

MOBILE DODGE, INC.,
Plaintiff,

v.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

: AT LAW

BRUCE AYERS, BRUCE AYERS doing
business as GULF PARK SALES CO.,
and GULF PARK SALES CO., a corpor-
ation,

Defendants.

CASE NO. 8821

COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendants the following personal property,
viz: One (1) 1969 Dodge Polara, dark blue six-passenger station wagon, Serial
Number DL 45 G 9R 202 962, Alabama License No. 3-59833, with V-8 engine,
automatic transmission, power steering, air conditioning, radio and white side-
wall tires, with the value of the hire or use thereof during the detention, viz:
From, to-wit: June 22, 1969.

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Plaintiff

By: Broox G. Holmes
BROOX G. HOLMES

By: T. K. Jackson, III
T. K. JACKSON, III

The Defendant, Bruce Ayers, resides and may be served at his residence
and office near Bear Point Marina, Orange Beach, Alabama.

The Defendant, Gulf Park Sales Co., a corporation, may be served
through its agent, Bruce Ayers, at his residence and office near Bear Point Ma-
rina, Orange Beach, Alabama.

The automobile described above is in the possession of Bruce Ayers and

should be located at his residence and office near Bear Point Marina, Orange Beach, Alabama.

Please contact Broox G. Holmes of Armbrrecht, Jackson & DeMouy in Mobile (432-6751) for better address if the above is not sufficient.

FILED

JUL 30 1969

ALICE J. DUCK

CLERK
REGISTER

The State of Alabama, }
Baldwin County

No. 8821

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Bruce Ayres, Bruce Ayres d/b/a Gulf Park Sales Company, and Gulf Park Sales Company

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 Mobile Dodge, Inc

Witness my hand this 30th day of July 19 69

Alice J. Luck, Clerk

COMPLAINT

MOBILE DODGE, Inc.

BRUCE AYRES, BRUCE AYRES d/b/a

GULF PARK SALES COMPANY and GULF PARK SALE CO.

Plaintiff

Versus

Defendant

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

Bill of Complaint attached

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

MOBILE DODGE, Inc.

Plaintiff

VS.

BRUCE AYRES, d/b/a etc

Defendant

Detinue Summons and Complaint

Filed 7-30-69, 19

Alive J. Duck, Clerk

Thought to be in
North Carolina

Armbricht, Jackson & DeMouy
Broox Holmes 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.

Alive J. Duck, Clerk

Defendant lives at

Received in office

7/30, 1969

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

Bruce Ayres

Returned 8/19/69
Not found as to
dept. of Property

Rayton White, Sheriff

Chadwick, Deputy Sheriff

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P. O. BOX 290

MOBILE, ALABAMA

36601

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOX G. HOLMES
W. BOYD REEVES
JOHN GROW
FRANK B. MCRIGHT
Y. D. LOTT, JR.
CLIFFORD FOSTER, III
T. K. JACKSON, III
E. B. PEEBLES, III
F. M. KEELING

TELEPHONE
AREA CODE 205
432-6751

CABLE ADDRESS
SEALAW

July 29, 1969

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama 36507

8821

Re: Mobile Dodge, Inc. v. Bruce Ayers, etc.

Dear Mrs. Duck:

We enclose the following for filing: A Complaint and two copies for serving, affidavit of ownership with two copies, and detinue bond as required by Title 7, Section 918.

According to our conversation today, you have a form for the summons and the Clerk's writ ordering the Sheriff to take the property into custody, and that you would endorse same on the summons.

We would like to have the Sheriff pick up this automobile as soon as possible and I would appreciate your calling me if there are any problems.

Thanks.

Sincerely yours,

FILED

JUL 30 1969

Broox G. Holmes
Broox G. Holmes

BGH/mls
Enclosures

ALICE J. DUCK

CLERK
REGISTER

700.8821

STATE OF ALABAMA)
 :
COUNTY OF MOBILE)

DETINUE AFFIDAVIT

PERSONALLY appeared before me, a Notary Public in and for said County in said State, JOE C. TRENT, who, being duly sworn, deposes and says that he is Secretary-Treasurer for MOBILE DODGE, INC., and that he states that the property sued for in the Complaint of Mobile Dodge, Inc., v. Bruce Ayers, et al, to-wit:

One (1) 1969 Dodge Polara, dark blue six-passenger station wagon, Serial Number DL 45 G 9R 202 962, Alabama License No. 3-59833, with V-8 engine, automatic transmission, power steering, air conditioning, radio and white sidewall tires,

belongs to MOBILE DODGE, INC., the said Plaintiff.

Joe C. Trent

JOE C. TRENT, as Secretary-Treasurer
of Mobile Dodge, Inc.

SWORN TO and SUBSCRIBED before me

this 29th day of July, 1969.

