

DAVID GOLDEN d/b/a NEW DEAL MOTOR COMPANY)

PLAINTIFF

VS

TOM POLK

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, James A. Brice, Notary Public,
~~Alice I. Duck, Clerk of the Circuit Court of~~

Baldwin County, in and for said County personally appeared

David Golden, who, being duly sworn deposeth and
saith, That the property sued for in the complaint of David Golden
d/b/a New Deal Motor Company vs Tom Polk, belongs to David Golden,
d/b/a New Deal Motor Company, the said plaintiff.

David Golden

Sworn to and subscribed before me this 6th day of
September 1961.

James A. Brice
Notary Public

FILED

SEP 9 1961

Alice I. Duck, CLERK
REGISTER

SUMMONS

STATE OF ALABAMA }
COUNTY OF BALDWIN) TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon Tom Polk to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding same, within thirty days from the service of this summons and complaint, then and there to demur or to plead to the complaint of David Golden d/b/a New Deal Motor Company.

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

Witness my hand this 9 day of September 1961.

Allice French
Clerk

DAVID GOLDEN d/b/a NEW DEAL
MOTOR COMPANY,

PLAINTIFF

VS

TOM POLK,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

COMPLAINT

The plaintiff claims of the defendant the following described personal property, to-wit: one 1951 Packard automobile, Motor No. 24627709, 1961 Alabama Tag No. 5-1215, with the value of the use therefrom, to-wit: September 1, 1961.

James A. Davis
Attorney for Plaintiff

Filed in office this 9 day of September 1961.

Reed J. Hunt
Clerk

SHERIFF'S RETURN

Received in office this _____ day of September 1961.

Sheriff

Executed by serving a copy of the within summons and complaint on defendant this 18 day of September 1961.

James A. Davis
Sheriff

Further executed by taking into my possession the property named in the complaint and storing at Mr. Paul M. Co.

_____, this the 18 day of September 1961.

Bond filed by plaintiff, property released. This the _____ day of September 1961.

Sheriff

720.11859

Sheriff claims 86 miles at

Ten Cents per mile Total \$ 8.60

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

Received 11 day of Sept 1921

and on 18 day of Sept 1921

I served a copy of the within Return

on Tom Palk

By service on

TAYLOR WILKINS, Sheriff

By [Signature]

Borderman

The above property
was taken in possession

and returned at

11/18/21

9-18-21

Barb's [Signature]

Def made bond

9/27/21 by: David

Golden, Ed Adams

Property was released

to P[er]t.

David Golden
d/b/a. New Deal Motors Co

vs.
Tom Palk

Received in office this 11 day of September 1921.

SHERIFF'S RETURN

CLERK

Filed in office this 11 day of September 1921.

see execution, co-wit: September 1, 1921.

No. 34031113, 1921 Wiprens 1st No. 2-13112, with the value of the
personal property, co-wit: one 1921 Ford automobile, motor
the business claims of the defendant and following described

COMPLAINT

DEFENDANT

TOM BOLT

AS

WITNESSES

MOTOR COMPANY,
DAVID GOLDEN d/b/a NEW DEAL

RETURN COMEY, WIPRENS
IN THE CIRCUIT COURT OF

BOND

STATE OF ALABAMA)
COUNTY OF BALDWIN)

KNOW ALL MEN BY THESE PRESENTS, That we, David Golden and ~~Tom~~ ^{Ed} Adams, as sureties are held and firmly bound unto Tom Polk in the sum of five hundred ninety (\$590.00) Dollars, 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, jointly, severally and firmly by these presents.

Sealed with our seals, and dated this, the 6th day of October 1961.

The condition of the above obligation is such, that whereas, the said David Golden did, on the 9 day of Sept 1961, sue out of the Circuit Court of Baldwin County, Alabama, 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: one (1) 1951 Packard automobile, Motor No. 24627704, which said writ was placed in the hands of Taylor Wilkins, Sheriff of the County of Baldwin on the 11 day of Sept 1961, and executed by him on the 18 day of Sept 1961, by taking into his possession the following property, to-wit: One (1) 1951 Packard automobile, Motor No. 24627704.

And whereas, the said Tom Polk, defendant in said suit has failed and neglected, for the space of 5 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 David Golden, plaintiff in said suit, shall deliver the above described property to the said Tom Polk, 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 of property and costs of suit, then, in that event, this obligation to be void, otherwise to remain in full force and effect.

