

PIONEER FINANCE COMPANY,  
a Corporation,

PLAINTIFF,

VS.

D. J. RACKLEY,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

NO. 786

Comes the defendant in the above entitled cause  
and for answer to each count of the complaint separately  
and severally says:

1. Not guilty.
2. The allegations of the complaint are un-

true.

The defendant agrees and consents that this  
cause may be set for trial by the court at any time here-  
after, without further notice to him.

*Sam T. McRae Sr.*  
\_\_\_\_\_  
ATTORNEY FOR DEFENDANT

STATE OF ALABAMA }  
COUNTY OF BALDWIN }

KNOW ALL MEN BY THESE PRESENTS, that we, Pioneer Finance Company, a Corporation, and Standard Accident Insurance Company are held and firmly bound unto D. J. Rackley in the sum of Three Thousand (\$3,000.00) Dollars, for the payment of which well and truly to be made we, jointly and severally, bind ourselves and each of us, our heirs, executors and administrators.

Sealed with our seals and dated the 23rd day of October, 1942.

The condition of the above obligation is such that whereas the said Pioneer Finance Company, a Corporation, did, on the 16th day of October, 1942, 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, to-wit:

One 1942 Ambassador Model, Chicago Streamlite Trailer, Serial No. 31234-42-1,

which said writ was placed in the hands of Ramsey Stuart, Sheriff of Baldwin County, on the 16th day of October, 1942, and executed by him on the 16th day of October, 1942, by taking into his possession the said property, and, whereas said D. J. Rackley, 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 Pioneer Finance Company, a Corporation, upon its failing in said suit, shall deliver the said property to the defendant within thirty days after judgment, and pay damages for the detention of the property and costs of suit, then this obligation to be void, otherwise to remain in full force and effect.

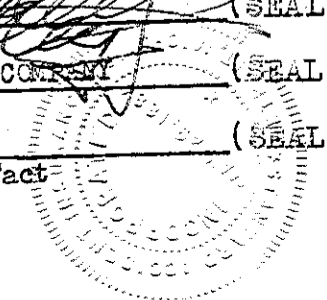
PIONEER FINANCE COMPANY, a Corporation,  
By [Signature] (SEAL)

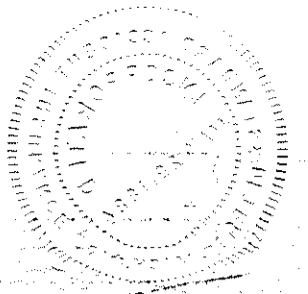
STANDARD ACCIDENT INSURANCE COMPANY (SEAL)

By E. S. Hammett (SEAL)  
Attorney in Fact

Taken and approved this 23rd day of October, 1942.

[Signature]  
SHERIFF.





No. 786

Pioneer Finance Co,  
a Corporation

VS

D. J. Ruckley

Filed Oct 24 1945  
D. J. Ruckley

PIONEER FINANCE COMPANY,  
a Corporation,

PLAINTIFF,

VS.

D. J. RACKLEY,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

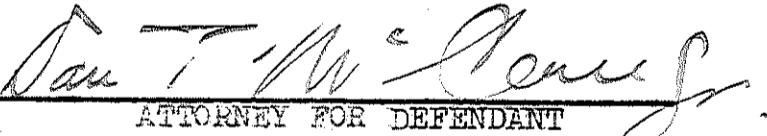
NO. 786

Comes the defendant in the above entitled cause  
and for answer to each count of the complaint separately  
and severally says:

1. Not guilty.
2. The allegations of the complaint are un-

true.

The defendant agrees and consents that this  
cause may be set for trial by the court at any time here-  
after, without further notice to him.

  
ATTORNEY FOR DEFENDANT

PIONEER FINANCE COMPANY,  
a Corporation,

Plaintiff,

Vs.

D. J. RACKLEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

COUNT ONE: Plaintiff claims of Defendant the following personal property, viz: One 1942 Ambassador Model, Chicago Streamlite Trailer, Serial No. 31234-42-1, with the value of the hire or use thereof during the detention from, to-wit, the 20th day of September, 1942.

COUNT TWO: Plaintiff claims of Defendant \$1500.00, damages for the conversion by him on, to-wit, the 20th day of September, 1942, of the following chattels: One 1942 Ambassador Model, Chicago Streamlite Trailer, Serial No. 31234-42-1, the property of the Plaintiff.

  
\_\_\_\_\_  
ATTORNEY FOR PLAINTIFF.

DEFENDANT'S ADDRESS:

The State of Alabama, }

CIRCUIT COURT

-Mobile County-  
BALDWIN COUNTY

To Any Sheriff of the State of Alabama:

You are hereby commanded \_\_\_\_\_ to summon

D. J. Rackley

to appear at the present term of the Circuit Court being held for said County, at the place of holding  
the same, within thirty days from service of this process, then and there to answer the complaint  
of Pioneer Finance Company, a Corporation, Vs. D. J. Rackley

Witness, W. A. Conrad, Clerk of said Court, this \_\_\_\_\_ day of \_\_\_\_\_ October, 19<sup>42</sup>,  
in the year of our Lord, one thousand nine hundred and \_\_\_\_\_ forty-two

Issued the \_\_\_\_\_ day of \_\_\_\_\_ October, 19<sup>42</sup>

Attest: *A. S. Duck*  
By *Alice J. Duck*, C.C. Clerk.

