

1758

STATE OF ALABAMA

BALDWIN COUNTY

KLUMPP MOTOR COMPANY, INC.,

a Corporation

vs.

MACK BOLDEN

Before me, Edgar R. Nelson, a Notary Public for the State of Alabama at Large, personally appeared Aubrey Brewton, an agent of the KLUMPP MOTOR CO., INC., plaintiff in the above-named cause, who, having been by me duly sworn, doth depose and say that the following property, to-wit:

One Chevrolet automobile, model 1948, four-door sedan, motor number FAA 128926

for the recovery of which the plaintiff has instituted suit this date in the circuit court of Baldwin County, Alabama, is the property of the plaintiff.

Aubrey Brewton

Subscribed to and sworn to before me this 19th day of January, 1952.

Edgar R. Nelson  
Edgar R. Nelson  
Notary Public for the State  
Of Alabama at Large

FILED  
JAN 20 1952  
BALDWIN COUNTY  
ALABAMA

RECORDED

RECORDED

1925.

Subscribed to and sworn to before me this 10th day of January,

Of Alabama at Large  
Notary Public for the State  
HARRY R. NELSON

FILED  
JAN 21 1952  
ALICE I. DUCK, Clerk

and of the district.

State in the circuit court of Baldwin County, Alabama, is the prob-  
for the recovery of which the plaintiff has instituted suit this

motor number EAV 158250  
One Chevrolet automobile, model 1948, four-door sedan,

and that the following property, to-wit:

named herein, who, having been by me duly sworn, both before and  
in and of the KIMBLE MOTOR CO., INC., plaintiff in the above-  
of Alabama at Large, personally appeared HARRY NELSON

Before me, Harry R. Nelson, a Notary Public for the State

X

X

BALDWIN COUNTY

X

HARRY NELSON

As

STATE OF ALABAMA

X

a Corporation

X

KIMBLE MOTOR COMPANY, INC.,

1528

STATE OF ALABAMA,  
Baldwin County.

KNOW ALL MEN BY THESE PRESENTS, That We,

Klumpp Motor Co. of Fairhope, Ala.

as principal, and

The Fidelity and Casualty Company of New York, New York

as surety, are held and firmly bound unto Mack Bolden

in the sum of Five Hundred DOLLARS,

to be paid to the said Mack Bolden, his heirs,

executors, administrators or assigns; for which payment, well and truly to be made, we bind ourselves,

and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly,

by these presents. Sealed with our seals, and dated this 19th day of January

in the year of our Lord, 1952

The condition of the above obligation is such, That whereas the above bound

Klumpp Motor Company, on the day of the date hereof hath obtained at the suit of

Klumpp Motor Company vs. Mack Bolden,

a summons and complaint for the recovery of personal property in specie against said defendant and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of said County, and which said endorsement is made upon the plaintiff entering into this bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

Klumpp Motor Company

By: X [Signature] (L. S.)

The Fidelity & Casualty Co. of New York, NY.

By: Geo. S. Huffman (L. S.)

Jno. S. Huffman, Attorney

(L. S.)

Approved this 21st day of Jan 1952

[Signature]  
Clerk.

RECORDED

No. 1958 Page \_\_\_\_\_

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

Plaintiff \_\_\_\_\_

vs.

Defendant \_\_\_\_\_

DETINUE BOND

Filed 1-21 1952

Alice I. Duck, Clerk

FILED

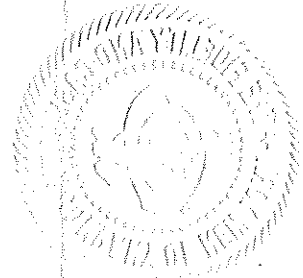
JAN 21 1952

ALICE I. DUCK, Clerk

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co.



**THE STATE OF ALABAMA**  
**Baldwin County**

CIRCUIT COURT

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

1952

To Any Sheriff of the State of Alabama :

You Are Hereby Commanded to Summon MACK BOLDEN

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 \_\_\_\_\_

KLUMPP MOTOR COMPANY, INC.. a corporation

Witness my hand this 21<sup>st</sup> day of January 1952

Heidi A. Clark, Clerk.

**COMPLAINT**

KLUMPP MOTOR CO., INC Plaintiff Versus MACK BOLDEN Defendant  
a corporation

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

One Chevrolet automobile, model 1948, four-door sedan, motor  
number FAA 128926

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

from November 28 1951, to January 19, 1952

Edgar R. Nelson, Plaintiff's Attorney.  
 Edgar R. Nelson

RECORDED

No. 1758 Page \_\_\_\_\_

**STATE OF ALABAMA**  
**Baldwin County**  
**CIRCUIT COURT**

KLUMPP MOTOR COMPANY, INC.,

A CORPORATION

Plaintiff\_\_

vs.

MACK BOLDEN

Defendant\_\_

**Detinue Summons and Complaint**

Filed 1-21, 1952

Alice French, Clerk

EDGAR R. NELSON

Plaintiff's Attorney

ALICE L. DICK, Clerk  
JAN 21 1952  
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 French, Clerk.

Defendant lives at

Fairhope, Alabama

Received in office

\_\_\_\_\_, 1952

\_\_\_\_\_, Sheriff.

I have executed this summons

this \_\_\_\_\_, 1952  
by leaving a copy with

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff

EDGAR R. NELSON

ATTORNEY-AT-LAW

PITMAN BUILDING

FAIRHOPE, ALABAMA

February 13, 1952

Mrs. Alice Duck, Clerk  
Circuit Court  
Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

Please advise me of the amount of the costs, to date, in the case of Klumpp Motor Co. v. Mack Bolden. The complaint is in petitue and was mailed from this office on the 19th day of January.

The defendant has agreed to pay the costs as soon as they are ascertained, contingent upon a dismissal of the case.

Thank you for your cooperation in this matter.

Very truly yours,

*Edgar R. Nelson*  
Edgar R. Nelson

ERN/en

THE STATE OF ALABAMA }  
Baldwin County

CIRCUIT COURT

No. ....

194...

To Any Sheriff of the State of Alabama :

You Are Hereby Commanded to Summon MACK BOLDEN

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 .....

KLUMPP MOTOR COMPANY, INC., a corporation

Witness my hand this 21<sup>st</sup> day of Jan 1952

W. J. Luck, Clerk.

COMPLAINT

KLUMPP MOTOR CO., INC Plaintiff..... MACK BOLDEN Defendant.....  
a corporation

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

One Chevrolet automobile, model 1948, four-door sedan, motor  
number FAA 128926

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

from November 28 1951, to January 19, 1952 194...

Edgar R. Nelson

Plaintiff's Attorney.



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**STATE OF ALABAMA**  
**Baldwin County**  
**CIRCUIT COURT**

KLUMPP MOTOR COMPANY, INC.,

a corporation

Plaintiff..

vs.

MACK BOLDEN

Defendant..

**Detinue Summons and Complaint**

Filed 1-21, 1952

Archie J. Nelson, Clerk

EDGAR R. NELSON

Plaintiff's Attorney

Defendant's Attorney

Received in Sheriff's Office  
this 21 day of Jan 1952  
TAYLOR WILKINS, Sheriff

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

Archie J. Nelson, Clerk.

Defendant lives at

FAIRHOPE, ALABAMA

Received in office

\_\_\_\_\_, 194\_\_\_\_

\_\_\_\_\_, Sheriff.

I have executed this summons

this \_\_\_\_\_, 194\_\_\_\_  
by leaving a copy with

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff