

UNIVERSAL CREDIT COMPANY,  
a Corporation,

Plaintiff,

VS.

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER \_\_\_\_.

PLEAS.

Now comes M. H. Wilkins, as Sheriff of Baldwin County, Alabama, and for plea to the complaint filed in this cause, sets forth and alleges to the Court separately and severally as follows:

1. That on to-wit, April 21, 1938, a Writ of Attachment was issued out of the Circuit Court of Baldwin County, Alabama, Law Side, in Case Number 428 pending therein, in which Earle Smith is Plaintiff and Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro is Defendant, which Writ of Attachment was placed in the hands of this Defendant, M. H. Wilkins, Sheriff of Baldwin County, Alabama, and was by him executed on April 28, 1938, by attaching One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, G. M. C. Model, License No. G. K. 3-1036, as the property of the said Defendant, Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro; Sheriff's return was made by the Defendant, M. H. Wilkins, as said Sheriff on April 28, 1938, to the Clerk of the Circuit Court of said County, and at the time this suit was commenced and at the time the said property was taken from this defendant by E. C. Culpepper, as Special Coroner, on May 7, 1938, he held it as an officer of this Court under and by virtue of said Writ of Attachment and the levy made by him thereunder.

2. That on to-wit, April 21, 1938, a Writ of Attachment was issued out of the Circuit Court of Baldwin County, Alabama, Law Side, in Case Number 429 pending therein, in which Joseph Bordenet is Plaintiff and Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro is Defendant, which Writ of

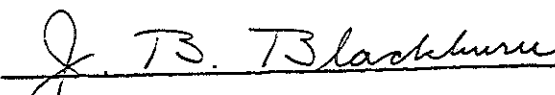
Attachment was placed in the hands of this Defendant, M. H. Wilkins, Sheriff of Baldwin County, Alabama, and was by him executed on April 28, 1938, by attaching One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, G. M. C. Model, License No. G. K. 3-1036, as the property of the said Defendant, Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro; Sheriff's return was made by the Defendant, M. H. Wilkins, as said Sheriff on April 28, 1938, to the Clerk of the Circuit Court of said County, and at the time this suit was commenced and at the time the said property was taken from this defendant by E. C. Culpepper, as Special Coroner on May 7, 1938, he held it as an officer of this Court under and by virtue of said Writ of Attachment and the levy made by him thereunder.

3. That on to-wit, April 21, 1938, a Writ of Attachment was issued out of the Circuit Court of Baldwin County, Alabama, Law Side, in Case Number 430 pending therein, in which Redmond Reilly is Plaintiff and Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro is Defendant, which Writ of Attachment was placed in the hands of this Defendant, M. H. Wilkins, Sheriff of Baldwin County, Alabama, and was by him executed on April 28, 1938, by attaching One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, G. M. C. Model, License No. G. K. 3-1036, as the property of the said Defendant, Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro; Sheriff's return was made by the Defendant, M. H. Wilkins, as said Sheriff on April 28, 1938, to the Clerk of the Circuit Court of said County, and at the time this suit was commenced and at the time the said property was taken from this Defendant by E. C. Culpepper, as Special Coroner on May 7, 1938, he held it as an officer of this Court under and by virtue of said Writ of Attachment and the levy made by him thereunder.

4. That on to-wit, April 21, 1938, a Writ of Attachment was issued out of the Circuit Court of Baldwin County, Alabama, Law Side, in Case Number 431 pending therein, in which Joseph Crabtree is Plaintiff and Joseph Vaccaro and Son, a Partnership composed of

Joseph Vaccaro and George Vaccaro is Defendant, which Writ of Attachment was placed in the hands of this Defendant, M. H. Wilkins, Sheriff of Baldwin County, Alabama, and was by him executed on April 28, 1938 by attaching One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, G. M. C. Model, License No. G. K. 3-1036 as the property of the said Defendant, Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro; Sheriff's return was made by the Defendant, M. H. Wilkins, as said Sheriff on April 28, 1938, to the Clerk of the Circuit Court of said County, and at the time this suit was commenced and at the time the said property was taken from this defendant by E. C. Culpepper, as Special Coroner on May 7, 1938, he held it as an officer of this Court under and by virtue of said Writ of Attachment and the levy made by him thereunder.

