

1067

STATE OF ALABAMA)  
BALDWIN COUNTY)

IN THE CIRCUIT COURT --- LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. Steadham 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 the Farmers and Merchants Bank, a Corporation.

\*

Witness my hand this 23 day of June, 1947.

Alice J. Ruck  
Clerk

|                            |           |           |                         |
|----------------------------|-----------|-----------|-------------------------|
| FARMERS AND MERCHANTS BANK |           | COMPLAINT |                         |
| A CORPORATION              |           | )         |                         |
|                            | Plaintiff | )         | IN THE CIRCUIT COURT OF |
| -vs-                       |           | )         | BALDWIN COUNTY, ALABAMA |
| H. STEADHAM,               |           | )         | LAW SIDE                |
|                            | Defendent | )         |                         |

The Plaintiff claims of the Defendant the following personal property, viz:- One (1) Bay mare about 9 years old; One (1) Black horse mule about 10 years old; One (1) 1940 model Dodge 1/2 ton truck, motor No. T 105- 10208, being the property conveyed by that certain chattel mortgage note bearing date the 18th day of March, 1947, and due on or before the 18th day of April, 1947.

[Signature]  
Attorney for Plaintiff

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 the 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 ten (10) days thereafter deliver the property to the Plaintiff and pay all damages and costs which may accrue from the detention thereof.

Alice J. Ruck  
Clerk of Court

1067.

SUMMONS AND COMPLAINT

*Delmar*

FARMERS AND MERCHANTS BANK  
A CORPORATION

Plaintiff

-VS-

H. STEADHAM

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

LAW SIDE

FILED

JUN 23 1947

ALICE J. BUCK, clerk

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

Executed this 14th day  
of July 1947 by  
Leaving a copy of the  
written summons  
and complaint on  
H. Steadham  
and taking into my  
possession 1 Bay  
More and one 1940  
Dodge 1/2 ton truck  
motor no. T 105-10208  
Jasper Wilkins  
Sherriff

Filed in Office 23rd day

June 1947  
Jasper Wilkins  
Sherriff

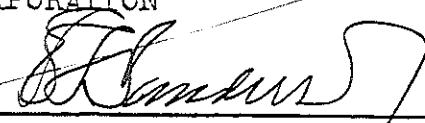
STATE OF ALABAMA)  
BALDWIN COUNTY)

The Farmers and Merchants Bank, a Corporation is bound unto H. Steadham in the sum of Two Hundred Thirty and no/100 Dollars (\$230) for the payment of which it binds itself, its successors and assigns.

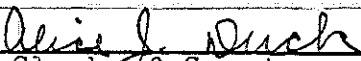
Sealed and dated this, the 43 day of June, 1947.

The condition of the above obligation is such that the above bound Farmers and Merchants Bank, a Corporation, has this day, commenced suit in the Circuit Court in Baldwin County, Alabama, Law Side, against H. Steadham for the recovery of One (1) Bay Mare about 9 years old; one (1) black horse mule about 10 years old; one (1) 1940 Model Dodge 1/2 ton truck motor No. T 105-10208; and having made affidavit that the said property sued for was conveyed under and by virtue of a chattel mortgage dated the 18th day of March, 1947, and entering into this bond has obtained an order requiring the sheriff to take the said property sued for into his possession; if the said H. Steadham shall succeed in this suit or if he shall fail in said suit to pay the defendant 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.

FARMERS AND MERCHANTS BANK, A  
CORPORATION

By 

Approved:

  
Clerk of Court

1067

BOND

FILED

JUN 23 1947

ALICE J. DUCK, Clerk

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said

county in said state, personally appeared E. F. Sanders, vice presi-  
dent of the Farmers and Merchants Bank, a Corporation, who having  
been first duly and legally sworn both depose and say under oath  
as follows:-

That on the 18th day of March, 1947, H. Steadham executed and

delivered, for value received, a chattel mortgage note conveying

to the Farmers and Merchants Bank, its successors or assigns, the

following described property, to-wit:- One (1) Bay Mare about 9

years old; one (1) Black horse mule about 10 years old; one (1)

1940 model dodge 1/2 ton truck, motor no. T 105-10208; that this

chattel mortgage note was due on or before the 18th day of April,

1947, and was in the principal sum of Two Hundred Thirty and no/100

Dollars (\$230.00); that no payment has been made on this said note

although demand has been made upon the said H. Steadham; that the

property hereinabove described is believed to be in the possession

of the said H. Steadham and that it must be in the possession of

the Farmers and Merchants Bank, a Corporation, before it may be

sold as set out in the said mortgage; that suit is being filed under

and by virtue of Section 929 of Title 7 of the Code of 1940 of the

State of Alabama, which provides for a suit in detinue by the Mort-  
gages.

Sworn to and subscribed before me,  
a Notary Public on this, the 20  
day of June, 1947.  
Notary Public, Baldwin County,  
State of Alabama

SEAL