

MIDLAND-GUARDIAN OF PENSACOLA,)
INC., a corporation,)

Plaintiff,)

vs.)

VAUD WILSON, JR., and BETTY)
WILSON,)

Defendants.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

6521

AMENDED COMPLAINT

Now comes the Plaintiff in the above styled cause and amends the complaint heretofore filed in this cause by adding "Junker" Boyington, whose name is otherwise unknown, as a party defendant to said suit.

James Owens, Jr.

FILED

JUN 9 1965

ALICE J. DUCK, CLERK
REGISTER

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 VAUD WILSON, JR., and BETTY WILSON
ROUTE 1, Box 146-D
ROBERTSDALE, 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
MIDLAND-GUARDIAN OF PENSACOLA, INC., a corporation,

Witness my hand this _____ day of MAY 19 68

_____, Clerk

COMPLAINT

MIDLAND-GUARDIAN OF PENSACOLA,
INC., a corporation

VAUD WILSON, JR., and BETTY
WILSON

Plaintiff

Versus

Defendant

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

One (1) 1960 Magnolia House Trailer, Serial #M25011445

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

from April 15 19 68 to _____ 19__

James C. Curry, Jr. Plaintiff's Attorney.

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JUNKER BOYINGTON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed

in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

VAUD WILSON, JR., ET AL.,

....., Defendant.....

by MIDLAND GUARDIAN OF PENSACOLA, INC., a corporation

.....

..... Plaintiff.....

Witness my hand this 9th day of June 19 65

Alice J. Week Clerk

RECEIVED

No. 6521 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MIDLAND GUARDIAN OF PENSACOLA,
INC., a corporation,

Plaintiffs

vs.

VAUD WILSON, JR., ET AL.,

Defendants

SUMMONS AND COMPLAINT

Filed June 9 1965

..... Clerk

ALICE J. DUCK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

JUN 9 1965
Defendant lives at

TAYLOR WILKINS

SHERIFF

Received In Office

7:40 AM approx 10 mi. S. Perdido
River at Vaud Wilson's
right of way, turn 70
on dirt rd. to cross roads,
Hadi left 2:40 2 mi. turn
right at 1/2 mile bridge located
100 mi. beyond 70 on
Blue 9 white trailer Sheriff

I have executed this summons

this June 11 1965

by leaving a copy with

Quaker Boyington
and

Johnny Inforsman
1777 Highway 100
H M 25011445 - and

Stearney Art

Willards in Robert Lake

Bond 6/21/65 by
Midland-Suallion

Fidelity & Deposit Co.

Property released to
Puf

James Wilkins Sheriff

Orville D. Deputy Sheriff

100 Ten Cents per mile Total \$10.00
TAYLOR WILKINS, Sheriff
McAulie Chedder
DEPUTY SHERIFF

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

Before me, the undersigned, a Notary Public in and for said County, personally appeared _____ who being by me

duly sworn deposes and says that the property sued for in the complaint of MIDLAND GUARDIAN OF PENSACOLA, INC., a corporation vs. VAUD WILSON, ET AL, filed in said Court, to-wit:

One (1) 1960 Magnolia House Trailer, Serial #M25011445

belongs to Midland-Guardian of Pensacola, Inc., a corporation, the plaintiff.

Sworn to and subscribed before me this 9th

day of June, 1965,

Alice L. Miller
Notary Public

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Midland-Guardian of Pensacola, Inc.,

Fidelity & Deposit Company of Maryland, Principal, and _____, Sureties, are held and firmly bound unto Junker Bovington, his heirs, executors and administrators in the sum of ~~XXXXXXX~~ FORTY and no/100----- Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 9th day of June, 1965

The condition of the above obligation is such that whereas, the above bound Midland Guardian of Pensacola, Inc., a corporation has on the 9th day of June, 1965 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Vaud Wilson, et al., described property, to-wit: for the recovery of the following

