

AUSTIN E. BARKER, individually
and doing business as BARKER
MOTORS for the use and benefit
of THE TRAVELERS INDEMNITY
COMPANY, a Corporation,

Plaintiff,

=vs=

GODFREY JONES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7719

DETINUE BOND AND AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS, that we, Austin E. Barker, individually and doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation, as Principal, and The Fidelity and Deposit Company of Maryland, Baltimore, Maryland, as Surety, are held and firmly bound unto Godfrey Jones, his heirs, executors and administrators, in the sum of One Hundred and No/100 (\$100.00) 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.

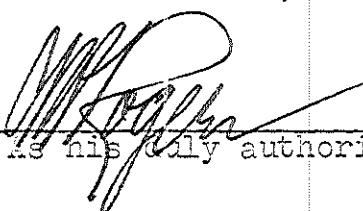
Sealed with our seals and dated this 31st day of August, 1967.

The condition of the above obligation is such that whereas the above bounden Austin E. Barker, individually and doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation, has, on the 31st day of August, 1967, sued out from the office of the Clerk of the Circuit Court of Baldwin, in the State of Alabama, a Writ of Detinue, returnable to the present term of said Circuit Court of Baldwin against the said Godfrey Jones for the recovery of the following property, to-wit: One 1966 Ford Galaxie "500" 4-door hardtop automobile, Identification No. 6G62C108337, or in the alternative the value thereof which is, to-wit, the sum of \$2,160.00, with the value of the hire or use thereof during the detention, viz, from, to-wit, the 21st day of February, 1967.

NOW, if the said Austin E. Barker, individually and

doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation, shall fail in said suit, and shall pay to the said Godfrey Jones 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.

AUSTIN E. BARKER, individually and doing business as BARKER MOTORS for the use and benefit of THE TRAVELERS INDEMNITY COMPANY, a Corporation

By  (SEAL)
As his duly authorized attorney

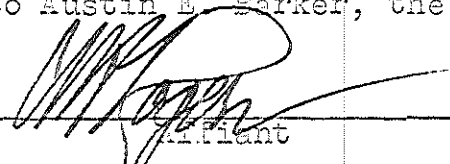
THE FIDELITY AND DEPOSIT COMPANY OF MARYLAND, BALTIMORE, MARYLAND

By  (SEAL)
As its attorney-in-fact

STATE OF ALABAMA
COUNTY OF MOBILE

Before me, the undersigned authority in and for said State and County, personally appeared C. M. A. Rogers, III, who, being duly sworn, deposes and says that he is informed and believes, and based upon such information and belief, says and avers that the property sued for in the complaint of Austin E. Barker, individually and doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation, to-wit, One 1966 Ford Galaxie "500" 4-door Hardtop automobile, Identification No. 6G62C108337, belongs to Austin E. Barker, the said Plaintiff.

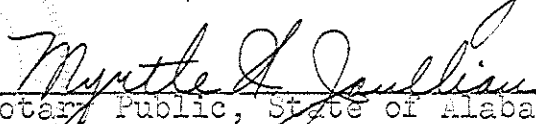
approved 8-1-67
Cliff French - Clerk


Plaintiff

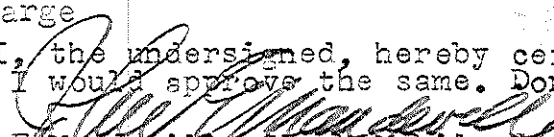
Sworn to and subscribed before me

this the 31st day of August, 1967.

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Notary Public, State of Alabama, at Large

(STATE OF ALABAMA) COUNTY OF MOBILE) I, the undersigned, hereby certify that, if this bond were presented to me I would approve the same. Done this the 31st day of August, 1967.


John E. Mandeville, Clerk, Mobile County Ala

AUSTIN E. BARKER, individually	§	IN THE CIRCUIT COURT OF
and doing business as BARKER		
MOTORS for the use and benefit	§	BALDWIN COUNTY, ALABAMA
of THE TRAVELERS INDEMNITY		
COMPANY, a Corporation,	§	AT LAW
Plaintiff,	§	CASE NO. _____
=vs=	§	
GODFREY JONES,	§	
Defendant.	§	

FORTHCOMING BOND

KNOW ALL MEN BY THESE PRESENTS, That we, Austin E. Barker, individually and doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation, as Principal, and The Fidelity and Deposit Company of Maryland, Baltimore, Maryland, as Surety, are held and firmly bound unto Godfrey Jones in the sum of Four Thousand Four Hundred and No/100 (\$4,400.00) Dollars 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 12th day of September, in the year of our Lord, one thousand, nine hundred and sixty-seven.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said Austin E. Barker, individually and doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation did, on the 31st day of August, 1967, sue out in the Circuit Court of 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:

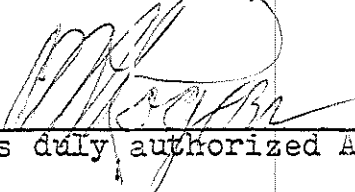
1 - 1966 Ford Galaxie "500" 4-door hardtop automobile
Identification No. 6G62C108337

which said writ was placed in the hands of Taylor Wilkins, Sheriff of the County of Baldwin, on the 1st day of September, 1967, by taking into his possession the following described

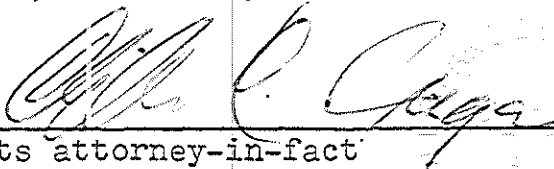
property, to-wit: 1 - 1966 Ford Galaxie "500" 4-door hardtop automobile Identification No. 6G62C108337 and whereas the said Godfrey Jones, Defendant in said writ, has failed and neglected, the space of five days from the execution of said writ, to give bond and take possession of said property as authorized by law.

Now if the said Austin E. Barker, individually and doing business as Barker Motors for the use and benefit of The Travelers Indemnity Company, a Corporation, 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.

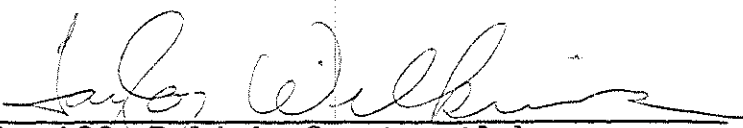
AUSTIN E. BARKER, individually and doing business as BARKER MOTORS for the use and benefit of THE TRAVELERS INDEMNITY COMPANY, a Corporation

By  (SEAL)
Its duly authorized Attorney

THE FIDELITY AND DEPOSIT COMPANY OF MARYLAND, BALTIMORE, MARYLAND

By  (SEAL)
As its attorney-in-fact

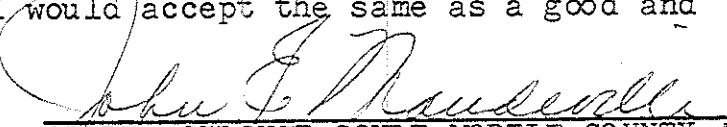
Taken and approved this the 13th day of September, 1967.


Sheriff, Baldwin County, Alabama

State of Alabama)
Mobile County)

Circuit Court

I, JOHN E. MANDEVILLE, Clerk of the Circuit Court of Mobile County, Alabama, hereby certify that if the foregoing Forthcoming Bond were presented to me, I would accept the same as a good and sufficient bond.


CLERK, CIRCUIT COURT, MOBILE COUNTY, ALABAMA.

AUSTIN E. BARKER, individually
and doing business as BARKER
MOTORS for the use and benefit
of THE TRAVELERS INDEMNITY
COMPANY, a Corporation,

Plaintiff,

=vs=

GODFREY JONES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

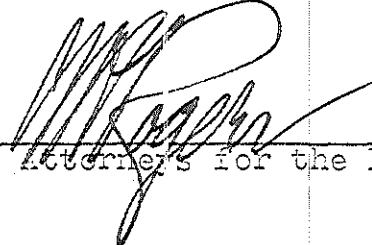
CASE NO. 7719

COUNT ONE

The Plaintiff claims of the Defendant the following personal property, viz: One 1966 Ford Galaxie "500" 4-door Hardtop automobile, Identification No. 6G62C108337, or in the alternative the value thereof which is, to-wit, the sum of \$2,160.00, with the value of the hire or use thereof during the detention, viz, from, to-wit, the 21st day of February, 1967.

The Plaintiff further avers that the Defendant continued to hold the above described property more than five (5) days after demand was made therefor, and after reasonable proof of the Plaintiff's ownership thereof had been made to the Defendant, wherefore, the Plaintiff claims a reasonable attorney's fee for the services of the Plaintiff's attorney in this cause in accordance with the provisions of Title 7, Section 921(1), of the Code of Alabama of 1940, Recompiled in 1958.

McCORVEY, TURNER, JOHNSTONE, ADAMS & MAY

By 

Attorneys for the Plaintiff

Defendant's address:

Route 1, Box 23
Daphne, Alabama

FILED

SEP 1 1967

ALICE J. BARKER
CLERK
REGISTER

The State of Alabama, }
Baldwin County

CIRCUIT COURT

No. 7719

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To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Godfrey Jones

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 Austin E. Barker, Ind. &
d/b/a BARKER MOTORS, for the use and benefit of THE TRAVELERS INDEMNITY CO., A CORP.

Witness my hand this 1st day of September 1947

Alice J. Luck Clerk

COMPLAINT

Plaintiff Versus Defendant

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

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

AUSTIN E. BARKER, Ind. & d/b/a

BARKER MOTORS, for the use and benefit
of THE TRAVELERS INDEMNITY CO., A CORP.

Plaintiff

VS.

GODFREY JONES

Defendant

Detinue Summons and Complaint

Filed, 19

, Clerk

McCorvey, Turner, Johnston, Adams & May
P. O. Box 1988 Plaintiff's Attorney
Mobile, Ala.

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 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.

Alice J. Slack Clerk

Defendant lives at

Received in office

Sept. 1, 1967

Mykel Wilkins, Sheriff

I have executed this summons

this Sept 3, 1967

by leaving a copy with

Godfrey Jones and
attaching one 1966 Galaxie
500 Ford stored at

Bay Minette

Towed in by Wilson

Part 1 Tag # 524675 also

Bond made 9/13/67 by

Plt. Arthur C. Barker

C. M. A. Legans, atty.

Fidelity & Deposit Co. by Maryland.

Scayler Wilkins, Sheriff

Roy Randall, Deputy Sheriff

Printed by Moore Printing Co.

44 miles at
Sheriff claims
Ten Cents per mile Total \$ 4.40
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF