

DETINUE SUMMONS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
CASE NO. \_\_\_\_\_

May 28, 1969

TO ANY SHERIFF OF THE STATE OF ALABAMA-GREETINGS

You are hereby commanded to summon EMMA BROWN WRIGHT to appear within thirty (30) 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 to the complaint of Baldwin County Bank.

Witness my hand this 28 day of May, 1969.

Alice J. Eluk, Clerk

\*\*\*\*\*

BALDWIN COUNTY BANK,  
Plaintiff

VERSUS

EMMA BROWN WRIGHT,  
Defendant

I

8723

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

1965 Dodge Dart, serial number L352 519 412  
with the value of the hire or use thereof during the detention  
to-wit:

From May 14, 1969, to May 28, 1969

Taylor D. Wilkins, Jr.  
Attorney for Plaintiff

FILED

MAY 28 1969

ALICE J. ELUK CLERK  
REGISTER

8723

DETINUE SUMMONS AND COMPLAINT

BALDWIN COUNTY BANK,

Plaintiff,

VS.

EMMA BROWN WRIGHT,

Defendant.

FILED

MAY 20 1969

ALICE J. BEEK CLERK  
REGISTER

Taylor D. Wilkins, Jr.  
Attorney for Plaintiff

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 \_\_\_\_\_

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 \_\_\_\_\_

Witness my hand this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_, 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

Baldwin County  
Bank

Plaintiff...

VS.

Emma Brown Wright

Defendant...

Detinue Summons and Complaint

Filed FILED \_\_\_\_\_, 19\_\_\_\_

MAY 28 1969

\_\_\_\_\_, Clerk

ALICE J. DUCK CLERK  
REGISTER

Taylor Wilkins Jr.  
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 Duck Clerk

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00  
TAYLOR WILKINS, Sheriff

BY Barnes  
DEPUTY SHERIFF

Defendant lives at

Received in office

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this May 28, 1969

by leaving a copy with

By attaching the within  
described property  
and storing at Hulson  
pure service spaniards  
and not fining  
Emma Brown Wright  
bond made 6/4/69  
By J. C. Hunt Agent  
Baldwin Co. Bank  
Property released to City

Taylor Wilkins, Sheriff

W. C. Barnes, Deputy Sheriff

Printed by Moore Printing Co.

I hope

DETINUE SUMMONS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
CASE NO. \_\_\_\_\_

May 28, 1969

TO ANY SHERIFF OF THE STATE OF ALABAMA-GREETINGS

You are hereby commanded to summon EMMA BROWN WRIGHT to appear within thirty (30) 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 to the complaint of Baldwin County Bank.

Witness my hand this 28 day of May, 1969.

Alice J. Busk, Clerk

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BALDWIN COUNTY BANK,

VERSUS

EMMA BROWN WRIGHT,

Plaintiff

Defendant

I

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

1965 Dodge Dart, serial number L352 519 412  
with the value of the hire or use thereof during the detention  
to-wit:

from May 14, 1969, to May 28, 1969

Taylor D. Wilkins, Jr.  
Attorney for Plaintiff

FILED

MAY 28 1969

ALICE J. BUSK

CLERK  
REGISTER

WITNESSES  
CLERK

MAY 5 1922

FILED

Attorney for Plaintiff  
Taylor D. Wilkins, Jr.

from May 14, 1922, to May 28, 1922

DETINUE SUMMONS AND COMPLAINT

BALDWIN COUNTY BANK,  
Plaintiff,  
VS.  
EMMA BROWN WRIGHT,  
Defendant.

Taylor D. Wilkins, Jr.  
Attorney for Plaintiff

BALDWIN COUNTY BANK,  
ARIZONA  
EMMA BROWN WRIGHT,

*Emma Brown Wright*, Clerk

Witness my hand this 28 day of May, 1922.

Baldwin County Bank.  
holding the same, then and there to answer to the complaint of  
the Circuit Court to be held for said County at the place of  
appear within thirty (30) days from the service of this writ, in  
you are hereby commanded to answer EMMA BROWN WRIGHT to  
TO THE SHERIFF OF THE STATE OF ARIZONA-DESHAYES

*May 28*, 1922

BALDWIN COUNTY  
STATE OF ARIZONA  
CASE NO.  
BALDWIN COUNTY, ARIZONA  
IN THE CIRCUIT COURT OF

DETINUE SUMMONS AND COMPLAINT

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 \_\_\_\_\_

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 \_\_\_\_\_

Witness my hand this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_, 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.

No. 8723

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State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiff...

VS.

Defendant...

Detinue Summons and Complaint

Filed \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Clerk

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. Luck* Clerk

Defendant lives at

Received in office

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff



STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, Taylor D. Wilkins, Jr., a Notary Public in and for said County,  
personally appeared Frank Hunt who being by me  
duly sworn deposes and says that the property sued for in the complaint of  
Baldwin County Bank filed in said Court, to-wit:

1965 Dodge Dart, serial number L352 519 412

belongs to Baldwin County Bank, the plaintiff.

Sworn to and subscribed before me this

28

day of

May 1969

[Signature]  
Notary Public

[Signature]

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, Baldwin County Bank

\_\_\_\_\_, Principal, and  
\_\_\_\_\_, Sureties, are held and  
firmly bound unto Emma Brown Wright, her  
heirs, executors and admin-  
istrators in the sum of FIFTY (\$50.00) Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

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

Baldwin County Bank has on the \_\_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_, 19 \_\_\_\_\_ sued out a writ of detinue in the Circuit Court of \_\_\_\_\_

Baldwin County, returnable to the said Circuit Court against the said \_\_\_\_\_

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

1965 Dodge Dart, serial number L352 519 412

Now, if the said Baldwin County Bank shall fail in said suit  
and shall pay to the said Emma Brown Wright, 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. BALDWIN COUNTY BANK

Taken and approved this 28 day of May 1969 BY: [Signature] (SEAL)

[Signature] (SEAL)

[Signature] (SEAL)

Clerk, Circuit Court

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

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

BALDWIN COUNTY BANK

Plaintiff

vs.

EMMA BROWN WRIGHT

Defendant

Detinue — Affidavit and Bond

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

Clerk

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we, Baldwin County Bank

and \_\_\_\_\_

are held and firmly bound unto Emma Brown Wright

in the sum of Fifteen Hundred (\$1,500.00) 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 \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

The condition of the above obligation is such that whereas the said \_\_\_\_\_

Baldwin County Bank did, on the \_\_\_\_\_ day

of July 19 69 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: \_\_\_\_\_

1965 Dodge Dart, serial number L352 519 412

which said writ was placed in the hands of Taylor D. Wilkins

Sheriff of Baldwin County, Alabama, on the 28th day of May, 19 69.

and executed by him on the 28th day of May, 19 69, by taking into his possession the following property, to-wit:

1965 Dodge Dart, serial number L352 519 412

And whereas the said Emma Brown Wright

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 Baldwin County Bank 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.

J. C. Shivers (SEAL)

Baldwin County Bank (SEAL)

(SEAL)

Taken and approved this 4th day of June, 19 69

Taylor D. Wilkins  
Sheriff, Baldwin County, Ala.