

SKY PHILLIPS,

PLAINTIFF

VS

WILLIAM OWENS and
FRANCES OWENS,

DEFENDANTS

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA


) AT LAW

) NUMBER: 7710
)
)

.....

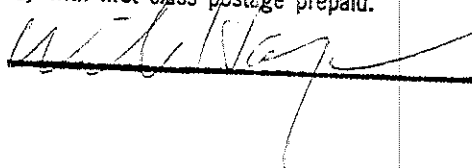
Comes now the Defendants in the above styled cause and
for answer to Plaintiff's complaint say:

1. The allegations contained in the Complaint are
untrue.
2. Not guilty.


Attorney for Defendants

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 20 day of Sept
1966 served a copy of the foregoing pleading on counsel for all
parties to this proceeding by mailing the same by United States
Mail, properly addressed, with first class postage prepaid.



FILED
9-21-67
12:11 PM
CLERK OF COURT

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William Owens and Frances Owens 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 Sky Phillips.

Witness my hand this 29 day of ^{Aug}~~July~~, 1967.

Alice J. Duck
Clerk

SKY PHILLIPS,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

BALDWIN COUNTY, ALABAMA

X

WILLIAM OWENS and
FRANCES OWENS,

X

AT LAW

X

7710

Defendants.

X

The Plaintiff claims of the Defendants the following personal property, viz:

One (1) White 1962 Chevrolet 2-door Impala
Hardtop, Serial Number 21847T218742,

with the value of the hire or use thereof during the detention,
from the 12th day of October, 1966.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

FILED

AUG 29 1967

ALICE J. DUCK

CLERK
REGISTER

STATE OF ALABAMA

BALDWIN COUNTY

TO THE SHERIFF OF BALDWIN COUNTY, GREETINGS:

The Plaintiff having given bond and made Affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the Defendant give bond payable to the Plaintiff, with security in double the value of the property, conditioned that if the Defendant is cast in the suit, he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

Witness my hand this 29 day of ^{Aug.}~~July~~, 1967.


Clerk Circuit Court, Baldwin County.

29 day of Aug 1967
20 day of Aug 1967

I served a copy of the within Detinue
on William Owens
Frances Owens
By service on

TAYLOR WILKINS, Sheriff
By W. A. Talbot

attached one 1962
Chevrolet sedan
Empala Hardtop
Serial # 218477218742
Depts. made bond
9/5/67 by Wm.
Owens Frances Owens
John Styron, Surgeon
Styron Property
released to Depts.
Taylor Wilkins
Shuff

7770

SKY PHILLIPS,
Plaintiff,

vs.

WILLIAM OWENS and
FRANCES OWENS,
Bay Minette
Defendants.
Old Pen. Rd.

* * * * *

DETINUE SUIT

* * * * *

FILED

AUG 29 1967

ALICE J. DUCK CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

STATE OF ALABAMA

JEFFERSON COUNTY

7710

Before me, the undersigned authority, personally appeared Sky Phillips, who, being duly sworn, deposeth and saith, That the property sued for in the Complaint of Sky Phillips vs. William Owens and Frances Owens, belongs to Sky Phillips, the said Plaintiff.

Sky Phillips

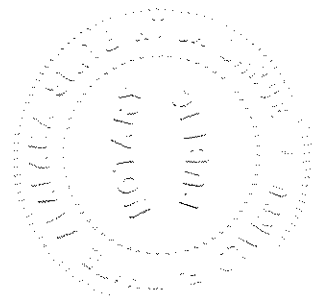
My Commission Expires July 19, 1977

Sworn to and subscribed before me on

this the 20th day of July, 1967.

Donald F. White

Notary Public, Jefferson County, Alabama.



FILED

AUG 29 1967

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

BOND

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS: That we, Sky Phillips, as principal, and FIDELITY + DEPOSIT Co. of Md., as surety, are held and firmly bound unto William Owens and Frances Owens in the sum of Fifty Dollars (\$50.00), to be paid to the said William Owens and Frances Owens, their heirs, executors, administrators or assigns; for which payment, well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals, and dated this _____ day of July, in the year of our Lord, One Thousand Nine Hundred and Sixty-seven.

The condition of the above obligation is such, that, whereas the above bound Sky Phillips, on the day of the date hereof hath obtained at the suit of Sky Phillips vs. William Owens and Frances Owens, a summons and complaint for the recovery of personal property in specie against said defendants and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession", as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of Baldwin County for said County, and which said endorsement is made upon the plaintiff entering into this bond.

Now, if the said plaintiff shall fail in this suit, and shall pay the defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this

obligation to be void, otherwise to remain in full force and effect.

x Skyl Phillips (SEAL)

Fidelity + Deposit Co. of Md. (SEAL)

My Commission Expires July 19, 1971

by Walter Lindsey (SEAL)
att'y in fact.

Approved this 29 day of

Aug
~~July~~ 1967.

Bernard J. Duck
Clerk

FILED

AUG 29 1967

ALICE J. DUCK

CLERK
REGISTER

THE STATE OF ALABAMA,

Civil

COURT.

Baldwin

COUNTY.

Term, 19

KNOW ALL MEN BY THESE PRESENTS:

That we, William Owens and Frances Owens
are held and firmly bound unto Sky Phillips
in the sum of Three thousand Dollars,
for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators,
jointly and severally, firmly by these presents.

Sealed with our seals and dated, this _____ day of _____ 19

The Condition of the above Obligation is Such, That whereas the said

Sky Phillips did on the 29th day
of August 1967, sue out of the Circuit

Court of said County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding
him to take into his possession the following property, sued for in action of detinue, to wit:

One White 1962 Chevrolet 2-door Impala Hardtop, Serial #21847T218742

which said writ was placed in the hands of Taylor Wilkins

Sheriff of the County of Baldwin, on the 29 day
of August 1967, and executed by him on the 30th day of

August 1967 by taking into his possession
same as above

and whereas the above bound William Owens and Frances Owens

has within five days from the execution of said writ entered into this bond as required by law, and here-
by obtain possession of said property.

Now, if the said Sky Phillips shall well and truly, within
thirty days after the determination of said suit, if the said William and Frances Owens
be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for de-
tention as may accrue from said detention, then this obligation to be void, otherwise to remain in full
force and effect.

And we, and each of us, hereby waive all rights of claim of exemption we or either of us have
now, or may hereafter have, under the Constitution and Laws of Alabama, and I hereby
severally certify that they have property free from all encumbrance to the full amount of the
above bond.

Witness our hands and seals, this 5th day of September 1967

Taken and approved,

Sept 5 1967
Earl Wilkins
Sheriff.

William Owens (L.S.)
Frances Owens (L.S.)
John S. [unclear] (L.S.)
[unclear] (L.S.)

No. _____	
The State of Alabama,	
_____ COUNTY.	
_____ COURT.	
SHERIFF'S OFFICE	

vs. _____	
Plaintiff.	

Defendant.	
DETINUE REPLEVIN BOND, DEFENDANT.	
Filed _____ 19 _____	
Sheriff.	
Sheriff's Execution Docket, page _____	