5. That on to-wit, April 21, 1938, a Writ of Attachment was issued out of the Circuit Court of Baldwin County, Alabama, Law Side, in Case Number 432 pending therein, in which Henry Charvez is Plaintiff and Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro is Defendant, which Writ of Attachment was placed in the hands of this Defendant, M. H. Wilkins, Sheriff of Baldwin County, Alabama, and was by him executed on April 28, 1938, by attaching One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, G. M. C. Model, License No. G. K. 3-1036 as the property of the said Defendant, Joseph Vaccaro and Son, a Partnership composed of Joseph Vaccaro and George Vaccaro; Sheriff's return was made by the Defendant, M. H. Wilkins, as said Sheriff on April 28, 1938, to the Clerk of the Circuit Court of said County, and at the time this suit was commenced and at the time the said property was taken from this Defendant by E. C. Culpepper, as Special Coroner on May 7, 1938, he held it as an officer of this Court under and by virtue of said Writ of Attachment and the levy made by him thereunder.

  
Attorney for Defendant, M. H. Wilkins.  
as Sheriff of Baldwin County, Ala.

RECORDED

*Book*

8-243

PLEAS.

UNIVERSAL CREDIT COMPANY, a  
Corporation,

Plaintiff,

VS.

M. H. WILKINS, Individually and  
as Sheriff of Baldwin County,  
Alabama,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

LAW SIDE.

NUMBER 413.

*Filed June 9 1938*  
*Per Court*

UNIVERSAL CREDIT COMPANY,  
A Corporation,

PLAINTIFF,

VS.

M. H. WILKINS, individually  
and as SHERIFF OF BALDWIN  
COUNTY, ALABAMA,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW, # 442.

Now come Redmond Reilly, a minor, by his father and next friend, R. E. Reilly, Joseph Crabtree, Henry Chavez, Earl Smith and Joseph Bordenet, a minor, by his father and next friend, and having been suggested as claimants in the above styled suit, file this, their answer and say that each of them is a plaintiff in separate suits filed in the Circuit Court of Baldwin County, Alabama, against Joseph Vaccaro and Son, a co-partnership composed of Joseph Vaccaro and George Vaccaro, both of whom are non-residents of the State of Alabama, and that service was obtained in each of the above styled suits by attaching an automobile which is the subject of the detinue suit above styled; that they and each of them have no title or claim in and to the property attached and that any claim contrary to the title of the Universal Credit Company, a Corporation, is vested in the defendant in the above entitled cause namely: M. H. Wilkins, individually and as Sheriff of Baldwin County, Alabama, who holds the property sued for in the detinue suit under a writ of attachment issued out of the Circuit Court of Baldwin County, Alabama.

  
Attorney for Claimants.

I hereby accept service  
of this Answer of Suggested  
Claimants this 30th day of  
May, 1938.

0-230

UNIVERSAL CREDIT CO., a Corp.,  
Plaintiff,

vs.

M. H. WILKINS, individually,  
and as sheriff of Baldwin  
County, Alabama,  
Defendant.

442

ANSWER OF CLAIMANT.

500 May 20 1938  
E. H. Wilkins  
Over

UNIVERSAL CREDIT COMPANY,  
a Corporation,

Plaintiff,

VS.

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

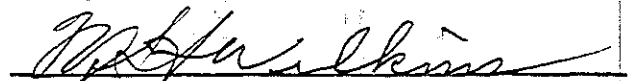
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER \_\_\_\_.


DISCLAIMER.

Now comes M. H. Wilkins, Individually only, Defendant in the above entitled cause, and alleges unto the Court that he was not, when this suit was filed, and is not now, individually, in possession of the property described in the complaint filed in this cause, and as an individual, did not, at the time this suit was filed and does not now, claim any right, title or interest in or to the said property.



Sworn to and subscribed before me  
on this the 17th day of June, 1938.

\_\_\_\_\_  
Clerk of the Circuit Court, Baldwin  
County, Alabama.



Attorney for Defendant.

RECORDED

*Decl*  
8-244

DISCLAIMER.

UNIVERSAL CREDIT COMPANY,  
a Corporation,

Plaintiff,

VS.

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER \_\_\_\_\_.

Filed on this the 7th day of June,  
1938.

