

SOUTHERN GULF LUMBER CO., : IN THE CIRCUIT COURT OF
INC., A CORP., d/b/a DELANEY'S, :
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS: :
ROLAND L. GUNNISON and IRA B. :
GUNNISON, separately and : ALABAMA
severally, :
Defendants. :
: NO. 3521

COUNT ONE

The Plaintiff claims of the Defendants, separately and severally the following personal property, viz:

1. One General Electric Refrigerator, Model No. LB10N, Serial No. SN665410.

With the value of hire or use thereof during the detention viz: From the 1st day of October, 1957.

Plaintiff avers that the above described property was purchased by the Defendants by virtue of a conditional sales contract, wherein they agreed to pay a reasonable attorney's fee, and the Plaintiff avers that it should be awarded a reasonable fee in the sum of TWENTY FIVE AND 00/100 (\$25.00) DOLLARS.

Plaintiff further avers that in said conditional sales contract wherein the title to the above described goods was retained by the Plaintiff that the Defendants did waive all rights in and to their exemption of personal property under the Constitution and laws of the State of Alabama.

COLLINS, GALLOWAY & MURPHY

By: Thomas W. Galloway
ATTORNEYS FOR PLAINTIFF

Address of Defendant:

Route 1, Box 126
Fairhope, Alabama

The Plaintiff, Southern Gulf Lumber Company, Inc.,
A Corporation, d/b/a Delaney's having made affidavit
and given bond, as required by Title 7, Section 918, of
the Code of Alabama, the Sheriff is required to take the
property mentioned in the within complaint into his
possession, unless the Defendants give bond, payable to
the Plaintiff, with sufficient surety in double the amount
of the value of the property, with conditions that if the
Defendants are cast in the suit, will within thirty days
thereafter, deliver the property to the Plaintiff, and pay
all costs and damages which may accrue from the detention
thereof.

Reese J. Duck
CLERK

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3521

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ROLAND L. GUNNISON and IRA B. GUNNISON,

Separately and severally

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 ROLAND L. GUNNISON
AND IRA B. GUNNISON, separately and severally, Defendant

by SOUTHERN GULF LUMBER CO., INC. A CORP. d/b/a DELANEY'S

Plaintiff

Witness my hand this 24 day of April 1958

Alice J. Purcell, Clerk

STATE OF ALABAMA

County of ~~Mobile~~. Baldwin

Southern Gulf Lumber Co., Inc.,

KNOW ALL MEN BY THESE PRESENTS, That we, a Corp., d/b/a Delaney's

Irene Cochran & Peter V. Crolich

as Principal, and _____ and _____, as Sureties, are held and firmly bound

unto Roland L. Gunnison and Ira B. Gunnison, separately and severally

in the sum of Two Hundred Fifty and 00/100 (\$250.00) Dollars

for the payment of which well and truly to be made we, jointly and severally, bind ourselves and

each of us, our heirs, executors and administrators. Sealed with our seals and dated this 18th

day of April in the year of our Lord, one thousand, nine hundred and fifty-eight.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said

Southern Gulf Lumber Co., Inc., a Corp., d/b/a Delaney's

did, on the _____ day of _____, 19____, sue out in the Circuit Court

of Baldwin County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, com-

manding him to take into his possession the following described property, to-wit: _____

One General Electric Refrigerator, Model No. LB10N, Serial No.

SN665410

which said writ was placed in the hands of Taylor Wilkins

Baldwin

Sheriff of the County of ~~Mobile~~, on the _____ day of _____, 19____ by taking into his

possession the following described property, to-wit: _____

One General Electric Refrigerator, Model No. LB10N, Serial No. SN665410

and whereas the said Roland L. Gunnison and Ira B. Gunnison

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 is the said Southern Gulf Lumber Co., Inc., a Corp., d/b/a Delaney's

upon his failing in said suit, shall deliver the said property to the defendant within thirty days after judgment, and pay 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.

So. Gulf Lumber Co., Inc., a Corp., d/b/a Delaney's

By: TOM TUGER (Seal)

Irene Cochran & Peter V. Crolich (Seal)

By: Peter V. Crolich (Seal)

Taken and approved this the 20 day

19 58

Sheriff, Mobile County, Alabama

Mobile, Alabama, County Courthouse, April 21st, 1958. I, the undersigned, John B. Mandeville, Clerk of the Circuit Court of Mobile County, Alabama, do hereby certify that if the above bond was presented to me as Clerk of this court, I would approve the same.

JOHN B. MANDEVILLE, CLERK OF THE CIRCUIT COURT, MOBILE COUNTY, ALA.