

9442

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY

Before me, Carol S. Stallings, a Notary Public in and for said County,  
personally appeared Phyllis S. Nesbit, attorney for Baldwin National Bank who being by me  
duly sworn deposes and says that the property sued for in the complaint of  
The Baldwin National Bank filed in said Court, to-wit:  
1-1963 Pontiac Tempest Convertible, Serial  
No. 263P11883

belongs to The Baldwin National Bank of Robertsedale, the plaintiff

Sworn to and subscribed before me this 14th  
day of August, 19 70

Carol S. Stallings  
Notary Public

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, Baldwin National Bank  
of Robertsedale, Principal, and  
\_\_\_\_\_, Sureties, are held and  
firmly bound unto Gerald W. Robinson, his heirs, executors and admin-  
istrators in the sum of ONE HUNDRED DOLLARS and NO/100----- Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-  
trators.

Sealed with our seals and dated the 14th day of August, 19 70

The condition of the above obligation is such that whereas, the above bound  
Baldwin National Bank of Robertsedale has on the \_\_\_\_\_ day of  
August, 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  
W. Robinson for the recovery of the following  
described property, to-wit:

1-1963 Pontiac Tempest Convertible, Serial #263P11883

Now, if the said Baldwin National Bank of Robertsedale shall fail in said suit  
and shall pay to the said Gerald W. Robinson, 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 20 day of \_\_\_\_\_ (SEAL)

Alicia J. Huckle, 19 70 Baldwin National Bank (SEAL)

Alicia J. Huckle  
Clerk, Circuit Court

Richard J. Fountain (SEAL)

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

**THE STATE OF ALABAMA**

\_\_\_\_\_ **COUNTY**

**CIRCUIT COURT**

\_\_\_\_\_ **Plaintiff**

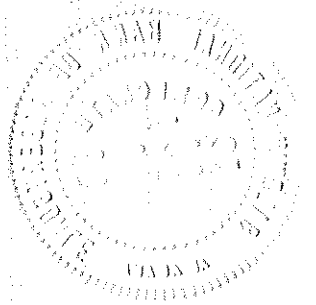
vs.

\_\_\_\_\_ **Defendant**

**Detinue — Affidavit and Bond**

Filed this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

\_\_\_\_\_  
**Clerk**



DETINUE — REPLEVY BOND OF PLAINTIFF

STATE OF ALABAMA }

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, Baldwin National

Bank of Robertsdale

and

are held and firmly bound unto Gerald W. Robinson

in the sum of ONE THOUSAND SEVENTY DOLLARS----- Dollars, for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated this 14th day of August 19 70

The condition of the above obligation is such that whereas the said Baldwin National Bank of Robertsdale did, on the \_\_\_\_\_ day of August 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: \_\_\_\_\_

1-1963 Pontiac Tempest Convertible, Serial

No. 263P11883

which said writ was placed in the hands of Taylor Wilkins

Sheriff of Baldwin County, Alabama, on the 20 day of August 19 70, and executed by him on the 26 day of August 19 70, by taking into his possession the following property, to-wit:

1-1963 Pontiac Tempest Convertible, Serial #263P11883

And whereas the said Gerald W. Robinson

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 Baldwin National Bank upon ~~its~~ <sup>its</sup> 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.

Baldwin Nat Bank (SEAL)

By [Signature] (SEAL)

[Signature] (SEAL)

Taken and approved this 3 day of September 19 70

Taylor Wilkins  
Sheriff, Baldwin County, Ala.

Civil # 9442

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

REPLEVY BOND  
Of Plaintiff

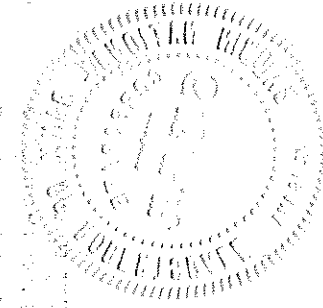
*Baldwin National Bank  
of Robertsdale*

vs.

*Gerald W. Robinson*

Taken and approved this

day of \_\_\_\_\_, 196\_\_\_\_



The State of Alabama,  
Baldwin County

CIRCUIT COURT  
No. 9445

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Gerald W. Robinson

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 National Bank of Robertsdale

Witness my hand this 20 day of August 1970

Alice J. Duck, Clerk

COMPLAINT

The Baldwin National Bank  
of Robertsdale, a  
Corporation

Gerald W. Robinson

Plaintiff Versus Defendant

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

1-1963 Pontiac Tempest Convertible,

Serial #263P11883

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

from July 13 1970, to August 14 1970

FIVE HUNDRED THIRTY FOUR DOLLARS AND 95/100

(\$534.95)

FILED

AUG 20 1970

ALICE J. DUCK

CLERK  
REGISTER

Phyllis L. Nesbit  
WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney.

VOL 67 PAGE 130  
VOL 67 PAGE 135  
197

State of Alabama

Baldwin County

CIRCUIT COURT

Baldwin National Bank of

Robertsdale

Plaintiff

VS.

Gerald W. Robinson

Defendant

Detinue Summons and Complaint

Filed **FILED** \_\_\_\_\_, 19

AUG 20 1970

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

**ALICE J. DUCK**

CLERK  
REGISTER

WILTERS, BRANTLEY & 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.

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20  
TAYLOR WILKINS, Sheriff

BY Charlotte  
DEPUTY SHERIFF

Alice J. Duck, Clerk

Received	20 day of Aug 1970
and on	26 day of Aug 1970
I served	a copy of the within Return & C
on	Gerald W. Robinson
By service on	
	TAYLOR WILKINS, Sheriff
	<u>Charlotte</u> 72

Defendant lives at  
Rt 3, Foley, Alabama and works  
at Hale Manufacturing Company

Received in office

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

I have executed this summons

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

by leaving a copy with

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

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

Printed by Moore Printing Co.

*Executed Aug 26, 1970  
By taking the within  
mentioned property in  
possession and storing  
at the Foley Jail*

*Taylor Wilkins  
Charlotte*  
72

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Charlotte  
DEPUTY SHERIFF

VOL. 67 PAGE 196

HARRY J. WILTERS, JR.  
TOLBERT M. BRANTLEY  
PHYLLIS S. NESBIT

LAW OFFICES OF  
WILTERS, BRANTLEY & NESBIT  
P. O. BOX 555  
ROBERTSDALE, ALABAMA 36567

PHONES  
ROBERTSDALE 947-4682

August 14, 1970

9442  
Mrs. Alice J. Duck,  
Circuit Clerk  
Baldwin County  
Bay Minette, Alabama

Attention: Eunice Blackmon

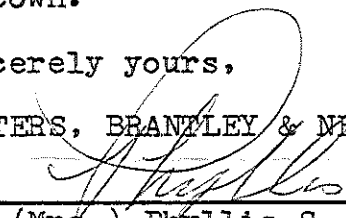
Dear Eunice:

Enclosed you will find a Detinue suit being filed by me on behalf of the Baldwin National Bank of Robertsdale against one Gerald W. Robinson, Foley, Alabama, for an automobile. Enclosed you will also find the Detinue Bond and Affidavit along with the Summons and Complaint.

Since I am going to be out of town for the next two weeks, I would appreciate your handling this for me. I have today sent Mr. Byrd of the Sheriff's department, a Plaintiff's Replevy Bond so that the whole business can go forward while I am out of town.

Sincerely yours,

WILTERS, BRANTLEY & NESBIT

BY:   
(Mrs.) Phyllis S. Nesbit  
Attorney at Law  
Robertsdale, Alabama

Encls.