

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

1195

September 28, 1948

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

Dear Mrs. Duck:

Request the following cases be dismissed.

1156	PHILSON PRODUCTS -vs- EDWARD W. ENGEL
1157	MURIELS SPORTWEAR -vs- EDWARD W. ENGEL
1187	THE BANK OF FAIRHOPE -vs- JOE HORACE STRONG, Jr.
1195	THE BANK OF FAIRHOPE -vs- PAMMIE LEE FOWLER

You will find the costs have been paid in all these cases.

Yours very truly,

RICKARBY & RICKARBY

by:- 

EGR,jr:rs  
340  
288  
380  
387

ELLIOTT G. RICKARBY

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

June 9, 1948

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

Dear Mrs. Duck:

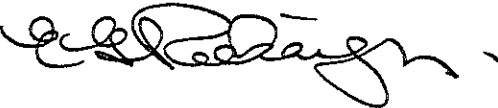
BANK OF FAIRHOPE -vs- PAMMIE R. FOWLER:  
With this we hand you Summons and Complaint,  
affidavit, bond and writ in the above mentioned  
cause.

Please execute writ at once and hand it  
to the Sheriff, together with enclosed letter.

Yours very truly,

RICKARBY & RICKARBY

by:-



EGRjr:la  
387.  
7 encls.

1195-

The Bank of Fairhope  
The Corporation

vs.

Sammi R. Fowler

Declarer

Filed 6-10-48

Rickaby

5611

STATE OF ALABAMA:

COUNTY OF BALDWIN:

KNOW ALL MEN BY THESE PRESENTS, That THE BANK OF FAIRHOPE, a Corporation, is held and firmly bound unto PAMMIE R. FOWLER, his heirs, executors, and administrators in the sum of THREE THOUSAND SIX HUNDRED FORTY-EIGHT and 40/100 DOLLARS, for the payment of which it binds itself and its assigns, firmly by these presents.

The condition of the above obligation is such that, whereas, the above bounden BANK OF FAIRHOPE, a Corporation, has on the day of June, Nineteen Hundred Forty-eight, sued out from the office of the Clerk of the Circuit Court of Baldwin County, in said State, a writ of detinue, returnable to the Circuit Court, against the said PAMMIE R. FOWLER, for the recovery of the following described property, to-wit: 1 Ford Ferguson Tractor; 1 Turn Bottom 14" plow; 1 4-Row weeder, ~~fixed~~; 1 Blade terracer, ~~fixed~~; 1 Transport Box; 1 Mowing machine; 1 Disc (Tandem), ~~fixed~~; 1 Cultivator, ~~fixed~~; 1 Planter.

Now if the said BANK OF FAIRHOPE, A Corporation, shall fail in said suit, and shall pay to the said PAMMIE R. FOWLER, the Defendant in said writ, all such costs and damages as he may sustain by the wrongful suing out thereof, then this obligation to be void, otherwise to remain in full force and effect.

THE BANK OF FAIRHOPE

by:-

President

Attest:

Cashier.

BONDSMEN. . . .

(SEAL)

(SEAL)

approved 6-10-48  
Alice J. Duck  
Clerk

*Handwritten notes at top right:*  
60-10-48  
10-10-48  
10-10-48

CONDENSED . . .  
Crafter.  
XXXXXX  
\_\_\_\_\_  
(GARY)  
\_\_\_\_\_  
(GARY)

President



THE BANK OF FAIRHOPE

were to remain in full force and effect.

Wherein said one thereof, then this obligation to be void, other-  
in said writ, all such costs and damages as he may sustain by the  
said writ, and shall pay to the said PAMMIE R. FOWLER, the Defendant  
Now if the said BANK OF FAIRHOPE, a Corporation, shall fail to  
obey: I Pray.

1195-  
RECORDED

THE BANK OF FAIRHOPE, a  
Corporation, Plaintiff  
-vs-  
PAMMIE R. FOWLER,  
Defendant

DETINUE BOND

*Handwritten notes:*  
Filed 6-10-48  
Alice J. Duck  
Clerk

being, executor, and administrators in the sum of THREE THOUSAND  
Corporation, is held and firmly bound unto PAMMIE R. FOWLER, his  
KNOW ALL MEN BY THESE PRESENTS, that the BANK OF FAIRHOPE, a  
CORPORATION OF ALABAMA:  
DAVID O. VIVIAN:

The State of Alabama,  
Baldwin County.

