

1739

WES FLADD, individually
and doing business as
WES FLADD MOTORS,

Plaintiff,

Vs.

BILLY FRED PARKER,

Defendant.

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

The plaintiff claims of the defendant the following personal property,

viz:

One 1947 Nash "600" 4-door, Motor No. K-150205 automobile.

With the value of the hire or use thereof during the detention, viz:

from the 31st day of August, 1951.

James T. Blackman
Attorney for Plaintiff

Defendant's Address:

510 Moran Street
Bay Minette, Alabama

ms 1739

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SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1739

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BILLY FRED PARKER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

BILLY FRED PARKER, Defendant

by WES FLADD, d/b/a as WES FLADD MOTORS

, Plaintiff

Witness my hand this 30th day of November 19 51

Adair J. Venable, Clerk

Boy Minette
516 Morgan St

No. 1739

RECORDED
Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

WES FLADD, individually and

d/b/a WES FLADD MOTORS

Plaintiffs

vs.

BILLY FRED PARKER

Defendants

SUMMONS and COMPLAINT

Filed 11-30, 1951

Miss. Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Nov. 30, 1951

Taylor Wilkins, Sheriff

I have executed this summons

this 6 - Dec - 1951
by leaving a copy with

Billy Fred Parker

Taylor Wilkins, Sheriff

Deputy Sheriff

KEENER T. BLACKMARR

ATTORNEY AT LAW

616 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

November 29, 1951

Clerk, Circuit Court of Baldwin County
At Law
Court House
Bayminette, Alabama

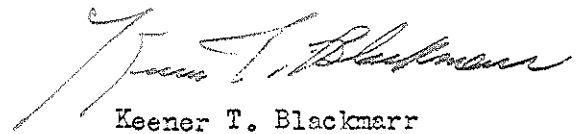
Re: Wes Fladd Motors v. Billy Fred Parker

Dear Sir:

Enclosed is a complaint in detinue in the above styled case.

I would greatly appreciate your advising me if and when the defendant files an appearance or answer to the action.

Yours very truly


Keener T. Blackmarr

KTB/am

MS1739

Wes Fadd, individually
to d/b/a Wes Fadd Motor Co

OK.

Billy Fred Parker

revenue

Filed 11-30-51

1951, 22 - revenue