*R. S. Buck, Clerk*



UNIVERSAL CREDIT COMPANY,  
a Corporation,

Plaintiff,

VS.

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW. NUMBER 442.

SUGGESTIONS OF ADVERSE CLAIMANTS.

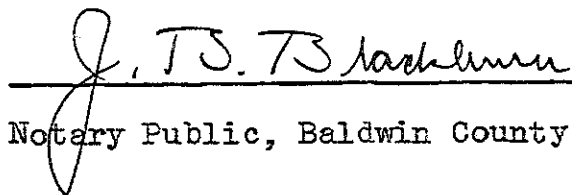
Now comes M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, the Defendant in the above entitled cause and alleges that Redmond Reilly, a minor, whose father and next friend is R. E. Reilly-; Joseph Crabtree; Henry Charvez; Earle Smith; Joseph Bordenet, a minor, whose father and next friend is C. J. Bordenet, all of whose addresses are in care of Marion R. Vickers, Attorney, Annex First National Bank Building, Mobile, Alabama; Joseph Vaccaro and Son, a Partnership composed of Jos. Vaccaro and Geo. Vaccaro, who are non-residents of the State of Alabama and whose residence and post office address is Tampa, Florida, all of whom are not parties to this suit and all of whom without collusion with the Defendant in this suit claim the chattels or a part thereof which form the basis of this suit:

WHEREFORE, Defendant prays for an order requiring each and all of the above named parties to come in and defend and that notice of said order be given each and all of the said parties as provided by Section 10387 of the 1923 Code of Alabama.



Individually and as Sheriff of  
Baldwin County, Alabama, Defendant.

Sworn to and subscribed before  
me on this the 11 day of May, 1938.



Notary Public, Baldwin County, Alabama.

RECORDED

*Book 2, 36*

SUGGESTIONS OF ADVERSE CLAIMANTS

UNIVERSAL CREDIT COMPANY,  
a Corporation,

Plaintiff,

VS.

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

*442*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

NUMBER 442.

*Filed May 11 1938  
Probert-  
Curt*

THE STATE OF ALABAMA. )  
BALDWIN COUNTY. ( )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW. NO. 442.

TO ANY SHERIFF OF SAID STATE:

You are hereby commanded to notify M. H. WILKINS, Individually and as Sheriff of Baldwin County, Ala., or J. B. BLACKBURN, Attorney of Record, that on the 25th day of July, 1938, HYBART & CHASON, in behalf of the Plaintiff, in a cause now pending in the Circuit Court of Baldwin County, Alabama, wherein UNIVERSAL CREDIT COMPANY, a Corporation, is Plaintiff, and M. H. WILKINS, Individually and as Sheriff of Baldwin County, Alabama, is Defendant, filed in the office of the Clerk of the said Court certain interrogatories to be propounded to M. J. HULSEY JR., whose address is Tampa, Florida, JOSEPH VACCARO, whose address is 2226 Ninth Avenue, Tampa, Florida, W. C. MARION, whose address is 610 Morgan Street, Tampa, Florida, and EDWARD DANIELS JR., whose address is 4603 Bartlett Street, Tampa, Florida, separately and severally, who are material witnesses for the Plaintiff in the above styled cause, and who are non-residents of the State of Alabama.

✓ The answers thereto will be read as evidence by the said Plaintiff on the trial of said cause. And further, you will notify the said M. H. WILKINS, Individually and as Sheriff of Baldwin County, Ala., or J. B. BLACKBURN, Attorney, that after the expiration of ten days from the service of this notice a commission will issue to MR. SAM BUCKLEW, whose address is 610 Morgan Street, Tampa, Florida, to take the answers of said witnesses to said interrogatories.

WITNESS my hand this 25th day of July 1938.

  
Clerk

RECORDED 8-23-35

NOTICE.

OF FILING INTERROGATORIES.

Filed 7-25-35

Filed this 25 day July 1935

R. S. Decker  
Clerk-Register

THE STATE OF ALABAMA. )  
(  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW, NO. 442.

TO ANY SHERIFF OF SAID STATE:

You are hereby commanded to notify M. H. WILKINS, Individually and as Sheriff of Baldwin County, Ala., or J. B. BLACKBURN, Attorney of Record, that on the 25th day of July, 1938, HYBART & CHASON, in behalf of the Plaintiff, in a cause now pending in the Circuit Court of Baldwin County, Alabama, wherein UNIVERSAL CREDIT COMPANY, a Corporation, is Plaintiff, and M. H. WILKINS, Individually and as Sheriff of Baldwin County, Alabama, is Defendant, filed in the office of the Clerk of the said Court certain interrogatories to be propounded to M. J. HULSEY JR., whose address is Tampa, Florida, JOSEPH VACCARO, whose address is 2226 Ninth Avenue, Tampa, Florida, W. C. MARION, whose address is 610 Morgan Street, Tampa, Florida, and EDWARD DANIELS JR., whose address is 4603 Bartlett Street, Tampa, Florida, separately and severally, who are material witnesses for the Plaintiff in the above styled cause, and who are non-residents of the State of Alabama.

The answers thereto will be read as evidence by the said Plaintiff on the trial of said cause. And further, you will notify the said M. H. WILKINS, Individually and as Sheriff of Baldwin County, Ala., or J. B. BLACKBURN, Attorney, that after the expiration of ten days from the service of this notice a commission will issue to MR. SAM BUCKLEW, whose address is 610 Morgan Street, Tampa, Florida, to take the answers of said witnesses to said interrogatories.

WITNESS my hand this 25th day of July 1938.

R. Duck  
Clerk

UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-VS-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

INTERROGATORIES TO BE PROPOUNDED TO M. J. HULSEY JR., WHOSE ADDRESS IS TAMPA, FLORIDA, JOSEPH VACCARO, WHOSE ADDRESS IS 2226 NINTH AVENUE, TAMPA, FLORIDA, W. C. MARION, WHOSE ADDRESS IS 610 MORGAN STREET, TAMPA, FLORIDA, AND EDWARD DANIELS JR., WHOSE ADDRESS IS 4603 BARTLETT STREET, TAMPA, FLORIDA, SEPARATELY AND SEVERALLY, WHO ARE MATERIAL WITNESSES FOR THE PLAINTIFF IN THE ABOVE STYLED CAUSE, AND WHO ARE NON-RESIDENTS OF THE STATE OF ALABAMA:-

No. 1. Did the Boyle Motor Company, acting by and through its Secretary and Treasurer, M. J. Hulsey Jr., enter into a Conditional Sales Contract with Joseph Vaccaro on January 22nd, 1938, by which Contract it agreed to sell to Joseph Vaccaro a Ford Truck, Motor No. BB 18-1980291, together with a Trailer, G. M. C. Model?

No. 2. Was this Contract signed by M. J. Hulsey Jr., and Joseph Vaccaro, in the presence of E. Hermandolfer, L. G. Perry and Edward Daniels Jr., and did the last three mentioned persons sign as witnesses to the execution of said Contract?

No. 3. Was this Contract assigned by the Boyle Motor Company, acting by and through M. J. Hulsey Jr., as its Secretary and Treasurer, to the Universal Credit Company? If you state that it was, what was the consideration for the execution of this assignment, and was this consideration paid by the Universal Credit Company to the Boyle Motor Company.

No. 4. Had all sums which were due under this Contract been fully paid in cash to the Universal Credit Company on April 20th, 1938? Did Joseph Vaccaro pay the Universal Credit Company the monthly installment in the sum of \$47.72 due by him March 22nd, 1938, and the monthly installment in the same amount due April 22nd, 1938, as set out in said Contract?

No. 5. Was Joseph Vaccaro the owner of a Ford Truck, Motor No. 18-1980291 and a G. M. C. Model Trailer, on April 28th, 1938? Was the Universal Credit Company the owner of said truck and trailer on April 28th, 1938?

(page two)

No. 6. Was M. J. Hulsey Jr., duly authorized by the Boyle Motor Company to execute the Conditional Sales Contract referred to in Interrogatory No. 1, and to execute the Assignment referred to in Interrogatory No. 3? If you state that he was, please attach as an Exhibit to the answers of M. J. Hulsey Jr., a true and correct copy of the Conditional Sales Contract which the Boyle Motor Company entered into with Joseph Vaccaro, and a true and correct copy of the Assignment executed by the Boyle Motor Company to Universal Credit Company.

Herbert & Chason  
Attorneys for Plaintiff.

