

The State of Alabama,  
Baldwin County

CIRCUIT COURT

No. \_\_\_\_\_ January 19 70

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Gerald Gulley

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 \_\_\_\_\_

Stephens Acceptance Corporation

Witness my hand this 24 day of January 19 70

W. J. Duck, Clerk

COMPLAINT

Stephens Acceptance Corporation

Gerald Gulley

Plaintiff

Versus

Defendant

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

One 1964 Chevrolet automobile, which the defendant unlawfully and wrongfully detains from the possession of the plaintiff. Plaintiff avers that it has the right to immediate possession of this automobile.

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

from December 13 19 69, to January 24 19 70

and of the alternate value of 322.00.

J. H. Williams, Plaintiff's Attorney.

State of Alabama

Baldwin County

CIRCUIT COURT

~~Stephens Acceptance Corp.~~

Plaintiff

VS.

Gerald Culley

Defendant

Detinue Summons and Complaint

Filed 1-24, 1970

Deice J. Duck, Clerk

Taylor Wilkins, Jr.

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.

Deice J. Duck Clerk

Defendant lives at

Received in office

, 19

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

, Sheriff

, Deputy Sheriff

Stephens Acceptance Corp.

Gerald Culley

Taylor Wilkins, Jr.

# 9094

Moore Printing Co. - Bay Minette, Alabama

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, Taylor Wilkins, Jr., a Notary Public in and for said County, personally appeared Rudolph Taylor who being by me duly sworn deposes and says that the property sued for in the complaint of Stephens Acceptance Corporation filed in said Court, to-wit: A 1964 Chevrolet Automobile

belongs to Stephens Acceptance Corporation, the plaintiff.

Sworn to and subscribed before me this 24 day of January, 1970  
[Signature]  
 Notary Public

STEPHENS ACCEPTANCE CORPORATION

By: Rudolph A. Taylor

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, \_\_\_\_\_

Stephens Acceptance Corporation, Principal, and \_\_\_\_\_, Sureties, are held and firmly bound unto Gerald Gulley, his heirs, executors and administrators in the sum of Fifty and NO/100 ( \$50.00 ) Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Scaled with our seals and dated the 24 day of January, 19 70

The condition of the above obligation is such that whereas, the above bound Stephens Acceptance Corporation has on the 24 day of January, 19 70 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Gerald Gulley for the recovery of the following described property, to-wit:

One 1964 Chevrolet Automobile

Now, if the said Stephens Acceptance Corporation shall fail in said suit and shall pay to the said Gerald Gulley, 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 24 day of January, 1970  
[Signature] (SEAL)  
[Signature] (SEAL)  
[Signature] (SEAL)  
 Clerk, Circuit Court

No. 9094

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this 24 day of June 1970

Ree J. Owen  
Clerk

9094

3-1-70

The State of Alabama, }  
Baldwin County

CIRCUIT COURT  
No. 9094  
January

19 70

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at the place of holding the same, then and there to answer the complaint of

Stephens Acceptance Corporation

Witness my hand this 24 day of January 19 70

Dee J. Duck, Clerk

COMPLAINT

Stephens Acceptance Corporation

Gerald Gulley

Plaintiff

Versus

Defendant

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

One 1964 Chevrolet automobile, which the defendant  
unlawfully and wrongfully detains from the possession  
of the plaintiff. Plaintiff avers that it has the  
right to immediate possession of this automobile.

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

from December 13 19 69, to January 24 19 70  
and of the alternate value of 322.00.

G. A. Wilkins, Plaintiff's Attorney.

State of Alabama  
Baldwin County

CIRCUIT COURT

Stephens Acceptance Corp.

Plaintiff--

VS.

Gerald Gulley

Defendant--

Detinue Summons and Complaint

Filed 1-24, 1970

Alice J. Duck Clerk

Defendant lives at  
850 Anderson - Apt B.

Taylor Wilkins, Jr.

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

Recall by  
Taylor Wilkins Jr  
Attorney

2-3-70  
Wa Talbot

Defendant lives at

Received in office

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff