

LAW OFFICES
CAFFEY, GALLALEE, EDINGTON & LOVELESS
CONTI AT ST. EMANUEL
MOBILE, ALABAMA
36602

WILLIAM G. CAFFEY (1884-1964)
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I. DAVID CHERNIAK
FREDERICK G. HELMSING
HORACE MOON, JR.

TELEPHONE 433-2531
AREA CODE 205

September 25, 1968

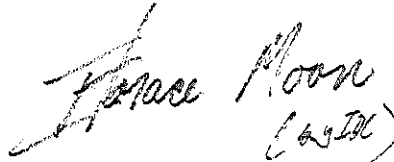
Mrs. Alice J. Duck, Clerk & Register
Circuit Court of Baldwin County
Court House
Bay Minette, Alabama

Re: Bay Minette Loan Company, vs. Jimmy L. Pugh
Case No. 8317

Dear Mrs. Duck:

I would greatly appreciate your filing the enclosed
Motion to Stay at your convenience. Thank you very much.

Very truly yours,

A handwritten signature in cursive script that reads "Horace Moon" with "Jr." written in smaller letters below it, all enclosed in a large, sweeping loop.

HORACE MOON, JR.
For the Firm

HM,jr:lme
Encl.

8317

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

Before me, Taylor Wilkins, Jr., a Notary Public in and for said County, personally appeared Ray Stephens who being by me

duly sworn deposes and says that the property sued for in the complaint of Bay Minette Loan Company filed in said Court, to-wit:

All household and kitchen furniture including one RCA refrigerator, one RCA electric range, and a console stereo

belongs to Bay Minette Loan Company, the plaintiff.

Sworn to and subscribed before me this

day of September 19 68

Notary Public

Ray C Stephens

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Bay Minette Loan Company

, Principal, and

, Sureties, are held and firmly bound unto Jimmy L. Pugh, 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 _____ day of September, 19 68

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

Bay Minette Loan Company has on the _____ day of

September, 1968 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Jimmy L. Pugh

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

All household and kitchen furniture, including one RCA refrigerator, one RCA electric range and a console stereo.

Now, if the said Bay Minette Loan Company shall fail in said suit and shall pay to the said Jimmy L. Pugh, 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 September, 19 68

Clerk, Circuit Court

No. 8317

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

BAY MINETTE LOAN COMPANY
Plaintiff

vs.

JIMMY L. PUGH
Defendant

Detinue — Affidavit and Bond

Filed this 10 day of NOV, 19 1917

Clerk

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County }

KNOW ALL MEN BY THESE PRESENTS, That we, Bay Minette Loan Company

and _____

are held and firmly bound unto Jimmie L. Pugh

in the sum of FOUR HUNDRED (\$400.00) 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 3rd day of October 19 68

The condition of the above obligation is such that whereas the said plaintiff

_____ did, on the 13th day of Sept 19 68 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: a RCA refrigerator,
RCA electric range and a console stereo

which said writ was placed in the hands of Taylor Wilkins

Sheriff of Baldwin County, Alabama, on the 13th day of Sept, 19 68,
and executed by him on the 24th day of Sept, 19 68, by taking into his possession the following property, to-wit:

same as above

And whereas the said Jimmie L. Pugh 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 plaintiff 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.

Ray C. Stephens (SEAL)

_____ (SEAL)

Taken and approved this 3rd day of October 19 68

Taylor Wilkins
Sheriff, Baldwin County, Ala.

The State of Alabama, }
Baldwin County

CIRCUIT COURT
No. 8317

September 10 1968

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Jimmy L. Pugh

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 Bay Minette Loan
Company

Witness my hand this 13 day of September 1968

Alice J. Luck Clerk

COMPLAINT

Bay Minette Loan Company Jimmy L. Pugh

Plaintiff Versus Defendant

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

I.

All household and kitchen furniture, including one RCA refrigerator,
one RCA electric range, and a console stereo.

II.

The Plaintiff claims of the Defendant Two Hundred (\$200.00) Dollars
balance due by promissory note for \$360.00 made by him on the 18th
day of November, 1967, and payable on the 25th day of August, 1968,
with interest thereon.

Plaintiff further alleges that in and by the terms of said note the
Defendant waived all rights of homestead exemption, and Defendant agreed
to pay all costs of collecting or securing the note, including a
reasonable Attorney's fee.
with the value of the hire or use thereof during the detention, to-wit:

from November 18th, 1967, to August 25th 1968

and of the alternate value of \$200.00.

[Signature]

Plaintiff's Attorney.

No. 8317 Page _____

State of Alabama

Baldwin County

CIRCUIT COURT

Bay Minette Loan Company

Plaintiff

VS.

Jimmy L. Pugh

Defendant

Detinue Summons and Complaint

Filed _____, 19____

FILED

SEP 13 1968, Clerk

ALICE J. DUCK CLERK
REGISTER

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. Duck Clerk

Defendant lives at
302 Mango Street, Bay Minette
Works for Terminex

Received in office
RECEIVED

SEP 13 1968

, Sheriff

I have executed this summons

this Sept 24, 1968

by leaving a copy with

Jimmy Pugh
and attached
all household and
kitchen furniture
including one
R C A refrigerator one
R C A electric range
and a console stereo

Plt made bond 10/3/68
By J. Ray C. Stephens & Property
relief of to Plt

Walter Wilkins, Sheriff

W A Talbert, Deputy Sheriff

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