

MOTOR CREDIT CORPORATION

vs

MRS. S. S. PARKER

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

AT LAW

Comes Richard J. Demeree, Attorney for the Motor Credit Company and E. Cramer, Attorney for Mrs. S. S. Parker and file this stipulation in the above styled cause.

1. They agree that judgment may be entered for the Plaintiff for the trailer which was the subject matter of this litigation upon the payment of court costs by the Complainant.

2. No further claim will be made by the Complainant against the Respondent or by the Respondent against the Complainant arising out of this litigation.

Attorney for Complainant

*E. Cramer*

Attorney for Respondent

MOTOR CREDIT CORPORATION,  
a corporation

: Circuit Court of Baldwin County  
:

vs

: No. 768

MRS. SS. PARKER, also known as  
Mrs. Olney B. Parker, also known as  
Mrs. W. R. Dietz

:  
:  
:

Comes the defendant in the above styled cause and demurs  
to the complaint therein filed and as grounds therefore says:

1. Said complaint does not set up a cause of action.
2. Said complaint fails to set out any legal basis for possession of the  
subject matter of said suit, namely, a covered house trailer, Serial No.  
5870.
3. That said complaint is completely vague and indefinite.

*E. Crowe*

Attorney for Defendant.

THE STATE OF ALABAMA,

DETINUE BOND AND AFFIDAVIT.

~~MAY 1944~~

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That We, The Motor Credit Corporationand The Maryland Casualty Company.are held and firmly bound unto Mrs. S. S. Parker alias Mrs. Olney B Parkeralias Mrs. W. R. Deitz

heirs, executors and administrators, in the

sum of Four Hundred 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 25 day of July, A. D. 1942The Condition of the above Obligation is such, That whereas the above bounden MotorCredit Corporation

has, on

the 28th day of July, 1942, sued out from the office of theBaldwin

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 Mobile against the said Mrs. S. S. Parker alias Mrs. Olney BParker alias Mrs. W. R. Deitz

for the recovery of the following property,

to-wit: One 1936 Model 19 foot Covered Wagon House Trailer Serial No5870NOW, if the said Motor Credit Corp shall failin said suit, and shall pay to the said Mrs. S S Parker alias Mrs. Olney B Parker  
alias Mrs. W. R. Deitz

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.

Motor Credit Corp.

(Seal)

By Richard J. Devereux AttorneyMARYLAND CASUALTY COMPANY OF  
BALTIMORE, MARYLAND

(Seal)

By J. O. C. Jackson

(Seal)

J.O.C. Jackson, Attorney-in-Fact

THE STATE OF ALABAMA,

~~Mobile~~ County.

~~Baldwin~~

R. S. Duch

Baldwin

PERSONALLY appeared before me, ~~W. A. GORDON~~, Clerk of the Circuit Court of ~~Mobile~~ County,

Richard Idemere as attorney for  
Motor Credit Corporation

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

Credit Corp

to-wit: 1936 model 19 Foot Corvair Major

House trailer # 5870

belongs to Motor Credit Corporation the said Plaintiff.

Sworn to and subscribed the 31 day

of July 1943 before me.

R. S. Duch Clerk.

Richard Idemere  
as attorney for  
Motor Credit Corp.

768  
RECORDED  
Circuit Court

~~MOBILE~~ COUNTY

~~Baldwin~~

No.

Detinue Affidavit  
and Bond.

VS.

Filed 31 day of July, 1943

R. S. Duch  
Clerk Circuit Court, ~~Mobile~~ County.

~~Baldwin~~

Richard Idemere

Attorney.

STATE OF ALABAMA  
COUNTY OF BALDWIN

KNOW ALL MEN BY THESE PRESENTS, that we, Motor Credit Corporation by and through its attorney, Richard J. Demaree and the Maryland Casualty Company are held and firmly bound unto Ramsey Stuart as Sheriff of Baldwin County, Alabama, in the sum of Two Hundred and Fifty Dollars (\$250.00) for the payment of which, we bind ourselves and our assigns, jointly and severally, firmly by these presents.

Sealed with our seals and dated this 11th day of August 1942.

The condition of the above obligation is such, that whereas the above bounden Motor Credit Corporation and the Maryland Casualty Company has on the 31 day of July 1942 sued out from the office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue, returnable to the present term of said Circuit Court of Baldwin against the said Mrs. S. S. Parker for the recovery of the following property to-wit: 1936 Covered Wagon Trailer, serial no. 5870 and whereas said property has been taken into the custody of the Sheriff of Baldwin County, Alabama.

Now, if the said Motor Credit Corporation shall fail in said suit, and shall pay to the said Mrs. S. S. Parker the defendant in said writ all such costs and damages as she 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.

The Motor Credit Corporation  
By Richard J. Demaree SEAL  
Attorney for said Plaintiff

MARYLAND CASUALTY COMPANY  
By J. O. C. Jackson  
J. O. C. Jackson, Atty-In-Fact.

Taken and approved this

11 day of August 1942

W. R. Stuart  
Sheriff of Baldwin County

RECORDED  
INDEXED  
FILED  
AUG 11 1942  
BALDWIN COUNTY  
ALABAMA

MOTOR CREDIT CORPORATION,  
A Corporation,

Plaintiff,

VS.

MRS. S. S. PARKER, known also  
as MRS. OLNEY B. PARKER, known: :  
also as MRS. W. R. DIETZ, :

Defendant.

: IN THE CIRCUIT COURT OF BALDWIN

: COUNTY, ALABAMA

:

: NO. \_\_\_\_\_

The plaintiff claims of the defendant the following personal property viz:

1. 1936 model 19 foot covered wagon house trailer, serial number 5870, with the value of the hire or use thereof during the detention, viz from to-wit the 1st of March, 1942.

  
Attorney for Plaintiff

Defendant's address is:

The Campbell House  
Point Clear, Alabama


The State of Alabama.

Baldwin. County.

To the Sheriff of Said County,\* Greeting.

The Plaintiff having given bond and Made affidavit as required by law you are hereby required to take the property mentioned in the complaint into your possession . unless the defendant give bond, ~~payable to the~~ payable to the plaintiff. with security in double value of the property, conditioned that if the defendant is cast in the suit he will. within thirty days thereafter, deliver the property to the plaintiff, and pay all costs and damages which may accrue from the detention thereof.

Witness my hand this 31st day of July ,1942.

  
Clerk Circuit Court Baldwin County

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, } No. 768.  
BALDWIN COUNTY }

CIRCUIT COURT BALDWIN COUNTY

July

TERM, 1942

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs S S Parker, known also as

Mrs Olney B Parker. known also as Mrs W R Dietz.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Mrs S S Parker known also as Mrs Olney B Parker known also as  
, Defendant

Mrs W R Dietz.  
by

Motor Credit Corporation a Corporation.

Plaintiff

Witness my hand this 31 day of July.

1942

R S Duck

Clerk.



No. 768.

Page

## THE STATE OF ALABAMA

BALDWIN COUNTY

## CIRCUIT COURT

Motor Credit Corporation,

A Corporation,

Plaintiffs

vs.

Mrs S S Parker known also as,

Mrs Olney B Parker, known also as,

Defendants

Mrs W R Dietz,

## SUMMONS AND COMPLAINT

Filed July 31 1942

R. S. Duck,

Clerk

Richard J Demeree,

768

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Bay Minette, Ala.

RECORDED

Defendant lives at

RECEIVED IN OFFICE

August 1

1942

W. R. Stuart

Sheriff

I have executed this summons

this Aug 4 - 1942  
by leaving a copy withWithin writ with  
Mrs W R Dietz  
and by taking into  
my possession one  
Covered Wagon home  
Trailer Serial No. 5870  
Ala Tag 10 B - 55-1941

W. R. Stuart

Sheriff

B. J. Zuercher

Deputy Sheriff