One (1) 1960 Magnolia House Trailer, Serial #M25011445

Now, if the said Midland-Guardian of Pensacola, Inc., shall fail in said suit

and shall pay to the said Junker Bovington, 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 9th day of June, 1965, by _____ (SEAL)

June 9, 1965

Alice L. Miller
Clerk Circuit Court

By: _____ (SEAL)

No. _____

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this _____ day of _____, 19 _____

Clerk

The State of Alabama,
Baldwin County

CIRCUIT COURT
No. 6521

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon VAUD WILSON, JR., and BETTY WILSON
ROUTE I, Box 146-D

ROBERTSDALE, 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
MIDLAND-GUARDIAN OF PENSACOLA, INC., a corporation,

Witness my hand this 19 day of MAY 19 65

Alice I. Duck, Clerk

COMPLAINT

MIDLAND-GUARDIAN OF PENSACOLA,
INC., a corporation

VAUD WILSON, JR., and BETTY
WILSON

Plaintiff

Versus

Defendant

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

One (1) 1960 Magnolia House Trailer, Serial #M25011445

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

from April 15 19 65, to 19

FILED
MAY 19 1965
ALICE I. DUCK, CLERK
REGISTER

J. Cannon Weaver Jr. Plaintiff's Attorney.

No. 6521 Page _____

State of Alabama

Baldwin County

CIRCUIT COURT

MIDLAND-GUARDIAN OF PENSACOLA,
INC., a corporation,

Plaintiff

VS.

VAUD WILSON, JR., and
BETTY WILSON

Defendant

Detinue Summons and Complaint

Filed May 19 65

_____, Clerk

J. 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 French Clerk

May 25, 1965
Executed by
Serving the within
People and finding
NO. 2. No. 1.

Taylor Wilkins
Carlisle Owens

14 mi E. Long

Defendant lives at

RECEIVED

Received in office

MAY 19 1965

TAYLOR WILKINS
SHERIFF

19

I have executed this summons

this 25 May, 1965

by leaving a copy with

Vaud Wilson &
Betty Wilson

Sheriff claims

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff
Carlisle Owens Deputy Sheriff

Printed by Moore Printing Co.

14 mi East Long

RECEIVED

JUN 4 1965

TAYLOR WILKINS
SHERIFF

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1041

STATE OF ALABAMA

BALDWIN

COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

Before me, J. Connor Owens, Jr.,

personally appeared Gerald Coursor

who being by me

duly sworn deposes and says that the property sued for in the complaint of Midland-Guardian of Pensacola, Inc., a corporation vs. Vaud Wilson, Jr., and Betty Wilson

filed in said Court, to-wit:

One (1) 1960 Magnolia House Trailer, Serial #M25011445

belongs to Midland-Guardian of Pensacola, Inc., the plaintiff.

Sworn to and subscribed before me this 19th

day of May, 1965

Notary Public

STATE OF ALABAMA

BALDWIN

COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Midland-Guardian of Pensacola, Inc., a corporation

Fidelity & Deposit Company of Maryland, Sureties, are held and

firmly bound unto Vaud Wilson, Jr., & Betty Wilson, his heirs, executors and admin-

istrators in the sum of FIVE THOUSAND 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 19th day of May, 1965

The condition of the above obligation is such that whereas, the above bound Midland-Guardian of Pensacola, Inc., a corporation has on the 19th day of

May, 1965 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Vaud Wilson, Jr. and Betty Wilson

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

One (1) 1960 Magnolia House Trailer, Serial #M25011445

Now, if the said Midland-Guardian of Pensacola, Inc., shall fail in said suit and shall pay to the said Vaud Wilson, Jr., & Betty Wilson, 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 19 day of May, 1965

May, 1965

Clerk, Circuit Court

MIDLAND-GUARDIAN OF PENSACOLA (SEAL)

BY: Gerald Coursor (SEAL)

FIDELITY & DEPOSIT COMPANY OF MARYLAND (SEAL)

No. 6521

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

FILED

Filed this MAY 18 day of 1965, 19

ALICE L. DUCK, CLERK
REGISTER

Clerk