GUARDIAN DISCOUNT COMPANY, a corporation,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY,
VS:	)	ALABAMA
JOEL H. MILLER and INA FAYE	)	AT LAW
MILLER, Jointly and Individ- ually,	)	
Defendants	)	CASE NO. 2095

Plaintiff claims of the defendants, jointly and individually, the following described personal property, viz:

One 1964 Ford Galaxie 500, 2 dr, H.T., Serial No. 4A66X-142093 automobile One Danish Modern Sofa w/2 matching chairs (Beige) One Table Radio One Floorlamp One Green Chair Two Table Lamps One Portable Silvertone 17" T. V. Two Blonde End Tables One Blonde Coffee Table One Small Console Stereo One Blonde Desk w/matching Chair One Brown & White Dinette w/4 matching Chairs One Electric Washing Machine Kenmore One Crosley Refrigerator One Walnut Bedroom Suite (Bed w/springs & mattress, chest, and triple dresser w/large mirror) One Night Stand One G. E. Air Conditioner One Kenmore Vacuum Cleaner Three 9 x 12 Rugs One Baby Bed

with the value of the use thereof during the detention, viz: from, to-wit, May 16, 1966, said above described property being the property of the plaintiff.

FILEM

1966

G. S.A. Register

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B.J. Molier.

B. F. STOKES, III Attorney for Plaintiff

Serve the defendants at Box 203, Silver Hill, Alabama. Defendent whether a served of the served of the served ser

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·	DWIN COUNTY		No 7095			:
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	of the State of A					
You Ar	re Hereby Commar	nded to Summo	n JOEL H.	MILLER, and	INA FAYE MILI	ER,
Jointly & I	Individually					
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<u>Guardian</u> D	)iscount Company	7, a Corpora	tion,			
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	al Anna an Anna Anna Anna Anna Anna Anna A	/			e <sup>r v</sup> 1 Maria - Maria 1 Maria	
		<b>*****</b> *******************************			) 	i si Ingga sa A
Witness	s my hand this	2nd day of	August		1 <u>966</u> _	23
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		Plaintiff	_ Versus _		Defen	dant
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with the value	of the hire or use			ion, to-wit:		19



## To The Sheriff of Said County:

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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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Executed by takeing in possession the with-in mention property and geting a bailee receipt. Aug\_3,1966

Taylor Wilkins Sheriff

undes

TAYLOR WILKINS SHERIFF Sheriff. I have executed this summons aug 3, 19,66 by leaving a copy with 120 bheriff claims OR WILKINS, DEPUTY SHERE Sheriff Deputy Sheriff

Defendant lives at

RE Received in office

AUG 2 1966

C.C. Law 30-1000-7-65

THE STATE OF ALABAMA BALDWIN MERIE COUNTY.

 $^{A} \Big\}$ 

# 2095

DETINUE BOND AND AFFIDAVIT.

