

1902

THE STATE OF ALABAMA }  
Baldwin ~~Montgomery~~ County

To any Sheriff of the State of Alabama—GREETING:

You are Hereby Commanded to Summon

Jerry N. Pope and Bessie A. Pope,  
jointly and individually

to appear before the Circuit Court of ~~Montgomery~~ <sup>Baldwin</sup> County, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to demur or plead to the complaint of

Commerce Union Bank,  
a Tennessee corporation

And you are hereby commanded to execute this process instanter and make return as required by law.

Witness my hand this 15<sup>th</sup> day of January 1953  
*W. J. Wilkins* Clerk.

COMPLAINT

THE STATE OF ALABAMA <del>Montgomery</del> <sup>Baldwin</sup> County, Alabama	VS.	In the Circuit Court of <del>Montgomery</del> <sup>Baldwin</sup> County
Commerce Union Bank, a corporation organized under the laws of the State of Tennessee Plaintiff.		Jerry N. Pope and Bessie A. Pope, jointly and individually Defendants
		Term, 19

The plaintiff claim of the Defendant s the following personal property, viz.:

One (1) 1950 Silver Star Housetrailer, Serial Number 50-SS-1173  
with the value of the hire or use thereof since, to-wit, December 10, 1952.

*W. J. Wilkins*  
Attorney for Plaintiff

THE STATE OF ALABAMA

THE STATE OF ALABAMA

~~Montgomery~~ County

Baldwin

To the Sheriff of Said County—GREETINGS:

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

WITNESS my hand this 15<sup>th</sup> day of

January

A. D., 1953

~~Baldwin~~  
Clerk Circuit Court, ~~Montgomery~~ County.

*Bevilacqua*

Executed Jan. 15, 1953 By attaching the  
within described property, House Trailer

*Taylor Wilkins*  
*177 Hall*  
*D.S.*

No. 1902	COMMERCE UNION BANK, a corporation	vs.	JERRY N. POPE BESSIE A. POPE	CIRCUIT COURT OF <del>MONTGOMERY</del> COUNTY BALDWIN	Term, 19	SUMMONS AND COMPLAINT	Filed in office this 15 <sup>th</sup> day of January A. D. 1953	<i>Bevilacqua</i> Clerk.	Plaintiff's Attorney.
----------	---------------------------------------	-----	---------------------------------	---	----------	--------------------------	--	-----------------------------	-----------------------

Received in office  
19

Sheriff.

Executed by serving  
of the within Summons and Complaint on  
Defendant this the 15 day of

1953

*January*  
*Taylor Wilkins*  
*By 177 Hall D.S.*

*875*

# The State of Alabama

~~MONTGOMERY~~ COUNTY  
BALDWIN

Know all Men by these Presents, That we **Commerce Union Bank, a corporation, and undersigned sureties**

are held and firmly bound unto **Jerry N. Pope and Bessie A. Pope**

in the sum of **Two Thousand Eight Hundred and no/100\*\*\*\*\*** Dollars,

to be paid to the said **Jerry N. Pope and Bessie A. Pope, their**

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 \_\_\_\_\_ day of \_\_\_\_\_ in the year of our Lord, One Thousand Nine Hundred and **Fifty-Three.**

The condition of the above obligations is such, That whereas the above bound **Commerce Union Bank** on the day of the date hereof, hath obtained at the suit of **Commerce Union Bank vs. Jerry N. Pope and Bessie A. Pope** a Summons and Complaint for the recovery of personal chattels in specie against 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 ~~Montgomery~~ <sup>Baldwin</sup> for 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 **they** 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.

*Commerce Union Bank*  
*By B L Canaday* (L. S.)  
Fidelity and Deposit Company of Maryland (L. S.)  
By *[Signature]* (L. S.)  
Attorney-in-Fact

Approved this 15<sup>th</sup>  
day of January 19 53  
*[Signature]*  
Clerk.

THE STATE OF ALABAMA  
~~Montgomery~~ County.  
Baldwin

Before me, ~~J. B. Williams~~ Clerk of the Circuit Court of ~~Montgomery~~ County, in and for said County,  
personally appeared Harry J. Williams, lawful attorney for Commerce Union Bank, Baldwin, Alabama  
who being duly sworn, deposeth and saith, That the property sued for in the complaint of

Commerce Union Bank vs. Jerry N. Pope and Bessie A. Pope

One (1) 1950 Silver Star House trailer, Serial Number 50-SS-1173  
belongs to Commerce Union Bank  
the said Plaintiff.

Sworn to and subscribed before me this

15<sup>th</sup> day of January 1953

Clerk

Harry J. Williams  
attorney for Commerce Union Bank  
Baldwin

to-wit:

701902

## DETINUE BOND AND AFFIDAVIT

Commerce Union Bank  
a corp.

vs.

Jerry N. Pope and  
Bessie A. Pope

BALDWIN  
Circuit Court of ~~Montgomery~~  
County

Filed in office

15<sup>th</sup> day of Jan, 1953

Alice J. French  
Clerk.

DIXIE 1918-B

This is to certify that  
this is a good and suffi-  
cient bond. If presented to  
me I would approve same.

G. A. Moeley Sheriff  
Montgomery County Ala  
1-13-53