
14.	One tackle box	(value unknown)
15.	Twelve Super Nintendo games	(\$360.00)
16.	Three trash cans	(\$ 40.00)
17.	Gas grill	(\$120.00)
18.	Antique chairs	(\$600.00)
19.	Sewing stool	(\$ 60.00)
20.	Two clocks	(\$ 50.00)
21.	T.V. trays	(\$ 40.00)
22.	Entertainment center	(\$200.00)
23.	Clown figurines	(\$ 50.00)

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PROPERTY OF
 POLICE
 HUNTSVILLE

24.	Ivory carvings from Africa	(value unknown)
25.	Hurricane lamp	(\$ 90.00)
26.	Two lamps	(\$150.00)
27.	Remote control for television	(\$ 50.00)
28.	25" or 27" television	(\$300.00)
29.	All of plaintiff's clothing	(value unknown)
30.	Jewelry	(\$500.00)
31.	130 compact discs	(\$400.00)
32.	Piano stool	(\$ 50.00)
33.	Queen size bed and mattress	(\$500.00)
34.	Curtains, sheers, draperies	(\$300.00)
35.	Picture of footprints in the sand	(\$ 70.00)
36.	Sewing stool	(\$ 50.00)
37.	Shelves	(\$ 50.00)
38.	Hutch	(\$200.00)
39.	Family Bible	(priceless to plaintiff)
40.	Photograph albums	(priceless to plaintiff)
41.	18 speed mountain bicycle	(\$150.00)
42.	Black dresser with mirror	(\$ 50.00)
43.	Washer and dryer	(\$400.00)
44.	Christmas ornaments	(\$150.00)
45.	Bed linens	(value unknown)
46.	Kitchen utensils	(value unknown)

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 COURT REPORTER
 F. L. ...
 ...

47. Left breast prosthesis (\$250.00)

3. The plaintiff entered into a landlord/tenant relationship with Mary Watkins, by an oral month to month tenancy, at 621 Cooper Avenue, Bellefontaine, Ohio 43311, in August 1996.
4. Edward Littler, Defendant, is the owner of the property located at 621 Cooper Avenue, Bellefontaine, Ohio 43311.
5. In consideration for said tenancy, the plaintiff was required to pay \$325.00 per month, plus a security deposit of \$325.00.
6. On or about July 2, 1999, Plaintiff left her residence and returned on or about July 8, 1999. When she returned there was a note on her door requesting that she contact her landlady, Mary Watkins. The note further stated that if she did not do so, her landlady would call the police.
7. On or about July 13, 1999, Defendant, Mary Watkins, changed the locks on the apartment Plaintiff was renting at 621 Cooper Avenue, Bellefontaine, Ohio 43311 with all of Plaintiff's household goods, furnishings, and personal belongings inside, thus wrongfully and illegally retaining possession over Plaintiff's personal property. (Please see the Notice attached hereto and marked as Plaintiff's Exhibit #1).
8. On or about July 16, 1999, Defendants, Mary Watkins and Edward Littler, wrongfully and illegally removed Plaintiff's household goods, furnishings, and personal belongings from her residence at 621 Cooper Avenue, Bellefontaine, Ohio 43311, without her knowledge or consent.

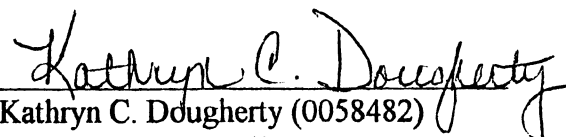
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Bellefontaine, Ohio

9. Defendants did not notify Plaintiff that they wished for Plaintiff to vacate the premises, they did not serve Plaintiff with a Notice to Leave the Premises, and, further, they did not file a Complaint for Forcible Entry and Detainer, all in violation of Ohio Revised Code Sections 1923.04, 1923.05, and 5321.15(B).
10. The Defendants have absolutely refused to return any part of said property listed in paragraph one (1) of this complaint, despite the Plaintiff's individual requests, and that of her legal counsel by regular United States Mail. (letter dated August 27, 1999, a copy of which is attached hereto and marked as Plaintiff's Exhibit #2).

WHEREFORE, Plaintiff demands that this Court issue a Writ of immediate replevin against the Defendants for the property listed in paragraph one (1) that in the alternative, the Plaintiff be awarded the sum of Ten Thousand and 00/100 dollars (\$10,000.00) representing compensation for the lost property; and that the Defendants be ordered to pay the costs of this action together with any and all such other relief as the Court deems just and equitable.

Respectfully submitted,

ALLEN COUNTY-BLACKHOOF AREA
LEGAL SERVICES ASSOCIATION


Kathryn C. Dougherty (0058482)
Attorney for Plaintiff
143 W. Columbus Avenue

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FILED
HASTY COUNTY CLERK
MARIETTA, OHIO

Bellefontaine, OH 43311
Phone: (937) 593-4050

**THIS IS AN ATTEMPT TO COLLECT THE ABOVE
REFERENCED DEBT THAT YOU OWE BILLIE HORNIKEL.
ANY INFORMATION WILL BE USED FOR THAT PURPOSE.**

PARTY CAMPBELL D. ELLIOTT
Bellefontaine, OH 43311
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