	NT COMPANY, a
corporation, as Principal, and FIDELITY & DEPOSIT COMPA	
as Surety	
are held and firmly bound unto JOEL H. MILLER and INA FAYE MILLE	
their heirs, executors an	d administrators, in the
sum of THREE THOUSAND AND NO/100THS (\$3,000.00)	· · · · · · · · · · · · · · · · · · ·
the payment of which, we bind ourselves, our and each of our heirs, executors, and	d administrators, iointly
and severally, firmly by these presents.	
Sealed with our seals and dated this lst day of August	, A. D. 19
The Condition of the above Obligation is such, That whereas the above bound	en
-	
GUARDIAN DISCOUNT COMPANY	
the 1st day of August 66, sued out	: from the office of the
Baldwin Clerk of the Circuit Court of MANN, in the State of Alabama, a Writ of Detinue, re Baldwin term of said Circuit Court of Analyzia against the said JOEL H. MILLER and	-
for the recovery of	the fellowing property
Floorlamp; 1 Green Chair; 2 Table Lamps; 1 Portable Si 2 Blonde End Tables; 1 Blonde Coffee Table; 1 Small Co 1 Blonde Desk w/matching chair; 1 Brown & White Dinett chairs; 1 Electric Washing Machine Kenmore; 1 Crosley 1 Walnut Bedroom Suite (bed w/springs & mattress, ches	nsole Stereo; e w/4 matching Refrigerator; t & triple dress
<pre>w/large mirror); 1 Night Stand; 1 G.E. Air Conditioner Cleaner; 3 - 9 x 12 Rugs; 1 Baby Bed.</pre>	; 1 Kenmore Vacu
GUARDIAN DISCOUNT COMPANY	shall fail
in said suit, and shall pay to the said JOEL H. MILLER and INA FAYE	MILLER
the defendant in said writ all such costs and damages as he may sustain by the wro	
Writ of Detinue, then this obligation to be void, otherwise to remain in full force GUARDIAN/PISCOUNT CO	and benefit. MPANY
	(Seal)
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Allow Xe Indon	
MUE 1. DUTH, REGISTER	
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THE STATE OF ALABAMA, **DETINUE AFFIDAVIT** BALDWIN MANN County NOTARY PUBLIC J. F. STALLWORTH who, being duly sworn deposes and says, that the property sued for in the complaint of\_. GUARDIAN DISCOUNT COMPANY One 1964 model Ford Galaxie 500, 2 dr, H.T. Serial No. 4A66X-142093; -wit: Table Radio; 1 Floor 17" T.V.; 2 Blonde Stereo; 1 Blonde Desk Danish Modern Sofa w/2 matching chairs (Beige); 1 Green Chair: 2 Table Lamps: 1 Portable Silvertone Floorlamp; 1 Blonde Coffee Table; 1 Small Console Stereo; 1 Blonde Desk hair; 1 Brown & White Dinette w/4 matching chairs; 1 Electric End Tables; matching <u>chair: 1</u> Washing Machine Kenmore; 1 Crosley Refrigerator; 1 Walnut Bedroom Suite (Bed W/springs & mattress, chest & triple dresser w/large mirror); 1 Night Stand; 1 G.E. Air Conditioner; 1 Kenmore Vacuum Cleaner; 3- 9x12 Rugs & 1 Baby Bed. Conditioner; 1 Kenmore Vacuum Cleaner; GUARDIAN DISCOUNT COMPANY belongs to\_\_\_\_ the said Plaintiff. lst Sworn to and subscribed the. \_day August 66 of\_ before me \$\*\*\*x NOTARY PUBLIC, MOBILE COUNTY, ALABAMA & Individually Attorney ß Detinue Affidavit Defendant Clerk Circuit Court, Mabile County GUARDIAN DISCOUNT COMPANY INA FAYE MOM TO DULL Baldwin TIT MILLER & Jointly and Bond Alabama STOKES, BOX 293 of corporation BALDWIN No. day JOEL H. MILLER, VS. 0 Filed പ്പ ъ

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GUARDIAN DISCOUNT COMPANY, a corporation,	)	IN THE CIRCUIT COURT OF
Plaintiff	>	BALDWIN COUNTY,
VS:	)	Alabama
JOEL H. MILLER and INA FAYE MILLER, Jointly and Individ-	>	at lay
ually,	)	.)
Defendants	)	CASE NO. 2095

Plaintiff claims of the defendants, jointly and individually, the following described personal property, viz:

One 1964 Ford Galaxie 500, 2 dr, H.T., Serial No. 4A66X-142093 automobile One Danish Modern Sofa w/2 matching chairs (Beige) One Table Radio One Floorlamp One Green Chair Two Table Lamps One Portable Silvertone 17" T. V. Two Blonde End Tables One Blonde Coffee Table One Small Console Stereo One Blonde Desk w/matching Chair One Brown & White Dinette w/4 matching Chairs One Electric Washing Machine Kenmore One Crosley Refrigerator One Walnut Bedroom Suite (Bed w/springs & mattress, chest, and triple dresser w/large mirror) One Night Stand One G. E. Air Conditioner One Kenmore Vacuum Cleaner Three 9 x 12 Rugs One Baby Bed

with the value of the use thereof during the detention, viz: from, to-wit, May 16, 1966, said above described property being the property of the plaintiff.

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AUG 3 1966 ALGE I BULK, SESSA

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B. F. STOKES, III Attorney for Plaintiff

Serve the defendants at Box 203, Silver Hill, Alabama. Befendantxieskikowikiesowayobassexwakow/oobksomployment, WanktysBeiryskimonesowikiebamassasefendantosImasKayeoWikkeromay SaksobessenwedsexeshersemploymentosFinstosiationaloganky Fairhopsookiabamas The defendants' residence is located just East of the Evangelical Church, Silver Hill, Alabama. This is the third bouse on the right hand side beyond said Church. Defendant Joel H. Miller may also be served c/o employment, Vanity Fair, Robertsdale, Alabama. Defendant Ina Faye Miller may also be served c/o her employment, First National Bank, Fairhope, Alabama.

