

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

No. \_\_\_\_\_

19\_\_\_\_

6327

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon BERTHA SIMON

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 \_\_\_\_\_

VIRGINIA M. DAVIS

Witness my hand this 3 day of Dec 1964

George J. Duck, Clerk

COMPLAINT

VIRGINIA M. DAVIS

BERTHA SIMON

Plaintiff

Versus

Defendant

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

Used 1955 Oldsmobile Holiday Fordor Hardtop - Motor No. 5584T9961

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

from MARCH 1964, to DECEMBER 1964

Defendant lives behind  
U.S. Garage on U.S. highway 90  
East of Robertsedale.

WILKERS, BRANTLEY & NESBIT

Plaintiff's Attorney.

DEC 8 1964

GEORGE J. DUCK, CLERK  
REGISTER

**State of Alabama**

Baldwin County

**CIRCUIT COURT**

VIRGINIA M. DAVIS

Plaintiff

VS.

BERTHA SIMON

Defendant

**Detinue Summons and Complaint**

Filed \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Clerk

Walters, Brantley & Nesbit  
Box 555  
Robertsdale, Alabama

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.

*Rebecca A. Smith* Clerk

Defendant lives at  
Behind U.S. Garage on U.S. Highway  
90 East of Robertsdale.

Received in office

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff

STATE OF ALABAMA

BALDWIN

COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

Before me, PHYLLIS S. NESBIT, a Notary Public in and for said County,  
 personally appeared VIRGINIA M. DAVIS who being by me  
 duly sworn deposes and says that the property sued for in the complaint of

VIRGINIA M. DAVIS

filed in said Court, to-wit:

Used 1955 Oldsmobile Holiday Fordor Hard Top, Motor No. 5584T9961

Automobile

belongs to VIRGINIA M. DAVIS, the plaintiff.

Sworn to and subscribed before me this

day of December, 19 64

Phyllis S. Nesbit  
 Notary Public  
 State of Alabama at Large

STATE OF ALABAMA

BALDWIN

COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we,

VIRGINIA M. DAVIS

Principal, and

her  
 firmly bound unto BERTHA SIRMON / his heirs, executors and admin-  
 istrators in the sum of FIVE HUNDRED (\$500.00) Dollars,  
 for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-  
 trators.

Sealed with our seals and dated the \_\_\_\_\_ day of December, 19 64

The condition of the above obligation is such that whereas, the above bound

VIRGINIA M. DAVIS

has on the \_\_\_\_\_ day of

December, 19 64 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said

BERTHA SIRMON

for the recovery of the following  
 described property, to-wit:

Used 1955 Oldsmobile Holiday Fordor Hard Top, Motor No. 5584T9961

Automobile

Now, if the said VIRGINIA M. DAVIS shall fail in said suit

and shall pay to the said BERTHA SIRMON, the defendant in  
 said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to  
 be void, otherwise, to remain in full force and effect.

Taken and approved this \_\_\_\_\_ day of

DECEMBER19 64

Alice J. Duck  
 Clerk, Circuit Court

Virginia M. Davis (SEAL)  
Phyllis S. Nesbit (SEAL)  
 (SEAL)

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

No. \_\_\_\_\_

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon BERTHA SIMON

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 \_\_\_\_\_

VIRGINIA M. DAVIS

Witness my hand this 3 day of Dec 1964

Alice I. Duck, Clerk

COMPLAINT

VIRGINIA M. DAVIS

BERTHA SIMON

Plaintiff

Versus

Defendant

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

Used 1955 Oldsmobile Holiday Fordor Hardtop - Motor No. 5584T9961

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

from MARCH 1964, to DECEMBER 1964

Defendant lives behind  
U.S. Garage on U.S. highway 90  
East of Robertsedale.

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

FILED

DEC 3 1964

ALICE I. DUCK, CLERK  
REGISTER

No. 4327 Page \_\_\_\_\_

**State of Alabama**

Baldwin County

**CIRCUIT COURT**

VIRGINIA M. DAVIS

Plaintiff

VS.

BERTHA SIMON

Defendant

**Detinue Summons and Complaint**

Filed \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Clerk

Winters, Brantley & Nesbit  
Box 555  
Robertsdale, Alabama

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.

Miss J. M. Smith Clerk

Recalled by Plt's  
Atty

Defendant lives at  
Behind U.S. Garage on U.S. Highway  
90 East of Robertsdale

**RECEIVED**  
Received in office

DEC 2 1964

, 19\_\_\_\_

TAYLOR WILKINS

SHERIFF

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff

Printed by Moore Printing Co.

291