

GENERAL MOTORS ACCEPTANCE CORPO-)
RATION, a Corporation,)
Plaintiff,)
Vs.)
EDWARD U. JOHNSON,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

NO. 9881

COUNT ONE: Plaintiff claims of Defendant the following personal property, viz: One (1) 1960 Model Chevrolet 2-Door Biscayne Automobile, Serial No. 01111A124962, with the value of the hire or use thereof during the detention from, to-wit, the 21st day of August, 1961.

COUNT TWO: Plaintiff claims of Defendant Nine Hundred Five and 06/100 (\$905.06) Dollars, damages for the conversion by him on, to-wit, the 21st day of August, 1961, of the following chattel: One (1) 1960 Model Chevrolet 2-Door Biscayne Automobile, Serial No. 01111A124962, the property of the Plaintiff.

CHASON & STONE

By *John Chason*

and

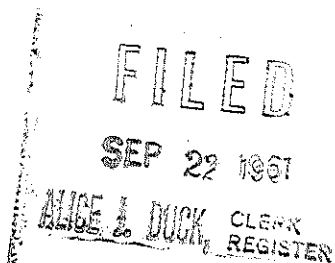
KEARLEY & McCONNELL

By *Alvin McConnell*

Attorneys for Plaintiff

DEFENDANT'S ADDRESS:

Route #1, Box 235B
Fairhope, Alabama



TO THE SHERIFF OF SAID COUNTY:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

GENERAL MOTORS ACCEPTANCE CORPORATION, a Corporation,

Plaintiff,

vs.

EDWARD U. JOHNSON,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

Alice J. Duck, Clerk

FILED
SEP 22 1961
ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

Received 22 day of Sept 1961
and on 23 day of Sept 1961
I served a copy of the within Defence
on Edward U. Johnson

By service on Edward U. Johnson
And taking one 1960 Chev. in my possession
TAYLOR WILKINS, Sheriff
By W. O. Garner D. S.

I suppose
And on 29 Sept 1961 the plaintiff Jimmy Bond car stored at *Chump Chev. Co.* I hope bond secured by Gen. Motors Acceptance Corp. J. M. Eastman, Nat'l Surety Corp - Donald C. Ludlow. Property released to *Plg.*

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY W. O. Garner
DEPUTY SHERIFF

221

THE STATE OF ALABAMA,
~~Mobile~~ County
Baldwin

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We ~~General Motors Acceptance~~
~~Corporation, a Corporation, as Principal, and National Surety Corporation,~~
as Sureties,

are held and firmly bound unto Edward U. Johnson, his

heirs, executors and administrators, in the

sum of Nine Hundred Twenty-Five and 00/100 (\$925.00) - - - 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 22nd day of September, A. D. 1961

The Condition of the above Obligation is such, That whereas the above bounden General Motors
Acceptance Corporation, a Corporation, has, on

the 22nd day of September 1961, sued out from the office of the

Baldwin County,

Clerk of the Circuit Court of ~~Mobile~~ in the State of Alabama, a Writ of Detinue, returnable to the present

Baldwin County, Alabama

term of said Circuit Court of ~~Mobile~~ against the said Edward U. Johnson

for the recovery of the following property.

to-wit: One (1) 1960 Model Chevrolet 2-Door Biscayne

Automobile, Serial No. 01111A124962

NOW, if the said General Motors Acceptance Corporation, a Corporation, shall fail

in said suit, and shall pay to the said Edward U. Johnson,

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.

GENERAL MOTORS ACCEPTANCE CORPORATION,
a Corporation

As Principal

By R. W. Murphy

NATIONAL SURETY CORPORATION

As Sureties

By E. S. Jenkins

Attorney in Fact

approved
and **FILED**

SEP 22 1961

ALICE J. DUCK, CLERK
REGISTER

Alice J. Duck

THE STATE OF ALABAMA,
Mobile County

DETINUE AFFIDAVIT

Alabama

PERSONALLY appeared before me, ~~Lee B. McAnally, a Notary Public in~~ of Mobile County, /

~~R. W. Murphy~~ a Representative of General Motors Acceptance
/Corporation, a Corporation,
who, being duly sworn, deposes and says, that the property sued for in the complaint of General Motors

Acceptance Corporation, a Corporation, vs. Edward U. Johnson

to-wit One (1) 1960 Model Chevrolet 2-Door Biscayne

Automobile, Serial No. 01111A124962,

belongs to General Motors Acceptance Corporation, a Corporation, the said Plaintiff.

Sworn to and subscribed the 21st day
of September, 1961 before me.

R. W. Murphy

Lee B. McAnally
Notary Public, Mobile County, Alabama

No. _____

CIRCUIT COURT

MOBILE COUNTY
BALDWIN

VS. } Detinue Affidavit
and Bond

Filed _____ day of _____ 19____

Clerk Circuit Court, ~~Mobile~~ County
Baldwin

Attorney

NATIONAL SURETY CORPORATION

New York

A Member of The FUND Insurance Companies

GENERAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that NATIONAL SURETY CORPORATION, a Corporation duly organized and existing under the laws of the State of New York, and having its principal office in the City of New York, N. Y., hath made, constituted and appointed, and does by these presents make, constitute and appoint B. F. ADAMS, JR. & E. S. JENKINS

JOINTLY OR SEVERALLY

of MOBILE and State of ALABAMA
its true and lawful Attorney(s)-in-Fact, with full power and authority hereby conferred in its name, place and stead, to execute, acknowledge and deliver any and all bonds, recognizances, contracts, agreements of indemnity and other conditional or obligatory undertakings, provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed ONE MILLION (\$1,000,000.00) DOLLARS.

and to bind the Corporation thereby as fully and to the same extent as if such bonds were signed by the President, sealed with the corporate seal of the Corporation and duly attested by its Secretary, hereby ratifying and confirming all that the said Attorney(s)-in-Fact may do in the premises. Said appointment is made under and by authority of the following provisions of the By-laws of NATIONAL SURETY CORPORATION:

"ARTICLE XII. RESIDENT OFFICERS AND ATTORNEYS-IN-FACT.

"Section 1.—The Chairman, President or any Vice-President may from time to time appoint Resident Vice-Presidents, Resident Assistant Secretaries and Attorneys-in-Fact to represent and act for and on behalf of the Corporation and the Chairman, President, or any Vice-President, the Board of Directors or the Executive Committee may at any time suspend or revoke the powers and authority given to any such Resident Vice-President, Resident Assistant Secretary and Attorney-in-Fact, and also remove them from office. (Adopted April 29, 1933. Applies to all powers of attorney executed prior to May 25, 1933).

"Section 1.—The President, Executive Vice-President or any Vice-President may, from time to time, appoint Resident Vice-Presidents, Resident Assistant Secretaries and Attorneys-in-Fact to represent and act for and on behalf of the Corporation and the President, Executive Vice-President or any Vice-President, the Board of Directors or the Executive and Finance Committee may at any time suspend or revoke the powers and authority given to any such Resident Vice-President, Resident Assistant Secretary or Attorney-in-Fact, and also remove any of them from office. (As amended May 25, 1933. Applies to all powers of attorney executed prior to April 27, 1943).

"Section 1.—Appointment.—The President, Executive Vice President or any Vice President may, from time to time, appoint Resident Vice Presidents, Resident Assistant Secretaries and Attorneys-in-Fact to represent and act for and on behalf of the Corporation. (As amended April 27, 1943. Applies to all powers of attorney executed on or after that date).

"Section 4.—Attorneys-in-Fact.—Attorneys-in-Fact may be given full power and authority to execute, acknowledge and deliver for and in the name and on behalf of the Corporation any and all bonds, recognizances, contracts of indemnity and other conditional or obligatory undertakings, and any such instrument executed by any such Attorney-in-Fact shall be as binding upon the Corporation as if signed by the Chairman or the President and sealed and attested by the Secretary. (Adopted April 29, 1933. Applies to all powers of attorney executed prior to May 25, 1933).

"Section 4.—Attorneys-in-Fact.—Attorneys-in-Fact may be given full power and authority to execute, acknowledge and deliver for and in the name and on behalf of the Corporation any and all bonds, recognizances, contracts of indemnity and other conditional or obligatory undertakings, and any such instrument so executed by any such Attorney-in-Fact shall be as binding upon the Corporation as if signed by the President and sealed and attested by the Secretary. (As amended May 25, 1933. Applies to all powers of attorney executed prior to July 30, 1935).

"Section 4.—Attorneys-in-Fact.—Attorneys-in-Fact may be given full power and authority, for and in the name and on behalf of the corporation, to execute, acknowledge and deliver, any and all bonds, recognizances, contracts of indemnity and other conditional or obligatory undertakings, and any and all notices and documents cancelling or terminating the corporation's liability thereunder, and any such instrument so executed by any such Attorney-in-Fact shall be as binding upon the corporation as if signed by the President and sealed and attested by the Secretary. (As amended July 30, 1935. Applies to all powers of attorney executed prior to April 27, 1943).

"Section 4.—Attorneys-in-Fact.—Attorneys-in-Fact may be given full power and authority, for and in the name and on behalf of the Corporation, to execute, acknowledge and deliver, any and all bonds, recognizances, contracts, agreements of indemnity and other conditional or obligatory undertakings, and any and all notices and documents cancelling or terminating the Corporation's liability thereunder, and any such instrument so executed by any such Attorney-in-Fact shall be as binding upon the Corporation as if signed by the President and sealed and attested by the Secretary. (As amended April 27, 1943. Applies to all powers of attorney executed prior to April 28, 1953.)

"Section 4.—Attorneys-in-Fact.—Attorneys-in-Fact may be given full power and authority, for and in the name and on behalf of the Corporation, to execute, acknowledge and deliver, any and all bonds, recognizances, contracts, agreements of indemnity and other conditional or obligatory undertakings, and any and all consents and releases incident thereto, and any and all notices and documents cancelling or terminating the Corporation's liability thereunder, and any such instrument so executed by such Attorney-in-Fact shall be as binding upon the Corporation as if signed by the President and sealed and attested by the Secretary. (As amended April 28, 1953. Applies to all powers of attorney executed on or after that date.)

"Section 7.—Attorneys-in-Fact.—Attorneys-in-Fact are hereby authorized to verify any affidavit required to be attached to bonds, recognizances, contracts of indemnity, or other conditional or obligatory undertakings, and they are also authorized and empowered to certify to a copy of the By-laws of the Corporation or any Article or Section thereof. (Adopted April 29, 1933. Applies to all powers of attorney executed prior to May 25, 1933).

"Section 7.—Attorneys-in-Fact.—Attorneys-in-Fact are hereby authorized to verify any affidavit required to be attached to bonds, recognizances, contracts of indemnity, or other conditional or obligatory undertakings, and they are also authorized and empowered to certify to copies of the By-laws of the corporation or any Article or Section thereof. (As amended May 25, 1933. Applies to all powers of attorney executed prior to April 27, 1943).

"Section 7.—Attorneys-in-Fact—Verifications.—Attorneys-in-Fact are hereby authorized to verify any affidavit required to be attached to bonds, recognizances, contracts, agreements of indemnity, or other conditional or obligatory undertakings, and they are also authorized and empowered to certify to copies of the By-laws of the Corporation or any Article or Section thereof. (As amended April 27, 1943. Applies to all powers of attorney executed prior to June 27, 1944).

"Section 7.—Attorneys-in-Fact—Verifications—Certifications.—Attorneys-in-Fact are hereby authorized to verify, by affidavit or otherwise, the authority to execute bonds, recognizances, contracts, agreements of indemnity, and other conditional or obligatory undertakings; and to certify, by affidavit or otherwise, as to the inspection or examination of assets of the estates, where the fiduciary responsible for such assets is bonded by the Corporation; and they are also authorized and empowered to certify to copies of the By-laws of the Corporation or any Article or Section thereof. (As amended June 27, 1944. Applies to all powers of attorney executed on or after that date).

"ARTICLE VIII. APPOINTMENT AND AUTHORITY OF RESIDENT ASSISTANT SECRETARIES, AND ATTORNEYS-IN-FACT, AND AGENTS TO ACCEPT LEGAL PROCESS AND MAKE APPEARANCES.

Section 30. Appointment. The President, any Vice President, or any other person authorized by the Board of Directors, the Chairman of the Board of Directors, the President or any Vice President, may, from time to time, appoint Resident Assistant Secretaries and Attorneys-in-Fact to represent and act for and on behalf of the Corporation and Agents to accept legal process and make appearances for and on behalf of the Corporation. (Adopted October 25, 1955. Applies to all Powers of Attorney executed on and after that date.)

Section 31. Authority. The authority of such Resident Assistant Secretaries, Attorneys-in-Fact, and Agents shall be as prescribed in the instrument evidencing their appointment, and any such appointment and all authority granted thereby may be revoked at any time by the Board of Directors or by any person empowered to make such appointment. (Adopted October 25, 1955. Applies to all Powers of Attorney executed on and after that date.)

IN WITNESS WHEREOF, NATIONAL SURETY CORPORATION has caused these presents to be signed by its Vice President, attested by its Assistant Secretary, and its corporate seal to be hereto affixed this 11th day of May A.D., 1953

NATIONAL SURETY CORPORATION

(Seal)

By S. G. DRAKE
Vice President

ATTEST: A. N. MacDOUGALL

F. 2014 REV. 1/56

Assistant Secretary

STATE OF NEW YORK,
COUNTY OF NEW YORK,

ss. :

On this 11th day of May A.D., 1953.

before me personally came S. G. DRAKE, to me known, who, being by me duly sworn, did depose and say, that he resides in the City of New York; that he is Vice President of NATIONAL SURETY CORPORATION, the Corporation described in and which executed the above instrument; that he knows the seal of said Corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said Corporation and that he signed

his name thereto by like order. And said S. G. DRAKE

further said that he is acquainted with A. N. MacDOUGALL and knows him to be an Assistant Secretary of said Corporation; and that he executed the above instrument.

ELIZABETH C. KING

(Notarial seal affixed)

Notary Public

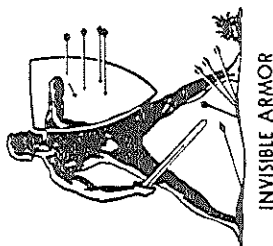
STATE OF GEORGIA
COUNTY OF FULTON

ss. :

I, NELLIE COOK, Resident Assistant Secretary and Attorney-in-Fact of NATIONAL SURETY CORPORATION, do hereby certify that the above and foregoing is a true and correct copy of a Power of Attorney (including applicable By-law sections), executed by said NATIONAL SURETY CORPORATION, which is still in force and effect.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said Corporation, at the City of ATLANTA this 22nd day of September A.D., 1961

Nellie Cook
Resident Assistant Secretary and Attorney-in-Fact



NATIONAL SURETY
CORPORATION
New York

A Member of The FUND Insurance Companies

GENERAL
POWER OF ATTORNEY

—TO—

ON

DATE

F. 2014

19

STATE OF ALABAMA

County of ~~Mobile~~
Baldwin

KNOW ALL MEN BY THESE PRESENTS, That we, General Motors Acceptance Corporation, a Corporation,
as Principal, and National Surety Corporation, as Sureties, are held and firmly bound
unto Edward U. Johnson

in the sum of One Thousand Eight Hundred and 00/100 (\$1,800.00) 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 this 29th day
of September in the year of our Lord, one thousand, nine hundred and sixty-one.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said General Motors Acceptance Corporation, a Corporation,
did, on the 22nd day of September, (1) 61, sue out in the Circuit Court
of ~~Mobile~~ Baldwin County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, commanding him
to take into his possession the following described property, to-wit:

One (1) 1960 Model Chevrolet 2-Door Biscayne
Automobile, Serial No. 01111A124962,

which said writ was placed in the hands of Taylor Wilkins
Baldwin and executed by him on the 23rd day of September, 1961
Sheriff of the County of ~~Mobile~~, on the 22nd day of September, 19 61, by taking into his
possession the following described property, to-wit:

One (1) 1960 Model Chevrolet 2-Door Biscayne
Automobile, Serial No. 01111A124962,

and whereas the said Edward U. Johnson,
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~~ if the said General Motors Acceptance Corporation, a Corporation,

its
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.