#### **GIBBONS & STOKES**

ATTORNEYS AT LAW 201 AMERICAN NATIONAL BANK BUILDING BIENVILLE OFFICE MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS B. F. STOKES, III

### September 7, 1966

MAILING ADDRESS P. O. BOX 293 MOBILE, ALABAMA, 36601

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

Re: Guardian Discount Co. vs. Joel H. Miller & Ina Faye Miller, et al, Case No. 7095

Dear Mrs. Duck:

Attorney Norborne C. Stone, Jr. represents the defendants in the above case. The case has been settled and the attorneys for both parties request that an order be entered upon the docket non-suiting the case and further, that an order be entered discharging the plaintiff and the surety on its bond.

You will note the signature of Mr. Stone below, evidencing his agreement.

Sincerely yours,

Stokes, III

BFS:mi

The undersigned represents the defendants in said case and agrees to the above and foregoing.

Norborne C. Stone, Jr. Attorney for Defendants

#### GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS B. F. STOKES, 111

# August 1, 1966

MAILING ADDRESS P. O. BOX 293 MOBILE, ALABAMA, 36601

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

Re: Guardian Discount Company vs. Joel H. Miller & Ina Faye Miller, Jointly & Individually

Dear Mrs. Duck:

The above is a detinue suit pertaining to an automobile and household goods. I enclose the original and two copies of the complaint. In addition, I enclose the detinue bond and affidavit. You will recall that you have accepted bonds from Fidelity & Deposit Company of Maryland previously, which I have submitted.

I would appreciate your kindness in docketing this case and forwarding the writ of detinue, etc, to the Sheriff as soon as possible.

Sincerely yours,

B. F. Stokes, III

BFS:mi Encl. C.C. Law 30-1000-7-65

THE STATE OF ALABAMA LOWIN MORTHE COUNTY.	} DETINUE BOND AND AFFIDAVIT.
KNOW ALL MEN BY THESI	E PRESENTS, That We, GUARDIAN DISCOUNT COMPANY, a
	pal, and FIDELITY & DEPOSIT COMPANY OF MARYLAND,
as Surety	
are held and firmly bound unto_	JOEL H. MILLER and INA FAYE MILLER
	their
sum of THREE THOUSAND A	AND NO/100THS (\$3,000.00) Dollars, for
	ourselves, our and each of our heirs, executors, and administrators, jointly.
and severally, firmly by these pr	esents.
Sealed with our seals and dat	ted thisday ofAugust, A. D. 19
The Condition of the above (	Obligation is such, That whereas the above bounden
GUARDIAN DISCOUN	T COMPANY has, on
	<b>66</b> 
to me 1964 model Fo	for the recovery of the following property. ord Galaxie 500, 2 dr, H.T., Serial No. 4A66X-1420 w/2 matching chairs (beige); 1 Table Radio; 1
Floorlamp; 1 Green Ch	air; 2 Table Lapps; 1 Portable Silvertone 1/" 1.V
1 Blonde Desk w/match	1 Blonde Coffee Table; I Small Console Stereo; bing chair; 1 Brown & White Dinette w/4 matching
l Walnut Bedroom Suit w/large mirror); 1 Ni	shing Machine Kenmore; 1 Crosley Refrigerator; e (bed w/springs & mattress, chest & triple dress ght Stand; 1 G.E. Air Conditioner; I Kenmore Vacu
Cleaner; 3 - 9 x 12 R	ugs; 1 Baby Bed.
,	
NOW, if the said	IAN DISCOUNT COMPANY
in said suit, and shall pay to the	JOEL H. MILLER and INA FAYE MILLER
the defendant in said writ all such	JOEL H. MILLER and INA FAYE MILLER said
the defendant in said writ all such	ch costs and damages as he may sustain by the wrongful suing out of said
the defendant in said writ all such	th costs and damages as he may sustain by the wrongful suing out of said ation to be void, otherwise to remark in full force and benefit. GUARDIAN SCOUNT COMPANY BY: BY: (Seal)

THE STATE OF ALABAMA, **DETINUE AFFIDAVIT** BALIFIE Mobile County NOTARY PUBLIC PERSONALLY appeared before me, John E. Mandeville, Clerk of the Circuit Court of Mobile County, J. F. STRILMORTH who, being duly sworn deposes and says, that the property sued for in the complaint of\_ GUARDIAN DISCOURT COMPANY One 1964 model Ford Galaxie 500, 7 dr. H.T. Serial No. 4866%-1420937 to-wit: wit: Danish Modern Sofa w/2 matching chairs Green Chair; 2 Table Lamps; 1 Portable A Tables; 1 Blonde Coffee Table; 1 Smal Lohing chairs (Beige); 1 Table Radio; 1 Floorlamp; s; 1 Portable Silvertone 17" T.V.; 2 Blonde Table; 1 Small Console Stereo; 1 Blonde Desk Mhite Dinette w/4 matching chairs; 1 Electric End Tables; 1 Blonde Coffee w/matching chair; 1 Brown & Wrebing Machine Kenmore, 1 Crocky Refrigeratoril Malnut Badrorm Suife (Bed Conditioner; 1 Renmore Vacuum Cleaner? Ruge ¥. G.S. ALT 2222 will baby Bed. GUARDIAN DISCOUNT COMPANY belongs to. the said Plaintiff. lat Sworn to and subscribed the .day august. 66 ..., before me. of 19\_ <u>us</u> ag Cletto: MOTARY PUBLIC, MOBILE COUNTY, MARAMA control a initation Attorney Defendante 10 Detinue Affidavit 5 Clerk Circuit Court, Mobile County TRANTAL DEFICIENT COMPARY ELEMANT & ELEMANDE MOBILE COUNTY \$m∛ 音响着 异响着 and Bond A Laboration corporation, of All and a second No.day VS. HILLER. **\* #** (\*\*4) (\*\*5) Filed. 1 \*

