

1942

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John O. Pulliam 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 same, then and there to answer the Complaint of Bob Brooks and Bill Brooks, doing business under the name of Brooks Motors.

Witness my hand this 12th day of March, 1953.

W. J. ...
Clerk.

COMPLAINT:

BOB BROOKS and BILL BROOKS,
doing business under the
name of BROOKS MOTORS,

Plaintiff,)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

vs.)

JOHN O. PULLIAM,

Defendant.)

COUNT ONE:

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

One (1) 1950 Chevrolet $\frac{1}{2}$ Ton P.D. Motor HAB-1125004,
Serial No. 8H-P117673; One (1) 1952 GMC 353-24 $1\frac{1}{2}$
Ton, Serial No. P24613; Motor No. A248177021; One
(1) 1952 GMC 353-24 $1\frac{1}{2}$ Ton, Serial No. P-20650,
Motor No. A248169740, all being motor trucks.

with the value of the hire or use thereof during the detention, viz:
from the 11th day of March, 1953.

CHASON AND STONE

BY: J. Anderson
Attorneys for the Plaintiff.

Received in Sheriff's Office
this 12 day of Mar 1953
TAYLOR WILKINS, Sheriff

No 1942

ORIGINAL
SUMMONS & COMPLAINT

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 case 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.

BOB BROOKS and BILL BROOKS,
doing business under the
name of BROOKS MOTORS,

Plaintiff,

vs.

JOHN O. PULLIAM,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Filed: March 12th, 1953.

Alice J. Neuch
Clerk.

Alice J. Neuch
Clerk.

*Executed March 13, 1953
By delivering a copy
of the within
summons & complaint
on John O. Pulliam
and by attaching
the within described
trucks and taking
them into my
possession.
Taylor Wilkins
Sheriff
By H. H. Hall P. 5*

BOB BROOKS and BILL BROOKS,
doing business under the
name of BROOKS MOTORS,

Plaintiff,

vs.

JOHN O. PULLIAM,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Before me Alice L. Miller, a Notary Public,

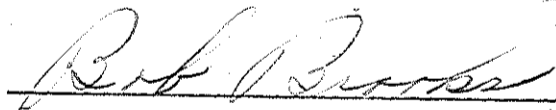
in and for Baldwin County, Alabama, personally appeared Bob

Brooks, who is known to me and who, after being by me
first duly and legally sworn doth depose and say under oath as
follows:

That his name is Bob Brooks; that he is
a partner of Brooks Motors, a partnership composed of
Bob Brooks and Bill Brooks, and as such is duly authorized to make
this affidavit that the following described property, to-wit:

One (1) 1950 Chevrolet $\frac{1}{2}$ Ton P.D. Motor HAB-1125004,
Serial No. 8H-P117673; One (1) 1952 GMC 353-24 $1\frac{1}{2}$
Ton, Serial No. P24613, Motor No. A248177021; One
(1) 1952 GMC 353-24 $1\frac{1}{2}$ Ton, Serial No. P-20650,
Motor No. A248169740, all being motor trucks,

for the recovery of which it has this day instituted suit in the
Circuit Court of Baldwin County, Alabama, is the property of Bob
Brooks and Bill Brooks, doing business under the name of Brooks
Motors.



Sworn to and subscribed before
me this 12th day of March,
1953.

Alice L. Miller
Notary Public, Baldwin County, Ala.

RECORDED *NO 1942*

AFFIDAVIT:

BOB BROOKS and BILL BROOKS,
doing business under the
name of BROOKS MOTORS,

Plaintiff,

vs.

JOHN O. PULLIAM,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

Filed: March 12th 1953.

Ricci Venete
Clerk.

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Bob Brooks and Bill Brooks, doing business under the name of Brooks Motors, as principal and the undersigned as surety, are held and firmly bound unto Alice J. Duck, her successors in office, in the sum of Twenty-five Dollars (\$25.00) 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 12th day of March, 1953.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That Whereas, the above bounden Brooks Motors, a partnership composed of Bob Brooks and Bill Brooks, has on the 12th day of March, 1953, sued out from the Office of the Circuit Clerk of Baldwin County, Alabama, a Writ of Detinue, returnable at the next term of the Circuit Court of Baldwin County, Alabama, in said cause against John O. Pulliam, for the recovery of the following described personal property, viz:

One (1) 1950 Chevrolet $\frac{1}{2}$ Ton P.D., Motor HAB-1125004, Serial No. 8H-P117673; One (1) 1952 GMC, 353-24 $1\frac{1}{2}$ Ton, Serial No. P24613, Motor No. A248177021; One (1) 1952 GMC 353-24 $1\frac{1}{2}$ Ton, Serial No. P-20650, Motor No. A248169740, all being motor trucks.

NOW, if the said Brooks Motors shall fail in said suit and shall pay to the said John O. Pulliam, 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 effect.

BROOKS MOTORS

BY: Bob Brooks SEAL

Bill Brooks SEAL

Taken and approved this 12th
day of March, 1953.

Alice J. Duck
Clerk of Circuit Court.

RECORDED

701942

BOND

BOB BROOKS and BILL BROOKS,
doing business under the
name of BROOKS MOTORS,

Plaintiff,

vs.

JOHN O. PULLIAM,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed: March 12th, 1953.

W. J. French
Clerk.