

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

No. 9183

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon ~~C. LEON BAGGETT & L. L. BAGGETT~~

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 ~~ALABAMA TRACTOR CO., SOUTH, INC., & Corporation~~

Witness my hand this 17th day of April 1970

*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

Plaintiff's Attorney.

**State of Alabama**

Baldwin County

**CIRCUIT COURT**

Plaintiff \_\_\_\_\_

VS.

Defendant \_\_\_\_\_

**Detinue Summons and Complaint**

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

\_\_\_\_\_, Clerk

\_\_\_\_\_, 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.

\_\_\_\_\_, Clerk

Defendant lives at \_\_\_\_\_

Received in office \_\_\_\_\_, 19\_\_

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

I have executed this summons

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

by leaving a copy with \_\_\_\_\_

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

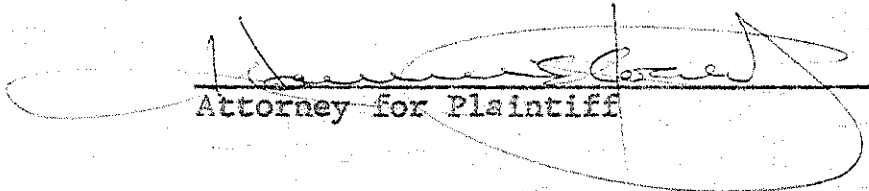
\_\_\_\_\_, Deputy Sheriff

ALABAMA TRACTOR CO. SOUTH, ) IN THE CIRCUIT COURT OF  
INC., a corporation, )  
Plaintiff, ) BALDWIN COUNTY, ALABAMA  
vs. )  
C. LEON BAGGETT and ) AT LAW  
L. L. BAGGETT, )  
Defendants. ) CASE NO. 9183

Comes now the plaintiff, Alabama Tractor Co. South,  
Inc., in the above-styled cause and amends its complaint  
heretofore filed herein as follows:

COMPLAINT

The plaintiff claims of the defendants the following  
personal property, viz: One (1) Lorraine Dragline, with  
the value of the hire or use thereof during the detention,  
viz: From the 15th day of October, 1969, and all costs,  
including a reasonable attorney's fees.

  
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendants' address:

P. O. Box 182  
Bay Minette, Alabama

*Filed*  
*April 17, 1970*

*Alice J. Duck*  
*Clerk*

ALABAMA TRACTOR CO. SOUTH, ) IN THE CIRCUIT COURT OF  
INC., a corporation, )  
Plaintiff, ) BALDWIN COUNTY, ALABAMA  
vs. )  
C. LEON BAGGETT and ) AT LAW  
L. L. BAGGETT, )  
Defendants. ) CASE NO.

COUNTY OF MOBILE:

Before me, \_\_\_\_\_, a Notary  
Public of Mobile County, in and for said County, in said  
State, personally appeared Robert Craig as Authorized Agent  
of Alabama Tractor Co. South, Inc., plaintiff, who, having  
been by me duly sworn, doth depose and say Alabama Tractor  
Co. South, Inc. has the right to possession of the property  
sued for in the amended complaint of Alabama Tractor Co.  
South, Inc. v. C. Leon Baggett and L. L. Baggett.

Subscribed and sworn to before me  
this \_\_\_\_\_ day of April, 1970.

NOTARY PUBLIC, MOBILE COUNTY, ALABAMA  
MY COMMISSION EXPIRES \_\_\_\_\_

ALABAMA TRACTOR CO. SOUTH, : IN THE CIRCUIT COURT OF  
INC., a corporation, :  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
vs. :  
C. LEON BAGGETT and : AT LAW  
L. L. BAGGETT, :  
Defendants. : CASE NO.

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, Lyman F. Holland Jr., a Notary Public  
of Mobile County, in and for said County, in said State,  
personally appeared Robert Craig as Authorized Agent of Alabama  
Tractor Co. South, Inc., plaintiff, who, having been by me duly  
sworn, doth depose and say Alabama Tractor Co. South, Inc. has  
the right to possession of the property sued for in the complaint  
of Alabama Tractor Co. South, Inc., v. C. Leon Baggett and L. L.  
Baggett.

Robert Craig  
Subscribed and sworn to before me this

24 day of March, 1970.

Lyman F. Holland Jr.  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

My commission expires 8/2-1/71

FILED

MAR 25 1970

ALICE J. BECK  
CLERK  
REGISTER

ALABAMA TRACTOR CO. SOUTH, : IN THE CIRCUIT COURT OF  
INC., a corporation, :  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
vs. :  
C. LEON BAGGETT and : AT LAW  
L. L. BAGGETT, :  
Defendants. : CASE NO.

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, Lyman F. Holland Jr, a Notary Public  
of Mobile County, in and for said County, in said State,  
personally appeared Robert Craig as Authorized Agent of Alabama  
Tractor Co. South, Inc., plaintiff, who, having been by me duly  
sworn, doth depose and say Alabama Tractor Co. South, Inc. has  
the right to possession of the property sued for in the complaint  
of Alabama Tractor Co. South, Inc., v. C. Leon Baggett and L. L.  
Baggett.

Robert Craig  
Subscribed and sworn to before me this Res.

24 day of March, 1970.

Lyman F. Holland Jr  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

My commission expires 3/23/71

ALABAMA TRACTOR COMPANY,	:	IN THE CIRCUIT COURT OF BALDWIN
SOUTH, INC., A Corporation,	:	
Plaintiff,	:	COUNTY, ALABAMA
VS:	:	
	:	AT LAW
C. LEON BAGGETT & L. L.	:	
BAGGETT,	:	
Defendants.	:	Case No. 9 1 8 3

Come now the Defendants in the above styled cause and for further answer to the complaint, and by way of set-off, say as follows:

2. Defendants claim of the Plaintiff TWO THOUSAND FIVE HUNDRED AND 00/100 (\$2,500.00) DOLLARS as damages for the breach of a written warranty wherein the Plaintiff warranted to the Defendants that it would repair or replace each part of a new Case Bulldozer, which the Plaintiff had sold to the Defendants on June 1, 1969, which was proven to their satisfaction to have been defective in material or workmanship, and the Defendants aver that on, to-wit, August 30, 1969, they returned to the Plaintiff the aforesaid piece of machinery which had numerous defective parts and/or workmanship, and the Plaintiff failed or refused to repair or replace said parts, all to the Defendants damages as aforesaid.

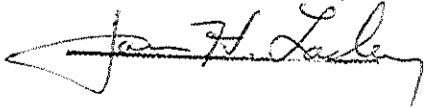
COLLINS, GALLOWAY & MURPHY

BY: 

JAMES H. LACKEY  
ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 20 day of April, 1970, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.



**FILED**

APR 21 1970

**ALICE J. DUCK**

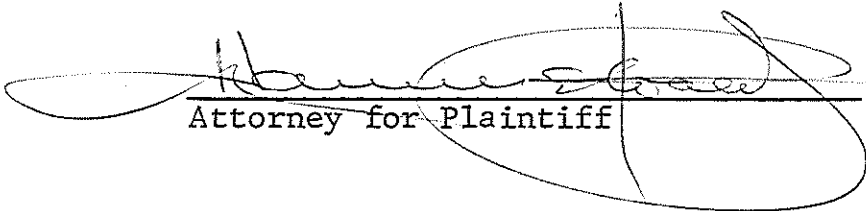
CLERK  
REGISTER

ALABAMA TRACTOR CO. SOUTH, ) IN THE CIRCUIT COURT OF  
INC., a corporation, )  
Plaintiff, )  
vs. )  
C. LEON BAGGETT and ) AT LAW  
L. L. BAGGETT, )  
Defendants. ) CASE NO. 9183

Comes now the plaintiff, Alabama Tractor Co. South,  
Inc., in the above-styled cause and amends its complaint  
heretofore filed herein as follows:

COMPLAINT

The plaintiff claims of the defendants the following  
personal property, viz: One (1) Loraine Dragline, with  
the value of the hire or use thereof during the detention,  
viz: From the 15th day of October, 1969, and all costs,  
including a reasonable attorney's fees.

