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 Corportion, a Corporation.

Witness my hand, this the Inday of Man, 1966.

STEPHENS INVESTMENT CORPORATION) IN THE CIRCUIT COURT a CORPORATION)

PLAINTIFF

VS

MARY SULLIVAN

DEFENDANT

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.

PLAINT FOR

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Defendant may be served at Robertsdale, Alabama

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					NUMBER: <u>7001</u>	
•					STEPHENS INVESTMENT CORPORAT A CORPORATION PLAINTIFF	ION,
•		2 22			VS	
: 1					MARY SULLIVAN	
		· · ·		U	DEFENDANT	
			· · ·		IN THE CIRCUIT COURT	,
	:	•	:		BALDWIN COUNTY, ALABAMA	
					AT LAW	
•					SUMMONS AND COMPLAINT	5
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i S (STEPHENS INVESTMENT CORPORATION) IN THE CIRCUIT COURT A CORPORATION)

PLAINTIFF

VS

MARY SULLIVAN

IN THE CIRCUIT COURT BALDWIN COUNTY, ALABAMA AT LAW

NUMBER:

DEFENDANT

•-•-•-•

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.

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STEPHENS INVESTMENT CORPORATION,

A CORPORATION,

Plaintiff,

vs:

MARY SULLIVAN,

Defendant:

TAYLOR WILKI Sheriff Ten Centa ATTOR WILKING (Done 1957

COST 0

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Wilson Hayes, Attorney

"DETINUE"

CASE NO. 7001

DETINUE - REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA Baldwin County	
Datumi County	
KNOW ALL MEN BY THESE PRESENTS, That we.	
tephens Investment Corp. A Corp.	
and	
are held and firmly bound unto Mary Sullivan	
in the sum of <u>Two Hundred</u> Dollars, for the	
which, well-and-truly-to-be-made, we-jointly and severally bind ourselves, our heirs, exec ministrators.	utors and ad-
Sealed with our seals and dated this day of	
The condition of the above obligation is such that whereas the said	vort
Stephens Investment Corp., A Corpdid, on the	<u>3rd</u> day
of Jume 19.66 sue out of the <u>Circuit Civil</u> Court of <u>Baldwin</u>	
a writ of detinue directed to any Sheriff of the State of Alabama com	manding 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 <u>Taylor Wilkins</u>	
Sheriff of Baldwin County, Alabama, on the <u>3rd</u> day of <u>June</u>	, 19 <u>_66</u> _,
and executed by him on the <u>9.th</u> day of <u>June</u> , 19 <u>66</u> , by ta possession the following property, to-wit:	aking into his
possission die tokowing property, to-with	
same as above	
And whereas the said Mary Sullivan	cution of said
And whereas the said <u>Mary Sullivan</u> Defendant in said writ, has failed and neglected for the space of five days from the exec	cution of said
And whereas the said <u>Mary Sullivan</u> Defendant in said writ, has failed and neglected for the space of five days from the exec writ to give bond and take possession of said property as authorized by law.	
And whereas the said Mary Sullivan Defendant in said writ, has failed and neglected for the space of five days from the exec writ to give bond and take possession of said property as authorized by law. Now if the said Stephens : Investment Corp. up n said suit shall deliver the said property to the Defendant within thirty days after judge	oon his failing nent and pay
And whereas the said	oon his failing nent and pay oid, otherwise
And whereas the said	oon his failing nent and pay oid, otherwise
And whereas the said	oon his failing nent and pay oid, otherwise
And whereas the said Mary Sullivan Defendant in said writ, has failed and neglected for the space of five days from the exec writ to give bond and take possession of said property as authorized by law. Now if the said Stephens Investment Corp up in said suit shall deliver the said property to the Defendant within thirty days after judgr all damages for the detention of the property and costs of suit, then this obligation to be very	oon his failing nent and pay oid, otherwise
And whereas the said Mary Sullivan Defendant in said writ, has failed and neglected for the space of five days from the exec writ to give bond and take possession of said property as authorized by law. Now if the said Stephens Investment Corp up in said suit shall deliver the said property to the Defendant within thirty days after judgr all damages for the detention of the property and costs of suit, then this obligation to be vo to remain in full force and effect.	oon his failing nent and pay oid, otherwise
And whereas the said	oon his failing nent and pay oid, otherwise (SEAL) _ (SEAL)
And whereas the said Mary Sullivan Defendant in said writ, has failed and neglected for the space of five days from the exec writ to give bond and take possession of said property as authorized by law. Now if the said Stephens Investment Corp up in said suit shall deliver the said property to the Defendant within thirty days after judgr all damages for the detention of the property and costs of suit, then this obligation to be ve to remain in full force and effect.	oon his failing nent and pay oid, otherwise (SEAL) _ (SEAL)
And whereas the said	oon his failing nent and pay oid, otherwise (SEAL) _ (SEAL)

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STATE OF ALABAMA) IN THE CIRCUIT COURT OF
BAT.DWTN	BAINT
COUNTY) COUNTY
Before me,RUTH K. HC	DWELL , a Notary Public in and for said County,
personally appearedWILSON	HAYES
duly sworn deposes and says that t	he property sued for in the complaint of <u>STEPHENS</u> INVESTMENT
CORPORATION, A CORPOR	
One 1957 Ford V8 two	door convertible
Anna an <mark>d Bhadanannanna ann ann ann ann ann ann ann </mark>	
belongs toStephens Invest	tment Corporation, a Corporation, the plaintiff.
	at Am
	me this 30 th 19^{66}
Sworn to and subscribed before	me this <u>JU</u>
day of May ,	1966
Nuth M. How	ell
Notary 'Public	
STATE OF ALABAMA	IN THE CIRCUIT COURT OF
BALDWIN COUNTY	BALDWIN COUNTY
KNOW ALL MEN BY THESE	PRESENTS, That we, Stephens Investment
Corporation, a Corpo	
and the second	Principal, and
un and a second s	, Principal, and
	, Principal, and , Sureties, are held and
firmly bound unto <u>Mary</u>	, Principal, and , Sureties, are held and Sullivan , his heirs, executors and admin-
istrators in the sum of	, Principal, and , Sureties, are held and Sullivan, his heirs, executors and admin- y and No/100 Dollars,
istrators in the sum of for the payment of which we joint	, Principal, and , Sureties, are held and Sullivan, his heirs, executors and admin- y and No/100 Dollars,
istrators in the sum of	, Principal, and , Sureties, are held and , his heirs, executors and admin- y and No/100 Dollars, tly and severally bind ourselves, our heirs, executors and adminis-
istrators in the sum of	, Principal, and , Sureties, are held and Sullivan, his heirs, executors and admin- y and No/100 Dollars,
istrators in the sum of <u>Fifty</u> for the payment of which we joint trators. Sealed with our seals and dat The condition of the above ob	, Principal, and , Sureties, are held and <u>Sullivan</u> , his heirs, executors and admin- y and No/100 Dollars, tly and severally bind ourselves, our heirs, executors and adminis- ed theday of <u>May</u> , 19 ⁶⁶ bligation is such that whereas, the above bound
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istrators in the sum of	, Principal, and , Sureties, are held and <u>Sullivan</u> , his heirs, executors and admini- y and No/100 Dollars, tly and severally bind ourselves, our heirs, executors and adminis- ed theday of <u>May</u> , 19 ⁶⁶ obligation is such that whereas, the above bound orporation, a Corporation has on theday of ued out a writ of detinue in the Circuit Court of ole to the said Circuit Court against the said for the recovery of the following <u>V8 two door convertible</u> ens Investment Corporation, a Corporation , the defendant in es as he may sustain by the wrongful complaint, then this obligation to
istrators in the sum of	, Principal, and , Sureties, are held and <u>Sullivan</u> , his heirs, executors and admini- y and No/100 Dollars, tly and severally bind ourselves, our heirs, executors and adminis- ed theday of <u>May</u> , 19 ⁶⁶ obligation is such that whereas, the above bound orporation, a Corporation has on theday of ued out a writ of detinue in the Circuit Court of ble to the said Circuit Court against the said for the recovery of the following <u>V8 two door convertible</u> ens Investment Corporation, a Corporation
istrators in the sum of	
istrators in the sum of	, Principal, and
istrators in the sum of	



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

Dear Mrs. Duck:

Please file the enclosed papers.

Thank you.

Yours very truly, Wilson Hayes

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WH/blr Enclosures