

2037

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 Joe Robinson 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 First Finance, Inc., a Corporation.

Witness my hand this 14th day of July, 1953.

Deane J. Leach
Clerk

COMPLAINT:

FIRST FINANCE, INC.,
A Corporation,

Plaintiff,

vs.

JOE ROBINSON, Individually
and doing business as JOE'S
GARAGE,

Defendant.

I
I
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I

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) 1946 two-door Ford Sedan, motor no. 99A-891650.
together with the value of the hire or use thereof during this
detention to-wit, from the 1st day of July, 1953.

CHASON & STONE

By:

Malcolm Stone
Attorneys for Plaintiff.

RECORDED 2-537

Received in Sheriff's Office
this 15 day of July, 1953
TAYLOR WILKINS, Sheriff

Executed July 16 1953
by serving copy of within Summons and
Complaint on

Joe Robinson
Individually and doing
business as Joe's Garage

Taylor Wilkins Sheriff
by W. F. Hall Deputy Sheriff

First Finance, Inc.,
A Corporation,

Plaintiff,

vs.

Joe Robinson, individually and
doing business as Joe's Garage,

Defendant.

In The Circuit Court Of
Baldwin County, Alabama

Law Side

Summons and Complaint

Filed 7-14-53
Alice J. Duck
Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO THE SHERIFF OF BALDWIN
COUNTY, ALABAMA, GREETINGS:

The Plaintiff in the within
suit having made affidavit and
bond as required by law you are
hereby commanded to take the prop-
erty described in the complaint
into your possession unless the
defendant give bond payable to the
plaintiff, with sufficient surety,
conditioned as required by law.

Witness my hand this the
14th day of July, 1953.

Alice J. Duck
Alice J. Duck, Clerk
Circuit Court of Baldwin
County, Alabama, At Law.

Executed July 14, 1953
By attaching the with
in described property

Taylor Wilkins
Sheriff
W. F. Hall D. S.

STATE OF ALABAMA
County of Baldwin.

KNOW ALL MEN BY THESE PRESENTS, That we, First Finance, Inc.
as Principal, and The Fidelity and Surety Company of New York
and _____, as Sureties, are held and firmly bound
unto Joe Robinson individually and doing business as Joe's Garage

in the sum of Seven Hundred and No/100 Dollars (\$700.00) * * * * *
for the payment of which well and truly to be made we, jointly and severally, bind ourselves and
each of us, our heirs, executors and administrators. Sealed with our seals and dated this 21st
day of July in the year of our Lord, one thousand, nine hundred and fifty-three

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said

First Finance, Inc.

did, on the 23 day of July, 1953, sue out in the Circuit Court of Barbarine ~~Mobile~~ County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, commanding him to take into his possession the following described property, to-wit: One (1)
1946 Model Ford Tudor Sedan, Motor No. 99A-891650

which said writ was placed in the hands of Taylor Wilkins
BALDWIN
 Sheriff of the County of ~~Mobile~~, on the 14th day of July, 1953, by taking into his
 possession the following described property, to-wit: One (1) 1946 Model Ford Tudor
Sedan, Motor No. 99A-891650

and whereas the said Joe Robinson individually and doing business as Joe's
defendant in said writ, ^{Garage.} has failed and neglected, for the space of five days from the execution of
said writ, to give bond and take possession of said property as authorized by law.

Now if the said First Finance, Inc. a corporation

upon his failing in said suit, shall deliver the said property to the defendant within thirty days after judgment, and pay damages for the detention of the property and costs of suit, then this obligation to be void, otherwise to remain in full force and effect.

FIRST FINANCE, INC. (Seal)

By U. H. Furber (Seal)

The Fidelity and Casualty Company of New York E. P. Bell (Seal)
E. P. Bell, Attorney

Taken and approved this the 25 day of

Sheriff, ~~Mobile~~ County, Alabama

RECORDED

No. _____

COURT

MOBILE COUNTY

VS.

} Detinue Forthcoming
Bond by Plaintiff



pages Exp 2

STATE OF ALABAMA
BALDWIN COUNTY

AFFIDAVIT IN DETINUE

Before me, Norborne C. Stone, Jr., the undersigned Notary Public in and for said County, in said State, personally appeared H. W. Hillman, 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 a agent of First Finance, Inc., a Corporation, whose principal place of business is Mobile, Mobile County, Alabama, and that the following described property, to-wit:

One (1) 1946 two-door Ford sedan, motor Number 99A-891650.

for the recovery of which First Finance, Inc., a Corporation, has instituted suit in the Circuit Court of Baldwin County, Alabama, against Joe Robinson, individually and doing business as Joe's Garage, is the property of First Finance, Inc., A Corporation.

H W Hillman

Sworn to and subscribed before

me on this the 14th day of

July, 1953.

Norborne C. Stone Jr.
Notary Public, Baldwin County, Ala.

Ms 2037

Affidavit **RECORDED**

Filed 7-14-53.
Alicia H. H. H.
Clark.

FIRST FINANCE, INC.,
A Corporation,

Plaintiff,

vs.

JOE ROBINSON, Individually
and doing business as JOE'S
GARAGE,

Defendant.

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

Before me, C. LeNoir Thompson, a Notary Public in and for Baldwin County, State of Alabama, personally appeared Joe Robinson, who is known to me and who by me being first duly sworn, doth depose and say that he is the defendant in the case of First Finance, Inc., A Corporation, Plaintiff, vs. Joe Robinson, individually and doing business as Joe's Garage, Defendant, now pending in the circuit court of Baldwin County; that no issue has been joined between the parties in said action; that he, the said defendant, does not claim title to the property sued for; but that one Will Smith, a person who is not a party to this suit without collusion with affiant, the said defendant, claims the property sued for.

Defendant prays the Court to make an order requiring said Will Smith to come in and defend said action.

Joe M Robinson

STATE OF ALABAMA ()

BALDWIN COUNTY ()

Sworn to and subscribed before me this the 10 day of
August, 1953.

C. LeNoir Thompson
Notary Public

2037

FIRST FINANCE, INC.,
a Corporation, Plaintiff,
RECORDED
vs.

JOE ROBINSON, Individually
and doing business as JOE'S
GARAGE, Defendant.

DISCLAIMER

FILED

AUG 12 1953

ALICE J. DUCK, Clerk

From the Law Office of
C. LENOIR THOMPSON,
Attorney at Law

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE.

Comes now the Plaintiff, by its attorneys, and amends the Complaint heretofore filed in said cause by adding thereto the following count:

COUNT TWO:

The Plaintiff claims of the Defendant Three Hundred Dollars (\$300.00), damages for the conversion by him on to-wit: the first day of October of 1953, of the following chattel:

One (1) 1946 Ford two-door sedan, motor number 99A-891650,

the property of the Plaintiff.

CHASON & STONE

By:

RECORDED

FIRST FINANCE, INC., A Corpor-
ation,

Plaintiff,

vs.

JOE ROBINSON,

Defendant.

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

AMENDMENT TO COMPLAINT

*Filed 7/8/10
10 minutes judge*

STATE OF ALABAMA,
Baldwin County. }

KNOW ALL MEN BY THESE PRESENTS, That We, First Finance, Inc., a
Corporation, acting by and through H. W. Hillman as its agent
as principal, and the undersigned -- The Fidelity and Casualty Company
of New York

as surety, are held and firmly bound unto Joe Robinson, individually and doing
business as Joe's Garage

in the sum of One Hundred (\$100.00) DOLLARS,

to be paid to the said _____, 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 14th day of July
in the year of our Lord, 1953.

The condition of the above obligation is such, That whereas the above bound First Finance,
Inc., a Corporation, on the day of the date hereof hath obtained at the suit of
First Finance, Inc., A Corporation Joe Robinson,
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.

First Finance, Inc., a Corporation
By: H. W. Hillman (L. S.)
As its Agent

The Fidelity and Casualty Company of New York
E. P. Bell (L. S.)
E. P. Bell, Attorney.

(L. S.)

Approved this 14th day of July 1953

David J. Wenzel
Clerk.



No. 20 **RECORDED** Page _____

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

Plaintiff _____

VS.

Defendant _____

DETERMINE BOND

Filed _____ 7-14 19 53

Asingh, Clerk

Plaintiff's Attorney

Defendant's Attorney



FIRST FINANCE, INC.,
A Corporation,

PLAINTIFF,

VS

JOE ROBINSON, Individually
and doing business as JOE'S
GARAGE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

ANSWER

Comes the Defendant in the above styled cause and for further answer to the complaint as last amended shows unto this Honorable Court as follows:

I.

Having disclaimed said property under oath and having named in said disclaimer filed with this Honorable Court the individual alleging himself to have been the owner of said property at the time said cause was filed, to-wit:

Will Smith

which person was not made a party to this suit and that said property was not claimed by the Defendant, your Defendant respectfully asks this Honorable Court that this answer be made and considered a part of the disclaimer filed heretofore and your Defendant further disclaims any control or responsibility for said motor vehicle, subject to this action.

II.

Your Defendant alleges that prior to the filing of the complaint in this cause your Defendant notified Will Smith that the said automobile was the responsibility of said Will Smith, and was no longer in the custody and control of said Defendant herein.

III.

That your Defendant denies the allegations alleged in Paragraph II of the complaint last amended.


Attorney for the Defendant.

2037
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FIRST FINANCE, INC.,
A Corporation,

PLAINTIFF,

VS

JOE ROBINSON, Individually
and doing business as JOE'S
GARAGE

DEFENDANT.

ANSWER

FILED
FEB 10 1954

ALICE J. DUCK, *clerk*
REGISTER

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

2637