STATE OF ALABAMA,  
BALDWIN COUNTY.

Before me, Mary F. Green, a Notary Public in and for said State and County, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath as follows:-

That his name is John Chason; that he is one of the Attorneys of Record for the Plaintiff in the above styled cause; that M. J. Hulsey Jr., Joseph Vaccaro, W. C. Marion and Edward Daniels Jr., are non-residents of the State of Alabama and that their testimony, if answers to the foregoing Interrogatories are well and truly made, will be material testimony for the Plaintiff in said cause.

Sworn to and subscribed before me,  
a Notary Public whose seal is here-  
to affixed, on this the 25<sup>th</sup> day  
of July, 1938.

Mary F. Green  
Notary Public, Baldwin County,  
State of Alabama.

Plaintiff suggests as Commissioner to take the testimony of the foregoing witnesses Mr. Sam Bucklew, whose address is 610 Morgan Street, Tampa, Florida.

Herbert & Chason  
Attorneys for Plaintiff.

INTERROGATORIES.

UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-vs-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT--JAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed July 25, 1938,

R. S. Duck

Clerk.

LAW OFFICES

HYBART & CHASON

BAY MINETTE, ALABAMA



UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-vs-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

INTERROGATORIES TO BE PROPOUNDED TO M. J. HULSEY JR., WHOSE ADDRESS IS TAMPA, FLORIDA, JOSEPH VACCARO, WHOSE ADDRESS IS 2226 NINTH AVENUE, TAMPA, FLORIDA, W. C. MARION, WHOSE ADDRESS IS 610 MORGAN STREET, TAMPA, FLORIDA, AND EDWARD DANIELS JR., WHOSE ADDRESS IS 4603 BARTLETT STREET, TAMPA, FLORIDA, SEPARATELY AND SEVERALLY, WHO ARE MATERIAL WITNESSES FOR THE PLAINTIFF IN THE ABOVE STYLED CAUSE, AND WHO ARE NON-RESIDENTS OF THE STATE OF ALABAMA:-

No. 1. Did the Boyle Motor Company, acting by and through its Secretary and Treasurer, M. J. Hulsey Jr., enter into a Conditional Sales Contract with Joseph Vaccaro on January 22nd, 1938, by which Contract it agreed to sell to Joseph Vaccaro a Ford Truck, Motor No. BB 18-1980291, together with a Trailer, G. M. C. Model?

No. 2. Was this Contract signed by M. J. Hulsey Jr., and Joseph Vaccaro, in the presence of E. Hermandolfer, L. G. Perry and Edward Daniels Jr., and did the last three mentioned persons sign as witnesses to the execution of said Contract?

No. 3. Was this Contract assigned by the Boyle Motor Company, acting by and through M. J. Hulsey Jr., as its Secretary and Treasurer, to the Universal Credit Company? If you state that it was, what was the consideration for the execution of this assignment, and was this consideration paid by the Universal Credit Company to the Boyle Motor Company.

No. 4. Had all sums which were due under this contract been fully paid in cash to the Universal Credit Company on April 20th, 1938? Did Joseph Vaccaro pay the Universal Credit Company the monthly installment in the sum of \$47.72 due by him March 22nd, 1938, and the monthly installment in the same amount due April 22nd, 1938, as set out in said Contract?

No. 5. Was Joseph Vaccaro the owner of a Ford Truck, Motor No. 18-1980291 and a G. M. C. Model Trailer, on April 28th, 1938? Was the Universal Credit Company the owner of said truck and trailer on April 28th, 1938?

(page two)

No. 6. Was M. J. Hulsey Jr., duly authorized by the Boyle Motor Company to execute the Conditional Sales Contract referred to in Interrogatory No. 1, and to execute the Assignment referred to in Interrogatory No. 3? If you state that he was, please attach as an Exhibit to the answers of M. J. Hulsey Jr., a true and correct copy of the Conditional Sales Contract which the Boyle Motor Company entered into with Joseph Vaccaro, and a true and correct copy of the Assignment executed by the Boyle Motor Company to Universal Credit Company.

Hubert A. Rason  
Attorneys for Plaintiff.

STATE OF ALABAMA,  
BALDWIN COUNTY.