  
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendants' address:

P. O. Box 182  
Bay Minette, Alabama

**FILED**

APR 17 1970

**ALICE J. DUCK** CLERK  
REGISTER

ALABAMA TRACTOR CO. SOUTH, )	IN THE CIRCUIT COURT OF
INC., a corporation,	)
Plaintiff,	BALDWIN COUNTY, ALABAMA
)	)
vs.	)
C. LEON BAGGETT and	AT LAW
L. L. BAGGETT,	)
Defendants.	CASE NO.

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, E. LAKE G. ROGERS, a Notary Public of Mobile County, in and for said County, in said State, personally appeared Robert Craig as Authorized Agent of Alabama Tractor Co. South, Inc., plaintiff, who, having been by me duly sworn, doth depose and say Alabama Tractor Co. South, Inc. has the right to possession of the property sued for in the amended complaint of Alabama Tractor Co. South, Inc. v. C. Leon Baggett and L. L. Baggett.

Robert Craig

Subscribed and sworn to before me  
this 16<sup>th</sup> day of April, 1970.

E. Lake G. Rogers  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

MY COMMISSION EXPIRES 1-3-73

Returned 21 day of April 1970  
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff  
By W. A. Collett  
Deputy Sheriff

*The within property was  
not found  
Taylor Wilkins  
Sheriff*

Received 17 day of April 1970  
and on        day of        19        
I served a copy of the within         
on James L. L. Baggett

By service on         
        
TAYLOR WILKINS, Sheriff  
By        D. L.

No. 9183

Alabama Tractors  
vs.  
C. Leon Baggett  
&  
L. L. Baggett

FILED

APR 17 1970

ALICE J. DUCK

CLERK  
REGISTER

*Hand Randall etc*

The State of Alabama, }  
Baldwin County

No. 9183

CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon C. LEON BAGGETT & L. L. BAGGETT

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 ALABAMA TRACTOR CO.  
SOUTH, INC., A Corporation

Witness my hand this 17th day of April 1970

*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

Plaintiff's Attorney.

State of Alabama

Baldwin County

CIRCUIT COURT

ALABAMA TRACTOR CO. SOUTH, INC.,  
a corporation

Plaintiff

VS.

C. LEON BAGGETT & L.L. BAGGETT

Defendant

Amended  
Detinue Summons and Complaint

Filed May April 17, 19 70

Alice J. Duck, Clerk

Harwell Coale-

Hand, Arendall, Plaintiff's Attorney  
Bedsole, Greaves & Johnston

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 21 May 19 70  
and on day of  
I served a copy of the within Detinue  
on C. Leon Baggett  
By service on  
TAYLOR WILKINS, Sheriff  
D.S.  
8698

Defendant lives at

Received in office

May 21, 19 70

Sheriff

I have executed this summons

this May 25, 19 70  
by leaving a copy with

L L Baggett no property found

C Leon Baggett not found in this county  
in Florida

Taylor Wilkins, Sheriff  
D A Felber, Deputy Sheriff

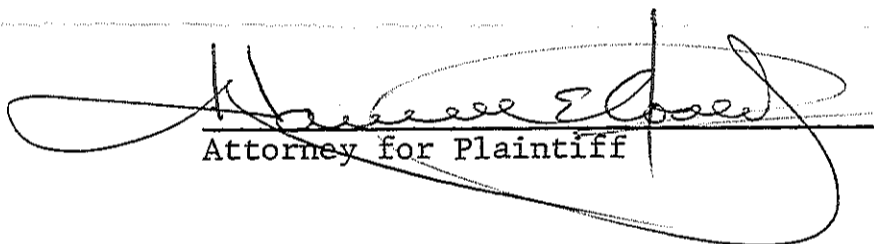
Printed by Moore Printing Co.

