

	X	KLUMPP MOTOR COMPANY, INC.,
STATE OF ALABAMA	Ĭ	a Corporation
BALDWIN COUNTY	X	VS •
•	¥	MACK BOLDEN
-	Ĭ	

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 abovenamed 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 Brewn

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

1952.

Nelson

Notary Public for the State Of Alabama at Large

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STATE OF ALABAMA,
Baldwin County.

KNOW ALL MEN	BY THESE PRESENTS	, That We,	
	Klumpp Mobor Co.	of Fairhope, Ala.	
	,		
as principal, and —	······································		
The Fideli	ty and Casualty Comp	pany of New York, New York	
			to a life to the control of persons and the control of the control
as surety, are held an	d firmly bound unto	Mack Bolden	
in the sum of	Five Hundred		DOLLARS,
to be paid to the said	Mack Bolde	n 'i .	, his heirs,
executors, administra	tors or assigns; for which I	payment, well and truly to be made	de, we bind ourselves,
and each of us, our a	nd each of our heirs, execu	ntors and administrators, jointly and	d severally and firmly,
by these presents. S	ealed with our seals, and o	dated this 19th day of _ J	eniierv
			arrani j
in the year of our Lo	ord, 19		*
The condition of	the above obligation is suc	th, That whereas the above bound	
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ATUMBD MOT	or Company, c	on the day of the date hereof hath of	obtained at the suit of
Klumpp Mot	or Company	vs. <u>Mack Bolden</u>	· .
a summons and comp	plaint for the recovery of p	ersonal property in specie against s	aid defendant and asks
an endorsement by th	ne Clerk of this Court "The	at the Sheriff is required to take the	e property mentioned in
said complaint into h	is possession,'' as required	by law in such cases, which summ	ions and complaint are
returnable to the nex	t term of the Circuit Court	t of said County, and which said en	idorsement is made upon
the plaintiff entering	into this bond.	•	
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		uit, and shall pay the Defendant al	
		ul complaint in said case, then this	obligation to be void,
otherwise to remain i	n full force and effect.		
		Klumpp Motor Company	
		The Fidelity & Cockelt	(L. S.)
		The Fidelity & Casualty	Lection (L.S.)
		Jno. \$. Huffman, Attorn	ney
			(L. S.)
Approved this 2/	at day of Jun		
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		Mac Ila	ere.

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To. Z.	758	Page	
	STATE OF Baldwin	ALABAMA County.	.,
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÷	V	a .	aintiff
		Def	endant
	DETINU	E BON	D
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	across.	renel	د, Clerl
	ALICE LAUG	Plaintiff' 1952 1, Optondant'	s Attorney

Detinue Summons and Complaint.	Moore Printing Co
THE STATE OF ALABAMA > Baldwin County	CIRCUIT COURT
To Any Sheriff of the State of Alabama:	19事2
You Are Hereby Commanded to Summon	MACK BOLDEN
to appear within thirty days from the service of the	his writ, in the Circuit Court to be held for said County
at the place of holding the same, then and there t	o answer the complaint of
KLUMPP MOTOR COMPANY, INC., a	corporation
Witness my hand this 21st day	of farming 1952
	heich white, Clerk
	Much Alanko, Clerk
COI	MPLAINT
KLUMPP MOTOR CO., INC Plaintiff	MACK BOIDEN - C
a corporacton	•
The plaintiffclaims of the defendant th	
One Chevrolet automobile, m	odel 1948, four-door sedan, motor
number FAA 128926	
e de la companya de	
with the value of the hire or use thereof during th	ne detention, to-wit:
1951	toJanuary 19, 1952
with the value of the hire or use thereof during the from November 28 1951.	toJanuary 19, 1952194_

Ödgar K. luson Eðgar R. Nelson __, Plaintiff's Attorney.

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EDGAR	R. NEI	SON		<u>. </u>
//* 		/ Plainti	ff's Atto	rney
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To the Sheriff of said County:	
Whereas, the Plaintiff in the within sta has made affidavit and given bond as by law you are hereby required to take	required the pro-
perty mentioned in Complaint into you	ir posses-
sion unless the Defendant gives bond p the Plantiff with sufficient surety in d	ouble the
amount of the value of the property, w tion that if the Defendant is cast in th	ith condi-
will within thirty days thereafter, de property to the Plaintiff, and pay all	e sun ne
property to the Plaintiff, and pay all and costs which may accrue from the	damages
thereof	determina
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Michrench	_, Clerk.
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	-					-, Sheriff
						, 13.10.11

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 etinue 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

ERN/en

Detinue Summons and Complaint.		Moore Printing Co
THE STATE OF ALABAMA > Baldwin County	CIRCUIT C	OURT
To Any Shoriff of the State of Alahama		194
To Any Sheriff of the State of Alabama: You Are Hereby Commanded to Summon	J MACK BOLDEN	•
Tou Are Heleby Commanded to Summon	a was a man	
to appear within thirty days from the service of the	nis writ, in the Circuit Court to be	held for said Count
at the place of holding the same, then and there t	o answer the complaint of	and the first of the second
KLUMIP MOTOR COMPANY, INC., a	•	
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Witness my hand this 21 st day	of fan 195 hiscol also	52
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KLUMPP MOTOR CO., INC Plaintiff	Versus MACK BOLDEN	Defendant
The plaintiffclaims of the defendant th	· · · · · · · · · · · · · · · · · · ·	
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number FAA 128926	i .	
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romNovember 20	. January 19, 1952	194

Elga Plan, Plaintiff's Attorney.

STATE OF A Baldwin	
CIRCUIT	COURT
KLUMPP MOTOR CO	MPANY, INC.,
a corporatio	$rac{1}{n}$
v5.	Plaintiff
MACK BOLDEN	
	Defendant
Detinue Summons	and Complaint
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anich-	, Clerk
EDGAR R. NE	
EDGAR R. NE	LSON Plaintiff's Attorney

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Received in Sheriff's Office this 2 day of 1950 TAYLOR WILKINS, Sheriff

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Defendant lives at	Accompany to the Common State of the Common St
FAIRHOPE, ALABAMA Received in office	•
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,De	puty Sheriff