APPROVED this 27 day of Sept 1961.

Taylor Wilkins
Sheriff, Baldwin County, Ala.

David Golden

Ed Adams

ORDER TO SHERIFF TO TAKE PROPERTY INTO POSSESSION

STATE OF ALABAMA)
COUNTY OF BALDWIN) To The Sheriff of said County, Greeting:

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 give bond payable to the plaintiff, with security in double the value of the property, conditioned that if the defendant is cast in the suit, he will, within thirty 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 _____ day of September 1961.

Circuit Clerk, Baldwin County, Alabama

Executed by serving a copy of the within summons and complaint on the defendant this _____ day of September 1961.

Sheriff

By _____
Deputy Sheriff

Further executed by taking into my possession and storing at _____ property described within, naming _____ as bailee.

This _____ day of September 1961.

Sheriff

By _____
Deputy Sheriff

The defendant having failed to file bond in the time allowed by law, the plaintiff files a good and sufficient bond and takes possession of the property sued for, on this _____ day of September 1961.

Sheriff

By _____
Deputy Sheriff

DAVID GOLDEN d/b/a NEW DEAL
MOTOR COMPANY,

PLAINTIFF

VS

TOM POLK,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

COMPLAINT

The plaintiff claims of the defendant the following described personal property, to-wit: one 1951 Packard automobile, Motor No. 24627709, 1961 Alabama Tag No. 5-1215, with the value of the use therefrom, to-wit: September 1, 1961.


Attorney for Plaintiff

Filed in office this _____ day of September 1961.

Clerk

SHERIFF'S RETURN

Received in office this _____ day of September 1961.

Sheriff

Executed by serving a copy of the within summons and complaint on defendant this _____ day of September 1961.

Sheriff

Further executed by taking into my possession the property named in the complaint and storing at _____

_____, this the _____ day of September 1961.

Bond filed by plaintiff, property released. This the _____ day of September 1961.

Sheriff

BOND

STATE OF ALABAMA)
COUNTY OF BALDWIN)

KNOW ALL MEN BY THESE PRESENTS, That we, David Golden as
principal and ED ADAMS

as surety are held and firmly bound unto Tom Polk in the sum of
Five Hundred Ninety and NO/100 (\$590.00) Dollars to be paid to
the said Tom Polk, 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 and admini-
strators, jointly and severally and firmly by these presents.

Sealed with our seals, and dated this 6th day of September,
1961.

The condition of the above obligation is such, that whereas,
the above bound David Golden has commenced suit in the Circuit
Court of Baldwin County, by summons and complaint returnable to the
next term of Court, to recover of said Tom Polk one 1951 Packard
automobile, Motor No. 24627709, 1961 Alabama Tag No. 5-1215, prop-
erty 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 re-
quired by law in such cases, which summons and complaint are
returnable to the next term of the Circuit Court of Baldwin 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 obliga-
tion to be void, otherwise to remain in full force and effect.

David Golden
Ed Adams

Approved this 9 day of September 1961.

Reece J. Duck
Clerk

SUMMONS

STATE OF ALABAMA)
) TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:
COUNTY OF BALDWIN)

You are hereby commanded to summon Tom Folk to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding same, within thirty days from the service of this summons and complaint, then and there to demur or to plead to the complaint of David Golden d/b/a New Deal Motor Company.

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

Witness my hand this _____ day of September 1961.

Clerk

ORDER TO SHERIFF TO TAKE PROPERTY INTO POSSESSION

STATE OF ALABAMA)

COUNTY OF BALDWIN) To The Sheriff of said County, Greeting:

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 give bond payable to the plaintiff, with security in double the value of the property, conditioned that if the defendant is cast in the suit, he will, within thirty 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 9 day of September 1961.

Reece J. Smith
Circuit Clerk, Baldwin County, Alabama

Executed by serving a copy of the within summons and complaint on the defendant this _____ day of September 1961.

Sheriff

By _____
Deputy Sheriff

Further executed by taking into my possession and storing at _____ property described within, naming _____ as bailee.

This _____ day of September 1961.

Sheriff

By _____
Deputy Sheriff

The defendant having failed to file bond in the time allowed by law, the plaintiff files a good and sufficient bond and takes possession of the property sued for, on this _____ day of September 1961.

