

7858

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, the undersigned, a Notary Public in and for said County, personally appeared _____ who being by me duly sworn deposes and says that the property sued for in the complaint of Midland-Guardian of Pensacola, Inc. filed in said Court, to-wit:

One (1) 1964 Detreater Housetrailer, 50' x 10'

Serial No. 2458

belongs to Midland Guardian of Pensacola, Inc., the plaintiff.

Sworn to and subscribed before me this 20 day of November, 1967

Henry Hyden

NOTARY PUBLIC, STATE OF ALABAMA
MY COMMISSION EXPIRES NOV. 15, 1970
BONDED THROUGH FRED W. DISTELHORST

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we, MIDLAND GUARDIAN OF PENSACOLA, INC., a corporation, Principal, and FIDELITY & DEPOSIT COMPANY OF MARYLAND, Sureties, are held and firmly bound unto Jimmy Mote and Judy Mote, his heirs, executors and administrators in the sum of Fifty and no/100----- Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Scaled with our seals and dated the _____ day of November, 1967

The condition of the above obligation is such that whereas, the above bound Midland Guardian of Pensacola, Inc. has on the _____ day of November, 19____ sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Jimmy Mote and Judy Mote for the recovery of the following described property, to-wit:

One (1) 1964 Detreater Housetrailer, 50' x 10'

Serial No. 2458

Now, if the said Midland Guardian of Pensacola, Inc. shall fail in said suit and shall pay to the said Jimmy Mote and Judy Mote, 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.

MIDLAND GUARDIAN OF PENSACOLA, INC.

Taken and approved this 21 day of November, 1967 By: Henry Hyden (SEAL) as its Vice Pres.

FIDELITY & DEPOSIT COMPANY OF MARYLAND By: Katherine Lindsey (SEAL) as its Atty. in Fact.

Clerk, Circuit Court

No. 7858

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

FILED

Filed this 21 day of NOV 1967

ALICE J. DUCK

CLERK
REGISTER
Clerk

The State of Alabama, }
Baldwin County

CIRCUIT COURT
No. _____

19__

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon JIMMY NOTE

JUDY NOTE

ROUTE 1, BOX 175

SEMINOLE, ALABAMA

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 _____

MIDLAND GUARDIAN OF PENSACOLA, INC.

a corporation

Witness my hand this 21 day of November, 1967

Alice J. Duck, Clerk

COMPLAINT

MIDLAND GUARDIAN OF PENSACOLA,
INC., a corporation

JIMMY NOTE AND JUDY NOTE

Plaintiff

Versus

Defendant

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

One (1) 1964 Detreiter Housetrailer, 50' x 10'

Serial No. 2458

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

from October 20, 1967, to date, 19__

FILED

NOV 21 1967

OWENS AND PATTON

By: [Signature]

Plaintiff's Attorney:

ALICE J. DUCK

CLERK
REGISTER

State of Alabama

Baldwin County

CIRCUIT COURT

Midland Guardian
of Pensacola, Inc
Plaintiff

VS.

Jimmy Mote
Judith Mote
Defendant

Detinue Summons and Complaint

FILED

Filed _____, 19

NOV 21 1967

ALICE J. BOY

CLERK
REGISTER

Quinn Patton
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 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. Boy, Clerk

Executed by serving Jimmy Mote
and Judith Mote, 11/24/67
and taking in possession the
1964 DETROITER HOUSE TRAILER
MENTIONED IN THE COMPLAINT,
and leaving at BOYD VAUGHN
HOME IN SEMINOLE, ALA. and
taking a BAYLEE RECEIPT
Signed by Judy Mote.

made bond 11/29/67
By Midland Guardian of Pensacola, Inc
Judith Mote + Deposit of \$1000 to Sheriff
Property released to P.D.
By Carlisle Chidress

Defendant lives at

Received in office

NOV 21 1967

TAYLOR WILKINS, Sheriff

I have executed this summons

this _____, 19

by leaving a copy with

Sheriff claims 18.0 miles

Ten Cents per mile Total \$ 1.80

TAYLOR WILKINS, Sheriff
by Carlisle Chidress
DEPUTY SHERIFF

_____, Sheriff

_____, Deputy Sheriff

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, MIDLAND GUARDIAN OF PENSACOLA, INC., a corporation

and FIDELITY & DEPOSIT COMPANY OF MARYLAND

are held and firmly bound unto JIMMY MOTE AND JUDY MOTE

in the sum of TEN THOUSAND FIVE HUNDRED AND NO/100--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 21st day of November 19 67

The condition of the above obligation is such that whereas the said MIDLAND GUARDIAN OF PENSACOLA, INC., did, on the day of November 19 67 sue out of the Circuit Court of Baldwin Alabama 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 (1) 1964 Detroittr Housetrailer, 50' x 10'
Serial No. 2458

which said writ was placed in the hands of Taylor Wilkins, Sheriff of Baldwin County, Alabama, on the 21st day of November, 19 67, and executed by him on the 24th day of November, 19 67, by taking into his possession the following property, to-wit:

One (1) 1964 Detroittr Housetrailer, 50' x 10'
Serial No. 2458

And whereas the said Jimmy Mote and Judy Mote 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 Midland Guardian of Pensacola, Inc. 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.

MIDLAND GUARDIAN OF PENSACOLA, INC.
By: Henry Hyden (SEAL)
As its Vice Pres.
FIDELITY & DEPOSIT COMPANY OF MARYLAND
By: Alton L. Lundy (SEAL)
As its Atty in Fact.

Taken and approved this 29th day of November 19 67

James W. Lundy
Sheriff, Baldwin County, Ala.