

STATE FINANCE COMPANY,
A partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell,

Plaintiff,

vs.

Daisy Opal Taylor and
Morris Taylor,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

A F F I D A V I T

Before me, Charles M. Hamilton, a Notary
Public, in and for Mobile County, Alabama, personally appeared
L. I. Hall, 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 L. I. Hall; that he is Manager of State
Finance Company, a partnership composed of R. J. O'Neal, A. T.
O'Neal and T. C. Connell, and as such is duly authorized to make
this affidavit; that the following described property, to-wit:-

One (1) 1946 Model Dodge 3/4 ton truck,
Motor #1120803-8.

for the recovery of which the said State Finance Company has
instituted suit in the Circuit Court of Baldwin County, Alabama,
against the above named Defendants, belongs to State Finance Company,
a partnership composed of R. J. O'Neal, A. T. O'Neal and T. C.
Connell.

L. I. Hall

L. I. Hall, Manager.

Sworn to and subscribed

before me, this 12th day of
August, 1949.

Charles M. Hamilton
Notary Public, Mobile County,
Alabama.

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~~W 2335~~

DETINUE AFFIDAVIT

STATE FINANCE COMPANY,
a partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell,

Plaintiffs,

vs.

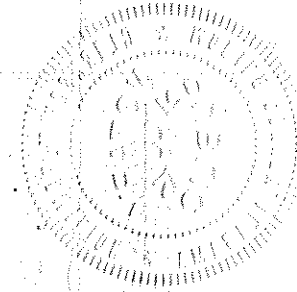
DAISY OPAL TAYLOR and MORRIS
TAYLOR.

Defendants.

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

Filed August 19, 1949.

Archie J. Lewis
Clerk.



STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS: That we, State Finance Company, a partnership composed of R. J. O'Neal, A. T. O'Neal and T. C. Connell, as principal and the undersigned as sureties, are held and firmly bound unto Daisy Opal Taylor and Morris Taylor, their heirs and assigns, in the sum of Twenty-Five and no/100 Dollars (\$25.00), for the payment of which we bind ourselves, our and each of our heirs, executors and administrators, jointly and severally by these presents.

Sealed with our seals and dated this 12th day of August, 1949.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, that whereas, the above bounden State Finance Company, a partnership composed of R. J. O'Neal, A. T. O'Neal and T. C. Connell has, on the 19th day of August, 1949, sued out from the office of the Clerk of the Circuit Court of Baldwin County, Alabama, a Writ of Detinue, returnable to the said Circuit Court of Baldwin County, Alabama, against the said Daisy Opal Taylor and Morris Taylor for the recovery of the following property, to-wit:-

One (1) 1946 Model Dodge 3/4 ton truck
Motor #1120803-8.

NOW, if the said State Finance Company, a partnership composed of R. J. O'Neal, A. T. O'Neal and T. C. Connell shall fail in said suit, and shall pay to the said Daisy Opal Taylor and Morris Taylor, the Defendants in said suit, all such costs and damages as they may sustain by the wrongful suing out of the said Writ of Detinue, then this obligation to be void, otherwise to remain in full force and effect.

State Finance Company, a partnership composed of R. J. O'Neal, A. T. O'Neal and T. C. Connell.

Taken and approved this

19th day of August, 1949.

Doris J. Smith
Clerk.

BY: [Signature]

[Signature]

[Signature]
As Sureties.

2334
DETINUE BOND

STATE FINANCE COMPANY, a
partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell,

Plaintiffs,

vs.

DAISY OPAL TAYLOR and MORRIS
TAYLOR,

Defendants.

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

Filed August 17, 1949.


Clerk.

The State of Alabama, {

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, _____

and Daisy Opal Taylor and Morris Taylor
 are held and firmly bound unto State Finance Company
 in the sum of Six hundred 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 _____ day of _____, 19____

The condition of the above obligation is such that whereas the said _____

State Finance Company did, on the 19 day
 of August 1949 sue out of the Circuit Court of Baldwin County
 a writ of detinue directed to any Sheriff of said State and commanding him to take into his possession the
 following property, to-wit: _____

One 1946 Model Dodge 3/4 ton truck
Motor no. 1120803-8

which said writ was placed in the hands of Laylor Wilkins,
 Sheriff of Baldwin County, Alabama, on the 19 day of August, 1949,
 and executed by him on the 19 day of August, 1949, by taking into his
 possession the following property, to-wit: _____

One 1946 Model Dodge 3/4 ton truck
Motor no. 1120803-8

And whereas the above bound Morris Taylor and Daisy Opal Taylor

Defendant in said suit, has, within five days from the execution of said writ, entered into and executed this
 bond as required by law and thereby obtained possession of said property seized under this writ.