Before me, Mary F. Green, a Notary Public in and for said State and County, personally appeared John Chason, who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath as follows:-

That his name is John Chason; that he is one of the Attorneys of Record for the Plaintiff in the above styled cause; that M. J. Hulsey Jr., Joseph Vaccaro, W. C. Marion and Edward Daniels Jr., are non-residents of the State of Alabama and that their testimony, if answers to the foregoing Interrogatories are well and truly made, will be material testimony for the Plaintiff in said cause.

Sworn to and subscribed before me,  
a Notary Public whose seal is here-  
to affixed, on this the 25<sup>th</sup> day  
of July, 1938.

Mary F. Green  
Notary Public, Baldwin County,  
State of Alabama.

Plaintiff suggests as Commissioner to take the testimony of the foregoing witnesses Mr. Sam Bucklew, whose address is 610 Morgan Street, Tampa, Florida.

Hubert A. Rason  
Attorneys for Plaintiff.

STATE OF ALABAMA,

AFFIDAVIT.

MOBILE COUNTY.

Before me, the undersigned authority in and for said State and County, personally appeared E. J. Zimlich Jr., who is known to me and who, after being by me first duly and legally sworn doth depose and say under oath as follows:-

That his name is E. J. Zimlich Jr.; that he is the Agent of the Universal Credit Company, a Corporation, and as such is duly authorized to make this Affidavit; that the following described personal property, to-wit:

One Ford Truck, 1936 Model, Motor No. 18-1980291,  
License No. B-90-7, and trailer, G. M. C. Model,  
License No. G. K. 3-1036;

for the recovery of which the Universal Credit Company, a Corporation, has this day instituted suit in the Circuit Court of Baldwin County, Alabama, against M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, is the property of said Company.

Sworn to and subscribed before  
me, a Notary Public whose seal  
is hereto affixed, this 20  
day of April, 1938.

Will D. King  
Notary Public, Mobile County,  
State of Alabama.

E. J. Zimlich Jr.

STATE OF ALABAMA,  
BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS: That the Universal Credit Company, a Corporation, as Principal, and the United States Fidelity & Guaranty Company, a Corporation, as Surety, are held and firmly bound unto M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, his heirs, executors and administrators, in the sum of Fifty Dollars (\$50.00), for the payment of which well and truly to be made we bind ourselves, our and each of our heirs, successors and assigns, jointly and severally, firmly by these presents.

Sealed with our seals and dated this 30<sup>th</sup> day of April, 1938.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH: That Whereas, the above bound Universal Credit Company, a Corporation, has this day sued out from the Office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue returnable at the next term of said Court, in said Court, against the said M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, for the recovery of the following described personal property, viz:-

One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, G. M. C. Model, License No. G. K. 3-1036;

Now, if the said Universal Credit Company, a Corporation, shall fail in said suit, and shall pay to the said M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, all such costs and damages as he may sustain by the wrongful complaint, or shall prosecute said suit to effect, then this obligation to be void, otherwise to remain in full force and effect.

UNIVERSAL CREDIT COMPANY,  
A Corporation,

By E. J. Zumbach Jr. (SEAL)  
As its Agent.

UNITED STATES FIDELITY & GUARANTY  
COMPANY, a Corporation,

By Robert Lyons (SEAL)  
As its ATTY IN FACT

Taken and approved this  
30<sup>th</sup> day of May,  
1938.

R. S. Luch  
Clerk Circuit Court, Baldwin  
County, Alabama.

RECORDED *Duch*  
8-2-34

AFFIDAVIT AND BOND.

UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-vs-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed May 2, 1938

*P. J. Dyer*  
Clerk.

LAW OFFICES

HYBART & CHASON

BAY MINETTE, ALABAMA

UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-vs-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

B O N D.

STATE OF ALABAMA,

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS: That Universal Credit Company, a Corporation, as Principal, and the undersigned, as Surety, are held and firmly bound unto M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, in the principal sum of Fifteen Hundred Dollars (\$1500.00), for the payment of which well and truly to be made we jointly and severally bind ourselves and each of us, our successors and assigns, firmly by these presents.

