## DETINUE BOND AND AFFIDAVIT.

DEPOSIT COMPANY OF MARYLAND

By:// As Attorney in Fact

as Principal, and Fidelity and Dep	osit Company of Maryland as Surety
:	
	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.	
	y of December , A. D. 1969
The Condition of the above Obligation is such,	That whereas the above bounden
Allen Parker Company, a corpo	ration has, or
the 29 day of December	19_69_, sued out from the office of the
Clerk of the Circuit Court of Makin in the State of Baldwin	f Alabama, a Writ of Detinue, returnable to the present
	d 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 se	rial number 15743
NOW, if the saidAllen_Parker_Company_,	_a_corporationshall fai
in said suit, and shall pay to the said Hiram L	. Parnell
	ges as he may sustain by the wrongful suing out of said
Writ of Detinue, then this obligation to be void, oth	
-	ALLEN PARKED COMPANY, a corpor
	By: J. Stallwell (Seal)

approved 12-30-69 Alice J. Duch

	x <b>M</b> s Bald	drik County	}			e <sup>1</sup> 07]	DETINUE AFI	FIDAVIT
ve Sir.	PERSON	NALLY appeared	before me, ko	huxixMand	Notary kxilixxilixik	Public MXXXXXXXXX	Exxx of Mobil	e County,
s		F. Stallwor					· · · · · · · · · · · · · · · · · · ·	
	who, being	duly sworn depo	oses and says, t	that the pro	perty sued fo	or in the compl	aint of	ر چين مين مين مين مين مين مين مين مين مين م
	All	<u>len Parker (</u>	Company, a	corpora	tion, vs	Hiram L.	Parnell	
	to-wit:	One 1964 mc	odel Great	Lakes M	obil Home	e 53' X 10	<u>!.,</u>	·
	. We save three sizes from some sizes size three sizes sizes	identificat	ion number	r or ser	ial numbe	er 15743	NAME AND ADDRESS A	
-	nain, adam		rangang matik	<u></u>				
	•					•		
	belongs to_	Allen Park	ker Company	y, a cor	poration	<u> 4754.</u>	the said	Plaintiff
	Sworn to a	and subscribed th	ıe29	day	.)	1a. i a. <b>A</b> 1 <b>A</b>	<i>-1</i>	
	of <b>D</b> 9 <b>C</b> 6	ember	,/,)1969,	before me.	<b>}</b>	J.F.	Mesecu	inch
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	and the William			garan ing Kabupatèn	e e da da e albea	i y lie inec	30 1969	
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			n T	efendan	19	ounty	ttorn	
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		SB	ANY F	년				
		CUIT CO MARKA COUNT ALDWIN	ER COMPANY, m Detinue Affidavi and Bond	PARNELL		Clerk Circuit Court, Mobile	4 440 777 977	
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	No.	CCC MORE	A A A C C C C C C C C C C C C C C C C C	· i	day of	cuit		
		OXI	rat	AM	da	K Cir.		
		CC <sup>M</sup>	ALLEN PARKER COMPANY, corporation  VS. Detinue Affidavi and Bond	HIRAM L.		Cleri	i ! !	
		Answerson.	AL S		lled.			

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THE	STATE	OF	ALAB.	AMA	۱,
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### **DETINUE AFFIDAVIT**

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	NALLY appeared	before me, Lo	an K. Mand	Notary	Public	it Court of Mob	ile County,
	F. Stallwor			PWW	**********	343444444	
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_	g duly sworn depo	•					
	len Parker C		-				
to-wit:	One-1964-mo	del Great	Lakes Mc	bil Home	_53! :X:]	LO 1 /	
	identificat	ion number	or seri	.al_numbe	r 15743		
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	Allen Park						
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No.	COLIN	IN PARKER COMPAI Soration S.   Detinue Affid	RAM L.	-day of.	ck Circuit Court, Mobil	E E	
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THE STATE OF ALABAMA,

XXXXXXX COUNTY.

BALDWIN

## DETINUE BOND AND AFFIDAVIT.

As Attorney in Fact (Seal)

	t We, Allen Parker Company, a corpor
s Principal, and Fidelity and Dep	posit Company of Maryland as Surety
	Parnell  heirs, executors and administrators, in the
	and no/100 (\$1,500.00) Dollars, for
	each of our heirs, executors, and administrators, jointly
d severally, firmly by these presents.	•
	ay of December , A. D. 1969
· · · · · · · · · · · · · · · · · · ·	That whereas the above bounden whereas the above bounded whereas the a
Allen Parker Company, a corpo	oration has, on
	19.69, sued out from the office of the
Baldwin	
Baldwin	id Hiram L. Parnell
	for the recovery of the following property.
wit One 1964 model Great Lakes	Mobil Home 53' X 10',
identification number or se	erial number 15743
Allen Parker Company.	, a corporation shall fail
said suit, and shall pay to the said	. Parnell
e defendant in said writ all such costs and damag rit of Detinue, then this obligation to be void, oth	
	By: (V. )
	(Seat)
	FIDELINA AND DEPOSIT-COMPANY OF (Smil)

# STATE OF ALABAMA County of \*\*MMM. Baldwin



KNOW ALL MEN BY THESE PRESENTS, That we, Allen Parker Company, a corporation Maryland as Principal, and Tidelity and Deposit Company of /, as Sureties, are held and firmly bound unto
11 th annual Toleran (1971)
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. Scaled 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 Baldwin of NEXE 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
The state of the s
which said writ was placed in the hands ofTaylor_Wilkins
Sheriff of the County of Next, 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
A LA
By: (Seal)
FEDERATY AND XDEPOSIT COMPANY OF MARYLAN
By: (Seal)
As Attorney in Fact
Taken and approved this the day of flawally, 19 70
- Lay 6- 1, 1, CB
Sheriff, Mobile County, Alabama
Baldwin

. 1	•_
N	O
• •	V

CIRCUIT

COURT

XMODIKE COUNTY

BALDWIN

ALLEN PARKER COMPANY, a corporation Plaintiff

VS.

Detinue Forthcoming
Bond by Plaintiff

HIRAM L. PARNELL Defendant

ALLEN PARKER COMPANY, a corporation	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
VS	)	AT LAW
HIRAM L. PARNELL	)	
De fendant	)	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.

Attorney for plaintiff

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

ruli

OEC 30 1969

ALOL J. DUN CLERK REGISTER

\_\_\_\_19\_\_\_\_

The State of Alabama,	CIRCUIT	COURT
Baldwin County	s:	

o Any Sheriff of the State	of Alabama—Greetings:	
on Are Hereby Commanded to S	Summon Hiram L. Parnel1	
	:	
	the service of this writ, in the Circuit Court to be held for	
t the place of holding the same, t	then and there to answer the complaint of <u>Allen Park</u>	<u>er Company</u>
a corporation		And 19 Control of the Land of
Witness my hand this	30th day of December 19.69	
	alies J. Duck	, Cle
,	COMPLAINT	
		/
	Plaintiff Versus	Defendant
The plaintingclaims of t	he defendant the following personal property, to wit:	
		; !
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		:
· · · · · · · · · · · · · · · · · · ·		: :
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ith the value of the hire or use th	hereof during the detention, to-wit:	
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## State of Alabama

Baldwin County

## CIRCUIT COURT

ALLEN PARKER COMPANY, A CORP.

Plaintiff.\_\_

VS.

HIRAM L. PARNELL

Defendant\_\_

## Detinue Summons and Complaint

December 30,

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.

Sherlff claims 60 milles at Taylor Wilkins, Sheriff

Defendant lives at

proceed tell in office

OEC-30 1969-----, 19-----

IAYLOR WILKINS , Sheriff SHERIFF

I have executed this summons

by Yeaving a copy with

Deputy Sheriff

Printed by Moore Printing Co.

ALLEN-PARKER COMPANY,	)	IN THE CIRCUIT COURT OF
a corporation		
	)	
Plaintiff		BALDWIN COUNTY, ALABAMA
	)	
VS		
	)	AT LAW
HIRAM L. PARNELL		
	)	
De fendant		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: 3-7. Molecu, For Attorneys for Plaintiff

FEB 1 - 1970

ALGE J. WELL CHARLES

a corporation	IN THE CIRCUIT COURT OF
Plaintiff	BALDWIN COUNTY, ALABAMA
vs	AT LAW
HIRAM L. PARNELL	
Defendant	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. 7. Molec. S. 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,

. F. Stokes, III

BFS: fo

FEB 1 1970

ANDE C. BULL REGISTER

ALLEN-PARKER COMPANY, a	( ) IN THE CIRCUIT COURT OF (
corporation	) ( BALDWIN ) XXXXXX COUNTY, (
PLAINTIFF,	) ( ) ALABAMA (
-versus-	) (
HIRAM L. PARNELL	) AT LAW ( )
	) ( )
DEFENDANT.	) CASE NO. 9050
NON-HILITARY	AFFIDAVIT
STATE OF ALABAMA)	
COUNTY OF MOBILE)	
Now comes, B. F. Stok	es, III
	poses 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 Servi	·
·	
Summerdale, Alabama	
	B.7. Woleen. E.
Sworn to and Subscribed before	
this 6 day of February	ongenus 1970
CMINIX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	XXXXXXX
FILED	
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