CIRCUIT COURT.

No. \_\_\_\_\_

1948  
~~192~~

To any Sheriff of the State of Alabama:

PAMMIE R. FOWLER

You are hereby commanded to summon \_\_\_\_\_

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

THE BANK OF FAIRHOPE, a Corporation

Witness my hand this 10<sup>th</sup> day of June, 1948.

Alice J. Duck Clerk.

## COMPLAINT

THE BANK OF FAIRHOPE, A  
Corporation,

PAMMIE R. FOWLER,

Plaintiff Versus Defendant

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

- 1 Ford Ferguson Tractor
- 1 Turn Bottom 14" plow
- 1 4-Row weeder,
- 1 Blade terracer,
- 1 Transport box
- 1 Mowing machine
- 1 Disc (Tandem),
- 1 Cultivator,
- 1 Planter

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

from December 28th, 1946, to date, 1948.

Richard R. R. R. Plaintiff's Attorney. S.

RECORDED

No. 1195- Page

State of Alabama,  
Baldwin County.

Circuit Court

THE BANK OF FAIRHOPE, A  
Corporation,

vs. Plaintiffs

PAMMIE R. FOWLER,  
Defendants

Detinue Summons and Complaint

Filed 6-10-1948  
Alice J. Duck, Clerk.

Richard F. Dackensby  
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.

Received in Sheriff's Office  
this 10 day of June, 1948  
TAYLOR WILKINS, Sheriff

RECORDED

Defendant lives at

Summerville Ala  
Received in office

6-16-1928

Taylor Wilkins, Sheriff  
I have executed this summons

this 6-18-1928  
by leaving a copy with

Pammie R. Fowler  
and taking her to my  
possession the with the  
described property

Taylor Wilkins, SHERIFF.  
A. R. Willis, DEPUTY SHERIFF.

STATE OF ALABAMA:

COUNTY OF BALDWIN:

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 Plaintiff, with security in double the 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 10<sup>th</sup> day of June, 1948.

*Alvin J. Duck*

Clerk, Circuit Court, Baldwin County.

The property to repossess is:

- 1 Ford Ferguson Tractor
- 1 Turn Bottom 14" plow
- 1 4-Row Weeder
- 1 Blade Terracer
- 1 Transport box
- 1 Mowing machine
- 1 Disc (Tandem)
- 1 Cultivator
- 1 Planter





STATE OF ALABAMA:

COUNTY OF BALDWIN:

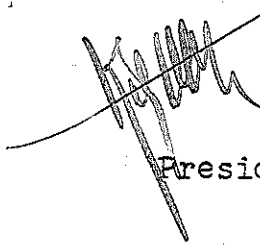
Before me, the undersigned Notary Public, in and for said State and County, personally appeared KIRBY WHARTON, President of the BANK OF FAIRHOPE, who, being duly sworn, deposes and says that the property sued for in the complaint of the BANK OF FAIRHOPE, a Corporation, to-wit:

1 Ford Ferguson Tractor  
1 Turn Bottom 14" plow  
1 4-Row weeder, field  
1 Blade terracer, field  
1 Transport box  
1 Mowing machine  
1 Disc (Tandem), field  
1 Cultivator, field  
1 Planter


belongs to THE BANK OF FAIRHOPE, a Corporation, the said Plaintiff.

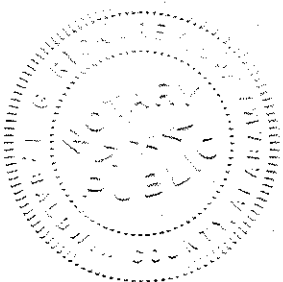
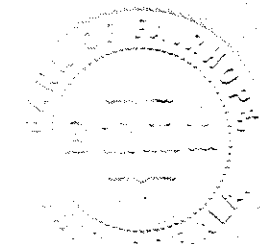
THE BANK OF FAIRHOPE

by:-

  
President.

Subscribed and sworn to before me, this the  
day of June, Nineteen Hundred Forty-eight.

  
Notary Public, Baldwin County, Alabama.



1195- RECORDED

THE BANK OF FAIRHOPE,  
A Corporation,  
Plaintiff

--vs--

PAMMIE R. FOWLER,  
Defendant

DETINUE AFFIDAVIT

Filed 6-10-48  
Arlene J. Duck  
clerk

