

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

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

May 28, 1970

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

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County  
Baldwin County Courthouse  
Bay Minette, Alabama 36507

Re: Commercial Credit Corporation vs. George J. Wasdin  
Circuit Court of Baldwin County, Case No. ~~8844~~

9103

Dear Mrs. Duck:

In connection with the above, the detinue suit was settled. The defendant paid the full amount of the contract and the charges relative to the detinue suit. I forwarded a release to him requesting that he sign the same and return to me but he did not do so. In order to clear the bond, I would appreciate it if you would enter a non-suit in this case and make a docket notation that the case was settled by the defendant paying the full amount. Please then send me a bill of costs. I would appreciate it if you would also send me a letter or "monkey order" showing that the case was non-suited.

Sincerely,

  
B. F. Stokes, III

BFS/ee

GIBBONS & STOKES

ATTORNEYS AT LAW  
160 CONGRESS STREET  
MOBILE, ALABAMA  
TELEPHONE 433-2611

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

January 29, 1970

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

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

9103

Re: Commercial Credit Corporation vs George J. Wasdin

Dear Mrs. Duck:

Enclosed I am forwarding a complaint in detinue as well as a detinue bond in the above styled cause. Please process this at once and forward to Mr. Taylor Wilkins, Sheriff.

Sincerely,

*B. F. Stokes, III*

B. F. Stokes, III

BFS:fo  
Enclosures

GIBBONS & STOKES

ATTORNEYS AT LAW

160 CONGRESS STREET

MOBILE, ALABAMA

TELEPHONE 433-2611

February 12, 1970

E. GRAHAM GIBBONS

B. F. STOKES, III

WILLIAM L. HOWELL

MAILING ADDRESS

P. O. BOX 293

MOBILE, ALABAMA 36601

Mr. Taylor Wilkins, Sheriff  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Commercial Credit Corporation vs George J. Wasdin,  
Circuit Court of Baldwin County, Case No. 8844

Dear Sheriff Wilkins:

Your deputy advises me that he served the writ of detinue on the defendant on February 2. Also, your office advises that the defendant did not file a defendant's replevin bond by the deadline, namely February 9, 1970. You will recall that by my letter of February 6, I forwarded the forthcoming bond. Therefore I assume you have seized this vehicle. Please advise as to whether I may now send a representative to obtain possession of the vehicle at your office.

Sincerely,

  
B. F. Stokes, III

BFS:fo

cc: Commercial Credit Corporation

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

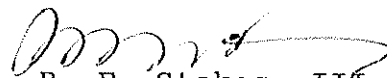
Mr. Taylor Wilkins, Sheriff  
Baldwin County, Alabama  
Baldwin County Courthouse  
Bay Minette, Alabama

Re: Commercial Credit Corporation vs George J. Wasdin,  
Circuit Court of Baldwin County, Alabama, Case No.  
8844

Dear Sir:

I enclose a copy of my letter to the Baldwin County Bank  
showing that we cannot accept partial payment. Also I  
enclose a forthcoming bond for filing in this case.

Sincerely,

  
B. F. Stokes, III

BFS:fo  
Encl.

P.S. Please note that this bond has been certified as  
being sufficient by the Sheriff of Mobile County.

GIBBONS & STOKES

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

E. GRAHAM GIBBONS  
B. F. STOKES, III

WILLIAM L. HOWELL

February 6, 1970

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Baldwin County Bank  
P. O. Box 531  
Bay Minette, Alabama

Re: Commercial Credit Corporation vs George J. Wasdin,  
Circuit Court of Baldwin County, Alabama Case No.  
8844

Dear Sirs:

Enclosed I am returning to you a cashier's check in the sum of \$355.87 received by my client, Commercial Credit, on February 6. The check is marked "Payoff of account", but does not constitute payment in full. Charges on this account are as follows:

Balance due	\$355.87
Attorney's fee	100.00
Court costs	24.00
Bond premium	15.00
Total	\$494.87

Suit was filed in this case on January 29 and on February 2 the defendant was served with the complaint and summons. Partial payment on the account cannot be accepted.

Sincerely,

B. F. Stokes, III

BFS:fo

Enclosure

cc: Mr. Taylor Wilkins, Sheriff  
Commercial Credit Corporation  
Mr. George J. Wasdin

C  
O  
P  
Y

STATE OF ALABAMA

County of ~~Mobile~~  
Baldwin

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

George J. Wasden

in the sum of One Thousand Dollars (\$1,000.00)

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 28 day of January  
in the year of our Lord, one thousand, nine hundred and seventy

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

Commercial Credit Corporation, a corporation,

did, on the 28 day of January, (1) 970, sue out in the Circuit Court  
Baldwin Court  
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 1964 model Chrysler automobile, serial number  
or identification number 8343159863

which said writ was placed in the hands of ~~Ray D. Bridges~~ Taylor Wilkins,  
Sheriff of the County of Baldwin on the 28 day of January, 19 70, by taking into his possession  
the following described property, to-wit:

One 1964 model Chrysler automobile, serial number  
or identification number 8343159863

and whereas the said George J. Wasden,  
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 Commercial Credit 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.

COMMERCIAL CREDIT CORPORATION, A  
Corporation

By: [Signature] (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND

By: [Signature] (Seal)

As Attorney in Fact

Taken and approved this the 11th day of July, 19 70

[Signature]  
Sheriff, ~~Mobile~~ County, Alabama  
Baldwin

No. \_\_\_\_\_

~~CIRCUIT~~  
~~General Sessions~~ COURT

~~MOBILE COUNTY~~  
~~XXXXXX~~  
Baldwin

COMMERCIAL CREDIT CORPORATION,  
a corporation  
Plaintiff

VS. } Detinue Forthcoming  
Bond by Plaintiff

GEORGE J. WASDIN  
Defendant

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

Sheriff, Mobile County, Ala.

By: Harold E. Donald

9103

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

DETINUE BOND AND AFFIDAVIT.

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

are held and firmly bound unto George J. Wasdin

his heirs, executors and administrators, in the

sum of Five Hundred and no/100 (\$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 28 day of January, A. D. 19 70

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

Commercial Credit Corporation, a corporation has, on

the 28 day of January 19 70, sued out from the office of the

Clerk of the Circuit Court of Baldwin County, in the State of Alabama, a Writ of Detinue, returnable to the present

term of said Circuit Court of Baldwin County against the said George J. Wasdin

for the recovery of the following property.

to-wit One 1964 model Chrysler automobile, serial number or

identification number 8343159863

NOW, if the said Commercial Credit Corporation, a corporation shall fail

in said suit, and shall pay to the said George J. Wasdin

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.

COMMERCIAL CREDIT CORPORATION,  
a corporation  
By: [Signature] (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND

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

*Approved*  
*1-30-70*  
*Alicia J. Duck*  
*Clerk*



THE STATE OF ALABAMA,  
Baldwin }  
Baldwin

DETINUE AFFIDAVIT

PERSONALLY appeared before me, ~~Notary Public~~ JAB  
C. N. Bagley

who, being duly sworn deposes and says, that the property sued for in the complaint of  
Commercial Credit Corporation, a corporation, vs George J. Wasdin  
to-wit: One 1964 model Chrysler automobile, serial number or  
identification number 8343159863

belongs to Commercial Credit Corporation, a corporation the said Plaintiff

Sworn to and subscribed the 28 day  
of January 1970, before me.  
Notary Public

FILED  
JAN 30 1970  
CLERK REGISTER

No. \_\_\_\_\_

CIRCUIT COURT  
BALDWIN COUNTY  
BALDWIN

COMMERCIAL CREDIT CORPORATION,  
a corporation

Plaintiff

VS. } Detinue Affidavit  
and Bond

GEORGE J. WASDIN  
Defendant

Filed \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Clerk Circuit Court, Baldwin County  
Baldwin

Attorney

# BAILEE'S RECEIPT

BAY MINETTE, ALA., Feb 2 1970

The State of Alabama, }  
Baldwin County

I hereby agree to take, care for and preserve as the Bailee of Taylor Wilkins  
Sheriff of Baldwin County, Alabama, the following described personal property this day levied upon  
under Writ of Fieri Facias, Attachment, Detinue, issued out of the Circuit Justice Civil Court of Baldwin  
County, Alabama, in the above styled case, to-wit:

one 1964 model Chrysler Ser No 8343159863

I further agree to deliver the above described personal property to the said Taylor  
Wilkins, Sheriff of Baldwin County, Alabama, upon his written order of demand.

Witness : W. A. Zalkert  
George J. Wadlin, Bailee.

COMMERCIAL CREDIT CORPORATION, ) IN THE CIRCUIT COURT OF  
a corporation )  
Plaintiff ) BALDWIN COUNTY, ALABAMA  
VS )  
GEORGE J. WASDIN ) AT LAW  
Defendant ) Case No. 9103

Plaintiff claims of the defendant the following described  
personal property, to-wit:

One (1) 1964 model Chrysler automobile, serial  
number or identification number 8343159863

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

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

Serve the defendant at 305 Station Street, Bay Minette, Ala.

FILED

NOV 10 1970

ALICE J. COOK CLERK  
REGISTER

The State of Alabama,  
Baldwin County

No. 9103

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon GEORGE J. WARDIN

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 COMMERCIAL CREDIT  
CORPORATION, A Corporation

Witness my hand this 30th day of January 19 70

*Alice J. Luck* Clerk

COMPLAINT

Plaintiff Versus Defendant

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

*Attached*

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

from 19 to 19

Plaintiff's Attorney.

No. 9103 Page

State of Alabama

Baldwin County

CIRCUIT COURT

COMMERCIAL CREDIT CORPORATION,

A Corporation

Plaintiff

VS.

GEORGE J. WASDIN

Defendant

Detinue Summons and Complaint

Filed January 30, 1970

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

Received 30 day of January 1970  
and on 2 day of Feb 1970  
I served a copy of the within Detinue & C  
on George J. Wasdin  
By service on  
TAYLOR WILKINS, Sheriff  
By W. A. Zalkut

Defendant lives at

Received in office

19

Sheriff

I have executed this summons

this Feb 2, 1970

by leaving a copy with

George Wasdin  
attached  
ONE 1964 Model  
Chrysler Auto-  
Ser - No 8343159863

Taylor Wilkins, Sheriff  
W. A. Zalkut, Deputy Sheriff

Printed by Moore Printing Co.