

THE AMERICAN NATIONAL BANK
& TRUST COMPANY OF MOBILE, A
National Banking Association,

Plaintiff

-VS-

GLADYS VAUGHN also known as
GLADYS MAE VAUGHN and EARL
VAUGHN, jointly and severally,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7123

COUNT ONE

The Plaintiff claims of the Defendants, jointly and
severally, the following personal property, to-wit:

One (1) 1964 Mercury Comet, 4-door,
Manufacturer's Serial No. 4 H02U603182

together with the value of the use or hire thereof from the
date of detention, to-wit: August 11, 1966.

HAMILTON, DENNISTON, BUTLER & RIDDICK

BY: James W. Dalton
Trial Attorney for Plaintiff

The Defendants may be served at:

Seminole, Alabama

FILED
AUG 22 1966
CLERK
REGISTER

THE AMERICAN NATIONAL BANK
& TRUST COMPANY OF MOBILE, A
National Banking Association,

Plaintiff

-vs-

GLADYS VAUGHN also known as
GLADYS MAE VAUGHN and EARL
VAUGHN, jointly and severally,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7133

COUNT ONE

The Plaintiff claims of the Defendants, jointly and
severally, the following personal property, to-wit:

One (1) 1964 Mercury Comet, 4-door,
Manufacturer's Serial No. 4 H02U603182

together with the value of the use or hire thereof from the
date of detention, to-wit: August 11, 1966.

HAMILTON, DENNISTON, BUTLER & RIDDICK

BY: *James W. Hamilton III*

Trial Attorney for Plaintiff

The Defendants may be served at:

Seminole, Alabama

FILED
AUG 22 1966
MAE A. BULL, CLERK
REGISTER

The State of Alabama, }
Baldwin County

No. 7133

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Gladys Vaughn, also known as Gladys Mae Vaughn and Earl Vaughn, Jointly & Severally

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 The American National Bank & Trust Company of Mobile, a National Banking Association,

Witness my hand this 23 day of August 1966

Heinefrueck, Clerk

COMPLAINT

Plaintiff Versus Defendant

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

Attached hereto

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

from 19, to 19

Plaintiff's Attorney.

State of Alabama

Baldwin County

CIRCUIT COURT

THE AMERICAN NATIONAL BANK & TRUST
COMPANY OF MOBILE, A National Banking
Association,

Plaintiff

VS.

GLADYS VAUGHN, also known as GLADYS
MAE VAUGHN, & EARL VAUGHN, Jointly
& Severally

Defendant

Detinue Summons and Complaint

Filed August 22nd, 19 66

Alice J. Duck, Clerk

Hamilton, Denniston, Butler & Riddick
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 pro-
perty mentioned in Complaint into your posses-
sion unless the Defendant gives bond payable to
the Plaintiff with sufficient surety in double the
amount of the value of the property, with condi-
tion 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. Duck, Clerk

Executed by attaching
one 1964 Mercury Comet
Ser no H02U603182
Tag no 18854

Defendant lives at

RECEIVED

Received in office

AUG 23 1966

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this 2nd Sept, 1966

by leaving a copy with

Gladys Vaughn &
Earl Vaughn also
Attaching one 1964
Mercury Comet Ser.
no. H02U603182

Tag no 5-18854 and
staring at County Jail
Pty. made bond 9/9/66
by St. Paul Fire & Marine Ins.
Co. of St. Louis. Property released
to Pty.

Taylor Wilkins, Sheriff

W.O. Garner, Deputy Sheriff

Seminole Printed by Moore Printing Co.

Sheriff claims 180 miles at

Ten Cents per mile Total \$18.00

TAYLOR WILKINS, Sheriff

BY W.O. Garner
DEPUTY SHERIFF

THE STATE OF ALABAMA,
Mobile County

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, The American National Bank & Trust Company of Mobile, as Principal; and St. Paul Fire & Marine Insurance Company, of St. Paul, Minnesota, as Surety
are held and firmly bound unto Gladys Mae Vaughn and Earl Vaughn

heirs, executors and administrators, in the
sum of NINE HUNDRED AND NO/100 DOLLARS (\$900.00) Dollars, for
the payment of which, we bind ourselves, our and each of our heirs, executors, and administrators, jointly
and severally, firmly by these presents.

