

JAMES R. OWEN
ATTORNEY AT LAW
110 COURTHOUSE SQUARE
BAY MINETTE, ALABAMA 36507

October 17, 1967

P. O. BOX 248
TEL. 937-2061
AREA CODE 205

Mrs. Alice J. Duck
Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

6779

Please dismiss the case of South Baldwin
Bank vs. Bobby J. Culpepper and send me a cost bill.

Yours very truly,



JAMES R. OWEN

JRO/ers

The State of Alabama,
Baldwin County

No. 6779

CIRCUIT COURT

December 7; 1965

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Bobby J. Culpepper

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 State Bank of Elberta, a Corporation.

Witness my hand this 7th day of December 1965.

~~Defendant resides at~~
~~Bon Secour~~

Alice I. Duck, Clerk

COMPLAINT

State Bank of Elberta, a

Bobby J. Culpepper

Corporation

Plaintiff

Versus

Defendant

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

One 1966 Rambler Classic automobile, four door, Serial Number
A6KA55H100088

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

from December 1 1965, to December 7 1965.

[Signature] Plaintiff's Attorney.

FILED
DEC 7 1965
ALICE I. DUCK, CLERK
REGISTERED

No. 6179 Page -----

Baldwin County

STATE BANK OF ELBERTA, A CORP

Plaintiff__

vs.

BOBBY J. CULPEPPER

Defendant _____

Detinue Summons and Complaint

Filed _____, 19____

ma 7 1995, Clerk

DUCK, CLERK REGISTER

JAMES R. OWEN

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. Clark

Defendant lives at

Received in office

19

, Sheriff

I have executed this summons

this _____, 19_____

by leaving a copy with

_____, Sheriff

Deputy Sheriff

The State of Alabama, }
Baldwin County

CIRCUIT COURT
No. 6279

December 7; 1965

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Bobby J. Culpepper

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 State Bank of
Elberta, a Corporation.

Witness my hand this 7th day of December 1965.

~~Defendant resides at~~
~~Bon Secour~~

Alice J. Luck, Clerk

COMPLAINT

State Bank of Elberta, a Bobby J. Culpepper
Corporation Plaintiff Versus Defendant

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

One 1966 Rambler Classis automobile, four door, Serial Number
A6KA55H100088

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

from December 1 1965, to December 7 1965.

[Signature] Plaintiff's Attorney.

DEC 7 1965
CLERK
REGISTER

and 5190
No. 6229 Page
State of Alabama
Baldwin County

CIRCUIT COURT

State Bank of
Elberta a corp.
Plaintiff

VS.

Bobby J. Culpepper
Defendant

Detinue Summons and Complaint

Filed DEC 7 1965
ALICE A. DUCK, CLERK
RECEIVED, Clerk

James B. Oliver
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 A. Duck Clerk

RETURNED 1-24-66
Not found in my County after diligent search and inquiry.
WILLIAM D. BRIDGES, Sheriff
By C. F. Anderson

BY
DEC 10 10 06 AM '65

REC'D. SHERIFF DEPT.
MOBILE COUNTY, ALA.

Works Richard Ramsey Co
1 South Broad St.
Mobile

Defendant lives at

RECEIVED
Received in office

DEC 7 1965

TAYLOR WILKINS

SHERIFF

, Sheriff

I have executed this summons

this _____, 19____

by leaving a copy with

, Sheriff

, Deputy Sheriff

Printed by Moore Printing Co.

#6279

STATE OF ALABAMA } IN THE CIRCUIT COURT OF
Baldwin COUNTY } Baldwin COUNTY

Before me, Ernestine R. Sims, a Notary Public in and for said County,
personally appeared James R. Owen who being by me
duly sworn deposes and says that the property sued for in the complaint of State Bank of
Elberta, a Corporation vs. Bobby J. Culpepper filed in said Court, to-wit:
December 7, 1965,

belongs to State Bank of Elberta, a Corporation, the plaintiff.

Sworn to and subscribed before me this 7th
day of December, 1965.

Ernestine R. Sims
Notary Public

STATE OF ALABAMA } IN THE CIRCUIT COURT OF
Baldwin COUNTY } Baldwin COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, State Bank of Elberta,
a Corporation, Principal, and
the undersigned, Sureties, are held and
firmly bound unto Bobby J. Culpepper, his heirs, executors and admin-
istrators in the sum of One Hundred and no/100----- 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 7th day of December, 1965.

The condition of the above obligation is such that whereas, the above bound State Bank
Elberta, a corporation has on the 7th day of
December, 1965 sued out a writ of detinue in the Circuit Court of Baldwin
County, returnable to the said Circuit Court against the said
Bobby J. Culpepper for the recovery of the following
described property, to-wit:
One 1966 Rambler Classic automobile, four door, Serial Number
A6KA55H100088

Now, if the said State Bank of Elberta, a Corporation shall fail in said suit
and shall pay to the said Bobby J. Culpepper, 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. State Bank of Elberta, a
Corporation

Taken and approved this 7th day of December, 1965 By: [Signature] (SEAL)
As its Attorney
The Travelers Indemnity Co. (SEAL)
A Corporation
By: [Signature] (SEAL)
As its attorney in fact
Alice J. [Signature]
Clerk, Circuit Court