Sealed with our seals and dated this 13th day of May, 1938.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH:- That Whereas, the Universal Credit Company, a Corporation, did, on the 2nd day of May, 1938, sue out of the Circuit Court of Baldwin County, 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 Ford Truck, 1936 Model, Motor No. 18-1980291,  
License No. B-90-7, and trailer, G. M. C. Model,  
License No. G. K. 3-1036;

which said Writ was placed in the hands of E. C. Culpepper, Special Coroner, on May 7th, 1938, and was executed by him on May 7th, 1938, by taking into his possession the following personal property, to-wit:-

One Ford Truck, 1936 Model, Motor No. 18-1980291,  
License No. B-90-7, and trailer, G. M. C. Model,  
License No. G. K. 3-1036;

AND WHEREAS, the said M. H. Wilkins, Individually and as Sheriff of Baldwin County, Alabama, the Defendant in said Writ, has failed and neglected for a period of five days from the execution of said Writ to give Bond and take possession of said property as authorized by law;

NOW, THEREFORE, if the said Universal Credit Company, a Corporation, shall deliver the above described property to the Defendant within thirty days after judgment, if the said Plaintiff shall fail in said suit, and shall pay all damages for the detention of the property and costs of suit, or if the Plaintiff shall prosecute said suit to effect, then this obligation to be void, otherwise to remain in full force and effect.

UNIVERSAL CREDIT COMPANY,  
A Corporation,

By E. J. Zimlich, Jr.  
As its Agent.

SEAL

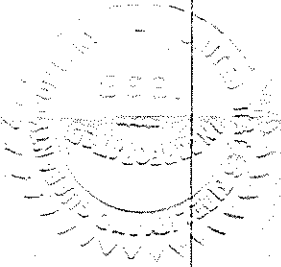
(page two)

UNITED STATES FIDELITY & GUARANTY  
COMPANY, a Corporation,

BY Herbert Lyons — SEAL  
As its Attorney in Fact.

Taken and approved this  
13 day of May, 1938.

E. B. Culpepper  
Special Coroner.



RECORDED

*Dick*  
8-235-

B O N D.

UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-VS-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

442

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed May 13, 1938

*W. R. Chason*  
Clerk.

LAW OFFICES

HYBART & CHASON  
BAY MINETTE, ALABAMA



STATE OF ALABAMA,  
BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon M. H. Wilkins, Individually and as Sheriff of Baldwin County, 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 same, then and there to answer the Complaint of Universal Credit Company, a Corporation.

Witness my hand this 2 day of April, 1938.

Res. [Signature]  
Clerk.

COMPLAINT.

UNIVERSAL CREDIT COMPANY, a  
Corporation,

Plaintiff,

-vs-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT--LAW SIDE  
STATE OF ALABAMA  
BALDWIN COUNTY.

The Plaintiff claims of the Defendant the following  
described personal property, viz:-

One Ford Truck, 1936 Model, Motor No. 18-1980291,  
License No. B-90-7, and trailer, G. M. C. Model,  
License No. G. K. 3-1036;

with the value of the hire or use thereof during the detention, viz,  
from, to-wit, April 21st, 1938.

Hubert [Signature]  
Attorneys for Plaintiff.

Executed the within Summons and Complaint this 7 day of May, 1938, by serving a copy on M. H. Wilkins, individually and as Sheriff of Baldwin County; and Executed the within Writ of Detinue on this 7 day of May, 1938, by taking into my possession the following described personal property, viz:- One Ford Truck, 1936 Model, Motor No. 18-1980291, License No. B-90-7, and trailer, C.M.C. Model, License No. G. K. 3-1036.

E. C. Culpepper  
E. C. Culpepper, Special Coroner.

RECORDED Duch  
8-223

SUMMONS & COMPLAINT.

UNIVERSAL CREDIT COMPANY,  
A Corporation,

Plaintiff,

-vs-

M. H. WILKINS, Individually  
and as Sheriff of Baldwin  
County, Alabama,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed May 24, 1938

R. S. Ditch  
Clerk.

LAW OFFICES  
HYBART & CHASON  
BAY MINETTE, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Whereas, the Plaintiff in the within stated cause has made Affidavit and given Bond as required by law, you are hereby commanded to take the property set out in the Complaint into your possession unless the Defendant gives Bond payable to the Plaintiff, with sufficient surety, in double the amount of the property set out, with condition that if the Defendant is cast in 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.

R. S. Ditch  
Clerk.