Sealed with our seals and dated this 11th day of August, A. D. 19 66

The Condition of the above Obligation is such, That whereas the above bounden The American National Bank & Trust Company of Mobile has, on

the 11th day of August 19 66, sued out from the office of the

Baldwin
Clerk of the Circuit Court of Mobile, in the State of Alabama, a Writ of Detinue, returnable to the present

Baldwin
term of said Circuit Court of Mobile against the said Gladys Mae Vaughn and Earl Vaughn

for the recovery of the following property.

to-wit: One (1) 1964 Mercury Comet, 4-door, Manufacturer's Serial
Number 4 H02U603182

NOW, if the said The American National Bank & Trust Company of Mobile shall fail
in said suit, and shall pay to the said Gladys Mae Vaughn and Earl Vaughn
the defendant in said writ all such costs and damages as he may sustain by the wrongful suing out of said
Writ of Detinue, then this obligation to be void, otherwise to remain in full force and benefit.

State of Alabama)
County of Mobile) I, John E. Mandeville,
Clerk, Circuit Court, Mobile County, Alabama,
do hereby certify that if this bond were
presented to me as Clerk of this Court,
I would approve the same.
DONE this 22nd day of August, 1966.
John E. Mandeville
JOHN E. MANDEVILLE, Clerk, Circuit Court,
Mobile County, Alabama.

THE AMERICAN NATIONAL BANK
& TRUST COMPANY OF MOBILE (Seal)

BY: [Signature] (Seal)

ITS: [Signature] (Seal)

ST. PAUL FIRE & MARINE INSURANCE COMP.

BY: [Signature]

ITS: Attorney-in-Fact

*Approved 8-23-66
Clerk J. Mandeville*

DETINUE AFFIDAVIT

W. Charles Prater

to-wit One (1) 1964 Mercury Comet, 4-door, Manufacturer's Serial
Number 4 H02U603182

Sworn to and subscribed the 11th day
of August 19 66, before me.

NOTARY: Wm. Joyce Reader
State at Large.

No. 7133

CIRCUIT COURT
BALDWIN COUNTY

VS. } Detinue Affidavit
and Bond

A hand-drawn sketch of a building, possibly a floor plan or architectural drawing. It features a central vertical axis with several rectangular sections of varying sizes and orientations. The drawing is done in a simple, sketchy style with lines and shading.

Filed _____ day of _____ 19____

Clerk Circuit Court, ~~XXXXXX~~County
Baldwin

Attorney

STATE OF ALABAMA
County of ~~MOBILE~~
Baldwin

KNOW ALL MEN BY THESE PRESENTS, That we, The American National Bank & Trust Company of Mobile, as Principal, and St. Paul Fire & Marine Insurance Company, as Sureties, are held and firmly bound unto Gladys Mae Vaughn and Earl Vaughn

in the sum of EIGHTEEN HUNDRED AND NO/100 DOLLARS (1800.00) 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 8th day of September in the year of our Lord, one thousand, nine hundred and sixty-six

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said The American National Bank & Trust Company of Mobile did, on the 11th day of August, (1) 966, sue out in the Circuit Court of ~~MOBILE~~ Baldwin County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, commanding him to take into his possession the following described property, to-wit:

One (1) 1964 Mercury Comet, 4-door,
Manufacturer's Serial No. 4 H02U603182

which said writ was placed in the hands of Taylor Wilkins *and executed 9-2*
Baldwin
Sheriff of the County of ~~MOBILE~~, on the 23rd day of August, 19 66 by taking into his possession the following described property, to-wit:

One (1) 1964 Mercury Comet, 4-door,
Manufacturer's Serial No. 4 H02U603182

and whereas the said Gladys Mae Vaughn and Earl Vaughn defendant in said writ, has failed and neglected, the 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} ~~if~~ the said The American National Bank & Trust Company of Mobile

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.

ST. PAUL FIRE & MARINE INSURANCE COMPANY

BY: Stephen S. Brown
Its: Attorney-in-Fact

THE AMERICAN NATIONAL BANK
& TRUST COMPANY OF MOBILE (Seal)

BY: [Signature] (Seal)
Its: Asst. VICE PRESIDENT (Seal)

Taken and approved this the 9th day of Sept, 19 66

[Signature]
Sheriff, ~~MOBILE~~ Baldwin County, Alabama

No. _____

COURT

BALDWIN
~~MOBILE~~ COUNTY

VS. { Detinue Forthcoming
Bond by Plaintiff