

The State of Alabama,
Baldwin County

CIRCUIT COURT
No. 9078

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Floyd Milstead, Jr. and Jeanette
Milstead

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
The City Furniture Company, Inc; a Corporation

Witness my hand this 15th day of January 19 70
Alice J. Duck, Clerk

COMPLAINT

City Furniture Company, Inc, a Corporation Plaintiff Versus Floyd Milstead, Jr. and Jeanette Milstead Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

One (1) used refrigerator, 2-door, One (1) used gas stove,
One (1) 9-piece dinette set, One (1) 2-piece sofa suite, One
(1) 3-piece bedroom suite, Three (3) tables, Two (2) lamps, One
(1) 4/6 coil spring and One (1) used Admiral Television Model
#3011

with the value of the hire or use thereof during the detention, to-wit:

from March 30 1968, to January 19 70
in the sum of ONE THOUSAND DOLLARS (\$1,000.00)

FILED

JAN 15 1970

ALICE J. DUCK CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney.

W. Brantley Nesbit

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No. 9078

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State of Alabama

Baldwin County

CIRCUIT COURT

City Furniture Company, Inc.

a Corporation

Plaintiff...

VS.

Floyd Milstead, Jr. and

Jeanette Milstead

Defendant...

Detinue Summons and Complaint

FILED

Filed _____, 19____

JAN 15 1970

Clerk

ALICE J. BUCK
CLERK
REGISTER

Walters, Bradley
+ Nesbit
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. Buck Clerk

Received 15 day of January 1970
and on 21 day of Jan 1970

I served a copy of the within S & C
on Floyd Milstead, Jr. &
Jeanette Milstead

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Zolbert D. S.

Sheriff claims 44 miles at

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff
BY Zolbert
DEPUTY SHERIFF

Defendants lives at on
Raben Route, Bay Minette
Alabama

Received in office

, 19____

, Sheriff

I have executed this summons

this Jan 21, 1970

by leaving a copy with

Floyd Milstead Jr.
Jeanette Milstead
attached

one used refrigerator
2 door one used gas stove
one 9 piece dinette set
one 2 piece sofa suite
one 3 piece bedroom suite
Three tables two lamps
one #6 coil spring one used
admiral television
model # 3011
Taylor Wilkins, Sheriff

W. A. Zolbert, Deputy Sheriff

Rabun
Printed by Moore Printing Co.

Sty. made Lond 1/29/70
By City Furniture Co.

585

DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }
Baldwin County }

KNOW ALL MEN BY THESE PRESENTS, That we, City Furniture Company,
Inc. A Corporation

and W. A. Graham and Jack D. Graham
are held and firmly bound unto Floyd Milstead, Jr. and Jeanette Milstead
in the sum of ONE HUNDRED AND NO/100----- Dollars, for the payment of
which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and ad-
ministrators.

Sealed with our seals and dated this 23rd day of January 19 70

The condition of the above obligation is such that whereas the said City Furniture
Company, Inc. did, on the 15th day
of January 19 70 sue out of the Circuit Court of Baldwin
County a writ of detinue directed to any Sheriff of the State of Alabama commanding him
to take into his possession the following property, to-wit: ONE (1) used refrigerator, 2-door
One (1) used gas stove, One (1) 9-piece dinette set, One (1) 2-piece
sofa suite, One (1) 3-piece bedroom suite, Three (3) tables, Two (2)
lamps, One (1) 4/6 coil spring and One (1) used Admiral television
Model #3011.

which said writ was placed in the hands of Taylor Wilkins
Sheriff of Baldwin County, Alabama, on the day of January 19 70,
and executed by him on the 21st day of January 19 70, by taking into his
possession the following property, to-wit:

One (1) used refrigerator, 2-door, One (1) used gas stove, One (1)
9-piece dinette set, One (1) 2-piece sofa suite, One (1) 3-piece
bedroom suite, Three (3) tables, Two (2) lamps, One (1) 4/6 coil spring
and One (1) used Admiral Television Model #3011

And whereas the said Floyd Milstead, Jr. and Jeanette Milstead
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 if the said City Furniture Company, Inc. upon his failing
in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay
all 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.

City Furniture Co. Inc.
By W. A. Graham Pres (SEAL)
Jack D. Graham Pres (SEAL)
Jack D. Graham (SEAL)

Taken and approved this 29th day of January 19 70
Taylor Wilkins
Sheriff, Baldwin County, Ala.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

REPLEVY BOND
Of Plaintiff

vs.

Taken and approved this

day of _____, 196__

Moore Printing Co. - Bay Minette, Ala.

This is to certify that this bond is signed
by two good and sufficient sureties and
presented to me I would accept same.

Sheriff, Mobile County, Ala.

By:

Harold E. Hone
Chief Clerk

9078

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

Baldwin COUNTY

Baldwin COUNTY

Before me, Thyllis S. Heshi, a Notary Public in and for said County, personally appeared W. E. Graham who being by me duly sworn deposes and says that the property sued for in the complaint of City Furniture Company, Inc., a Corporation filed in said Court, to-wit: one (1) used refrigerator, 2 door, One (1) used gas stove, one (1) 9-piece dinette set, One (1) 2-piece sofa suite, One (1) 3-piece bedroom suite, Three (3) tables, Two (2) lamps, One (1) 4/6 coil spring, One (1) Used admiral television Model #3011 belongs to City Furniture Company, Inc., the plaintiff.

Sworn to and subscribed before me this

day of

19

Thyllis S. Heshi
Notary Public

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

BALDWIN

BALDWIN

COUNTY

COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, City Furniture Company, Inc.
A Corporation

, Principal, and
, Sureties, are held and firmly bound unto Floyd Milstead, Jr. and Jeanette Milstead, their heirs, executors and administrators in the sum of THREE HUNDRED DOLLARS AND NO/100 Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the January day of 1970

The condition of the above obligation is such that whereas, the above bound

City Furniture Company, Inc., a Corporation has on the

January, 1970 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Floyd Milstead, Jr. and Jeanette Milstead for the recovery of the following described property, to-wit:

One (1) used refrigerator, 2-door, One (1) used gas stove, One (1) 9-piece dinette set, One (1) 2-piece sofa suite, One (1) 3-piece bedroom suite, Three (3) tables, Two (2) lamps, One (1) 4/6 coil spring and One (1) used admiral television Model #3011

Now, if the said City Furniture Company, Inc. shall fail in said suit

and shall pay to the said Floyd Milstead, Jr. and Jeanette Milstead, the defendant in said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to be void, otherwise, to remain in full force and effect.

Taken and approved this

day of

19

W. E. Graham
Clerk, Circuit Court

(SEAL)

(SEAL)

(SEAL)

STATE OF ALABAMA

COUNTY OF MOBILE

I, JOHN F. MANDEVILLE, Clerk of the Circuit Court of the State of Alabama, Mobile County, do hereby certify that if the said Bond were presented to me I would accept same.

John E. Mandeville
JOHN E. MANDEVILLE, CLERK

No. _____
THE STATE OF ALABAMA
Baldwin
COUNTY
CIRCUIT COURT
City Furniture Company, Inc. a Corporation
Plaintiff
VS.
Floyd Milstead and Jeanette Milstead
Defendants
Detinue — Affidavit and Bond
Filed this _____ day of _____, 19____
Clerk