15 miles north of B M = 30 mi

ALABAMA TRACTOR CO. SOUTH, : IN THE CIRCUIT COURT OF  
INC., a corporation, :  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
vs. :  
C. LEON BAGGETT and : AT LAW  
L. L. BAGGETT, :  
Defendants. : CASE NO. 9183

COMPLAINT

The plaintiff claims of the defendants the following personal property, viz: One (1) Loraine, L-20, with the value of the hire or use thereof during the detention, viz: From the 15<sup>th</sup> day of October, 1969, and all costs, including a reasonable attorney's fee.

  
Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendants' address:

P. O. Box 182  
Bay Minette, Alabama

FILED

MAR 25 1970

ALICE J. DUCK CLERK  
REGISTER

The State of Alabama, }  
Baldwin County

No. 9183 CIRCUIT COURT

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon C. Leon Baggett and L. L. Baggett

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  
Alabama Tractor Co. South, Inc., a corp

Witness my hand this 25 day of March 19 70

*Alice J. Duck*, Clerk

COMPLAINT

ALABAMA TRACTOR CO. SOUTH

C. LEON BAGGETT & L.L. BAGGETT

INC. a corp

Plaintiff

Versus

Defendant

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

Complaint attached

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

from 19, to 19

Plaintiff's Attorney.

State of Alabama

Baldwin County

## CIRCUIT COURT

ALABAMA TRACTOR CO. SOUTH

INC. a corp

Plaintiff

VS.

C. LEON BAGGETT &amp; L.L. BAGGETT

Defendant

## Detinue Summons and Complaint

Filed 3-25, 1970

Alice J. Duck

Clerk

~~Hand, Arendall, Bedsole, etc~~  
Plaintiff's Attorney

Defendant's Attorney

438-5612  
Robert Craig

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 25 day of March 1970  
and on the 25th day of March 1970I served a copy of the within Detinue  
on Baggett

By service on

TAYLOR WILKINS, Sheriff  
By

Defendant lives at

Received in office

, 19

, Sheriff

I have executed this summons

this March 28, 1970

by leaving a copy with

L.L. Baggett &  
C. Leon Baggett And  
Not finding the within  
Described propertyTaylor Wilkins, Sheriff  
W.O. Garner, Deputy Sheriff

Printed by Moore Printing Co.

Phillipsville 15 mi away = 60 mi

ALABAMA TRACTOR CO. SOUTH, : IN THE CIRCUIT COURT OF  
INC., a corporation, :  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
vs. :  
C. LEON BAGGETT and : AT LAW  
L. L. BAGGETT, :  
Defendants. : CASE NO. 9183

STATE OF ALABAMA:

COUNTY OF MOBILE:

KNOW ALL MEN BY THESE PRESENTS, that we, Alabama Tractor Co. South, Inc., a corporation, as principal, and U. S. Fidelity & Guaranty Co. \_\_\_\_\_, as sureties, are held and firmly bound unto C. Leon Baggett and L. L. Baggett, their heirs, executors, administrators and assigns, in the penal sum of ONE HUNDRED AND NO/100 (\$100.00) DOLLARS, for payment of which we jointly and severally bind ourselves and each of us, firmly by these presents; sealed with our seals, and dated this 24<sup>th</sup> day of March, 1970.

The condition of the above obligation is such that whereas the above bound Alabama Tractor Co. South, Inc., has on the 25<sup>th</sup> day of March, 1970, sued out in the Circuit Court of Baldwin County, Alabama, a writ of detinue returnable to said Court against the said C. Leon Baggett and L. L. Baggett for the recovery of the property mentioned in said complaint, and asked an endorsement on the summons "that the Sheriff is required to take the property mentioned in said complaint into his possession" as required by law in such cases.

Now if the said Alabama Tractor Co. South, Inc., shall succeed in said suit or shall fail in said suit and pay the said defendant all such costs and damages as he may sustain by reason of a wrongful complaint in said cause, then this obligation to be void, otherwise to remain in full force and effect.

