

9034

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

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Laurentide Finance Corporation,
a corporation, as Principal and Fidelity and Deposit Company of Maryland,
as Surety

are held and firmly bound unto George M. Rabon
his heirs, executors and administrators, in the
sum of One Thousand Five Hundred and no/100 (\$1,500.00) 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 5 day of December, A. D. 1969.

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

Laurentide Finance Corporation, a corporation has, on

the 5 day of December 1969, 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
Baldwin
term of said Circuit Court of ~~Mobile~~ against the said George M. Rabon
Baldwin

for the recovery of the following property.

to-wit One 1967 model Chevrolet one half ton pick-up truck, Identification
number or serial number CS147A138819 and One 1968 model Morse AM-FM Radio,
Serial number or identification number 87589

NOW, if the said Laurentide Finance Corporation, a corporation shall fail
in said suit, and shall pay to the said George M. Rabon
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.

LAURENTIDE FINANCE CORPORATION,
a corporation
By: J. F. Halloway (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND
By: Alice J. Duck (Seal)
As Attorney in fact

FILED

DEC 8 1969

Approved
12-8-69
Alice J. Duck
Clerk

THE STATE OF ALABAMA,
Mobile County
Baldwin

DETINUE AFFIDAVIT

Notary Public

PERSONALLY appeared before me, John D. M... of Mobile County,

J. F. Stallworth

who, being duly sworn deposes and says, that the property sued for in the complaint of
Laurentide Finance Corporation, a corporation, vs George M. Rabon
to-wit: One 1967 model Chevrolet one half ton pick-up truck, Identifica-
tion number or serial number CS147A138819 and One 1968 Model
Morse AM-FM Radio, Serial Number or identification number 87589
belongs to Laurentide Finance Corporation, a corporation the said Plaintiff

Sworn to and subscribed the 5 day
of December 1969, before me.

Notary Public

J. F. Stallworth

FILED

DEC 8 1969

ALICE J. DUCK

CLERK
REGISTER

No. _____
CIRCUIT COURT

MOBILE COUNTY

BALDWIN

LAURENTIDE FINANCE CORPORATION,
a corporation

Plaintiff

VS. } Detinue Affidavit
and Bond

GEORGE M. RABON

Defendant

Filed _____ day of _____ 19____

Clerk Circuit Court, Mobile County
Baldwin

Attorney

GIBBONS & STOKES

ATTORNEYS AT LAW
160 CONGRESS STREET
MOBILE, ALABAMA
—
TELEPHONE 433-2811

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

January 12, 1970

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

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


Re: Laurentide Finance Company vs George M. Rabon
Case No. 9034

Dear Mrs. Duck:

More than thirty days have elapsed since the defendant was served. I enclose a motion for judgment by default, as well as a non-military affidavit.

Please present this matter to Judge Mashburn at your earliest convenience and advise me if judgment is rendered, sending to me a certificate of judgment in the matter.

Sincerely,


B. F. Stokes, III

BFS:fo
Enclosures

LAURENTIDE FINANCE COMPANY,

a corporation

PLAINTIFF,

-versus-

GEORGE M. RABON

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN
~~MOBILE~~ COUNTY,

ALABAMA

AT LAW

CASE NO. 9034

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA)

COUNTY OF MOBILE)

Now comes, B. F. Stokes, III,
who being first duly sworn, deposes and says that the defendant
herein, George M. Rabon,
was not at the time of filing of this suit, and is not now
in the Military or Naval Service of the United States.

The Defendant resides at _____
Bay Minette, Alabama.

Sworn to and Subscribed before me,
this 12 day of January, 1970.

William L. B. L.
~~XXXXXXXXXXXX~~, MOBILE COUNTY, ALABAMA
NOTARY PUBLIC,

FILED _____


Clerk.

LAURENTIDE FINANCE COMPANY,)	IN THE CIRCUIT COURT OF
a corporation)	
Plaintiff)	BALDWIN COUNTY, ALABAMA
VS)	AT LAW
GEORGE M. RABON)	Case No. 9034
Defendant)	

MOTION FOR JUDGMENT BY DEFAULT

Comes now the plaintiff in the above styled cause and shows unto the Court that the defendant herein was served more than thirty days ago and has failed to plead, answer or demur to the complaint.

WHEREFORE, plaintiff moves the court to enter judgment by default.


 B. F. Stokes, III
 Attorney for Plaintiff
 P. O. Box 293
 Mobile, Alabama 36601

STATE OF ALABAMA

~~XXXX~~ of Mobile.
Baldwin

KNOW ALL MEN BY THESE PRESENTS, That we, Laurentide Finance Corporation, a corporation of Maryland
as Principal, and Fidelity and Deposit Company of as Sureties, are held and firmly bound unto

George M. Rabon

in the sum of Three Thousand and no/100 (\$3,000.00) Dollars

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 5 day of December
in the year of our Lord, one thousand, nine hundred and sixty nine

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

Laurentide Finance Corporation, a corporation

did, on the 5 day of December, (1) 969 sue out in the Circuit Court
Baldwin
of ~~XXXX~~ 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 1967 model Chevrolet one half ton pick-up truck,

Identification number or serial number CS147A138819 and

One 1968 model Morse AM-FM Radio, Serial number or

identification number 87589

which said writ was placed in the hands of Taylor Wilkins

Baldwin
Sheriff of the County of ~~xxx~~, on the _____ day of _____, 19____, by taking into his possession
the following described property, to-wit:

One 1967 model Chevrolet one half ton pick-up truck,

Identification number or serial number CS147A138819 and

One 1968 model Morse AM-FM Radio, Serial Number or

identification number 87589

and whereas the said George M. Rabon

defendant in said writ, 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 is the said Laurentide Finance Corporation, 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.

LAURENTIDE FINANCE CORPORATION,
a corporation

By: J. F. Stearns (Seal)

(Seal)
FIDELITY AND DEPOSIT COMPANY OF MARYLAND
(Seal)

By: As Attorney in Fact

Taken and approved this the 17th day of December, 1969

December 17, 1969

If the above bond were submitted to
me for approval in my county, I would
accept and approve the same.

Taylor Wilkins
Sheriff, ~~Mobile~~ County, Alabama

Baldwin

Ray D. Bridges
Ray D. Bridges, Sheriff, Mobile County,
~~Mobile County~~ Alabama

No. _____

CIRCUIT COURT

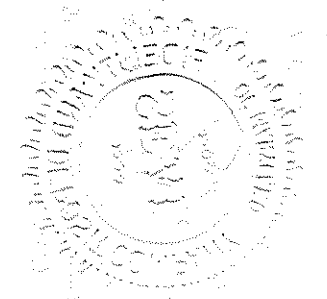
Baldwin
~~MONROE~~ COUNTY

LAURENTIDE FINANCE CORPORATION,
a corporation
Plaintiff

VS.

} Detinue Forthcoming
Bond by Plaintiff

GEORGE M. RABON
Defendant :



LAURENTIDE FINANCE CORPORATION,) IN THE CIRCUIT COURT OF
a corporation)
Plaintiff) BALDWIN COUNTY, ALABAMA
VS) AT LAW
GEORGE M. RABON) Case No. 9034
Defendant)

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

One 1967 model Chevrolet one half ton pick-up truck,
Identification number or serial number CS147A138819 and
One 1968 model Morse AM-FM Radio, Serial number or
identification number 87589

with the value of the hire or use thereof during the detention,
viz: from the 26th day of July, 1969.

B. F. Stokes, III
Attorney for Plaintiff
B. F. Stokes, III
P. O. Box 293
Mobile, Alabama

Serve defendant at Quality Roofing Company, Rabun Road, Bay
Minette, Alabama

FILED

DEC 8 1969

ALICE J. DUCK CLERK
REGISTER

The State of Alabama, }
Baldwin County

CIRCUIT COURT
No. 9034

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon George M. Rabon

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 Laurentide
Finance Corporation, a Corp.

Witness my hand this 8 day of Dec. 1969

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.

State of Alabama
Baldwin County

CIRCUIT COURT

Laurentide Finance
Corp. a corp.

Plaintiff...

VS.

George M. Rabon

Defendant...

Detinue Summons and Complaint

Filed **FILED** _____, 19

DEC 8 1969

Clerk

ALICE J. DUCK CLERK
REGISTER

B. F. Stokes III
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.

Sheriff claims 3 miles at

Ten Cents per mile Total \$ 30

TAYLOR WILKINS, Sheriff

BY W. A. Talbot
DEPUTY SHERIFF

Alice J. Duck Clerk

Received 8 day of Dec. 1969
and on 9 day of Dec. 1969
I served a copy of the within on George M. Rabon
By service on Taylor Wilkins, Sheriff
By W. A. Talbot D. S.
3 miles East of B.M.

Defendant lives at

Received in office

_____, 19____

_____, Sheriff

I have executed this summons

this Dec 9, 1969

by leaving a copy with

George M. Rabon

attached one

1969 Model Chevrolet

one Half ton pickup

Ser No C.S. 147 A 138819

one 1968 Model Mopar

A.M. - 7 M. Radio Ser-

No 87589 - Bond made by: City 12/7/69

by Laurentide Finance Fidelity & Deposit Co

Property released to City

Taylor Wilkins, Sheriff

W. A. Talbot, Deputy Sheriff

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