

The State of Alabama, }  
Baldwin County

No. 6493

CIRCUIT COURT

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon BILLIE EDWARD WATSON and JACQUELINE F. WATSON, Route 1, Seminole, Alabama.

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 J & R Agency, Inc., a corporation,

Witness my hand this 28 day of April 1965

Alice J. Duck, Clerk

COMPLAINT

J & R AGENCY, INC., BILLIE EDWARD WATSON and  
a corporation, JACQUELINE F. WATSON,  
Plaintiff Versus Defendant

The plaintiff claims of the defendant the following personal property, to-wit:  
One (1) 1953 Magnolia House Trailer, Serial #533793

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

March 15, 1965  
from 19\_\_ to 19\_\_

FILED

APR 28 1965

ALICE J. DUCK, CLERK  
REGISTER

James Owens, Jr. Plaintiff's Attorney.

No. 6493

Page \_\_\_\_\_

## State of Alabama

Baldwin County

## CIRCUIT COURT

J & R AGENCY, INC.,a corporation

Plaintiff

VS.

BILLIE EDWARD WATSON andJACQUELINE F. WATSON

Defendant

## Detinue Summons and Complaint

Filed April **FILED**, 19 65

APR 28 1965

ALICE J. DUCK CLERK  
REGISTERJ. CONNOR OWENS, JR.

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

Route I  
Seminole, Alabama

Received in office

April **APR 28 1965**, 19 65TAYLOR WILKINS

SHERIFF

, Sheriff

I have executed this summons

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

by leaving a copy with

Jacqueline F. Watson b'v  
mm  
10 days on  
Not found in my county after 10 days on  
going.

Taylor Wilkins  
Deputy Sheriff

, Sheriff

, Deputy Sheriff

The State of Alabama, }  
Baldwin County

CIRCUIT COURT  
No. 6493

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon BILLIE EDWARD WATSON and JACQUELINE F. WATSON, Route I, Seminole, Alabama.

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 J & R Agency, Inc., a corporation,

Witness my hand this 28 day of April 19 65

Alice J. Duck, Clerk

COMPLAINT

J & R AGENCY, INC., BILLIE EDWARD WATSON and  
a corporation, JACQUELINE F. WATSON,  
Plaintiff Versus Defendant

The plaintiff claims of the defendant the following personal property, to-wit:  
One (1) 1953 Magnolia House Trailer, Serial #533793

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

from March 15, 1965 19\_\_, to 19\_\_

FILED

APR 28 1965

ALICE J. DUCK, CLERK  
REGISTER

James Owens Jr. Plaintiff's Attorney.

## State of Alabama

Baldwin County

## CIRCUIT COURT

J & R AGENCY, INC.,  
a corporation

Plaintiff

VS.

BILLIE EDWARD WATSON and

JACQUELINE F. WATSON,

Defendant

## Detinue Summons and Complaint

Filed April 19 65

APR 28 1965

ALICE L. DUCK, CLERK  
REGISTER

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 L. Duck, Clerk

Defendant lives at

Route I  
Seminole, Alabama

Received in office

April 19 65

, Sheriff

I have executed this summons

this May 12 19 65

by leaving a copy with

Billy Edwards  
Watson,

attached 1-1953  
Magna House  
Apartment # 5332B

Plt. made bond 5/18/65  
J & R Agency, Indemnity  
& Deposit Subparty Co.  
by James Ladd, Sheriff  
Colson. Property released  
to Plt.  
James Ladd, Sheriff  
Deputy Sheriff

Printed by Moore Printing Co.

Seminole

Sheriff claims 90 miles at  
Ten Cents per mile Total \$ 9.00  
JAMES L. WILKINS, Sheriff  
BY Children  
DEPUTY SHERIFF

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

Before me, J. Connor Owens, Jr.,

a Notary Public in and for said County,

personally appeared J. M. Deas who being by me

duly sworn deposes and says that the property sued for in the complaint of J. & R. Agency, a  
Midland Guardian Company, vs. Billie E. Watson and  
Jacqueline F. Watson, filed in said Court, to-wit:

One (1) 1953 Magnolia House Trailer, Serial #533793

belongs to J &amp; R Agency, Inc., the plaintiff.

J &amp; R AGENCY, INC., a corporation

Sworn to and subscribed before me this 28th

By: *J. M. Deas*

day of April, 19 65

Manager

Notary Public

FILED

APR 28 1965

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, J &amp; R Agency, Inc.,

Principal, and

Fidelity &amp; Deposit Company of Maryland

Sureties, are held and

firmly bound unto Billie Edward Watson &amp; Jacqueline F. Watson, his heirs, executors and admin-

istrators in the sum of Forty and no/100----- Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-

Sealed with our seals and dated the April 28, 19 65

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

J &amp; R Agency, Inc.

has on the day of

April, 19 65 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Billie E. Watson

and Jacqueline F. Watson for the recovery of the following  
described property, to-wit:

One (1) 1953 Magnolia House Trailer, Serial #533793

Now, if the said J &amp; R Agency, Inc. shall fail in said suit

and shall pay to the said Billie Edward Watson and Jacqueline F. Watson, 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 April, 1965. By: *J. M. Deas* (SEAL)

Manager

April, 1965.

