

STATE OF ALABAMA }
Baldwin County }

CIRCUIT COURT

No.....

..... 19.....

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Comanded to SummonHEGGERD..R...WILLIAMS...&...ANNE..E...WILLIAMS,
Jointly & Individually

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...20th...day of...October..... 1970..

Alice J. Quirk 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

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

COMMERCIAL CREDIT CORPORATION,

A Corp., Plaintiff....

VS.

HEGGERD R. WILLIAMS & ANNE E.

WILLIAMS, Jointly & Individually
Defendant....

Detinue Summons and Complaint

Filed October 20, 19...70

Alice J. Duck Clerk

B. F. Stokes, III
P. O. Box 293 Plaintiff's Attorney
Mobile, Alabama

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

Defendant lives at

Received in office

Oct 20 19...70

Taylor Wilkins Sheriff

I have executed this summons

this *Oct 21* 19...70

by leaving a copy with

10-21-70
Heggerd R. Williams

10-21-70
Anne E. Williams

Attacked one
1968 Model Dodge

Polaris V8, 2 Door

hardtop Ser #

DL 23 F8 F15 66

Stored at County

Jail

Taylor Wilkins Sheriff

W.A. Zolner Deputy Sheriff

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 are held and firmly bound unto HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individually,

in the sum of FOUR THOUSAND AND NO/100TH (\$4,000.00)

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 19th day of October

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 20 day of October, (1)970, sue out in the Circuit Court of Baldwin ~~Mobile~~ 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 1968 model Dodge Polara v8, 2 door hardtop automobile, Identification Number or Serial Number DL23F8F1566

which said writ was placed in the hands of TAYLOR WILKINS

Sheriff of the County of Baldwin, on the 20 day of October, 1970, by taking into his possession the following described property, to-wit:

One 1968 model Dodge Polara v8, 2 door hardtop automobile, Identification Number or Serial Number DL23F8F1566

and whereas the said HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individually, 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

BY: [Signature] (Seal)

FIDELITY AND DEPOSIT COMPANY

~~OF MARYLAND~~ (Seal)

BY: [Signature] (Seal)

As its Attorney-in-Fact

Taken and approved this the 28 day of Oct, 1970

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

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: *Shirley S. Howard*

No. _____

CIRCUIT COURT

BALDWIN ~~MOBILE~~ COUNTY

COMMERCIAL CREDIT CORPORATION,
a corporation,

Plaintiff

VS.

Definue Forthcoming

Bond by Plaintiff

HEGGERD R. WILLIAMS & ANNE E.
WILLIAMS, jointly & individ-
ually,

Defendants

9519

THE STATE OF ALABAMA,
BALDWIN MOBILE COUNTY.

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 HEGGER R. WILLIAMS and ANNE E. WILLIAMS, jointly
and individually, their heirs, executors and administrators, in the
sum of TWO THOUSAND AND NO/100TH (\$2,000.00) 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 19th day of October, A. D. 1970

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

COMMERCIAL CREDIT CORPORATION, a corporation, has, on

the October day of 1970, sued out from the office of the
Clerk of the Circuit Court of Baldwin ~~Mobile~~, in the State of Alabama, a Writ of Detinue, returnable to the present
Baldwin
term of said Circuit Court of Baldwin ~~Mobile~~ against the said HEGGERD R. WILLIAMS and ANNE E.

WILLIAMS, jointly and individually, for the recovery of the following property.

to-wit One 1968 model Dodge Polara v8, 2 door hardtop
automobile, Identification Number or Serial
Number DL23F8F1566

NOW, if the said COMMERCIAL CREDIT CORPORATION, a corporation, shall fail

in said suit, and shall pay to the said HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly
and individually

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

BY: [Signature] (Seal)
FIDELITY AND DEPOSIT COMPANY
OF MARYLAND (Seal)

BY: [Signature] (Seal)

Approved 10-20-70
Alice J. Duck
Clerk

FILED
OCT 20 1970

ALICE J. DUCK
CLERK
REGISTER

THE STATE OF ALABAMA,
Mobile County

DETINUE AFFIDAVIT

PERSONALLY appeared before me, John H. Mandeville, Clerk of the Circuit Court of Mobile County,
DON ODOM

NOTARY PUBLIC

who, being duly sworn deposes and says, that the property sued for in the complaint of COMMERCIAL CREDIT
CORP. vs. HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individually:
to-wit: One 1968 model Dodge Polara v8, 2 door hardtop

automobile, Identification Number or Serial

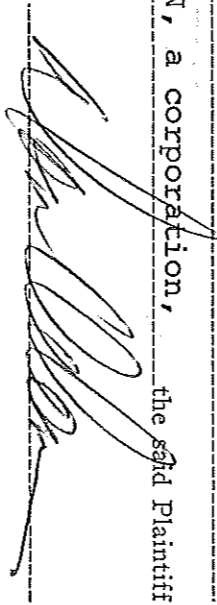
Number DL23F8F1566

belongs to COMMERCIAL CREDIT CORPORATION, a corporation, the said Plaintiff

Sworn to and subscribed the 19th day
of October, 1970, before me.

NOTARY PUBLIC

Clerk



No. _____

CIRCUIT COURT

BALDWIN ~~MOBILE~~ COUNTY

COMMERCIAL CREDIT CORPORATION,
a corporation, Plaintiff

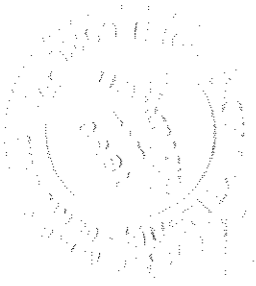
VS. } Detinue Affidavit
and Bond

HEGGERD R. WILLIAMS & ANNE E.
WILLIAMS, jointly & individ-
ually, Defendants

Filed _____ day of _____ 19____

Clerk Circuit Court, ~~XXXXXXXXXX~~
Baldwin County

B. F. STOKES, III Attorney
P. O. Box 293
Mobile, Alabama 36601



COMMERCIAL CREDIT
CORPORATION, A corporation

PLAINTIFF,

-versus-

HEGGERD R. WILLIAMS and
ANNE E. WILLIAMS, jointly
and individually

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO. 9519

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA)
COUNTY OF MOBILE)

Now comes, Ben Stokes,
who being first duly sworn, deposes and says that the defendant
herein, Heggerd R. Williams,
was not at the time of filing of this suit, and is not now
in the Military or Naval Service of the United States.

The Defendant resides at 1603 McMillan Street, Bay
Minette, Alabama.

Ben Stokes

Sworn to and Subscribed before me,
this 23rd day of November, 1970.

Mildred K. Ingle
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

FILED

NOV 24 1970

ALICE J. DUCK CLERK REGISTER

FILED _____

Clerk.

COMMERCIAL CREDIT CORPORATION,)
a corporation,

Plaintiff,

vs.

HEGGERD R. WILLIAMS and
ANNE E. WILLIAMS, jointly
and individually,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9519

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff in the above styled cause and
shows unto the Court that more than 30 days have elapsed but
defendants have failed to plea, answer, or demurrer.

Wherefore plaintiff moves that the Court enter Judgment
by default for the property sued for in the complaint, with no
alternate value or attorneys fee.

GIBBONS & STOKES

By Ben Moler
Attorney for Plaintiff

FILED

NOV 2 1970

CLERK REGISTER

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
BEN STOKES
WILLIAM L. HOWELL
ROBERT F. CLARK
JOHN T. BALLARD

November 23, 1970

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

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

Re: Case No. 9519 Commercial Credit Corp. vs. Heggerd
R. Williams and Anne E. Williams

Dear Mrs. Duck:

I enclose a motion for judgment default and non-military
affidavit. Please present this to the judge at your earliest
convenience.

Sincerely,


Ben Stokes

BS:dh'

Enclosures.

COMMERCIAL CREDIT CORPORATION,) IN THE CIRCUIT COURT OF
a corporation,)
Plaintiff,)
vs.) AT LAW
HEGGERD R. WILLIAMS and)
ANNE E. WILLIAMS, jointly)
and individually,)
Defendants.) CASE NO. 9519
)

MOTION FOR DEFAULT JUDGMENT

Comes now the plaintiff in the above styled cause and shows unto the Court that more than 30 days have elapsed but defendants have failed to plea, answer, or demurrer.

Wherefore plaintiff moves that the Court enter Judgment by default for the property sued for in the complaint, with no alternate value or attorneys fee.

