

PLAINTIFF

RICHARD R. ROHM and
VERONICA L. ROHM, Jointly
and Individually,
DEFENDANTS

AT LAW

CASE NO. ✓ 6894

/jointly and individually

Three (3) Chairs

One (1) White Range

One (1) Norge Washer

One (1) White Range

One (1) Norge Washer.

Canal Circle off
Marianne Beach Road
Fairhope, Alabama

P.O. BOX 293
Mobile, Alabama

31

100-443887-100

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT

No. 6894

19

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon

Richard R. Robm and Veronica L. Robm

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

S.I.C Finance Company, A Corp.

Witness my hand this 10 day of March, 19 66

Alvin J. Smith Clerk.

COMPLAINT

Plaintiff Versus Defendant

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

Bill od Complaint Attached

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

from 19 to 19

Exp Mar. 10-1966

Marianna Beach

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

S.I. G. Finance Company, a Corp.

Plaintiff.

VS.

Richard R. Rohm and Veronica L Rohm

Defendant.

DETINUE SUMMONS AND COMPLAINT

Filed 2-10-66, 19

Alice J. Duck, 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. Duck Clerk

Defendant lives at

RECEIVED
Received in office

MAR 10 1966

TAYLOR WILKINS
SHERIFF

I have executed this summons

this 3/18/66, 1966

by leaving a copy with

Richard R. Rohm
Veronica L. Rohm
Attached the within
described prop.

Sheriff claims 220 miles at
Ten Cents per mile Total \$22.00
TAYLOR WILKINS, Sheriff

BY Roy Randall
Deputy Sheriff
Neither party made bond.
Property is returned
to dept.

Taylor Wilkins, Sheriff
Roy Randall, Deputy Sheriff

Marianna Beach

S. I. C. FINANCE COMPANY, a corporation,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY,
VS:)	ALABAMA
RICHARD R. ROHM and VERONICA L. ROHM, Jointly and Individually,)	AT LAW
Defendants)	CASE NO. 6894

MOTION TO WITHDRAW AS ATTORNEY OF RECORD FOR PLAINTIFF

Comes now B. F. Stokes, III and shows unto the Court that he is the Attorney of Record in behalf of the above named plaintiff; and that he desires to withdraw as said Attorney of Record. Movant would further show unto the Court that he has notified the plaintiff of his withdrawal from this case.

WHEREFORE, the said B. F. Stokes, III moves the Court to allow him to withdraw as said Attorney of Record for said plaintiff.

B. F. Stokes, III
B. F. STOKES, III
Attorney for Plaintiff

FILED

JUL 15 1998

ALICE L. DUCK, CLERK

CERTIFICATE OF SERVICE

I certify that on this 14th day of July,
19 98 a copy of the foregoing pleading has been
served upon counsel for all adverse parties to this
proceeding by mailing the same to each by first class
U. S. mail, properly addressed and postage prepaid.

B. F. Stokes, III
ATTORNEY FOR plaintiff

GIBBONS & STOKES

ATTORNEYS AT LAW

201 AMERICAN NATIONAL BANK BUILDING

BIENVILLE OFFICE

MOBILE, ALABAMA

TELEPHONE 433-2611

E. GRAHAM GIBBONS

B. F. STOKES, III

MAILING ADDRESS

P. O. BOX 293

MOBILE, ALABAMA, 36601

March 9, 1966

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

Re: S.I.C. Finance Company vs. Richard R. Rohm and
Veronica L. Rohm

Dear Mrs. Duck:

I enclose a suit in detinue and conversion as styled above. I also enclose a detinue bond. In the past, you will recall you have been approving this bondsman, the Fidelity and Deposit Company of Maryland.

I will appreciate it if you would forward the necessary papers to the Sheriff's department as soon as possible. Your kindness is appreciated.

Sincerely yours,


B. F. Stokes, III

BFS/jh

Enc.

S. I. C. FINANCE COMPANY
a corporation,

Plaintiff

vs

RICHARD R. ROHM & VERONICA
L. ROHM

Defendants

* IN THE CIRCUIT COURT OF
* BALDWIN COUNTY, ALABAMA
* AT LAW
*
*
* CASE NO. 6894

Comes now the Defendants, Richard R. Rohm and Veronica L. Rohm, separately and severally, and for answer to the complaint heretofore filed herein, say and show unto the Court that heretofore and on the 23 day of March, 1966, the defendant, Richard R. Rohm, filed a petition under Chapter XIII of the Bankruptcy Act in the District Court of the United States for the Southern District of Alabama, at Mobile; that the Plaintiff in this cause was listed on said peition as a creditor; that all property in the possession, custody and control of the Defendants named herein, was at that time under the jurisdiction of the Federal Court; that the said Chapter XIII proposal was confirmed by the said District Court on May 9, 1966 and that said proposal was paid out according to its terms; that on December 30, 1966, the said District Court ordered that the Defendant, Richard Ralph Rohm, be discharged from all debts and liabilities provided for by said plan (which included the Plaintiff's claim herein); that a copy of said Order of Discharge is attached hereto and made a part hereof.

