

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

August 19, 1969

E. GRAHAM GIBBONS
B. F. STOKES, III
WILLIAM L. HOWELL

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA 36601

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

8852

Re: Commercial Credit Corporation vs Wayne K. Plaisance

Dear Mrs. Duck:

I enclose a detinue suit styled as above relative to the seizure of one 1968 Plymouth automobile as described therein. I also enclose a detinue bond and affidavit, with Fidelity and Deposit Company of Maryland as surety. You have approved this surety in the past.

Please forward the writ of detinue, etc. to the sheriff for service as soon as possible.

Sincerely,


B. F. Stokes, III

BFS:fo
cc: Commercial Credit Corporation
Enclosures

COMMERCIAL CREDIT CORPORATION) IN THE CIRCUIT COURT OF
a corporation)
Plaintiff) BALDWIN COUNTY, ALABAMA
VS) AT LAW
WAYNE K. PLAISANCE)
Defendant) CASE NO. 8850

INTERROGATORIES TO DEFENDANT

Comes now the Plaintiff in the above styled cause and propounds the following interrogatories to Defendant:

1. Please state your name and address.
2. Please state whether or not you are in possession of the following described motor vehicle:

One 1968 Plymouth 8 cyls. Barracude Convertible
Automobile, Model BH27, Manufacturer's Serial
No. BH27-F8B-224413

and if so, please state as follows:

- A. The date on which you acquired possession of said motor vehicle.
 - B. From whom you acquired said motor vehicle.
 - C. The purchase price of said motor vehicle, that is the cash sale price.
3. Please state whether or not your possession of said motor vehicle has been continuous and uninterrupted from the time you acquired it down to the time of filing of suit herein and to the present time, except for a period of time when the Sheriff levied upon said vehicle.
4. Please state your age.
 5. Please state how long you have been driving an automobile.
 6. Please state whether or not you have had occasions in the past to buy and sell automobiles and if so about how many such occasions.
 7. Please describe the condition of the above described motor vehicle at the time the Sheriff initially served the writ of detinue upon you in this cause, giving details as to such condition.

8. Please state whether or not the condition of the above described motor vehicle has worsened or deteriorated since you acquired it other than normal wear and tear and if so, please state details.

9. Please state whether or not you have an opinion as to the fair and reasonable market value of the above described motor vehicle at the time the Sheriff served the writ of detinue upon you and if so please state your opinion of the fair and reasonable market value amount.

10. Please attach to your answers to these interrogatories true and correct facsimile copy of any bill of sale or conditional sales contract or other document by which you might have acquired said motor vehicle.

B. F. Stokes, III
B. F. STOKES, III
ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned authority, personally appeared B. F. Stokes, III, who stated under oath that the answers to the above and foregoing interrogatories if well and truthfully made, will constitute relevant, competent and material evidence in behalf of the Plaintiff upon the trial of said cause.

B. F. Stokes, III
B. F. STOKES, III

Sworn and subscribed to before me this 24th day of October,

1969.

Blaine Levine
NOTARY PUBLIC

Please make personal service on the defendant by service on Defendant's attorney Mr. J. R. Meriwether, 215 E. Main Street, Prichard, Alabama

FILED

OCT 27 1969

ALICE J. DUCK CLERK
REGISTER

to be served on:
J.R. Merriweather
att'y

215 Main St
Tuscaloosa Ala

RECEIVED

OCT 27 1968

U.S. DEPT. OF JUSTICE

Received 29 Day of Oct 1968
and on 29 Day of Oct 1968
I served a copy of this order on
on J.R. Merriweather, att'y

by service on

KAY D. BRIDGES, Clerk

U.S. DEPT. OF JUSTICE

Not ✓ 7840

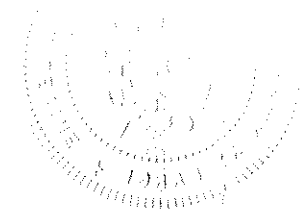
WJ 710 8850

Commercial Credit
Corporation

291 VS
Will
Wayne R. Plausance

Interrogatories

BY
OCT 28 10 51 AM '68
U.S. DEPT. OF JUSTICE
TUSCALOOSA, ALA.



B-7 Inter

LAW OFFICES OF
AGEE & MERIWETHER
211 EAST MAIN STREET, P. O. BOX 10366
PRICHARD, ALABAMA 36610

ALLWIN T. AGEE
J. R. MERIWETHER

September 12, 1969

457-2378

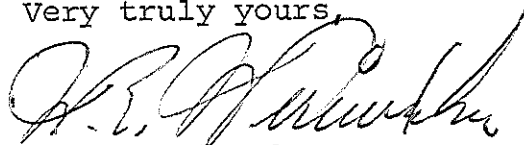
Mrs. Alice J. Duck
Clerk Register
Circuit Court, Baldwin County
Bay Minette, Alabama

Re: Commercial Credit Corporation, vs. Wayne K. Plaisance
Case No. 8850

Dear Mrs. Duck:

Please find enclosed pleading in the above entitled
case. Please receipt the card and return to us. Thank
you.

Very truly yours,



J. R. Meriwether

JRM:mm

Enclosures

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
TELEPHONE 433-2611

E. GRAHAM GIBBONS
B. F. STOKES, III
WILLIAM L. HOWELL

September 8, 1969

MAILING ADDRESS
P. O. BOX 293
MOBILE, ALABAMA 36601

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

Re: Commercial Credit Corp. vs Wayne K. Plaisance
Case No. 8850

Dear Mrs. Duck:

I have been told by the grape vine the Sheriff never did pick up this car and that later the defendant posted a replevin bond. Please send to me a facsimile copy of the replevin bond and let me know what the charge is if any for this and I will make prompt remittance.

Sincerely,


B. F. Stokes, III

BFS/al

COMMERCIAL CREDIT CORPORATION,	:	IN THE CIRCUIT COURT OF
a corporation,	:	
	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	
	:	AT LAW
-VS-	:	
	:	
WAYNE K. PLAISANCE,	:	Case No. 8850
Defendant.	:	

Comes now the defendant in the above entitled cause and for answer to Plaintiff's Complaint and to each and every Count and allegation thereof, separately and severally says as follows:

1. Defendant pleads the general issue.

AGEE & MERIWETHER

J. R. Meriwether
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on the 12th day of September, 1969, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.

J. R. Meriwether

FILED
15 1969

8650

1. The first part of the report is a general description of the project and its objectives. It includes a brief history of the project and a statement of the problem to be solved. The second part of the report is a detailed description of the methodology used in the study. This includes a description of the data collection methods, the statistical methods used to analyze the data, and the results of the analysis. The third part of the report is a discussion of the results of the study and their implications. This includes a comparison of the results with previous studies and a discussion of the limitations of the study. The final part of the report is a conclusion and a list of references.

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#8850

THE STATE OF ALABAMA,
BALDWIN ~~MOBILE~~ COUNTY.

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Commercial Credit Corporation
as principal and Fidelity and Deposit Company of Maryland, as Surety
are held and firmly bound unto Wayne K. Plaisance
his heirs, executors and administrators, in the
sum of SEVENTEEN HUNDRED AND NO/100 Dollars, for
the payment of which, we bind ourselves, our and each of our heirs, executors, and administrators, jointly
and severally, firmly by these presents.

Sealed with our seals and dated this _____ day of _____, A. D. 19____

The Condition of the above Obligation is such, That whereas the above bounden _____

Commercial Credit Corporation has, on
the _____ day of Baldwin 19____, sued out from the office of the
Clerk of the Circuit Court of MOBILE, in the State of Alabama, a Writ of Detinue, returnable to the present
term of said Circuit Court of Baldwin against the said _____

Wayne K. Plaisance for the recovery of the following property.
to-wit One 1968 Plymouth 8 cyls. Barracuda Convertible Model BH27
Manufacturer's serial No. BH27-F8B-224413

NOW, if the said Commercial Credit Corporation shall fail
in said suit, and shall pay to the said Wayne K. Plaisance
the defendant in said writ all such costs and damages as he may sustain by the wrongful suing out of said
Writ of Detinue, then this obligation to be void, otherwise to remain in full force and benefit.

COMMERCIAL CREDIT CORPORATION

By [Signature] (Seal)

FIDELITY AND DEPOSIT COMPANY OF
MARYLAND (Seal)

By [Signature] (Seal)
As Attorney in Fact

Approved
8-20-69
Alice J. Dusk
Clerk

FILED

AUG 20 1969

COMMERCIAL CREDIT CORPORATION) IN THE CIRCUIT COURT OF
a corporation)
Plaintiff) BALDWIN COUNTY, ALABAMA
VS) AT LAW
WAYNE K. PLAISANCE)
Defendant) CASE NO. 8850

Plaintiff claims of the Defendant the following described
personal property, viz:

One 1968 Plymouth 8 cyls. Barracude Convertible
Automobile, Model BH27, Manufacturer's serial
No. BH27-F8B-224413

with the value of the use thereof during the detention, viz:
From, to-wit, April 15, 1969, said above described property
being the property of the Plaintiff.