Sheriff

By _____
Deputy Sheriff

SUMMONS

STATE OF ALABAMA)
COUNTY OF BALDWIN) TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon Tom Polk to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding same, within thirty days from the service of this summons and complaint, then and there to demur or to plead to the complaint of David Golden d/b/a New Deal Motor Company.

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

Witness my hand this 9 day of September 1961.

Deirdre J. Leuch
Clerk

DAVID GOLDEN d/b/a NEW DEAL
MOTOR COMPANY,

PLAINTIFF

VS

TOM POLK,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

COMPLAINT

The plaintiff claims of the defendant the following described personal property, to-wit: one 1951 Packard automobile, Motor No. 24627709, 1961 Alabama Tag No. 5-1215, with the value of the use therefrom, to-wit: September 1, 1961.

James A. Linn
Attorney for Plaintiff

Filed in office this 4 day of September 1961.

Rich. J. Luch
Clerk

SHERIFF'S RETURN

Received in office this _____ day of September 1961.

Sheriff

Executed by serving a copy of the within summons and complaint on defendant this _____ day of September 1961.

Sheriff

Further executed by taking into my possession the property named in the complaint and storing at _____

_____, this the _____ day of September 1961.

Bond filed by plaintiff, property released. This the _____ day of September 1961.

Sheriff

BOND

STATE OF ALABAMA)
COUNTY OF BALDWIN)

KNOW ALL MEN BY THESE PRESENTS, That we, David Golden as principal and ED ADAMS as surety are held and firmly bound unto Tom Polk in the sum of Five Hundred Ninety and NO/100 (\$590.00) Dollars to be paid to the said Tom Polk, 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 and administrators, jointly and severally and firmly by these presents.

Sealed with our seals, and dated this 6th day of September, 1961.

The condition of the above obligation is such, that whereas, the above bound David Golden has commenced suit in the Circuit Court of Baldwin County, by summons and complaint returnable to the next term of Court, to recover of said Tom Polk one 1951 Packard automobile, Motor No. 24627709, 1961 Alabama Tag No. 5-1215, 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, 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.

David Golden

E. Adams

Approved this _____ day of September 1961.

Clerk

ORDER TO SHERIFF TO TAKE PROPERTY INTO POSSESSION

STATE OF ALABAMA)
COUNTY OF BALDWIN) To The Sheriff of said County, Greeting:

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 give bond payable to the plaintiff, with security in double the value of the property, conditioned that if the defendant is cast in the suit, he will, within thirty 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 9 day of September 1961.

Richard H. Smith
Circuit Clerk, Baldwin County, Alabama

Executed by serving a copy of the within summons and complaint on the defendant this 18 day of September 1961.

Thomas Wilkins
Sheriff
By *Charles D. [unclear]*
Deputy Sheriff

Further executed by taking into my possession and storing at *Ward's Motor Co* property described within, naming *Ward's Garage* as bailee.

This 18 day of September 1961.

Thomas Wilkins
Sheriff
By *Charles D. [unclear]*
Deputy Sheriff

The defendant having failed to file bond in the time allowed by law, the plaintiff files a good and sufficient bond and takes possession of the property sued for, on this ____ day of September 1961.

Sheriff
By _____
Deputy Sheriff

DAVID GOLDEN d/b/a NEW DEAL MOTOR COMPANY)

PLAINTIFF

VS

TOM POLK

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

James A. Brice, Notary Public,

Before me, ~~Alice J. Duck, Clerk of the Circuit Court of~~

Baldwin County, in and for said County personally appeared

_____, who, being duly sworn deposeth and

saith, That the property sued for in the complaint of David Golden
d/b/a New Deal Motor Company vs Tom Polk, belongs to David Golden,
d/b/a New Deal Motor Company, the said plaintiff.

David Golden

Sworn to and subscribed before me this 6th day of
September 1961.

James A. Brice
Clerk Notary Public

DAVID GOLDEN d/b/a NEW DEAL MOTOR COMPANY)

PLAINTIFF

VS

TOM POLK

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, James A. Brice, Notary Public
~~Alice J. Duck, Clerk of the Circuit Court of~~
Baldwin County, in and for said County personally appeared
_____, who, being duly sworn deposeth and
saith, That the property sued for in the complaint of David Golden
d/b/a New Deal Motor Company vs Tom Polk, belongs to David Golden,
d/b/a New Deal Motor Company, the said plaintiff.

David Golden

Sworn to and subscribed before me this 6th day of
September 1961.

James A. Brice
Notary Public