C.C. Law 30-1000-7-65

THE STATE OF ALABAMA DWIN MORILE COUNTY.	}	DETINUE BOND A	ND AFFIDAVIT
KNOW ALL MEN BY THES	E PRESENTS, That We	GUARDIAN DISCOUNT	COMPANY, a
corporation, as Princ	tpal, and FIDELII	Y & DZPOSIT COMPANY	OF MARYLAND
as Surety			، ــــــــــــــــــــــــــــــــــــ
are held and firmly bound unto	JOHL H. MILLER a	nd INA PAYE MILLER	
· · · ·	thei	heirs, executors and adn	ninistrators, in th
sum ofTHREE THOUSAND	and no/100THs (\$3	3,000.00)	Dollars. fo
the payment of which, we bind and severally, firmly by these pr	ourselves, our and each o		
Sealed with our seals and da	ted thisday of.	August	66 , A. D. 19
The Condition of the above	Obligation is such, That	whereas the above bounden	
GUARDIAN DISCOU	T COMPANY		has. oi
theday ofBa	ldwin	66, sued out from	n the office of the
Clerk of the Circuit Court of Mon		na, a Writ of Detinue, returna	ble to the presen.
term of said Circuit Court of Me	Ble against the said	TOTL H. MILLER and IN	ia paye Milli
		for the recovery of the fo	ollowing property
<sub>to-wit</sub> One 1964 model Fo l Danish Modern Sofa Floorlamp; l Green Ch	air; 2 Table Lap	ps; l Portable Silver	ctone 17" T.
2 Blonde End Tables; 1 Blonde Desk w/match			
chairs; l Electric Wa l Walnut Bedroom Suit	shing Machine Ker e (bed w/springs	more; I Crosley weight $\&$ mattress, chest $\&$	rigerator, triple dres
w/large mirror); 1 Ni Cleaner; 3 - 9 x 12 R		. air conditioner; 1	
GUARDI NOW, if the said	AN DISCOUNT COMP		
in said suit, and shall pay to the	said	LER and DRA FAYS MILE	
the defendant in said writ all suc Writ of Detinue, then this obliga		A –	-
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-----------------(Seal) FIDELT 5. . . 0 4. BY: lÌ e Γι LASSalas <u>~</u> Y

who, being duly sworn depose		he property sued for i	n the complaint of	
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to-wit: 1 Danich Modern Sofa 1 Oreen Chairy 2 Tab	w/2 watchir 14 Lamos; 1	g chaire (Seig Fortable Silvs	e; 1 Table Sad rtona 17 $\sim$ V;	107 1 2100rla 2 210nde
ond Taples; 1 Sionde W/matching chair; 1	Brown & Mhit	le; 1 Small Con le Dinstte w/4	scle Sterno; 1 matching chairs:	Slonde Desk : 1 Slectric
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COURT	fidavit TWA FAYE Individually,		មារលាយ ប្រ ខ្មែរ ដែមរាំ។	
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	nute Affid Bond 않说 춘 및 た1y 초		Mobile C	
	Detinue Affid and Bond MILLER & T JOINTLY &		k Circuit Court, Medua C STUKES, III BUX 293 , Alabama	
	Detinue Affid and Bond MILLER & T JOINTLY &	day of	k Circuit Court, Medua C STUKES, III BUX 293 , Alabama	
	nute Affid Bond 않说 춘 및 た1y 초	day of	. STOKES, III Baldwir Baldwir Box 293 Ie, Alabama	
	Detinue Affid and Bond MILLER & T JOINTLY &		. F. STOKES, III . 0. BOX 293 . Dile, Alabama	
	Detinue Affid and Bond MILLER & T JOINTLY &	day of	. F. STOKES, III . 0. BOX 293 . Dile, Alabama	