Mickey L. Blanc Sims

Notary Public, Mobile County, Alabama

(AFFIX NOTARIAL SEAL)

My Commission Expires:

March 11, 1973

FILED

JUL 30 1969

ALICE J. DUCK

CLERK
REGISTER

STATE OF ALABAMA)
 :
COUNTY OF MOBILE)

DETINUE AFFIDAVIT

PERSONALLY appeared before me, a Notary Public in and for said County in said State, JOE C. TRENT, who, being duly sworn, deposes and says that he is Secretary-Treasurer for MOBILE DODGE, INC., and that he states that the property sued for in the Complaint of Mobile Dodge, Inc., v. Bruce Ayers, et al, to-wit:

One (1) 1969 Dodge Polara, dark blue six-passenger station wagon, Serial Number DL 45 G 9R 202 962, Alabama License No. 3-59833, with V-8 engine, automatic transmission, power steering, air conditioning, radio and white sidewall tires,

belongs to MOBILE DODGE, INC., the said Plaintiff.

Joe C. Trent

JOE C. TRENT, as Secretary-Treasurer
of Mobile Dodge, Inc.

SWORN TO and SUBSCRIBED before me

this 29th day of July, 1969.

Mickey L. Blane Sims
Notary Public, Mobile County, Alabama

(AFFIX NOTARIAL SEAL)

My Commission Expires:

March 11, 1973

STATE OF ALABAMA)
 :
COUNTY OF MOBILE)

DETINUE AFFIDAVIT

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One (1) 1969 Dodge Polara, dark blue six-passenger station wagon, Serial Number DL 45 G 9R 202 962, Alabama License No. 3-59883, with V-8 engine, automatic transmission, power steering, air conditioning, radio and white sidewall tires,

belongs to MOBILE DODGE, INC., the said Plaintiff.

Joe C. Trent

JOE C. TRENT, as Secretary-Treasurer
of Mobile Dodge, Inc.

SWORN TO and SUBSCRIBED before me

this 29th day of July, 1969.

Mickey LeBlanc Sims
Notary Public, Mobile County, Alabama

(AFFIX NOTARIAL SEAL)

My Commission Expires:

March 11, 1973

MOBILE DODGE, INC.,

Plaintiff,

v.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

BRUCE AYERS, BRUCE AYERS doing
business as GULF PARK SALES CO.,
and GULF PARK SALES CO., a corpor-
ation,

Defendants.

CASE NO. 8821

COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendants the following personal property,
viz: One (1) 1969 Dodge Polara, dark blue six-passenger station wagon, Serial
Number DL 45 G 9R 202 962, Alabama License No. 3-59833, with V-8 engine,
automatic transmission, power steering, air conditioning, radio and white side-
wall tires, with the value of the hire or use thereof during the detention, viz:
From, to-wit: June 22, 1969.

ARMERECET, JACKSON & DeMOUY
Attorneys for Plaintiff

FILED

JUL 30 1969

ALICE J. DUCK

CLERK
REGISTER

By:

Brock G. Holmes
BROCK G. HOLMES

By:

T. K. Jackson, III
T. K. JACKSON, III

The Defendant, Bruce Ayers, resides and may be served at his residence
and office near Bear Point Marina, Orange Beach, Alabama.

The Defendant, Gulf Park Sales Co., a corporation, may be served
through its agent, Bruce Ayers, at his residence and office near Bear Point Ma-
rina, Orange Beach, Alabama.

The automobile described above is in the possession of Bruce Ayers and

should be located at his residence and office near Bear Point Marina, Orange Beach, Alabama.

Please contact Broox G. Holmes of Armbrrecht, Jackson & DeMouy in Mobile (432-6751) for better address if the above is not sufficient.

The State of Alabama, }
Baldwin County

No. 8821

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Bruce Ayres, Bruce Ayres d/b/a Gulf Park Sales Company, and Gulf Park Sales Company

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 Mobile Dodge, Inc

Witness my hand this 30th day of July 19 69

Alice J. Luck Clerk

COMPLAINT

MOBILE DODGE, Inc.

BRUCE AYRES, BRUCE AYRES d/b/a

GULF PARK SALES COMPANY and GULF PARK SALES CO.

Plaintiff

Versus

Defendant

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

Bill of Complaint attached

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

from 19, to 19

Plaintiff's Attorney.

The State of Alabama, }
Baldwin County

No. 8821

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Bruce Ayres, Bruce Ayres d/b/a Gulf Park Sales Company, and Gulf Park Sales Company

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 Mobile Dodge, Inc

Witness my hand this 30th day of July 19 69

W. J. Duck, Clerk

COMPLAINT

MOBILE DODGE, Inc.

BRUCE AYRES, BRUCE AYRES d/b/a

GULF PARK SALES COMPANY and GULF PARK SALE CO.

Plaintiff

Versus

Defendant

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

Bill of Complaint attached

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

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.