B. F. Stokes, III
B. F. STOKES, III

Serve the defendant at 301 Spanish Main, Spanish Fort,
Alabama.

FILED

AUG 20 1969

ALICE J. DUCK CLERK
REGISTER

The State of Alabama, }
Baldwin County

CIRCUIT COURT

No. 8850

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon WAYNE K. PLAISANCE

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

COMMERCIAL CREDIT CORPORATION, A Corporation

Witness my hand this 20th day of August 19 69

Alice J. Luck, Clerk

COMPLAINT

Plaintiff

Versus

Defendant

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

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

from 19 , to 19

Plaintiff's Attorney.

301 Sp. Maine

No. 8850 Page

State of Alabama

Baldwin County

CIRCUIT COURT

COMMERCIAL CREDIT CORPORATION,

A Corp.

Plaintiff

VS.

WAYNE K. PLAISANCE

Defendant

Detinue Summons and Complaint

Filed August 20, 1969

Alice J. Duck, Clerk

Gibbons & Stokes

Plaintiff's Attorney

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 J. Duck, Clerk

Defendant lives at

RECEIVED

AUG 20 1969

TAYLOR WILKINS

Sheriff

I have executed this summons

this Aug. 25, 1969
by leaving a copy with

Wayne K. Plaisance
attached 1-1968
Stymouth 8 cy. Buick
Convertible, Serial #2427-
F8B-224413.
Bond made 8/28/69
By Wgt: Wayne K.
Plaisance, A. L. W.
Plaisance, Lloyd O. Plaisance
Property released to Wgt:

Taylor Wilkins, Sheriff
Roy Randall, Deputy Sheriff

Printed by Moore Printing Co.

Sp. Fort

Sheriff claims 44 miles

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

by Randall

VOL 62 PAGE 895

THE STATE OF ALABAMA,

Circuit

COURT.

Baldwin

COUNTY.

Term, 19

KNOW ALL MEN BY THESE PRESENTS:

That we, Wayne K. Plaisanceare held and firmly bound unto Commercial Credit Corp.in the sum of Four thousand Dollars,

for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated, this _____ day of _____ 19

The Condition of the above Obligation is Such, That whereas the said

Commercial Credit Corp., A Corp. did on the 20th dayof August 19 69, sue out of the Circuit

Court of said County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding him to take into his possession the following property, sued for in action of detinue, to wit:

One 1968 Plymouth 8 cyls. Barracuda Convertible,Model BH27, Serial No. BH27-F8B-224413which said writ was placed in the hands of Taylor WilkinsSheriff of the County of Baldwin, on the 20th dayof August 19 69, and executed by him on the 25th day ofAugust 19 69, by taking into his possessionsame as aboveand whereas the above bound Wayne K. Plaisance

has within five days from the execution of said writ entered into this bond as required by law, and hereby obtain possession of said property.

Now, if the said Wayne K. Plaisance shall well and truly, within
thirty days after the determination of said suit, if the said Wayne K. Plaisance
be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for de-
tention as may accrue from said detention, then this obligation to be void, otherwise to remain in full
force and effect.

And we, and each of us, hereby waive all rights of claim of exemption we or either of us have
now, or may hereafter have, under the Constitution and Laws of Alabama, and _____ hereby
severally certify that the have property free from all encumbrance to the full amount of the
above bond.

Witness our hands and seals, this 28th day of August 1969

Taken and approved,

August 28 1969
Wayne K. Plaisance
Sheriff.

Wayne K. Plaisance (L.S.)

(L.S.)
Nellie D. Plaisance (L.S.)
Lloyd D. Plaisance (L.S.)

428-5343
Mrs. Fendal
1350.0

No. _____	County _____	Court _____	Plaintiff _____	Defendant _____	Filed _____ 19 _____	Sheriff _____
The State of Alabama,						
SHERIFF'S OFFICE						
vs.						
DETINUE REPLEVIN BOND, DEFENDANT.						
Sheriff's Execution Docket, page _____						