

FORD MOTOR CREDIT COMPANY,
a corporation,

Plaintiff,

VS.

LESLIE BRYARS,

Defendant.

*

IN THE CIRCUIT COURT OF

*

BALDWIN COUNTY, ALABAMA.

*

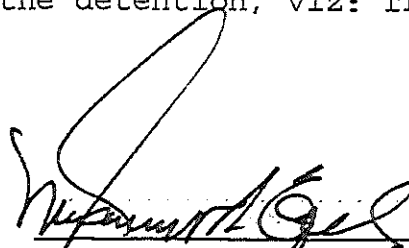
AT LAW.

*

CASE NO.

5998

The Plaintiff claims of the defendant the following
personal property, viz: One (1) 1963 Ford F-600 truck with
pulpwood frame, tandem wheels, (6-825 x 20 tires, 5 speed trans-
mission, 2 speed axel) Serial No. F 60 DK 342745, with the value
of the hire or use thereof during the detention, viz: from the
5th day of February, 1964.


MYLAN R. ENGEL
Attorney for Plaintiff
610 Van Antwerp Building
Mobile, Alabama

Defendant's address:

P. O. Box 246
Perdido, Alabama

FILED

MAR 31 1964

ALICE L. DUCK, CLERK
REGISTER

The State of Alabama, }
Baldwin County

No. 5998

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Leslie Bryars

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 the same, then and there to answer the complaint of

Ford Motor Credit Company, a Corp.

Witness my hand this 31st day of March, 1964

Alice J. Duck, Clerk

COMPLAINT

Plaintiff Versus Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

with the value of the hire or use thereof during the detention, to-wit:

from 19, to 19

Plaintiff's Attorney.

State of Alabama

Baldwin County

CIRCUIT COURT

FORD MOTOR CREDIT COMPANY, A CORP.

Plaintiff

VS.

LESLIE BRYARS

Defendant

Detinue Summons and Complaint

Filed March 31, 1964

Alice J. Duck, Clerk

Mylan R. Engel

Plaintiff's Attorney

Defendant's Attorney

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.

Alice J. Duck, Clerk

Defendant lives at

Perdido, Ala

Received in office

I have executed this summons

this 31st March, 1964
by leaving a copy with

Leslie Bryars

1-1963 Ford F600

Wreck tag 45# 2264

Ala. 64 Serial# F600K342745

Property stored at Jail
Pdy. made bond
4/6/64 By Ford Motor
Credit Co. Maryland
Casualty Co. Property
released to Pdy.

Taylor Wilkins, Sheriff

J. M. Eastman, Deputy Sheriff

Perdido, Ala
Printed by Moore Printing Co.

MEMORANDUM

DATE _____

From the Office of

MYLAN R. ENGEL
Attorney at Law

Delivered to Mrs. Alice J.
Duck, clerk of Circuit
Court. 2nd Floor Baldwin
County Court House.

STATE OF ALABAMA

County of ~~Mobile~~ Baldwin

Ford Motor Credit Company, a corporation

KNOW ALL MEN BY THESE PRESENTS, That we, Maryland Casualty Company
as Principal, and ~~XXX~~, as Sureties, are held and firmly bound
unto Leslie Bryars

in the sum of Four Thousand and No/100 (\$4,000.00) 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 this _____ day
of _____ in the year of our Lord, one thousand, nine hundred and sixty-four

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said
Ford Motor Credit Company, a corporation

did, on the 31 day of March, (1) 964, sue out in the Circuit Court
of 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) 1963 Ford F-600
truck with pulpwood frame, tandem wheels, (6-825 x 20 tires, 5
speed transmission, 2 speed axel) Serial No. F 60 DK 342745

which said writ was placed in the hands of Baldwin
Sheriff of the County of Mobile, on the _____ day of _____, 19____, by taking into his
possession the following described property, to-wit:
One (1) 1963 Ford F-600 truck with pulpwood frame, tandem wheels,
(6-825 x 20 tires, 5 speed transmission, 2 speed axel) Serial No.
F 60 DK 342745

and whereas the said Leslie Bryars
defendant in said writ, has failed and neglected, the 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 is the said Ford Motor Credit Company, a corporation

upon his 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.

FORD MOTOR CREDIT COMPANY, a corporation

BY: [Signature] (Seal)
Its Collection Manager
MARYLAND CASUALTY COMPANY (Seal)
BY: [Signature] (Seal)
Its Attorney in Fact

Taken and approved this the 6 day of _____

[Signature] 1964
[Signature]
Sheriff, Mobile County, Alabama
Baldwin

5998

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

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Ford Motor Credit Company,
a corporation, and Maryland Casualty Company

are held and firmly bound unto Leslie Bryars
his heirs, executors and administrators, in the
sum of FOUR THOUSAND AND NO/100 (\$4,000.00) 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 31st day of March, A. D. 19 64

The Condition of the above Obligation is such, That whereas the above bounden

Ford Motor Credit Company, a corporation has, on
the 31 day of March 19 64, sued out from the office of the
Baldwin
Clerk of the Circuit Court of ~~Mobile~~ in the State of Alabama, a Writ of Detinue, returnable to the present
Baldwin
term of said Circuit Court of ~~Mobile~~ against the said Leslie Bryars

for the recovery of the following property.
to-wit One (1) 1963 Ford F-600 truck with pulpwood frame, tandem
wheels, (6-825 x 20 tires, 5 speed transmission, 2 speed
axel) Serial No. F 60 DK 342745

NOW, if the said Ford Motor Credit Company, a corporation shall fail
in said suit, and shall pay to the said Leslie Bryars
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.

