

1078

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 Percy A. Lord 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 State Bank of Elberta, A Corporation.

Witness my hand this 29 day of July, 1947.

Alice J. Neuch  
Clerk

THE STATE BANK OF ELBERTA,  
A CORPORATION

Plaintiff

-vs-

PERCY A. LORD

Defendant

COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

The Plaintiff claims of the Defendant the following personal property, viz:- One (1) 1935 model Oldsmobile Sedan, Motor number 7452046, being the property conveyed by that certain chattell mortgage note bearing date the 12th day of August, 1946, and payable in ten (10) monthly installments after date.

[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. Neuch  
Clerk of Court

Received in Sheriff's Office  
this 30 day of July, 1947  
TAYLOR WILKINS, Sheriff

Exhibited By serving a  
Copy of Summons and  
Complaint on Percy A.  
Lord 8-14-47

Taylor Wilkins Sheriff  
Jollie B. Gifford D.S.

The automobile  
described herein  
could not be found  
8-14-47

Taylor Wilkins  
Sheriff

1098  
RECORDED  
Summons

SUMMONS AND COMPLAINT

STATE BANK OF ALBERTA, A  
CORPORATION

Plaintiff

-VS-

PERCY A. LORD

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

FILED  
JUL 29 1947  
ALICE J. DUCK, Clerk

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

STATE OF ALABAMA)

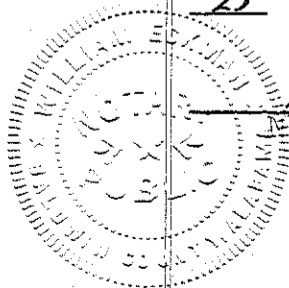
BALDWIN COUNTY)

Before me, <sup>William Eckman</sup>~~Cecil G. Cassen~~, a Notary Public in and for said county in said state, personally appeared Alfred M. Neumann, cashier of the State Bank of Elberta, a Corporation, who having been first duly and legally sworn doth depose and say under oath as follows:-

That on the 12th day of August, 1946, Percy A. Lord executed and delivered, for value received, a chattel mortgage note conveying to the State Bank of Elberta, its successors or assigns, the following described property, to-wit:- One (1) 1935 model Oldsmobile Sedan, Motor number 7452046, that this chattel mortgage note was due and payable in ten (10) monthly installments after date thereof, and was in the principal sum of Two Hundred Thirteen and no/100 Dollars (\$213.00), of which amount there has been paid Seventy and no/100 Dollars (\$70.00) and that there remains due One Hundred Forty-three and no/100 (\$143.00) although demand for payment of this amount has been made upon the said Percy A. Lord; that the property hereinabove described is believed to be in the possession of the said Percy A. Lord and that it must be in the possession of the State Bank of Elberta, 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 Mortgagee.

Sworn to and subscribed before  
me, a Notary Public, on this, the  
25 day of JULY, 1947.

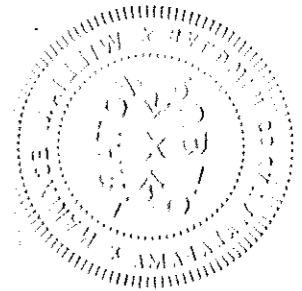
William Eckman  
Notary Public, Baldwin County  
State of Alabama



RECORDED

AFFIDAVIT

FILED  
JUL 29 1947  
ALICE J. DUCK, Clerk



STATE OF ALABAMA)  
BALDWIN COUNTY)

The State Bank of Elberta, a Corporation is bound unto Percy A. Lord in the sum of Two Hundred Thirteen and no/100 Dollars (\$213.00) for the payment of which it binds itself, its successors and assigns.

Sealed and dated this, the 25 day of July, 1947.

The condition of the above obligation is such that the above bound State Bank of Elberta, a Corporation, has this day, commenced suit in the Circuit Court in Baldwin County, Alabama, Law Side, against Percy A. Lord for the recovery of One (1) 1935 model Oldsmobile Sedan, Motor number 7452046; and having made affidavit that the said property sued for was conveyed under and by virtue of a chattel mortgage dated the 12th day of August, 1946, 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 Percy A. Lord 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.

STATE BANK OF ELBERTA, A CORPORATION

By [Signature]

Cashier

Approved:

Alice J. Smith  
Clerk of Court

RECORDED

BOND

FILED

JUL 29 1947

ALICE J. DUCK, Clerk