ALABAMA TRACTOR CO. SOUTH, INC.

By: *Robert D. Larned* (SEAL)  
*President*

U. S. Fidelity & Guaranty Co.

By: *James S. Matter* (SEAL)  
*Attorney-in-Fact*

Approved this 25 day of March, 1970.

*Alice J. Duck*  
Clerk

I hereby certify that if this bond was presented to me I would approve the same as good and sufficient surety.

*John E. Mandville*  
Clerk, Circuit Court, Mobile County, Ala.

FILED

MAR 25 1970

ALICE J. DUCK CLERK  
REGISTER

# GENERAL POWER OF ATTORNEY

No. 72978

*Know all Men by these Presents:*

That UNITED STATES FIDELITY AND GUARANTY COMPANY, a corporation organized and existing under the laws of the State of Maryland, and having its principal office at the City of Baltimore, in the State of Maryland, does hereby constitute and appoint

Harry S. Mattei

of the City of Mobile, State of Alabama  
its true and lawful attorney in and for the State of Alabama

for the following purposes, to wit:

To sign its name as surety to, and to execute, seal and acknowledge any and all bonds, and to respectively do and perform any and all acts and things set forth in the resolution of the Board of Directors of the said UNITED STATES FIDELITY AND GUARANTY COMPANY, a certified copy of which is hereto annexed and made a part of this Power of Attorney; and the said UNITED STATES FIDELITY AND GUARANTY COMPANY, through us, its Board of Directors, hereby ratifies and confirms all and whatsoever the said

Harry S. Mattei

may lawfully do in the premises by virtue of these presents.

*In Witness Whereof*, the said UNITED STATES FIDELITY AND GUARANTY COMPANY has caused this instrument to be sealed with its corporate seal, duly attested by the signatures of its Vice-President and Assistant Secretary, this 12th day of August, A. D. 19 60

UNITED STATES FIDELITY AND GUARANTY COMPANY.

(Signed)

By L. Brent Wood

Vice-President.

(SEAL)

(Signed)

E. W. Buffington

Assistant Secretary.

STATE OF MARYLAND  
BALTIMORE CITY.

ss:

On this 12th day of August, A. D. 19 60,

L. Brent Wood, Vice-President of the UNITED STATES FIDELITY AND GUARANTY COMPANY and E. W. Buffington, Assistant Secretary of said Company, with both of whom I am personally acquainted, who being by me severally duly sworn, said that they resided in the City of Baltimore, Maryland; that they, the said L. Brent Wood and E. W. Buffington were respectively the Vice-President and the Assistant Secretary of the said UNITED STATES FIDELITY AND GUARANTY COMPANY, the corporation described in and which executed the foregoing Power of Attorney; that they each knew the seal of said corporation; that the seal affixed to said Power of Attorney was such corporate seal, that it was so affixed by order of the Board of Directors of said corporation, and that they signed their names thereto by like order as Vice-President and Assistant Secretary, respectively, of the Company.

My commission expires the first Monday in May, A. D. 19 61

(Seal)

(Signed)

Anne M. O'Brien

Notary Public.

STATE OF MARYLAND.  
BALTIMORE CITY.

Sct.

I, James F. Carney, Clerk of the Superior Court of Baltimore City, which Court is a Court of Record, and has a seal, do hereby certify that Anne M. O'Brien, Esquire, before whom the annexed affidavits were made, and who has thereto subscribed his name, was at the time of so doing a Notary Public of the State of Maryland, in and for the City of Baltimore, duly commissioned and sworn and authorized by law to administer oaths and take acknowledgments, or proof of deeds to be recorded therein. I further certify that I am acquainted with the handwriting of the said Notary, and verily believe the signature to be his genuine signature.

*In Testimony Whereof*, I hereto set my hand and affix the seal of the Superior Court of Baltimore City, the same being a Court of Record, this 12th day of August, A. D. 1960

(SEAL)

(Signed)

James F. Carney

Clerk of the Superior Court of Baltimore City.