FIDELITY &amp; DEPOSIT COMPANY OF MARYLAND (SEAL)

By: *Alice J. Duck* (SEAL)

Clerk, Circuit Court

No. 6493

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

Clerk

Power of Attorney  
**FIDELITY AND DEPOSIT COMPANY OF MARYLAND**

HOME OFFICE: BALTIMORE, MD.

KNOW ALL MEN BY THESE PRESENTS: That the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, a corporation of the State of Maryland, by D. L. BUCKLER, Vice-President, and M. A. KELLY, Assistant Secretary, in pursuance of authority granted by Article VI, Section 2, of the By-Laws of said Company, which reads as follows:

"The President, or any one of the Executive Vice-Presidents, or any one of the additional Vice-Presidents specially authorized so to do by the Board of Directors or by the Executive Committee, shall have power, by and with the concurrence of the Secretary or any one of the Assistant Secretaries, to appoint Resident Vice-Presidents, Resident Assistant Secretaries and Attorneys-in-Fact as the business of the Company may require, or to authorize any person or persons to execute on behalf of the Company any bonds, undertakings, recognizances, stipulations, policies, contracts, agreements, deeds, and releases and assignments of judgments, decrees, mortgages and instruments in the nature of mortgages, and also all other instruments and documents which the business of the Company may require, and to affix the seal of the Company thereto."

does hereby nominate, constitute and appoint Chester Hilliard, H. C. Sarra, Dave Johnson, James Redd, Martha S. McCall, Farrell Dearing, John A. Hoefflin, Eddie Bonifay and Louis P. Hebard, all of Pensacola, Florida, EACH.....

its true and lawful agent and Attorney -in-Fact, to make, execute, seal and deliver, for, and on its behalf as surety, and as its act and deed: any and all bonds and undertakings, each in a penalty not to exceed the sum of FIVE HUNDRED THOUSAND DOLLARS (\$500,000).....

And the execution of such bonds or undertakings in pursuance of these presents, shall be as binding upon said Company, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its office in Baltimore, Maryland, in their own proper persons.

The said Assistant Secretary does hereby certify that the foregoing is a true copy of Article VI, Section 2, of the By-Laws of said Company, and is now in force.

IN WITNESS WHEREOF, the said Vice-President and Assistant Secretary have hereunto subscribed their names and affixed the Corporate Seal of the said FIDELITY AND DEPOSIT COMPANY OF MARYLAND, this 16th day of January, A.D. 1964.....

ATTEST: **FIDELITY AND DEPOSIT COMPANY OF MARYLAND**

(SIGNED) M. A. KELLY By D. L. BUCKLER  
(SEAL) Assistant Secretary Vice-President

STATE OF MARYLAND }  
CITY OF BALTIMORE } ss:

On this 16th day of January, A.D. 19 64, before the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore, duly commissioned and qualified, came the above-named Vice-President and Assistant Secretary of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, to me personally known to be the individuals and officers described in and who executed the preceding instrument, and they each acknowledged the execution of the same, and being by me duly sworn, severally and each for himself depose and saith, that they are the said officers of the Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and that the said Corporate Seal and their signatures as such officers were duly affixed and subscribed to the said instrument by the authority and direction of the said Corporation.

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

(SIGNED) FRANK G. MEURER  
(SEAL) Notary Public Commission Expires May 3, 1965

**CERTIFICATE**

I, R. D. GILLISS, Assistant Secretary of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, do hereby certify that the attached Power of Attorney dated January 16, 1964, in behalf of Chester Hilliard, et al of Pensacola, Florida, is a true and correct copy and that same has been in full force and effect since the date thereof and is in full force and effect on the date of this certificate; and I do further certify that the said D. L. BUCKLER and M. A. KELLY, who executed the attached Power of Attorney as Vice-President and Assistant Secretary respectively, were on the date of the execution of the attached Power of Attorney the duly elected Vice-President and Assistant Secretary of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and that the said D. L. BUCKLER was one of the additional Vice-Presidents specially authorized by the Board of Directors to appoint any Attorney-in-Fact or to authorize any person or persons to execute on behalf of the Company any bonds, recognizances, stipulations, undertakings, deeds, releases of mortgages, contracts, agreements and policies, and to affix the seal of the Company thereto as provided in said Article VI, Section 2 of the By-Laws of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the corporate seal of the said Company, this 17th day of May, 19 65