GENERAL MOTORS ACCEPTANCE CORPORATION
a Corporation, ~~XXXX~~
By Jm Eastlund AS Principal ~~XXXX~~
NATIONAL SURETY CORPORATION ~~XXXX~~
As Sureties ~~XXXX~~

Taken and approved this the 29th day of September, 19 61

Taylor Wilkins
Sheriff, ~~Mobile~~ Baldwin County, Alabama

No. _____

COURT

MOBILE COUNTY

VS.

{ Detinue Forthcoming
Bond by Plaintiff



NATIONAL SURETY CORPORATION
A Member of The FUND Insurance Companies

GENERAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that NATIONAL SURETY CORPORATION, a Corporation duly organized and existing under the laws of the State of New York, and having its principal office in the City of New York, New York, and its home office in the City and County of San Francisco, California, (hereinafter called the Corporation), has made, constituted and appointed, and does by these presents make, constitute and appoint

DONALD E. LUDLOW

of MOBILE and State of ALABAMA its true and lawful Attorney(s)-in-Fact, with full power and authority hereby conferred in its name, place and stead, to execute, seal, acknowledge and deliver any and all bonds, recognizances, contracts, agreements of indemnity and other conditional or obligatory undertakings; provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed Five Hundred Thousand (\$500,000.00) Dollars

and to bind the Corporation thereby as fully and to the same extent as if such bonds were signed by the President, sealed with the corporate seal of the Corporation and duly attested by its Secretary, hereby ratifying and confirming all that the said Attorney(s)-in-Fact may do in the premises.

IN WITNESS WHEREOF, NATIONAL SURETY CORPORATION has caused these presents to be signed by its Vice President, attested by its Assistant Secretary, and its corporate seal to be hereto affixed this 6th day of August A.D., 1959

NATIONAL SURETY CORPORATION

By C. A. KEPPLER Vice President

[Seal]

ATTEST: H. L. JOHNSON Assistant Secretary

STATE OF NEW YORK COUNTY OF NEW YORK ss.:

On this 6th day of August A.D., 1959, before me personally came C. A. KEPPLER to me known, who, being by me duly sworn, did depose and say, that he is Vice President of NATIONAL SURETY CORPORATION, the Corporation described in and which executed the above instrument; that he knows the seal of said Corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said Corporation and that he signed his name thereto by like order. And said C. A. KEPPLER further said that he is acquainted with H. L. JOHNSON and knows him to be an Assistant Secretary of said Corporation; and that he executed the above instrument.

ELIZABETH C. KING Notary Public

STATE OF NEW YORK COUNTY OF NEW YORK ss.:

I, H. L. JOHNSON, Assistant Secretary of NATIONAL SURETY CORPORATION, do hereby certify that the following is a full, true and correct copy of Article VIII of the By-laws of the NATIONAL SURETY CORPORATION adopted on the 25th day of October, 1955, and now in full force and effect, to wit:

ARTICLE VIII Appointment and Authority of Resident Assistant Secretaries, and Attorneys-in-Fact and Agents to Accept Legal Process and Make Appearances.

"SECTION 30. APPOINTMENT. The President, any Vice President or any other person authorized by the Board of Directors, the Chairman of the Board of Directors, the President or any Vice President, may, from time to time, appoint Resident Assistant Secretaries and Attorneys-in-Fact to represent and act for and on behalf of the Corporation and Agents to accept legal process and make appearances for and on behalf of the Corporation.

"SECTION 31. AUTHORITY. The authority of such Resident Assistant Secretaries, Attorneys-in-Fact, and Agents shall be as prescribed in the instrument evidencing their appointment, and any such appointment and all authority granted thereby may be revoked at any time by the Board of Directors or by any person empowered to make such appointment."

