

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

April 14, 1970

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

No. 9214

Dear Mrs. Duck:

Please file the enclosed Detinue Suit.

With kind regards, I am

Yours very truly,



Wilson Hayes

WH/ms  
Enc.

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

June 26, 1970

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

Dear Mrs. Duck:

Please have Judge Mashburn dismiss, without prejudice, the case styled Baldwin County Bank vs Tully W. King, at Law, and give us the costs for this.

With kind regards, I am

Yours very truly,

  
Wilson Hayes

WH/ms

110.9214

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY

Before me, the undersigned, a Notary Public in and for said County, personally appeared Frank Hunt who being by me duly sworn deposes and says that the property sued for in the complaint of Baldwin County Bank, A Corporation, vs Tully W. King, filed in said Court, to-wit: One 1960 Ford Falcon, 2 door sedan, Serial Number OK115108681 belongs to Baldwin County Bank, A Corporation, the plaintiff

Frank Hunt  
Frank Hunt

Sworn to and subscribed before me this 13th day of

April, 1970.

W. L. Day  
Notary Public,

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KNOW ALL MEN BY THESE PRESENTS, That Baldwin County Bank, Principal, is held and firmly bound unto Tully W. King, his heirs, executors and administrators in the sum of Fifty (\$50) Dollars, for the payment of which it jointly and severally binds itself, its heirs, executors and administrators.

Sealed with its seal and dated the 13th day of

April, 1970.

The condition of the above obligation is such that whereas, the above bound Baldwin County Bank has on the 13th day of April, 1970 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Tully W. King for the recovery of the following described property, to-wit:

One 1960 Ford Falcon, 2 door sedan, Serial Number OK115108681

Now, if the said Baldwin County Bank shall fail in said suit and shall pay to the said Tully W. King, 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.

BALDWIN COUNTY BANK

BY: Frank Hunt

Taken and approved this 14 day of April, 1970.

Reice J. Duck  
Clerk

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BALDWIN COUNTY BANK,  
A Corporation

PLAINTIFF

VS

TULLY W. KING

DEFENDANT

X  
X  
X  
X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER:

92-14

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.

W. J. Duck  
Clerk

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Tully W. King 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 Baldwin County Bank, a Corporation.

Witness my hand this the 14 day of April, 1970.

Alvin J. Duck  
Clerk

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BALDWIN COUNTY BANK,  
A Corporation

PLAINTIFF

VS

TULLY W. KING

DEFENDANT

X  
X  
X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 9214

I

The Plaintiff claims of the Defendant the following personal property, to-wit:

One 1960 Ford Falcon, 2 door sedan, Serial  
Number OK115108681

with the value of the hire or use thereof during the detention, to-wit, from April 5, 1970 to April 9, 1970 and of the alternate value of \$393.68.

II

The Plaintiff claims of the Defendant the sum of Three Hundred Ninety-Three and Sixty-Eight/100 (\$393.68) Dollars, balance due on a note for Six Hundred Eighty-Five and Eighty/100 (\$685.80) Dollars, made by him on the 29th day of January, 1963 and due on the 5th day of April, 1970 with interest thereon.

The note contains provision for a reasonable Attorney's fee and waiver of exemption whereof Plaintiff claims benefit.

W. H. Day  
Attorney for Plaintiff

FILED

Defendant may be served:

Stapleton, Alabama

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APR 14 1970

ALBANY 1 1970

Received 14 day of April 1920  
and on 16 day of April 1920  
I served a copy of the within DOC  
on Tully W. King

By service on \_\_\_\_\_

\_\_\_\_\_  
TAYLOR WILKINS, Sheriff

By W. A. Stapleton D. S.

Stapleton

Sheriff claims 24 miles at 24  
Ten Cents per mile Total \$ 2.40  
TAYLOR WILKINS, Sheriff  
BY W. A. Stapleton  
DEPUTY SHERIFF

~~SA~~ no property attached

NUMBER: 9214

BALDWIN COUNTY BANK,  
A Corporation

PLAINTIFF

VS

TULLY W. KING

DEFENDANT

IN THE CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA

Defendant may be served:

Stapleton, Alabama