

1311

FIRST FINANCE, INC.,  
A Corporation,  
  
Plaintiff,  
  
vs.  
  
W. R. DUCKWORTH,  
  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
LAW SIDE.

Before me, W. C. Robertson, a Notary Public  
in and for Mobile County, personally appeared A. L. Jordan  
\_\_\_\_\_, 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 A. L. Jordan; that he  
is the Agent of First Finance, Inc., a Corporation, and as such is  
duly authorized to make this affidavit; that the following des-  
cribed property to-wit:

One (1) 1937 Model DeSoto automobile, Model  
S3, Manufacturing Serial #5527731, Motor #S3-12401.

for the recovery of which it has this day instituted suit in the  
Circuit Court of Baldwin County, Alabama, is the property of First  
Finance, Inc., a Corporation.

A. L. Jordan

Sworn to and subscribed before  
me this 18th day of February,  
1949.

W. C. Robertson  
Notary Public, Mobile, County,  
Alabama.

Filed 2-21-49  
Alice J. Much  
clerk

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, that we, First Finance, Inc., a Corporation, as principal and the undersigned as surety, are held and firmly bound unto W. R. Duckworth, his heirs, executors and administrators in the sum of \$150.00, 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 21<sup>st</sup> day of February, 1949.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas the above bounden First Finance, Inc., a Corporation, has on the \_\_\_\_\_ day of February, 1949, sued out from the office of the Circuit Clerk of Baldwin County, Alabama, a Writ of Detinue, returnable at the next term of the Circuit Court of Baldwin County, Alabama, in said cause against W. R. Duckworth, for the recovery of the following described personal property, viz:-

One (1) 1937 Model DeSoto automobile, Model S3, Manufacturing Serial #5527731, Motor #S3-12401.

NOW, if the said First Finance, Inc., a Corporation, shall fail in said suit and shall pay to the said W. R. Duckworth, 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 effect.

*As its Agent.*  
UNITED STATES FIDELITY and GUARANTY COMPANY

A MARYLAND CORPORATION, BALTIMORE, MARYLAND

*Houston W. Briggs*  
HOUSTON W. BRIGGS, ATTORNEY-IN-FACT

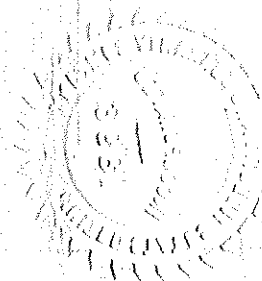
Taken and approved this

21<sup>st</sup> day of February, 1949.

*Alvin L. Smith*  
Clerk of Circuit Court.

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Filed 2-21-49  
Aucy. Wick  
Club



STATE OF ALABAMA  
BALDWIN COUNTY

I  
I

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. R. Duckworth, 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 First Finance, Inc., a Corporation.

Witness my hand this 21<sup>st</sup> day of February, 1949.

Alice J. Duck  
Clerk.

FIRST FINANCE, INC.,  
A Corporation,

Plaintiff,

vs.

W.R. DUCKWORTH,

Defendant.

I  
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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

The Plaintiff claims of the Defendant the following personal property, to-wit:-

One (1) 1937 Model DeSoto automobile, Model S3, Manufacturing Serial #5527731, Motor #S3-12401.

with the value of the hire or use thereof during the detention, to-wit: since November 30, 1948.

Hyland Chason and Stone  
Attorneys for Plaintiff.

BY: Marbome P. Stone

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 21 day of Feb., 1949  
TAYLOR WILKINS, Sheriff

Executed 2-21 1949  
by serving copy of within Summons and  
Complaint on

*W. R. Duckworth and*  
*taking into my possession*  
*the within described*  
*property*  
*Taylor Wilkins* Sheriff  
By *H. F. Hall* Deputy Sheriff

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FIRST FINANCE, INC.,  
A Corporation,

Plaintiff,

vs.

W. R. DUCKWORTH,

Defendant.

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

FILED

FEB 21 1949

ALICE J. DUCK, Clerk

LAW OFFICES  
HYBART, CHASON & STONE  
BAY MINETTE, ALABAMA

# The State of Alabama, {

## Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, First Finance, Inc.,  
a Corporation

and the undersigned as surety

are held and firmly bound unto W. R. Duckworth

in the sum of Three Hundred (\$300.00) Dollars, for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated this 27<sup>TH</sup> day of FEBRUARY 1949

The condition of the above obligation is such that whereas the said First Finance, Inc., a Corporation did, on the 21<sup>st</sup> day of February 1949 sue out of the Circuit Court of Baldwin County,

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 (1) 1937 Model DeSoto automobile, Model S3, Manufacturing Serial #5527731, Motor #S3-12401.

which said writ was placed in the hands of Taylor Wilkins, Sheriff of Baldwin County, Alabama, on the 21<sup>st</sup> day of February, 1949, and executed by him on the 21<sup>st</sup> day of FEBRUARY, 1949, by taking into his possession the following property, to-wit:

One (1) 1937 Model DeSoto automobile, Model S3, Manufacturing Serial #5527731, Motor #S3-12401.

And whereas the said W. R. Duckworth, Defendant in said writ, has failed and neglected for the space of five days from the execution of said writ to give bond and take possession of said property as authorized by law.

Now if the said First Finance, Inc., a Corporation upon his failing in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay all damages for the detention of the property and costs of suit, then this obligation to be void, otherwise to remain in full force and effect.

FIRST FINANCE, INC., A Corporation (SEAL)

BY: [Signature] (SEAL)

UNITED STATES FIDELITY and GUARANTY COMPANY

A MARYLAND CORPORATION, BALTIMORE, MARYLAND (SEAL)

BY

[Signature]  
HOUSTON W. BRIGGS, ATTORNEY-IN-FACT

Taken and approved this 27<sup>th</sup> day of Feb 1949

[Signature]  
Taylor Wilkins

Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Circuit Court, Baldwin County

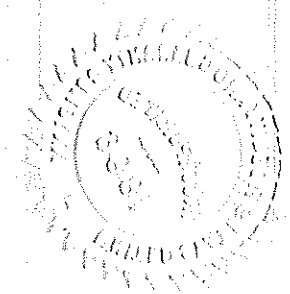
REPLEVY BOND  
OF PLAINTIFF

VS.

Taken and approved this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_

*Filed 2-27-49  
Alice Duck  
Clerk*





FIRST FINANCE, INC.,  
A Corporation,

Plaintiff,

vs.

W. R. DUCKWORTH,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE.

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiff in the above styled cause by its attorneys and moves the Court to render a Judgment by Default in favor of the Plaintiff and against the Defendant for the property claimed in Plaintiff's Complaint that has heretofore been filed in this cause.

A copy of said Summons and Complaint was served on the Defendant, W. R. Duckworth on February 21, 1949, and he has to the date hereof failed to plead, answer or demur to said Complaint.


This suit is to recover One (1) 1937 Model DeSoto automobile, Model S3, Serial Number 5527731, Motor Number S3-12401, which automobile is the property of the Plaintiff and which automobile was, at the time of the filing of this suit, in the possession of the said Defendant.

WHEREFORE, the Plaintiff moves the Court to render a Judgment for the Plaintiff and against the Defendant for the said automobile.

Respectfully submitted,

Hybart, Chason & Stone

BY:



1311

FIRST FINANCE, INC.,  
A CORPORATION,  
PLAINTIFF

VS.

W. R. DUCKWORTH,  
DEFENDANT

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Motion for Judgment By Default

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FILED  
MAY 20 1949  
ALICE J. DUCK, Clerk