

1976

STATE OF ALABAMA

SS:

AFFIDAVIT IN DETINUE

COUNTY OF MOBILE

Before me, A. A. Judson, the

undersigned Notary Public in and for said County, in said State, personally appeared H. B. Fountain, who is known to me and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That he is Credit Manager of Delaney's, Inc., A Corporation, whose principal place of business is Mobile, Mobile County, Alabama, and that the following described property, to-wit:

One (1) N-2LP Maytag Washer, Serial Number 368024-G

One (1) Magic Chef Range, Model #16AL, Serial Number 350720

One (1) 150 gallon above-ground Propane Tank, Serial Number 9328

One (1) DRC-25 Dearborn Heater

for the recovery of which Delaney's, Inc., A Corporation, has instituted suit in the Circuit Court of Baldwin County, Alabama, against Charlie C. Stanton, is the property of Delaney's Inc., A Corporation.

Sworn to and subscribed before H. B. Fountain

me on this the 22nd day of

April, 1953.

A. A. Judson
Notary Public, Mobile County, Ala.

RECORDED

Delaney's, Inc., A Corporation,
Plaintiff,

vs.

Charlie C. Stanton,
Defendant.

In The Circuit Court Of
Baldwin County, Alabama
At Law

AFFIDAVIT

FILED

4-24-53

ALICE J. DUCK, Clerk

STATE OF ALABAMA,
Baldwin County.

KNOW ALL MEN BY THESE PRESENTS, That We, DELANEY'S, INC., A Corporation,
acting by and through J.B. Fountain as its agent
as principal, and the undersigned Royal Indemnity Company

as surety, are held and firmly bound unto Charlie C. Stanton
in the sum of One Hundred and No/100 (\$100.00) * * * * * DOLLARS,
to be paid to the said Charlie C. Stanton, 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 _____ day of April
in the year of our Lord, 1953.

The condition of the above obligation is such, That whereas the above bound Delaney's, Inc.,
A Corporation,, on the day of the date hereof hath obtained at the suit of
Delaney's, Inc., A Corporation vs. Charlie C. Stanton,
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 dam-
ages 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.

DELANEY'S, INC., A Corporation

By: J.B. Fountain (L. S.)
As Its _____

ROYAL INDEMNITY COMPANY (L. S.)
J. B. Fountain (L. S.)
Attorney-in-fact

Approved this 24th day of April 1953

Alice J. Leach
Clerk.

RECORDED

No. 1976 Page _____

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

Delaney's, Inc., A Corporation

Plaintiff.....

vs.

Charlie C. Stanton

Defendant....

DETINUE BOND

Filed 4-24 1953

Arcy J. Suck Clerk

CHASON & STONE

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co.

STATE OF ALABAMA

MOBILE COUNTY

ss.

I, John Mandeville, do hereby certify that I am Clerk of the Circuit Court of Mobile County, Alabama, and that I have examined the within Detinue Bond and the surety thereon and that if the same were presented to me, in my capacity as such Clerk, for the uses and purposes therein shown that I would approve the same..

Witness my hand and the Seal of The Circuit Court of Mobile County, Alabama, on this the 22 day of April, 1953.

John Mandeville
John Mandeville, Clerk
Circuit Court of Mobile County, Ala.

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 Charlie C. Stanton 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 Delaneys, Inc., a Corporation.

Witness my hand this 24th day of April, 1953.

Archie J. Leuch
Clerk.

COMPLAINT:

DELANEYS, INC.,
A Corporation,

Plaintiff,

vs.

CHARLIE C. STANTON,

Defendant.

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

COUNT ONE

The Plaintiff claims of the Defendant the following described personal property, to-wit:-

- One (1) N-2LP Maytag Washer, Serial #368024-G
- One (1) Magic Chef Range, Model #16AL, Serial #350720
- One (1) 150 gallon above-ground Propane Tank, Serial #9328
- One (1) Dearborn Heater

together with the value of the hire or use thereof during this detention to-wit, from the 1st day of April, 1953.

COUNT TWO

The Plaintiff further claims of the Defendant a reasonable Attorney's fee which the Defendant agreed to pay in and by the terms

of that certain contract and note dated January 20, 1953, executed by the Defendant and Plaintiff alleges that the sum of One Hundred Twenty Dollars (\$120.00) is such a reasonable fee.

Plaintiff further alleges that in and by the terms of the contract and note referred to above, that the Defendant waived all rights of exemption under the Constitution and Laws of Alabama and the Plaintiff does hereby claim the benefit of said waiver.

CHASON AND STONE

BY: 
Attorneys for Plaintiff.

TO THE SHERIFF OF SAID COUNTY:

SUMMONS AND COMPLAINT

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.

DELANEYS, INC.,
A Corporation,

Plaintiff,

vs.

CHARLIE C. STANTON,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

Alice L. Duck
Clerk.

*Executed May, 2, 1953
By attaching the
Within described
property & serving a copy
of the within summons
& comp on Millie Stanton

Sheriff
Taylor Wilkins
By Edleigh Steadham*

FILED
4-24-53
ALICE L. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA