

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

DETINUE BOND AND AFFIDAVIT.

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

are held and firmly bound unto Hiram L. Parnell

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 29 day of December, A. D. 1969

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

Allen Parker Company, a corporation has, on
 the 29 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 Hiram L. Parnell
Baldwin

for the recovery of the following property.

to-wit One 1964 model Great Lakes Mobil Home 53' X 10',

identification number or serial number 15743

NOW, if the said Allen Parker Company, a corporation shall fail

in said suit, and shall pay to the said Hiram L. Parnell
 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.

ALLEN PARKER COMPANY, a corporation

By: J. F. Hecox (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND (Seal)

By: [Signature] (Seal)

As Attorney in Fact

approved
12-30-69
Alice J. Duck

THE STATE OF ALABAMA,

~~Mobile~~ County

Baldwin

DETINUE AFFIDAVIT

Notary Public

PERSONALLY appeared before me, ~~John F. Stallworth, Clerk of the Circuit Court~~ of Mobile County,

J. F. Stallworth

who, being duly sworn deposes and says, that the property sued for in the complaint of

Allen Parker Company, a corporation, vs Hiram L. Parnell

to-wit: One 1964 model Great Lakes Mobil Home 53' X 10',

identification number or serial number 15743

belongs to Allen Parker Company, a corporation

the said Plaintiff

Sworn to and subscribed the 29 day

of December 1969, before me.

Mildred K. [Signature]
Notary Public

~~Clerk~~

[Signature]

FILED

DEC 30 1969

No. _____

CIRCUIT COURT

~~MOBILE~~ COUNTY

BALDWIN

ALLEN PARKER COMPANY, a
corporation Plaintiff

VS. Detinue Affidavit
and Bond

HIRAM L. PARNELL

Defendant

Filed _____ day of _____ 19____

ALICE J. DUCK

Clerk Circuit Court, Mobile County

Attorney

CLERK
REGISTER

THE STATE OF ALABAMA,

Mobile County

Baldwin

DETINUE AFFIDAVIT

Notary Public

PERSONALLY appeared before me, John E. Manderly, Clerk of the Circuit Court of Mobile County,

J. F. Stallworth

who, being duly sworn deposes and says, that the property sued for in the complaint of

Allen Parker Company, a corporation, vs Hiram L. Parnell

to-wit: One 1964 model Great Lakes Mobil Home 53' x 10',

identification number or serial number 15743

belongs to Allen Parker Company, a corporation the said Plaintiff

Sworn to and subscribed the 29 day

of December, 1969, before me.

Notary Public

J. F. Stallworth

No.

CIRCUIT COURT

MOBILE COUNTY

BALDWIN

ALLEN PARKER COMPANY, a
corporation Plaintiff
VS. Detinue Affidavit
and Bond

HIRAM L. PARNELL

Defendant

Filed day of 19

Clerk Circuit Court, Mobile County

Attorney

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

DETINUE BOND AND AFFIDAVIT.

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

are held and firmly bound unto Hiram L. Parnell

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 29 day of December, A. D. 1969

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

Allen Parker Company, a corporation has, on
the 29 day of December 1969, sued out from the office of the
Clerk of the Circuit Court of ~~Mobile~~ Baldwin in the State of Alabama, a Writ of Detinue, returnable to the present
term of said Circuit Court of ~~Mobile~~ Baldwin against the said Hiram L. Parnell

for the recovery of the following property.
to-wit One 1964 model Great Lakes Mobil Home 53' X 10',
identification number or serial number 15743

NOW, if the said Allen Parker Company, a corporation shall fail
in said suit, and shall pay to the said Hiram L. Parnell
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.

ALLEN PARKER COMPANY, a corporation

By: [Signature] (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND

By: [Signature] (Seal)
As Attorney in Fact

STATE OF ALABAMA

County of ~~Mobile~~
Baldwin

9050

KNOW ALL MEN BY THESE PRESENTS, That we, Allen Parker Company, a corporation
as Principal, and Fidelity and Deposit Company of Maryland, as Sureties, are held and firmly bound unto
Hiram L. Parnell

in the sum of Three Thousand Dollars (\$3,000.00)

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 29 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
Allen Parker Company, a corporation

did, on the 29 day of December, (1)969, sue out in the Circuit Court
of ~~XXXX~~ Baldwin 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 1964 model Great Lakes Mobil Home 53' X 10',
identification number or serial number 15743

which said writ was placed in the hands of Taylor Wilkins
Sheriff of the County of ~~XXXX~~ Baldwin, on the _____ day of _____, 19____, by taking into his possession
the following described property, to-wit:

One 1964 model Great Lakes Mobil Home 53' X 10',
identification number or serial number 15743

and whereas the said Hiram L. Parnell
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 Allen Parker Company, 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. ALLEN PARKER COMPANY, a corporation

By: J. F. Secum (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND (Seal)

By: J. F. Secum (Seal)

As Attorney in Fact

Taken and approved this the 13th day of _____

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

No. _____

CIRCUIT COURT

MOBILE COUNTY
BALDWIN

ALLEN PARKER COMPANY, a
corporation
Plaintiff

VS. } Detinue Forthcoming
 } Bond by Plaintiff

HIRAM L. PARNELL
Defendant

This is to certify that this bond is signed
by two good and sufficient sureties and if
presented to the court for approval

ALLEN PARKER COMPANY,
a corporation

Plaintiff

VS

HIRAM L. PARNELL

Defendant

)
)
)
)
)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

Case No.

9050

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

One 1964 model Great Lakes Mobil Home 53' X 10'.
identification number or serial number 15743

with the value of the use thereof during the detention, viz,
from, to-wit, December 1, 1969, said above described property
being the property of the plaintiff.

B. F. Wheeler
Attorney for plaintiff

Serve the defendant at Summerdale, Alabama at Route 1, Box 68B

FILED

DEC 30 1969

ALICE J. DUCK CLERK
REGISTER

The State of Alabama, }
Baldwin County

No. 9050

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Hiram L. Parnell

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 Allen Parker Company,
a corporation

Witness my hand this 30th day of December 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

State of Alabama

Baldwin County

CIRCUIT COURT

ALLEN PARKER COMPANY, A CORP.,

Plaintiff

VS.

HIRAM L. PARNELL

Defendant

Detinue Summons and Complaint

Filed December 30, 1969

Alice J. Duck, Clerk

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.

Alice J. Duck, Clerk

1066
99201
Sheriff claims 60 miles at
Ten Cents per mile Total \$6.00
TAYLOR WILKINS, Sheriff
BY J. M. Byrd
DEPUTY SHERIFF

Defendant lives at

Received in office

DEC 30 1969, 19

TAYLOR WILKINS, Sheriff
SHERIFF

I have executed this summons

this Jan 6, 1970
by leaving a copy with

Hiram L. Parnell
attached one 1964
model Buat Lakes
model home 53'x10'
Aerial # 15743
Pay. made Bond 1/23/70
By Allen Parker Co
Fidelity & Surenty Co.

Taylor Wilkins, Sheriff
J. M. Byrd, Deputy Sheriff

Printed by Moore Printing Co.

Summons 60 mi

ALLEN-PARKER COMPANY,
a corporation

Plaintiff

VS

HIRAM L. PARNELL

Defendant

)

)

)

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)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Case No. 9050

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.

GIBBONS & STOKES

By: B. F. Stokes, Jr.

Attorneys for Plaintiff

FILED

FEB 11 1970

ALICE J. DUCK

CLERK
REGISTER

ALLEN-PARKER COMPANY,
a corporation

Plaintiff

VS

HIRAM L. PARNELL

Defendant

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) AT LAW

) Case No. 9050

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.

GIBBONS & STOKES

By: B. F. Motter, Jr.
Attorneys for Plaintiff

GIBBONS & STOKES

ATTORNEYS AT LAW

160 CONGRESS STREET

MOBILE, ALABAMA

TELEPHONE 433-2611

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

February 6, 1970

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

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

Re: Allen-Parker Company vs Hiram L. Parnell, Case No.
9050

Dear Mrs. Duck:

I enclose herewith a motion for judgment by default and a non-military affidavit for filing in the above styled cause. Please present same to Judge Mashburn at your earliest convenience and if judgment is rendered, please forward certificate of judgment.

Sincerely,


B. F. Stokes, III

BFS:fo

FILED

FEB 11 1970

ALICE J. BUSH, CLERK
REGISTER

ALLEN-PARKER COMPANY, a

corporation

PLAINTIFF,

-versus-

HIRAM L. PARNELL

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN
~~MOBILE~~ COUNTY,

ALABAMA

AT LAW

CASE NO. 9050

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, Hiram L. Parnell,
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 _____
Summerdale, Alabama.

B. F. Stokes, III

Sworn to and Subscribed before me,
this 6 day of February, 1970.

Mildred K. [Signature]
~~XX~~
NOTARY PUBLIC

FILED _____

Clerk.