

GIBBONS & STOKES

ATTORNEYS AT LAW
308-309 VAN ANTWERP BUILDING
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

September 9, 1964

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

Mrs. Alice J. Duck, Clerk
Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

Re: Commercial Credit Corporation vs. William H. Courtney, Case No. 6027

Dear Mrs. Duck:

The above is a detinue suit wherein we have not been able to obtain service of process upon the defendant. Accordingly, I request that you enter a non-suit upon the motion of the plaintiff, and forward to me your bill of costs.

Sincerely yours,


B. F. Stokes, III

BFS:m

Detinue Summons and Complaint

Printed by Moore Ptg. Co.

The State of Alabama, }
Baldwin County

CIRCUIT COURT

No. 6027

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon William H. Courtney

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
Commercial Credit Corporation

Witness my hand this 15 day of April 1961

Reese J. Black, Clerk

COMPLAINT

COMMERCIAL CREDIT CORPORATION,) IN THE CIRCUIT COURT OF
Plaintiff)
vs.) BALDWIN COUNTY, ALABAMA.
WILLIAM H. COURTNEY,)
Defendant.) CASE NO. 6027

Plaintiff claims of the defendant the following personal
property, viz:

1963 Ford Fairlane Hardtop automobile
SN 3F47F203854

1963 Oldsmobile 88 automobile, SN 632A02355

with the value of the hire or use thereof during the detention,

viz: from, to-wit, December 13, 1963.

B. F. W. W. W. W. W.
ATTORNEY FOR PLAINTIFF

Serve the defendant % his place of residence, a house
trailer, General Delivery, Small Farms, Robertsdale, Alabama
or % Courtney Builders, Foley, Alabama or % Gatlin Lumber Co.,
Foley, Alabama.

FILED

APR 15 1964

ALICE L. DICK, CLERK
REGISTER

No. 6027

Page

State of Alabama

Baldwin County

CIRCUIT COURT

COMMERCIAL CREDIT CORPORATION

Plaintiff

VS.

WILLIAM H. COURTNEY

Defendant

Detinue Summons and Complaint

Filed 4-15-1964

Alice J. Duck

Clerk

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

GIBBONS & STOKES

ATTORNEYS AT LAW
308-309 VAN ANTWERP BUILDING
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III

April 14, 1964

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA, 36601

Mrs. Alice J. Duck
Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

Re: Commercial Credit Corporation vs. William H. Courtney

Dear Mrs. Duck:

The above is a detinue suit and I enclose a complaint together with a detinue bond and affidavit. You will recall that we discussed this matter by phone today. I would appreciate it if you would docket this case and forward the same to the sheriff as soon as possible, in order that my client may secure possession of these vehicles.

Sincerely yours,


B. F. Stokes, III

BFS:j

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

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, COMMERCIAL CREDIT CORPORATION
as principal and UNITED STATES FIDELITY & GUARANTY CO., as
surety

are held and firmly bound unto WILLIAM H. COURTNEY

his

heirs, executors and administrators, in the

sum of \$9,600.00

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 14th day of April, A. D. 1964

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

COMMERCIAL CREDIT CORPORATION

has, on

the 14th day of April

1964 sued out from the office of the

Clerk of the Circuit Court of Baldwin
~~Mobile~~

in the State of Alabama, a Writ of Detinue, returnable to the present term of said Circuit Court of Mobile against the said WILLIAM H. COURTNEY

for the recovery of the following property.

to-wit: 1963 Ford Fairlane Hardtop automobile SN 3F47F203854

1963 Oldsmobile 88 automobile, SN 632A02355

NOW, if the said COMMERCIAL CREDIT CORPORATION shall fail

in said suit, and shall pay to the said WILLIAM H. COURTNEY

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

COMMERCIAL CREDIT CORPORATION

BY: John H. Pennington (Seal)
UNITED STATES FIDELITY & GUARANTY CO.

BY: J. L. Wells (Seal)

(Seal)

FILED

APR 15 1964

Alice I. Duck, CLERK
 REGISTER
 approved H-15-64
 Alice I. Duck
 clerk

THE STATE OF ALABAMA,
~~XXXXXXXXXXXX~~
BALDWIN COUNTY

DETINUE AFFIDAVIT

NOTARY PUBLIC

PERSONALLY appeared before me, ~~John D. Quinlivan, Clerk of the Court~~ of Mobile County,

JOHN D. QUINLIVAN

who, being duly sworn, deposes and says, that the property sued for in the complaint of

COMMERCIAL CREDIT CORPORATION, plaintiff vs. WILLIAM H. COURTNEY,
Defendant

to-wit

1963 Ford Fairlane Hardtop automobile SN3F47F203854

1963 Oldsmobile 88 automobile, SN 632A02355

belongs to COMMERCIAL CREDIT CORPORATION the said Plaintiff.

Sworn to and subscribed the 14th day
of April, 1964, before me.

~~XXXX~~

NOTARY PUBLIC

Filed 19 day of

Clerk Circuit Court, Mobile County

Attorney

CIRCUIT COURT
MOBILE COUNTY

VS. { Detinue Affidavit
and Bond

COMMERCIAL CREDIT CORPORATION,) IN THE CIRCUIT COURT OF
Plaintiff)
vs.) BALDWIN COUNTY, ALABAMA.
WILLIAM H. COURTNEY,)
Defendant.) CASE NO. 6027

Plaintiff claims of the defendant the following personal
property, viz:

1963 Ford Fairlane Hardtop automobile
SN 3F47F203854

1963 Oldsmobile 88 automobile, SN 632A02355

with the value of the hire or use thereof during the detention,
viz: from, to-wit, December 13, 1963.

B. F. Volmer
ATTORNEY FOR PLAINTIFF

Serve the defendant % his place of residence, a house
trailer, General Delivery, Small Farms, Robertsedale, Alabama
or % Courtney Builders, Foley, Alabama or % Gatlin Lumber Co.,
Foley, Alabama.

FILED

APR 15 1964

ALICE J. DUCK, CLERK
REGISTER

The State of Alabama, }
Baldwin County

No. 6027

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon William H. Courtney

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
Commercial Credit Corporation

Witness my hand this 15 day of April 19 64

Beice J. French, 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

COMMERCIAL CREDIT CORPORATION

Plaintiff

VS.

WILLIAM H. COURTNEY

Defendant

Detinue Summons and Complaint

Filed 4-15-1964

Alice J. Duck, Clerk

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

Returned 30 day of April 1964
Not found in my county after diligent search and inquiry.

By Fred Wilkins, Sheriff
Deputy Sheriff

Defendant lives at

Received in office

4/15, 1964

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

, Sheriff

, Deputy Sheriff