COPY OF RESOLUTION

*That Whereas*, it is necessary for the effectual transaction of business that this Company appoint agents and attorneys with power and authority to act for it and in its name in States other than Maryland, and in the Territories of the United States and in the Provinces of the Dominion of Canada and in the Colony of Newfoundland.

*Therefore, be it Resolved*, that this Company do, and it hereby does, authorize and empower its President or either of its Vice-Presidents in conjunction with its Secretary or one of its Assistant Secretaries, under its corporate seal, to appoint any person or persons as attorney or attorneys-in-fact, or agent or agents of said Company, in its name and as its act, to execute and deliver any and all contracts guaranteeing the fidelity of persons holding positions of public or private trust, guaranteeing the performances of contracts other than insurance policies and executing or guaranteeing bonds and undertakings, required or permitted in all actions or proceedings, or by law allowed, and

*Also*, in its name and as its attorney or attorneys-in-fact, or agent or agents to execute and guarantee the conditions of any and all bonds, recognizances, obligations, stipulations, undertakings or anything in the nature of either of the same, which are or may by law, municipal or otherwise, or by any Statute of the United States or of any State or Territory of the United States or of the Provinces of the Dominion of Canada or of the Colony of Newfoundland, or by the rules, regulations, orders, customs, practice or discretion of any board, body, organization, office or officer, local, municipal or otherwise, be allowed, required or permitted to be executed, made, taken, given, tendered, accepted, filed or recorded for the security or protection of, by or for any person or persons, corporation, body, office, interest, municipality or other association or organization whatsoever, in any and all capacities whatsoever, conditioned for the doing or not doing of anything or any conditions which may be provided for in any such bond, recognizance, obligation, stipulation, or undertaking, or anything in the nature of either of the same.

I, **R. H. Bland, Jr.**, an Assistant Secretary of the UNITED STATES FIDELITY AND GUARANTY COMPANY, do hereby certify that the foregoing is a full, true and correct copy of the original power of attorney given by said Company to **Harry S. Mattei**

of **Mobile, Alabama**, authorizing and empowering **him** to sign bonds as therein set forth, which power of attorney has never been revoked and is still in full force and effect.

And I do further certify that said Power of Attorney was given in pursuance of a resolution adopted at a regular meeting of the Board of Directors of said Company, duly called and held at the office of the Company in the City of Baltimore, on the 11th day of July, 1910, at which meeting a quorum of the Board of Directors was present, and that the foregoing is a true and correct copy of said resolution, and the whole thereof as recorded in the minutes of said meeting.

*In Testimony Whereof*, I have hereunto set my hand and the seal of the UNITED STATES FIDELITY AND GUARANTY COMPANY on **March 24, 1970**  
(Date)

*R. H. Bland Jr.*

Assistant Secretary.

ALABAMA TRACTOR CO. SOUTH, : IN THE CIRCUIT COURT OF  
INC., a corporation, :  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
vs. :  
C. LEON BAGGETT and : AT LAW  
L. L. BAGGETT, :  
Defendants. : CASE NO. 9183

STATE OF ALABAMA:

COUNTY OF MOBILE:

Before me, Hyman F. Holland Jr., a Notary Public  
of Mobile County, in and for said County, in said State,  
personally appeared Robert Craig as Authorized Agent of Alabama  
Tractor Co. South, Inc., plaintiff, who, having been by me duly  
sworn, doth depose and say Alabama Tractor Co. South, Inc. has  
the right to possession of the property sued for in the complaint  
of Alabama Tractor Co. South, Inc., v. C. Leon Baggett and L. L.  
Baggett.

Subscribed and sworn to before me this  
24 day of March, 1970.

Hyman F. Holland Jr.  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

My commission expires

8/22/71

FILED

MAR 25 1970

ALICE J. DUCK CLERK  
REGISTER

Mr. L. L. Baggett is in the  
Hospital in Atlanta, Georgia and  
do not know when he will be home.  
Leon Baggett is in Florida.