

1396

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Klumpp Motor Company, Inc., a Corporation, of Robertsdale, Alabama, 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 American National Bank & Trust Company.

Witness my hand this 23rd day of August, 1949.

Heinz F. Leuck
Clerk.

AMERICAN NATIONAL BANK
& TRUST COMPANY,

Plaintiff,

vs.

KLUMPP MOTOR COMPANY, INC.,
A Corporation,

Defendant.

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

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

One (1) Ford Tudor Automobile, Motor #491720,
Model of the year 1939.

together with the value of the hire or use thereof during the detention, to-wit: since May 12, 1949.

Hyland Chason & Stone
Attorneys for Plaintiff.

By: Malone P. Stone

To the Sheriff of said County:

Whereas

~~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. Ruck
Clerk.

Received in Sheriff's Office
this 23 day of Aug, 1949
TAYLOR WILKINS, Sheriff

8-24

Executed this 24th
day of Aug 1949
By Alice J. Ruck a copy of
the within writ of
Duress Mason, Manager
of Klumpp Motor Co
is taking into my
possession the within

701396

8-24-49

SUMMONS AND COMPLAINT

AMERICAN NATIONAL BANK &
TRUST COMPANY,

Plaintiff,

vs.

KLUMPP MOTOR COMPANY, INC.,
a corporation.

Robertsdale
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

LAW SIDE.

Filed August 23rd., 1949.

Alice J. Ruck
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, that we, The American National Bank & Trust Company of Mobile, a National Banking Association, by Curtis Kendall, its Vice-President as principal and Marie F. Rolston, as surety, are held and firmly bound unto Klumpp Motor Company, a Corporation, its successors 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 5th day of July, 1949.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, that whereas, the above bounden The American National Bank & Trust Company of Mobile has, on the 23rd day of ~~July~~ ^{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 Klumpp Motor Company for the recovery of the following property, to-wit:-

One (1) Ford Tudor Automobile, Motor #54-491720
Model of the year 1939.

NOW, if the said The American National Bank & Trust Company of Mobile shall fail in said suit, and shall pay to the said Klumpp Motor Company, the Defendant in said Writ, all such costs and damages as it 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.

The American National Bank & Trust
Company of Mobile

BY:

Curtis Kendall
As its Vice-President.

Taken and approved this
23rd day of July, 1949.

Marie F. Rolston
Marie F. Rolston a.e.

Alice J. Duck
Alice J. Duck, Clerk of the Circuit
Court of Baldwin County, Alabama.

AMERICAN NATIONAL BANK
& TRUST COMPANY,

Plaintiff,

vs.

KLUMPP MOTOR COMPANY, INC.,
A Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

A F F I D A V I T

Before me, Nan Thompson, a Notary

Public, in and for Mobile County, Alabama, personally appeared
Curtis Kendall, 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 Curtis Kendall; that he is Vice-President
of the American National Bank & Trust Company of Mobile and an
agent of said Bank and Trust Company and as such is duly authorized
to make this affidavit; that the following described property, to-
wit:-

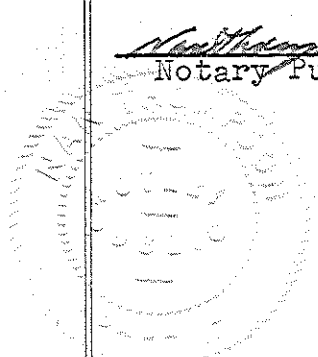
One (1) Ford Tudor Automobile, Motor #491720,
Model of the year 1939,

for the recovery of which the said American National Bank & Trust
Company has instituted suit in the Circuit Court of Baldwin County,
Alabama, against the above named Defendant belongs to the American
National Bank & Trust Company of Mobile.


Curtis Kendall.

Sworn to and subscribed before
me, this 20th day of August, 1949.


Notary Public, Mobile County,
Alabama.



Ms 1396

DETINUE BOND AND AFFIDAVIT

AMERICAN NATIONAL BANK &
TRUST COMPANY,

Plaintiff,

vs.

KLUMPP MOTOR COMPANY, INC.,
a corporation,

Defendant.

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

Filed August 23rd., 1949.

Alfred J. Smith
Clerk.

LAW OFFICES
HYBART, CHASON & STONE
BAY MINETTE, ALABAMA