The Defendants, separately and severally show unto this Court that all property claimed in said complaint was under the jurisdiction of the Federal Court under the said proposal; that all of the Plaintiff's claim to the property described in said complaint has heretofore been determined by the said Chapter XIII proceedings, and any lien or security interest which Plaintiff may have had in said property at the time of filing this suit has been determined and extinguished by said Chapter XIII proceedings.

WHEREFORE, the premises considered, Defendants pray that this cause be dismissed with prejudice.

Gerrard Clay
GERRARD CLAY, Attorney for Defendants
405 Van Antwerp Bldg.
Mobile, Alabama

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 20 day
of May, 1968, served a copy of the
foregoing pleading on counsel for all parties to this pre-
ceeding, by mailing the same by United States mail,
properly addressed and first class postage prepaid.

Gerrard Clay

FILED

MAY 21 1968

ALICE J. EUBANK CLERK
REGISTER

33-A

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE SOUTHERN DISTRICT OF ALABAMA

In the matter of	*	In Proceedings for a
		Composition and/or
<u>RICHARD RALPH ROHM</u>	*	Extension Chapter XIII
Debtor	*	No. <u>22,769</u>

ORDER OF DISCHARGE

It appearing to the Court from the report of the Trustee that the above named debtor has fully complied with the terms of his extension proposal of his Wage Earner Plan, heretofore made and confirmed, by paying all his creditors whose claims have been filed and allowed in full and all fees of administration in this cause, it is

ORDERED, ADJUDGED AND DECREED

1. That said report of Trustee be, and it hereby is, approved and confirmed.

2. That said debtor be, and he hereby is, discharged from all his debts and liabilities provided for by said Plan, but excluding debts which are not dischargeable under Section 17 of the Act held by creditors who have not accepted the Plan.

ORDERED this 30th day of December, 1965.

SIDNEY J. GRAY

Referee in Bankruptcy

Copy to: Debtor
Debtor's Attorney
Supervisor-Trustee
Merchants Credit Association

Clay & Clay
ATTORNEYS AT LAW

GERRARD CLAY
CALVIN CLAY

January 10, 1969

405 VAN ANTWERP BLDG.
MOBILE, ALA. 36602
438 - 9735

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

RE: S.I.C. Finance Company
vs. Richard R. Rohm &
Veronica L. Rohm
Case No. 6894

Dear Mrs Duck:

The last time this case was set down for trial on February 13, 1968, I talked with the Judge by telephone. Since no attorney has appeared for the Plaintiff since the case was filed, it was my understanding that the suit would be dismissed with prejudice for failure to prosecute. Please check the docket sheet entry. I thought this matter was already taken care of, and I would appreciate your advising me at your earliest convenience if this matter will require me to be in court on the 27th of January, 1969.

Your cooperation in this matter will be greatly appreciated.

Very truly yours,

Gerrard Clay

GERRARD CLAY

GC/mm

S. I. C. FINANCE COMPANY,
a corporation,

Plaintiff,

vs.

RICHARD R. ROHM and
VERONICA L. ROHM, jointly
and individually,

Defendants.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 6894

MOTION TO STAY

Come now the Defendants, RICHARD R. ROHM and VERONICA L. ROHM, jointly and separately, by and through their Attorneys, and shows unto this Court that heretofore and on the 23rd day of March, 1966, their Petition for an Extension under Chapter XIII, Section 622, of the Bankruptcy Act was filed in the District Court of the United States for the Southern District of Alabama, Southern Division, at Mobile, Alabama, and that the Plaintiff in this cause was listed on said petition as a creditor. All property in the possession, custody or control of the Defendants is under the jurisdiction of said Federal Court, and your Defendants respectfully move this Honorable Court to Stay these proceedings pending the outcome of said Bankruptcy proceedings.

GERRARD CLAY
ATTORNEY AT LAW
405 VAN ANTWERP BLDG.
MOBILE, ALABAMA 36602

GERRARD CLAY and
JAMES W. HOWELL
Attorneys for Defendants

BY: Gerrard Clay
GERRARD CLAY

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 23rd day of March, 1966, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

Gerrard Clay

FILED

MAR 20 1966

ALICE L. DUK, CLERK
RECEIVED

S. I. C. FINANCE COMPANY,
a corporation,

Plaintiff,

vs.