786

Original  
No. 786

CIRCUIT COURT  
MOBILE COUNTY  
DADEPHI COUNTY

VS. { DETINUE  
Complaint and Summons

Issued 16 day of Oct, 1942

The Plaintiff.....  
having made affidavit and given bond, as required by  
Section 7389 of the Revised Code of Alabama, the  
Sheriff is required to take the property mentioned in  
the within complaint into his possession, unless the  
defendant give bond, payable to the plaintiff, with  
sufficient surety in double the amount of the value of  
the property, with conditions that if the defendant  
is cast in the suit, will, within thirty days there-  
after, deliver the property to the plaintiff, and pay  
all costs and damages which may accrue from the de-  
tention thereof.

*B. S. Welch*  
Clerk

Plaintiff's Attorney

Executed by serving a copy of the within summons and complaint  
on D. J. Rackley, the defendant, and by taking into my possession  
the within described property; One 1942 Ambassador Model Chicago  
Streamlite Trailer, Serial No. 51234-42-1,  
This 16th day of October 1942.

Received in Sheriff's Office  
this 16 day of Oct, 1942  
W. R. STUART, Sheriff

W. R. STUART, Sheriff  
BY *A. O. Smith*  
Deputy Sheriff

THE STATE OF ALABAMA,  
Mobile County  
BALDWIN

DETINUE BOND AND AFFIDAVIT.

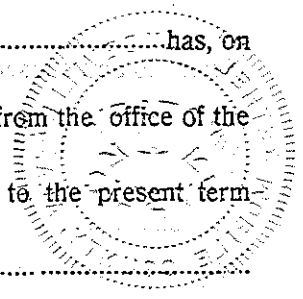
KNOW ALL MEN BY THESE PRESENTS, That We, Pioneer Finance Company,  
a Corporation, of STANDARD ACCIDENT INSURANCE COMPANY

are held and firmly bound unto D. J. Rackley,

his heirs, executors and administrators, in the  
sum of One Thousand Five Hundred and 00/100 Dollars, for  
the payment of which, we bind ourselves, our and each of our heirs, executors, and administrators, jointly and  
severally, firmly by these presents.

Sealed with our seals and dated this October day of October, A. D. 19 42.

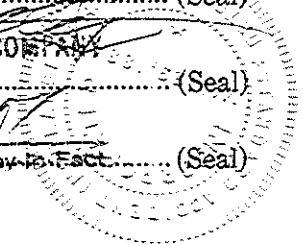
The Condition of the above Obligation is such, That whereas the above bounden Pioneer  
Finance Company, a Corporation, has, on  
the October day of October, 19 42, sued out from the office of the  
Clerk of the Circuit Court of Baldwin  
Baldwin in the State of Alabama, a Writ of Detinue, returnable to the present term  
of said Circuit Court of Baldwin against the said D. J. Rackley



for the recovery of the following property,  
to-wit: One 1942 Ambassador Model, Chicago Streamlite Trailer, Serial  
No. 31234-42-1

NOW, if the said Pioneer Finance Company, a Corporation, shall fail  
in said suit, and shall pay to the said D. J. Rackley  
the defendant in said writ all such costs and damages as he may sustain by the wrongful suing out of said Writ  
of Detinue, then this obligation to be void, otherwise to remain in full force and benefit

PIONEER FINANCE COMPANY, a Corporation,  
By Arthur Rackley (Seal)  
STANDARD ACCIDENT INSURANCE COMPANY (Seal)  
Attorney-in-Fact (Seal)





THE STATE OF ALABAMA,  
Mobile County.

DETINUE AFFIDAVIT.

said County and State

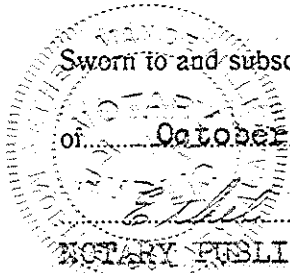
PERSONALLY appeared before me, Ethel Mandeville, a Notary Public in and for  
~~Wm. A. Conrad~~, Clerk of the Circuit Court of Mobile County,

Arthur J. Kearley, Attorney for Pioneer Finance Company, a Corporation

who, being duly sworn, deposes and says, that the property sued for in the complaint of Pioneer Finance  
Company, a Corporation,

to-wit One 1942 Ambassador Model, Chicago Streamlite Trailer, Serial  
No. 31234-42-1

belongs to Pioneer Finance Company, a Corporation, the said Plaintiff.



Sworn to and subscribed the 15<sup>th</sup> day

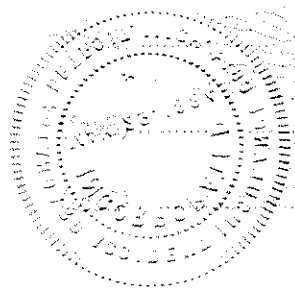
of October 1942, before me.

Ethel Mandeville Clerk  
NOTARY PUBLIC, MOBILE COUNTY, ALA.

*Arthur J. Kearley*

RECORDED

<b>Circuit Court</b> <b>MOBILE COUNTY</b>	No. <u>786</u>	Detinue Affidavit and Bond. VS.	Filed <u>16</u> day of <u>Oct</u> , 19 <u>42</u>	<u>Ethel Mandeville</u> Clerk Circuit Court, Mobile County, <u>Alabama</u> Ala.	Attorney.



ARTHUR J. KEARLEY

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

October 15, 1942

Honorable R. S. Duck, Clerk,  
Circuit Court, Baldwin County,  
Bay Minette, Alabama.

Dear Sir:

Enclosed herewith you will find complaint and summons together with detinue bond in the suit of Pioneer Finance Company, a Corporation, Vs. D. J. Rackley for the recovery of the trailer described therein. Please file this suit and place the summons and complaint in the hands of the Sheriff so that same can be executed right away.

Thanking you for your prompt attention in this, I am

Yours very truly,

  
ARTHUR J. KEARLEY

AJK/em  
Enc.