FORD MOTOR CREDIT COMPANY, a corporation
BY: [Signature] (Seal)
Its collection manager
MARYLAND CASUALTY COMPANY (Seal)
BY: Hugh F. Finnear (Seal)
Its Attorney in Fact

Approved
3-31-64
Airtight Clerk

THE STATE OF ALABAMA,
BALDWIN ~~MOBILE~~ County

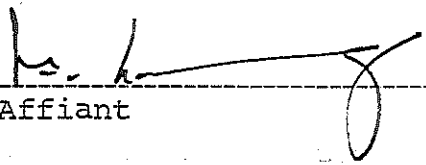
DETINUE AFFIDAVIT

the undersigned Notary Public
PERSONALLY appeared before me, ~~John E. Mendenhall, Clerk of the Circuit Court of Baldwin County,~~

who, being duly sworn deposes and says, that the property sued for in the complaint of
Ford Motor Credit Company, a corporation vs. Leslie Bryars
to-wit: One (1) 1963 Ford F-600 truck with pulpwood frame, tandem
wheels, (6-825 x 20 tires, 5 speed transmission, 2 speed axel)
Serial No. F 60 DK 342745

belongs to Ford Motor Credit Company, a corporation the said Plaintiff.

Sworn to and subscribed the 21st day
of ~~March~~, 1964, before me.


Affiant

Notary Public, State of Alabama at Large
My Commission Expires March 6, 1965

No. _____	CIRCUIT COURT MOBILE COUNTY BALDWIN	FORD MOTOR CREDIT COMPANY, a corporation VS. } Detinue Affidavit and Bond	LESLIE BRYARS	Filed _____ day of _____ 19____	Clerk Circuit Court Mobile County Baldwin	Mylan R. Engel Attorney
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Know all Men by these Presents: That MARYLAND CASUALTY COMPANY, a corporation created by and existing under the laws of the State of Maryland, of Baltimore City, Maryland, in pursuance of the authority set forth in Section 12 of Article V of its By-laws, from which the following is a true extract, and which Section has not been amended nor rescinded:

"The Chairman of the Board and President or any Vice-President may, by written instrument under the attested corporate seal, appoint attorneys-in-fact with authority to execute bonds, policies, recognizances, stipulations, undertakings, or other like instruments on behalf of the Corporation, and may authorize any officer or any such attorney-in-fact to affix the corporate seal thereto; and may with or without cause modify or revoke any such appointment or authority."

does hereby nominate, constitute and appoint J. C. VAN ANTWERP, JR. and HUGH F. TINNEA,
each with full power to act alone,

of MOBILE State of ALABAMA its Attorney -in-Fact
to make, execute, seal, and deliver on its behalf as Surety, and as its act and deed, any and all bonds, recognizances, stipulations, undertakings, and other like instruments, when penalty does not exceed
ONE HUNDRED THOUSAND DOLLARS (\$100,000).

STATE OF ALA. MOBILE CO.
TO CERTIFY THIS INSTRUMENT
WAS FILED ON
JUL 10 8 10 AM '61
RECORDED & INDEXED
DEED TAX HAS BEEN
PAID ON THIS INSTRUMENT.
NOTARY OF PROBATE

Such bonds, recognizances, stipulations, undertakings or other like instruments shall be binding upon said Company as fully and to all intents and purposes as if such instruments had been duly executed and acknowledged and delivered by the authorized officers of the Company, when duly executed by either one of the aforesaid attorneys in fact.

This instrument supersedes power of attorney granted J. C. Van Antwerp, Jr., dated September 1, 1959.

In Witness Whereof, MARYLAND CASUALTY COMPANY has caused these presents to be executed in its name and on its behalf and its Corporate Seal to be hereunto affixed and attested by its officers thereunto duly authorized, this 26th day of May, 1961, at Baltimore City, Maryland.

ATTEST:

MARYLAND CASUALTY COMPANY,

Assistant Secretary.

By

Vice-President.

STATE OF MARYLAND

BALTIMORE CITY

ss.

On this 26th day of May, A. D., 1961, before the subscriber,

a Notary Public of the State of Maryland, in and for Baltimore City, duly commissioned and qualified, come.

Albert H. Walker

Vice-President, and

Rose E. Lutz

Assistant

Secretary, of MARYLAND CASUALTY COMPANY, to me personally known, and known to be the officers described in, and who executed the preceding instrument; and they each acknowledged the execution of the same; and, being by me duly sworn, they severally and each for himself deposed and said that they respectively hold the offices in said Corporation as indicated, that the Seal affixed to the preceding instrument is the Corporate Seal of said Corporation, and that the said Corporate Seal, and their signatures as such officers, were duly affixed and subscribed to the said instrument pursuant to all due corporate authorization.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal, at Baltimore City, the day and year first above written.

Notary Public.

My commission expires May 6, 1963