RICHARD R. ROHM and
VERONICA L. ROHM, jointly
and individually,

Defendants.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 6894

MOTION TO STAY

Come now the Defendants, RICHARD R. ROHM and VERONICA L. ROHM, jointly and separately, by and through their Attorneys, and shows unto this Court that heretofore and on the 23rd day of March, 1966, their Petition for an Extension under Chapter XIII, Section 622, of the Bankruptcy Act was filed in the District Court of the United States for the Southern District of Alabama, Southern Division, at Mobile, Alabama, and that the Plaintiff in this cause was listed on said petition as a creditor. All property in the possession, custody or control of the Defendants is under the jurisdiction of said Federal Court, and your Defendants respectfully move this Honorable Court to Stay these proceedings pending the outcome of said Bankruptcy proceedings.

GERRARD CLAY
ATTORNEY AT LAW
405 VAN ANTWERP BLDG.
MOBILE, ALABAMA 36602

GERRARD CLAY and
JAMES W. HOWELL
Attorneys for Defendants

BY:

Gerrard Clay
GERRARD CLAY

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 23rd
day of March, 1966, served a copy of the
foregoing pleading on counsel for all parties to this
proceeding by mailing the same by United States mail,
properly addressed, and first class postage prepaid.

Gerrard Clay

FILED

MAR 23 1966

CLERK
REGISTER

THE STATE OF ALABAMA
MOBILE COUNTY.

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, S. I. C. FINANCE COMPANY,
A CORPORATION, as principal, and THE FIDELITY AND DEPOSIT COMPANY
OF MARYLAND, as surety

are held and firmly bound unto RICHARD R. ROHM and VERONICA L. ROHM

their heirs, executors and administrators, in the
sum of ONE THOUSAND AND NO/100 (\$1,000.00) - - - - - 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 9th day of March, A. D. 19 66

The Condition of the above Obligation is such, That whereas the above bounden

S. I. C. FINANCE COMPANY, A CORPORATION has, on

the 9th day of March 19 66, sued out from the office of the

Baldwin
Clerk of the Circuit Court of ~~MOBILE~~ in the State of Alabama, a Writ of Detinue, returnable to the present

term of said Circuit Court of Baldwin ~~MOBILE~~ against the said RICHARD R. ROHM and

VERONICA L. ROHM for the recovery of the following property.

to-wit	Three (3) Chairs	One (1) Hotpoint Refrigerator
	One (1) White Divan	One (1) Double Bed
	One (1) Brown Divan	Three (3) Single Beds
	Two (2) Maple Lamps	Three (3) Maple Dressers
	Two (2) Maple Tables	Two (2) Beds
	One (1) Silvertone Television	One (1) Shelf
	One (1) Curtis Mathis Combination	Two (2) Maple Desks
	One (1) Maple Desk	One (1) Ward Clothes Dryer
	One (1) Coffee Table	One (1) Norge Freezer
	One (1) Maple China Cabinet	One (1) Ironer
	Six (6) Oak Chairs & Table	One (1) Atlas Sewing Machine
	One (1) White Range	One (1) Norge Washer

NOW, if the said S. I. C. FINANCE COMPANY, A CORPORATION shall fail

in said suit, and shall pay to the said RICHARD R. ROHM and VERONICA L. ROHM

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.

S. I. C. FINANCE COMPANY, A CORPORATION

BY: [Signature] (Seal)

THE FIDELITY & DEPOSIT COMPANY OF MARYLAND

BY: [Signature] (Seal)

(Seal)

approved
3-10-66
A. J. Duck
Clerk

THE STATE OF ALABAMA,
Mobile County

DETINUE AFFIDAVIT

Eunice L. Paquet, Notary Public
PERSONALLY appeared before me, ~~XXXXXX~~ of Mobile County,

J. F. STALLWORTH

who, being duly sworn deposes and says, that the property sued for in the complaint of

S. I. C. FINANCE COMPANY, A CORPORATION

to-wit:	Three (3) Chairs	Six (6) Oak Chairs & Table
	One (1) White Divan	One (1) White Range
	One (1) Brown Divan	One (1) Hotpoint Refrigerator
	Two (2) Maple Lamps	One (1) Double Bed
	Two (2) Maple Tables	Three (3) Single Beds
	One (1) Silvertone Television	Three (3) Maple Dressers
	One (1) Curtis Mathis Combination	Two (2) Beds
	One (1) Maple Desk	One (1) Shelf
	One (1) Coffee Table	Two (2) Maple Desks
	One (1) Maple China Cabinet	One (1) Ward Clothes Dryer
	One (1) Atlas Sewing Machine	One (1) Norge Freezer
belongs to	S. I. C. FINANCE COMPANY, A CORPORATION	One (1) Norge Washer

Sworn to and subscribed the 9th day
of March, 1966, before me.