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of NATIONAL SURETY CORPORATION, this 6th day of August, 1959

H. L. JOHNSON Assistant Secretary of NATIONAL SURETY CORPORATION

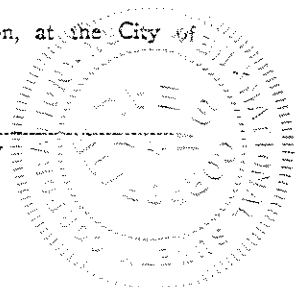
[Corporate Seal]

STATE OF GEORGIA COUNTY OF FULTON ss.:

I, NELLIE COOK, Resident Assistant Secretary of NATIONAL SURETY CORPORATION, a corporation of the State of New York, do hereby certify that the above and foregoing is a full, true and correct copy of the original power of attorney issued by said Corporation and that I have compared same with the original and that it is a correct transcript therefrom and of the whole of the original. Said power of attorney is in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said Corporation, at the City of ATLANTA, this 29 day of September 1961

Nellie Cook Resident Assistant Secretary



GENERAL MOTORS ACCEPTANCE CORPO- IN THE CIRCUIT COURT
RATION, a Corporation, OF
 Plaintiff. BALDWIN
VS. /MOBILE COUNTY, ALABAMA.
EDWARD U. JOHNSON, NO. _____

Defendant.

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA
COUNTY OF MOBILE

NOW comes, John T. Bailey, Assistant Manager, General Motors
Acceptance Corporation, a Corporation,
/who being first duly sworn, deposes and says that the defendant
herein, Edward U. Johnson,
was not at the time of the filing of this suit, and is not now
in the Military or Naval Service of the United States.

The Defendant resides at Route #1, Box 235B,
Fairhope, Alabama.
_____.

Sworn to and subscribed before me,
this 23rd day of October

1961

Lee B. McAnally
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

FILED _____

CLERK

FILED

OCT 25 1961

ALICE J. DUCK, CLERK
REGISTER

GENERAL MOTORS ACCEPTANCE
CORPORATION, A CORPORATION,

Plaintiff,

vs.

EDWARD U. JOHNSON,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4881

Comes the Plaintiff in the above styled cause, acting by and through John Chason as one of its attorneys of record, and moves the Court to grant a judgment by default in said cause and shows unto the Court as follows:

1. That a copy of the Summons and Complaint in said cause was served by the Sheriff of Baldwin County, Alabama, on the Defendant in said cause on September 23, 1961, and the Writ of Detinue was executed on said date.

2. That the Defendant failed to give bond for the property sued for after it was seized by the Sheriff, within five days from the date of such seizure and the Plaintiff gave bond with sufficient surety, which bond was approved by the Sheriff of Baldwin County, Alabama, on September 29, 1961, and the property sued for was delivered to the Plaintiff.

3. That more than thirty days have elapsed since service of the Summons and Complaint was had on the Defendant and he has failed to plead, answer or demur to said complaint within the time allowed him by law.

WHEREFORE, the Plaintiff moves that a judgment by default be rendered in favor of the Plaintiff and against the Defendant for the property sued for in its complaint and that the cost be taxed against the Defendant.

FILED

OCT 25 1961

ALICE J. DUEK, CLERK
REGISTER

Chason & Stone
Attorneys for Plaintiff

ABC COMPOUNDING COMPANY, INC.,
a corporation,

Plaintiff

) IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
)

vs:

ANDREW J. HOOVER, individually
and d/b/a HOOVER JANITORIAL
SUPPLIES,

Defendant.

CASE NO. 4881

COUNT ONE

Plaintiff claims of the Defendant \$73.73, due from him
on account since to-wit, March 5, 1959, which sum of money , with
the interest thereon, is still due and unpaid.

COUNT TWO

Plaintiff claims of the Defendant the sum of \$73.73, due from
him by account stated by and between Plaintiff and Defendant on,
to-wit, March 5, 1959, which sum of money , with the interest thereon,
is still due and unpaid.

B. F. A. Robert III
ATTORNEY FOR PLAINTIFF

Serve the Defendant at:
Foley, Alabama

Box 293
Mobile, Ala.

FILED

SEP 22 1961

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA

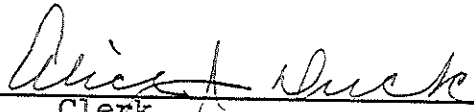
IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO: ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Edward U. Johnson to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of General Motors Acceptance Corporation, a corporation.

Witness my hand this the 22 day of September, 1961.


Clerk