Now if the said Morris Taylor and Daisy Opal Taylor is cast in said
 suit and within thirty days after judgment deliver the property aforesaid to the Plaintiff and pay all costs
 and damages which may accrue from the detention thereof, then this obligation to be void, otherwise to
 remain in full force and effect.

Morris Taylor (SEAL)

Daisy Opal Taylor (SEAL)

G. M. Lambert (SEAL)

G. B. McDice

Taken and approved this 22 day of August, 1949

Laylor Wilkins Sheriff
 Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Circuit Court, Baldwin County

**REPLEVY BOND
OF DEFENDANT**

VS.

Taken and approved this _____

day of _____, 193_____

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 Daisy Opal Taylor and Morris Taylor to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County, then and there to answer the complaint of State Finance Company, a partnership composed of R. J. O'Neal, A. T. O'Neal and T. C. Connell.

Witness my hand this 19th day of August, 1949.

Dwight J. Smith
Clerk.

STATE FINANCE COMPANY,
a partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell,

Plaintiff,

vs.

Daisy Opal Taylor and
Morris Taylor,

Defendants.

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

COUNT ONE:

The Plaintiffs claim of the Defendants the following described personal property, to-wit:-

One (1) 1946 Model Dodge 3/4 ton truck,
Motor #1120803-8.

with the value of the hire or use thereof during the detention,
to-wit, since April 17, 1949.

COUNT TWO:

The Plaintiffs claim of the Defendants the sum of One Hundred Twenty-four and 80/100 Dollars (\$124.80) due by Promissory Note made by them on, to-wit: February 7, 1949, and payable in installments, the last of which was due July 21, 1949, together with interest thereon from date at the rate of 8% per annum, which sum of money, together with such interest is due and unpaid.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Circuit Court, Baldwin County

REPLEVY BOND
OF DEFENDANT

vs.

Taken and approved this

day of _____, 193

The Plaintiffs aver that in, by and as a part of said note the Defendants waived as to this debt, any right to claim exemption under the Constitution and Laws of the State of Alabama, and of this waiver the Plaintiffs now claim the benefit.

The Plaintiffs further aver that in, by and as a part of said note the Defendants agreed to pay all cost of collecting the same, including a reasonable attorney's fee and the Plaintiffs further claim of the Defendant the further and additional sum of \$25.00 as such reasonable attorney's fee.

Hyatt Rasmussen Stone
Attorneys for Plaintiffs.

TO THE SHERIFF OF SAID COUNTY:

as, the Plaintiffs in the
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 Defendants gives bond
payable to the Plaintiffs with
sufficient surety in double the
amount of the value of the property
with condition that if the Defendant
is cast in the suit they will
within thirty days thereafter
deliver the property to the
Plaintiffs, and pay all damages and
costs which may accrue from the
detention thereof.

Alice J. Luck
Clerk.

Received in Sheriff's Office
this 20 day of Aug., 1949
TAYLOR WILKINS, Sheriff

Executed 8.20 19 49
by serving copy of within Summons and
Complaint on

Daisy Opal Taylor
Morris Taylor and taking
in my Possession 1946 Dodge
1 ton Truck Motor # 1120803-8
Taylor Wilkins Sheriff
By Zolene B. Giff Deputy Sheriff

1395

1395

SUMMONS AND COMPLAINT

STATE FINANCE COMPANY, a
partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell,

Plaintiffs,

vs.

DAISY OPAL TAYLOR and MORRIS
TAYLOR,
Defendants.

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

Filed August 19th, 1949.

Alice J. Luck
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

Executed Aug 20 19 49
by serving copy of within Summons and
Complaint on

Daisy Opal Taylor
Morris Taylor and taking
in my Possession 1946 Dodge Truck
3/4 ton Motor # 1120803-8
Taylor Wilkins Sheriff
By Zolene B. Giff Deputy Sheriff

STATE FINANCE COMPANY,
a partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell.

PLAINTIFF

VS.

DAISY OPAL TAYLOR and
MORRIS TAYLOR,

DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

Now comes the Defendant and for answer to the Plaintiff's
complaint, and to each count thereof, separately and severally says:

1.

That he is not guilty.

2.

That the facts therein alleged are untrue.

3.

That he is not indebted to the Plaintiff in the manner and
form alleged.

J. M. Lee
Attorney for the Defendant

The Defendant demands a trial by jury.

J. M. Lee
Attorney for the Defendant

1396

STATE FINANCE COMPANY,
a partnership composed of
R. J. O'Neal, A. T. O'Neal
and T. C. Connell.

PLAINTIFF

VS.

DAISY OPAL TAYLOR and
MORRIS TAYLOR,

DEFENDANTS

Filed 9-19-49
Beice G. Welch
Clerk