

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mary Sullivan 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 same, then and there to answer the complaint of Stephens Investment Corporation, a Corporation.

Witness my hand, this the 2nd day of June, 1966.

Alice J. Duck  
CLERK

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STEPHENS INVESTMENT CORPORATION )  
a CORPORATION )

PLAINTIFF )

VS )

MARY SULLIVAN )

DEFENDANT )

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 7001

1. The Plaintiff claims of the Defendant the following personal property, to-wit:

One 1957 ford V8 two door convertible

With the value of the hire or use thereof during the detention, to-wit from October 5, 1965 to this date, and of the alternate value of \$120.00.

2. The Plaintiff claims of the Defendant the following personal property, to-wit:

One 1957 ford V8 two door convertible

With the value of the hire or use thereof during the detention, to-wit, from October 5, 1965 to this date, and of the alternate value of \$120.00.

Plaintiff further says that it is entitled to possession of the said chattel by reason of a chattel mortgage dated April 17, 1965; that the said chattel mortgage contains waiver of exemption, and provides for the payment of all costs of collecting, whereof Plaintiff claims benefit.

3. The Plaintiff claims of the Defendant the sum of ONE-HUNDRED, TWENTY and NO/100 (\$120.00) DOLLARS, due by promissory note in the amount of \$180.00 made by her on the 17th day of April, 1965 and payable on the 5th day of October, 1965, with interest thereon.

The said note contains waiver of exemption and provides for payment of costs of collection, whereof Plaintiff claims benefit.

  
ATTORNEY FOR PLAINTIFF

Defendant may be  
served at Robertsdale,  
Alabama

NUMBER: 7001

STEPHENS INVESTMENT CORPORATION,  
A CORPORATION

PLAINTIFF

VS

MARY SULLIVAN

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

STEPHENS INVESTMENT CORPORATION )  
A CORPORATION )

PLAINTIFF )

VS )

MARY SULLIVAN )

DEFENDANT )

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: \_\_\_\_\_

.....

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.

Beijing, China  
CLERK

"DETINUE"

CASE NO. 7001

STEPHENS INVESTMENT CORPORATION,

A CORPORATION,

Plaintiff,

vs:

MARY SULLIVAN,

Defendant

Received 3 day of June 1966  
and on 9 day of June 1966  
I served a copy of the within Detinue  
on Mary Sullivan

My service on

TAYLOR WILKINS, Sheriff

Sheriff claims 50 miles at

Ten Cents per mile Total 5.00

TAYLOR WILKINS, Sheriff

By Charles C. Haldre  
DEPUTY SHERIFF

Execution by  
att. 11 June 1967

Ford Corv.

FLA TAG # 5-22352

Bond made 6/16/66 and returned at  
by Ptf. Signed By: Willard in  
Stephens Investment  
By: Ludolph A. Wilson RTHC  
Property released to Ptf.

Wilson Hayes, Attorney

Taylor Wilkins  
Haldre

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, \_\_\_\_\_

Stephens Investment Corp. A Corp. \_\_\_\_\_

and \_\_\_\_\_

are held and firmly bound unto \_\_\_\_\_ Mary Sullivan \_\_\_\_\_

in the sum of Two Hundred \_\_\_\_\_ Dollars, for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated this \_\_\_\_\_ day of \_\_\_\_\_ 19 \_\_\_\_\_

The condition of the above obligation is such that whereas the said \_\_\_\_\_

Stephens Investment Corp., A Corp \_\_\_\_\_ did, on the 3rd day of June 19 66 sue out of the Circuit Civil Court of Baldwin

\_\_\_\_\_ a writ of detinue directed to any Sheriff of the State of Alabama commanding him to take into his possession the following property, to-wit: \_\_\_\_\_

One 1957 Ford V8 Two door Convertible

which said writ was placed in the hands of \_\_\_\_\_ Taylor Wilkins \_\_\_\_\_, Sheriff of Baldwin County, Alabama, on the 3rd day of June, 19 66, and executed by him on the 9th day of June, 19 66, by taking into his possession the following property, to-wit:

same as above

And whereas the said \_\_\_\_\_ Mary Sullivan \_\_\_\_\_ 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 if the said \_\_\_\_\_ Stephens Investment Corp. \_\_\_\_\_ upon his failing in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay all 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.

Stephens Investment Corp (SEAL)  
By Rudolph A. Taylor (SEAL)  
\_\_\_\_\_ (SEAL)

Taken and approved this 16th day of August 19 66

Taylor Wilkins  
Sheriff, Baldwin County, Ala.



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

**THE STATE OF ALABAMA**

\_\_\_\_\_  
**COUNTY**

**CIRCUIT COURT**

\_\_\_\_\_  
**Plaintiff**

**vs.**

\_\_\_\_\_  
**Defendant**

**Detinue — Affidavit and Bond**

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

\_\_\_\_\_  
**Clerk**



HAYES & WILKINS  
ATTORNEYS  
BAY MINETTE, ALABAMA 36507

Wilson Hayes  
Taylor D. Wilkins, Jr.

June 2, 1966

P. O. Box 268  
937-5506

Mrs. Alice J. Duck  
Clerk  
Circuit Court  
Baldwin County  
Bay Minette, Alabama

7001

Dear Mrs. Duck:

Please file the enclosed papers.

Thank you.

Yours very truly,

  
Wilson Hayes

WH/blr  
Enclosures