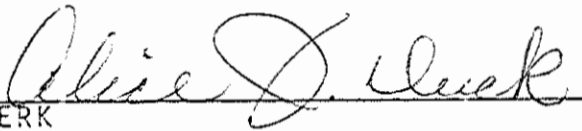


STATE OF ALABAMA

BALDWIN COUNTY

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.

  
CLERK

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Rayford Lambert 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 W. S. Padget.

Witness my hand this the 13 day of June 1967.

Alice J. Luck  
CLERK

W. S. PADGET

PLAINTIFF

VS

RAYFORD LAMBERT

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 7570

I

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

One 40 foot ELCAR, House Trailer  
with the value of the hire or use thereof during the detention,  
to-wit, from October 1, 1966 to November 1, 1966 and of the  
alternate value of \$295.00.

W. H. Hagan  
Attorney for Plaintiff

FILED  
JUN 13 1967  
MADE A. BROWN, CLERK

285

Property may be found at  
clerk's office.

Detinue

NUMBER: 7570

W. S. PADGET

PLAINTIFF

VS

RAYFORD LAMBERT

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS AND COMPLAINT

FILED

JUN 13 1967

CLERK  
RECEIVED

456-5377  
Pensacola Fla.

13 day of June 1967  
and on ~~14~~ day of ~~June~~ 1967  
I served a copy of the within Detinue  
on Rayford Lambert  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By W. A. Lambert

15 miles South of Bt.

Executed 6/14/67 by  
attaching one 40 ff  
clear, House trailer  
Wgt. Not found  
Pty made Bond  
7/10/67 by W. A.  
Padgett by Wilson  
Hayes Atty.  
Property released to  
Pty

Sheriff claims 30 miles at

Ten Cents per mile Total \$ 3.00

TAYLOR WILKINS, Sheriff

BY Lambert  
DEPUTY SHERIFF

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

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

W. S. Padgett

and \_\_\_\_\_

are held and firmly bound unto Rayford Lambert

in the sum of Six 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 \_\_\_\_\_

W. S. Padgett

did, on the 13th day

of June 19 67 sue out of the Circuit Court of Baldwin County

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 40 foot Elcar, House Trailer

which said writ was placed in the hands of Taylor Wilkins

Sheriff of Baldwin County, Alabama, on the 13th day of June, 1967,

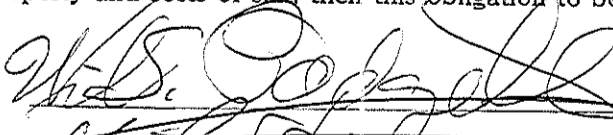
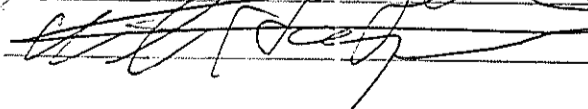
and executed by him on the 14 day of June, 1967, by taking into his possession the following property, to-wit:

same as above

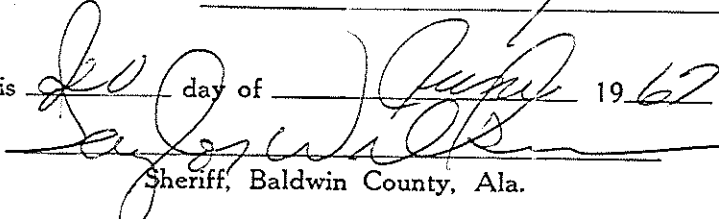
And whereas the said Rayford Lambert

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 W. S. Padgett 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.

 (SEAL)  
 (SEAL)  
\_\_\_\_\_  
(SEAL)

Taken and approved this 30 day of June 19 67

  
Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

REPLEVY BOND  
Of Plaintiff

vs.

Taken and approved this

day of \_\_\_\_\_, 196\_\_

STATE OF ALABAMA

BAEDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

Before me, Ruth K. Howell, a Notary Public in and for said County,

personally appeared Wilson Hayes who being by me

duly sworn deposes and says that the property sued for in the complaint of W. S. Padget

vs Rayford Lambert filed in said Court, to-wit:

One 40' ELCAR House Trailer

belongs to W. S. Padget, the plaintiff.

Sworn to and subscribed before me this

day of May, 19 67

Ruth K. Howell  
Notary Public

Wilson Hayes

FILED

JUN 23 1967

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, W. S. Padget

, Principal, and

Wilson Hayes,

Sureties, are held and

firmly bound unto Rayford Lambert, his heirs, executors and admin-

istrators in the sum of FIFTY and NO/100 (\$50.00) Dollars,

for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-

trators.

Sealed with our seals and dated the 18th day of May, 19 67

The condition of the above obligation is such that whereas, the above bound

W. S. Padget has on the 18th day of

May, 19 67 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said

Rayford Lambert

for the recovery of the following described property, to-wit:

One 40' ELCAR House Trailer

Now, if the said W. S. Padget shall fail in said suit

and shall pay to the said Rayford Lambert, the defendant in said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to be void, otherwise, to remain in full force and effect.

Taken and approved this 13 day of May, 1967 (SEAL)

(SEAL)

Alice J. Duck  
Clerk, Circuit Court

(SEAL)

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

**THE STATE OF ALABAMA**

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

**CIRCUIT COURT**

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

vs.

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

**Detinue — Affidavit and Bond**

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

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

W. S. PADGET,

Plaintiff,

vs.

RAYFORD LAMBERT,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 7570

PLEA:

Comes now the Defendant in the above styled cause and through his attorneys of record and for plea to the Complaint heretofore filed against him, says as follows:

1. Non Detinet.

CHASON, STONE & CHASON

By:

*John Earl Chason*

Defendent Respectfully Demands a

Trial of this cause by Jury.

*John E. Chason*

CERTIFICATE OF SERVICE

certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 24 day of August, 1967

*John E. Chason*

**FILED**

AUG 24 1967

**ALICE J. DUCK**

CLERK  
REGISTER