Wm. F. Duck Clerk

Defendant lives at _____

Received in office

_____, 19____

_____, Sheriff

I have executed this summons

this _____, 19____

by leaving a copy with _____

_____, Sheriff

_____, Deputy Sheriff

MOBILE DODGE, INC.,

Plaintiff,

v.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

BRUCE AYERS, BRUCE AYERS doing
business as GULF PARK SALES CO.,
and GULF PARK SALES CO., a corpor-
ation,

Defendants.

CASE NO. _____

COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendants the following personal property,
viz: One (1) 1969 Dodge Polara, dark blue six-passenger station wagon, Serial
Number DL 45 G 9R 202 982, Alabama License No. 3-59833, with V-8 engine,
automatic transmission, power steering, air conditioning, radio and white side-
wall tires, with the value of the hire or use thereof during the detention, viz:
From, to-wit: June 22, 1969.

FILED

JUL 30 1969

ALICE J. DUCK

CLERK
REGISTER

ARMERECET, JACKSON & DeMOUY
Attorneys for Plaintiff

By:

BROCK G. HOLMES

By:

T. K. JACKSON, III

The Defendant, Bruce Ayers, resides and may be served at his residence
and office near Bear Point Marina, Orange Beach, Alabama.

The Defendant, Gulf Park Sales Co., a corporation, may be served
through its agent, Bruce Ayers, at his residence and office near Bear Point Ma-
rina, Orange Beach, Alabama.

The automobile described above is in the possession of Bruce Ayers and

should be located at his residence and office near Bear Point Marina, Orange Beach, Alabama.

Please contact Brook G. Holmes of Armbrrecht, Jackson & DeMouy in Mobile (432-6751) for better address if the above is not sufficient.

ARMBRECHT, JACKSON & DEMOUY
LAWYERS

MERCHANTS NATIONAL BANK BUILDING

P.O. BOX 290

MOBILE, ALABAMA

36601

TELEPHONE
AREA CODE 205
432-6751

CABLE ADDRESS
SEALAW

WM. H. ARMBRECHT
THEODORE K. JACKSON
MARSHALL J. DEMOUY
WM. H. ARMBRECHT, III
RAE M. CROWE
BROOK G. HOLMES
W. BOYD REEVES
JOHN GROW
FRANK B. MCRIGHT
Y. D. LOTT, JR.
CLIFFORD FOSTER, III
T. K. JACKSON, III
E. B. PEEBLES, III
F. M. KEELING
GEOFFREY V. PARKER

February 23, 1970

Mrs. Alice J. Duck
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Mobile Dodge, Inc. v.
Bruce Ayers, et al.
Case No. 8821

Dear Mrs. Duck:

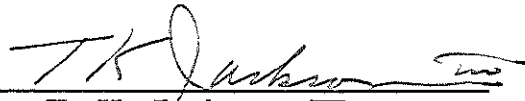
We wish the captioned action dismissed without prejudice.

Please enter a non-suit and forward the cost bill to us.

Thanking you for your assistance, we remain

Yours very truly,

ARMBRECHT, JACKSON & DeMOUY
Attorneys for Mobile Dodge, Inc.

By 
T. K. Jackson, III

TKJ, III:ls

no. 8821

STATE OF ALABAMA)
 :
COUNTY OF MOBILE)

DETINUE BOND

KNOW ALL MEN BY THESE PRESENTS, That we, MOBILE DODGE, INC., as Principal, and FIDELITY AND DEPOSIT COMPANY OF MARYLAND, as Surety, are held firmly bound unto BRUCE AYERS, his heirs, executors and administrators, and GULF PARK SALES CO., a corporation, its successors and assigns, in the sum of THREE THOUSAND TWO HUNDRED AND 00/100 (\$3,200.) 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 29th day of July, A.D. 1969.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas the above bounden MOBILE DODGE, INC., has, on the 29th day of July, 1969, sued out from the office of the Clerk of the Circuit Court of Baldwin County, in the State of Alabama, a Writ of Detinue, returnable to the present term of said Circuit Court of Baldwin County, Alabama, against the said BRUCE AYERS and GULF PARK SALES CO. for the recovery of the following property, to-wit:

One (1) 1969 Dodge Polara, dark blue six-passenger station-wagon, Serial Number DL 45 G 9R 202 962, Alabama License No. 3-59833, with V-8 engine, automatic transmission, power steering, air conditioning, radio and white sidewall tires.

NOW, if the said MOBILE DODGE, INC., shall fail in said suit, and shall pay to the said BRUCE AYERS and GULF PARK SALES CO., the Defendants in said writ, all such costs and damages as they 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.

MOBILE DODGE, INC.

By: Joe C. Trent (SEAL)
JOE C. TRENT
Secretary-Treasurer

FIDELITY AND DEPOSIT COMPANY OF
MARYLAND

By: *[Signature]* (SEAL)
As Its Attorney in Fact

approved

7-30-69

Alice J. Duck
Clerk

FILED

JUL 30 1969

ALICE J. DUCK CLERK
REGISTERED