GIBBONS & STOKES

By _____
Attorney for Plaintiff

GIBBONS & STOKES

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

E. GRAHAM GIBBONS
BEN STOKES
WILLIAM L. HOWELL
ROBERT F. CLARK
JOHN T. BALLARD

October 19, 1970

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

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

Re: Commercial Credit Corporation vs. Heggerd R.
Williams and Anne E. Williams, jointly and
individually

9519
—

Dear Mrs. Duck:

I enclose a detinue suit styled as above. I also
enclose the appropriate detinue bond. Please forward
this matter to the Sheriff as soon as possible.

Sincerely yours,


Ben Stokes

BS:mi
Encl.

COMMERCIAL CREDIT) IN THE CIRCUIT COURT OF
CORPORATION, a corporation,)
Plaintiff)
ALABAMA
VS:) AT LAW
HEGGERD R. WILLIAMS and)
ANNE E. WILLIAMS, jointly)
and individually,)
Defendants) CASE NO. 9519

Plaintiff claims of the Defendants, jointly and
individually, the following personal property:

One 1968 model Dodge Polara V8, 2 door
hardtop automobile, Identification Number
or Serial Number DL23F8F1566

with the value of the hire or use thereof during the
detention, viz: from, to-wit, August 19, 1970.

GIBBONS & STOKES

BY: B. F. Stokes, III
B. F. STOKES, III
P. O. Box 293
Mobile, Alabama 36601

Serve the Defendants at 1603 McMillan Street, Bay Minette,
Alabama.

FILED

OCT 20 1970

ALICE J. DUCK CLERK
REGISTER

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

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 HEGGER R. WILLIAMS and ANNE E. WILLIAMS, jointly
and individually, their heirs, executors and administrators, in the
sum of TWO THOUSAND AND NO/100TH (\$2,000.00) 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 19th day of October, A. D. 1970

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

COMMERCIAL CREDIT CORPORATION, a corporation, has, on
the October day of 1970, sued out from the office of the
Clerk of the Circuit Court of Baldwin ~~Mobile~~, in the State of Alabama, a Writ of Detinue, returnable to the present
term of said Circuit Court of Baldwin ~~Mobile~~ against the said HEGGERD R. WILLIAMS and ANNE E.
WILLIAMS, jointly and individually, for the recovery of the following property.

to-wit One 1968 model Dodge Polara v8, 2 door hardtop
automobile, Identification Number or Serial
Number DL23F8F1566

NOW, if the said COMMERCIAL CREDIT CORPORATION, a corporation, shall fail
in said suit, and shall pay to the said HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly
and individually 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

BY: [Signature] (Seal)
FIDELITY AND DEPOSIT COMPANY
OF MARYLAND (Seal)

BY: [Signature] (Seal)

Original

THE STATE OF ALABAMA,
Mobile County

DETINUE AFFIDAVIT

NOTARY PUBLIC

PERSONALLY appeared before me, John E. Mandeville, Clerk of the Circuit Court of Mobile County,
DON ODUM

who, being duly sworn deposes and says, that the property sued for in the complaint of COMMERCIAL CREDIT CORP. vs. REGGARD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individual:

to-wit: One 1968 model Dodge Polara vs, 2 door hardtop

automobile, Identification Number or Serial

Number DL23F8F1566

belongs to COMMERCIAL CREDIT CORPORATION, a corporation, the said Plaintiff

Sworn to and subscribed the 19th day

of October, 1970, before me.

B. J. Golden, Jr.
Notary Public

Clerk

[Handwritten Signature]

FILED

OCT 20 1970

No. _____

CIRCUIT COURT

MOBILE COUNTY

BALDWIN

COMMERCIAL CREDIT CORPORATION,
a corporation,

Plaintiff

VS. } Detinue Affidavit
and Bond

REGGARD R. WILLIAMS & ANNE E.
WILLIAMS, jointly & individually,
Defendants

Filed _____ day of _____ 19____

ALICE J. DUCK

CLERK REGISTER

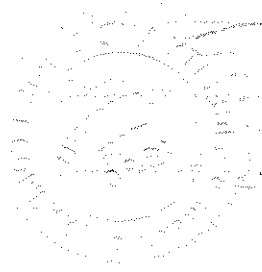
Clerk Circuit Court, Mobile County
Baldwin County

Attorney

D. F. STOKES, III

P. O. Box 293

Mobile, Alabama 36601



THE STATE OF ALABAMA,
BALDWIN MOBILE COUNTY.

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 HUGGER R. WILLIAMS and ANNE E. WILLIAMS, jointly
and individually, their heirs, executors and administrators, in the
sum of TWO THOUSAND AND 00/100TH (\$2,000.00) 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.

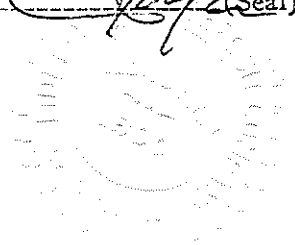
Sealed with our seals and dated this 19th day of October, A. D. 1970

The Condition of the above Obligation is such, That whereas the above bounden
COMMERCIAL CREDIT CORPORATION, a corporation, has, on
the October day of October 1970, sued out from the office of the
Clerk of the Circuit Court of Baldwin Mobile, in the State of Alabama, a Writ of Detinue, returnable to the present
term of said Circuit Court of Baldwin Mobile against the said HUGGER R. WILLIAMS and ANNE E.
WILLIAMS, jointly and individually,

for the recovery of the following property.
One 1968 model Dodge Polara v8, 2 door hardtop
to-wit automobile, Identification Number or Serial
NUMBER 0L33871366

COMMERCIAL CREDIT CORPORATION, a corporation,
NOW, if the said HUGGER R. WILLIAMS and ANNE E. WILLIAMS, jointly shall fail
and individually in said suit, and shall pay to the said
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 effect.

BY: [Signature] (Seal)
FIDELITY AND DEPOSIT COMPANY
OF MARYLAND
BY: [Signature] (Seal)
[Signature] (Seal)



THE STATE OF ALABAMA,
Mobile County

DETINUE AFFIDAVIT

NOTARY PUBLIC

PERSONALLY appeared before me, ~~John E. Mandeville, Clerk of the Circuit Court of Mobile County,~~
DON ODOM

who, being duly sworn deposes and says, that the property sued for in the complaint of COMMERCIAL CREDIT
CORP. vs. HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individual

to-wit: One 1968 model Dodge Polara v8, 2 door hardtop

automobile, Identification Number or Serial

Number DL23F8F1566

belongs to COMMERCIAL CREDIT CORPORATION, a corporation, the said Plaintiff

Sworn to and subscribed the 19th day

of 9th October, 1970, before me.

NOTARY PUBLIC

Clerk

No. _____

CIRCUIT COURT

BALDWIN ~~MOBILE~~ COUNTY

COMMERCIAL CREDIT CORPORATION,
a corporation,

VS. } Plaintiff
 } Detinue Affidavit
 } and Bond

HEGGERD R. WILLIAMS & ANNE E.
WILLIAMS, jointly & individually,
Defendants.

Filed _____ day of _____ 19____

Clerk Circuit Court, ~~Mobile County~~
Baldwin County

Attorney
B. F. STOKES, III
P. O. Box 293
Mobile, Alabama 36601



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 are held and firmly bound unto HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individually,

in the sum of FOUR THOUSAND AND NO/100TH (\$4,000.00)

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 19th day of October

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 10 day of October, (1) 970, sue out in the Circuit Court of ~~Mobile~~ Baldwin 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 1968 model Dodge Polara v8, 2 door hardtop

automobile, Identification Number or Serial

Number DL23F8F1566

which said writ was placed in the hands of TAYLOR WILKINS

Sheriff of the County of ~~Mobile~~ Baldwin, on the 21 day of October, 19 70, by taking into his possession

the following described property, to-wit:

One 1968 model Dodge Polara v8, 2 door hardtop

automobile, Identification Number or Serial

Number DL23F8F1566

and whereas the said HEGGERD R. WILLIAMS and ANNE E. WILLIAMS, jointly and individually,

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

BY: [Signature] (Seal)

FIDELITY AND DEPOSIT COMPANY OF MARYLAND (Seal)

BY: [Signature] (Seal)

As its Attorney-in-Fact

Taken and approved this the 28 day of Oct

, 19 70

Taylor Wilkins

Sheriff, ~~Mobile~~ Baldwin County, Alabama

This is to certify that this bond is signed by two good and sufficient sureties and if presented to me I would accept same. Sheriff, Mobile County, Ala.

By: *[Signature]*

No. _____

CIRCUIT COURT

MOBILE COUNTY
BALDWIN XXXXX

COMMERCIAL CREDIT CORPORATION,
a corporation, Plaintiff

VS. } **Definue Forthcoming**
Bond by Plaintiff

REGGARD R. WILLIAMS & ANNE E.
WILLIAMS, jointly & individ-
ually, Defendants