Eunice L. Paquet
Notary Public, Mobile County, Alabama

J. F. Stallworth

No. 6894

CIRCUIT COURT

BALDWIN COUNTY

S. I. C. FINANCE COMPANY,
A CORPORATION,

PLAINTIFF

VS. Detinue Affidavit
and Bond

RICHARD R. ROHM and
VERONICA L. ROHM,

DEFENDANTS

Filed 10 day of March 1966

Debra J. L. L. L.
Clerk Circuit Court Baldwin County

Attorney

RAYMOND W. EICHER, suing as the
father and next friend of TERRY
WAYNE EICHER, a minor eighteen
years of age,

Plaintiff,

vs.

ROBERT SCHNEEFLOCK, individually,
and ROBERT SCHNEEFLOCK as Adminis-
trator of the Estate of James
Schneeflock, deceased,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

6896

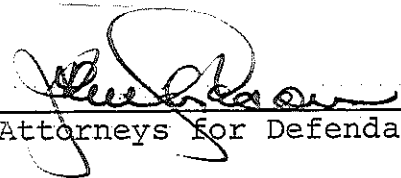
PLEA

Come the Defendants in the above styled cause and for
Plea to the Complaint filed in said cause say:

1. Not guilty.

CHASON, STONE & CHASON

By:


Attorneys for Defendants

FILED
MAR 11 1966
ALICE L. DICK, CLERK
RECORDS

RAYMOND W. EICHER, suing as the
father and next friend of TERRY
WAYNE EICHER, a minor eighteen
years of age,

Plaintiff,

vs.

ROBERT SCHNEEFLOCK, individually,
and ROBERT SCHNEEFLOCK as Admin-
istrator of the Estate of James
Schneeflock, deceased,

Defendants.

PLEA

JOHN V. DUCK
DUCK & LACEY

Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE March 9, 1966

Re: Arthur Mannich dba Mannich's City
Market & Grocery vs. Vera Joyner.

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed in captioned case together with
copy of same and summons to be served.

Sincerely,

John V. Duck
(28)

SIGNED

DATE

SIGNED

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert Schneeflock, individually, and Robert Schneeflock as Administrator of the Estate of James Schneeflock, deceased, 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 same, then and there to answer the Complaint of Raymond W. Eicher, suing as the father and next friend of Terry Wayne Eicher, a minor eighteen years of age.

Witness my hand this 11th day of March

1966.

Alice J. Clark
Clerk

RAYMOND W. EICHER, suing as the
father and next friend of TERRY
WAYNE EICHER, a minor eighteen
years of age,

Plaintiff,

vs.

ROBERT SCHNEEFLOCK, individually,
and ROBERT SCHNEEFLOCK as Adminis-
trator of the Estate of James
Schneeflock, deceased,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

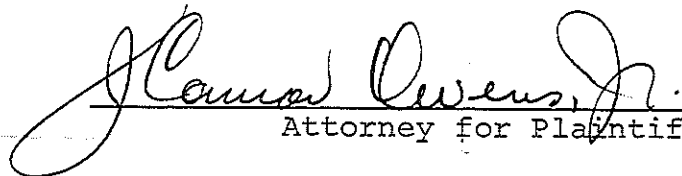
6896

COUNT ONE:

The Plaintiff claims of the Defendants the sum of
Fifteen Hundred Dollars (\$1500.00) as damages for that, on to-wit,

January 8, 1966, at a point on Alabama Highway No. 138, .9 miles West of the City Limits of Bay Minette, Alabama, the Defendant, Robert Schneeflock, acting by and through his agent, servant or employee, James Schneeflock, who was then and there acting within the line and scope of his authority as such, wantonly injured Terry Wayne Eicher by wantonly driving an automobile at an excessive rate of speed and as a proximate result of such negligence the said Terry Wayne Eicher, who was a passenger in such automobile, was injured in this: He received a fractured spleen, broken rib and ruptured liver and was otherwise bruised and lacerated, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

FILED
MAR 11 1966
ALICE L. DICK, CLERK
RECORDED


Attorney for Plaintiff

RAYMOND W. EICHER, suing as the
father and next friend of TERRY
WAYNE EICHER, a minor eighteen
years of age,

Plaintiff,

vs.

ROBERT SCHNEEFLOCK, individually,
and ROBERT SCHNEEFLOCK as Admin-
istrator of the Estate of James
Schneeflock, deceased,

Defendants.

SUMMONS AND COMPLAINT
