

WINDELL C. OWENS

Attorney At Law

MONROEVILLE, ALABAMA

August 28, 1964

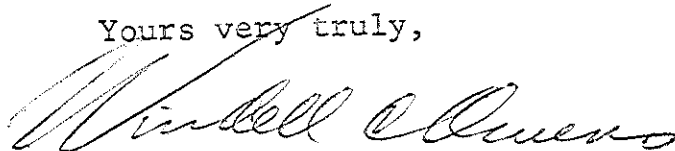
Mrs. Alice Duck
Circuit Clerk
Baldwin County
Bay Minette, Alabama

Re: Michigan National Bank
vs Champion et al

Dear Mrs. Duck:

I am enclosing an appearance which I will appreciate your filing in the above matter. I have arranged with Mr. Tolbert Brantley of Bay Minette to handle this matter and you can enter his name as the attorney of record in this case for the Defendants.

Yours very truly,



Windell C. Owens

WCO/hw

Enclosure

AFFIDAVIT:

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared Kenneth Cooper, attorney for the plaintiff Michigan National Bank of Grand Rapids, Michigan, who by me being first duly sworn deposes and says that the property sued for in the complaint of Michigan National Bank of Grand Rapids, Michigan, Plaintiff vs. Marvin Champion and Mrs. Marvin Champion, Defendants, belongs to the said Michigan National Bank of Grand Rapids, Michigan, the said Plaintiff, by virtue of a Retail Installment Contract entered into the defendants on the 29th day of July, 1963.

Kenneth Cooper

Subscribed and sworn to before me this 12 day of August, 1964.

Alice J. Duck
Clerk, Circuit Court

FILED

AUG 22 1964


Alice J. Duck, CLERK
REGISTER

MICHIGAN NATIONAL BANK OF)	
GRAND RAPIDS, MICHIGAN,)	
)	IN THE CIRCUIT COURT OF
PLAINTIFF,)	
)	BALDWIN COUNTY, ALABAMA
VS.)	
)	AT LAW
MARVIN CHAMPION and)	
MRS. MARVIN CHAMPION,)	
)	Case No. 6145
DEFENDANTS.)	

Now come the Defendants, Marvin Champion and Mrs. Marvin Champion in the above styled cause and demur to the Bill of Complaint heretofore filed in this cause and as grounds for demurrer sets out and assigns the following seperate and several grounds:

1. Said Complaint does not state a cuase of action.

The Defendants request a trial by a jury.


 Attorney for Defendants

FILED

AUG 31 1934

ALICE I. DUCK, CLERK
 REGISTER

The State of Alabama, }
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, MICHIGAN NATIONAL BANK
OF GRAND RAPIDS, MICHIGAN AS PRINCIPAL

and FIDELITY AND DEPOSIT COMPANY OF MARYLAND, AS SURETY

are held and firmly bound unto MARVIN CHAMPION

in the sum of FIVE THOUSAND AND NO/100-----Dollars, for the payment of
 which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and ad-
 ministrators.

Scaled with our seals and dated this 20TH day of AUGUST 19 64

The condition of the above obligation is such that whereas the said MICHIGAN NATIONAL
BANK, GRAND RAPIDS, MICHIGAN did, on the 12TH day
 of AUGUST 19 64 sue out of the CIRCUIT Court of BALDWIN
COUNTY, ALABAMA 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 (1) 1963 CONCORD
TRAILER HOUSE, SERIAL NUMBER 2920

which said writ was placed in the hands of TAYLOR WILKINS,
 Sheriff of Baldwin County, Alabama, on the 12TH day of AUGUST, 19 64,
 and executed by him on the 12TH day of AUGUST, 19 64, by taking into his
 possession the following property, to-wit:
ONE (1) 1963 CONCORD TRAILER HOUSE, SERIAL NUMBER 2920

And whereas the said MARVIN CHAMPION,
 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 MICHIGAN NATIONAL BANK upon his failing
 in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay all
 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.

MICHIGAN NATIONAL BANK
 BY Kenneth Cooper (SEAL)
 ATTORNEY-IN-FACT

FIDELITY & DEPOSIT COMPANY OF MARYLAND (SEAL)
 BY Kathleen L. Loefer (SEAL)
 ATTORNEY-IN-FACT

Taken and approved this 20th day of August 19 64
Taylor Wilkins
 Sheriff, Baldwin County, Ala.

SUMMONS:

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Marvin Champion and Mrs. Marvin Champion, to appear before the Circuit Court of Baldwin County, Alabama in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur to or plead to the complaint of the Michigan National Bank of Grand Rapids, Michigan.

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

Witness my hand this 12 day of August, 1964.

Alice L. Duck
Clerk of Circuit Court

MICHIGAN NATIONAL BANK OF
GRAND RAPIDS, MICHIGAN,

Plaintiff,

vs.

MARVIN CHAMPION and
MRS. MARVIN CHAMPION,

Defendants.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) Case No. 6145

The Plaintiff claims of the Defendant the following described personal property, to-wit: One 1963 Concord Trailerhouse, Serial No. 2920, of the value of Seven Thousand Six Hundred Three and 08/100 (\$7,603.08) Dollars, with the value of the use thereof from, to-wit, May 1st, 1964 to this date, together with a reasonable attorneys fee, court costs and all other items of costs in securing re-possession of said Trailerhouse.

FILED
AUG 12 1964

ALICE L. DUCK, CLERK
REGISTER

Kenneth L. Brown
Attorney For Plaintiff

ORDER TO SHERIFF TO TAKE PROPERTY
INTO POSSESSION

STATE OF ALABAMA

BALDWIN COUNTY

TO THE SHERIFF OF SAID COUNTY, GREETINGS:

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 Defendants give bond payable to the Plaintiff, with security in double the value of the property, conditioned that if the defendants are 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 12 day of August, 1964.

Alice J. Duck
Clerk, Baldwin County Circuit Court.

Executed by serving a copy of the within Summons and Complaint on the defendants this 12 day of August, 1964.

Taylor Wilkins
Sheriff, Baldwin County
By W. A. Jellum, D. A.

Further executed by taking into my possession and storing under my control the property described within.

Sheriff claims 22 miles at
Ten Cents per mile Total \$ 2.20
TAYLOR WILKINS, Sheriff

BY Jellum
DEPUTY SHERIFF

Taylor Wilkins
Sheriff, Baldwin County, Alabama.
By W. A. Jellum, D. A.

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 20 day of Aug, 1964.

Bond signed by
Michigan Nat'l
Bank, Fidelity &
Deposit Co.

Property released
to Ptg. Ex-8-12-64

Taylor Wilkins
Sheriff, Baldwin County, Alabama.

By: _____
Deputy Sheriff

Live Oak Landing

Case No. 6145

received 12 day of Aug 1934
at 12 day of Aug 1934
served a copy of the within W. L. Wilkins
on Martin Champion
Mrs. Martin Champion
by service on _____

TAYLOR WILKINS, Sheriff

By W. L. Wilkins

~~Signature~~
Live Oak Landing

2/3

Martin Champion +
Mrs. Martin Champion

W. L. Wilkins

FILED

AUG 12 1934

ALICE I. DICK CLERK

H. Cooper, Atty.