

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. _____

Before me, DANIEL A. BENTON, a Notary Public in and for said county, personally appeared WILBURN L. ODOM, as Vice President of the FIRST NATIONAL BANK OF FAIRHOPE who being by me first duly sworn deposes and says that the property sued for in the complaint of FIRST NATIONAL BANK OF FAIRHOPE vs FRANK B. GEIGER filed in said Court, to wit: One 1966 Ford Country Squire Station Wagon Automobile, Vehicle Identification Number 6W78X124385 belongs to the FIRST NATIONAL BANK OF FAIRHOPE, the plaintiff in this cause.

Wilburn L. Odom
WILBURN L. ODOM, as Vice President
FIRST NATIONAL BANK OF FAIRHOPE.

Sworn to and subscribed before me this 31 day of February, 1971

Daniel A. Benton
Notary Public

LAW OFFICES
RICKARBY & BENTON
ATTORNEYS AT LAW
35 SOUTH SECTION STREET
P. O. BOX 471
FAIRHOPE, ALABAMA 36532

E. G. RICKARBY
DANIEL A. BENTON

TELEPHONE
(205) 928-2308

March 8, 1971

Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama

Re: First National Bank of Fairhope
v. Frank B. Geiger
Case No. 9668

Dear Judge Mashburn:

We request judgment by default in the above styled case, as personal service was obtained on Mr. Geiger on the 4th day of February, 1971; and to our knowledge, there have been no pleadings filed in the matter. The requested judgment is for the property sued for.

Yours very truly,


Daniel A. Benton

DAB:w

Baldwin COUNTY.) February Term, 1971

That we, Frank B. Geiger and his surety

in the sum of Two Thousand and 00/100 Dollars.

Sealed with our seals and dated, this 4 day of Feb 1971

Court of said County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding him to take into his possession the following property, sued for in action of detinue, to wit:

which said writ was placed in the hands of Taylor Wilkins
Sheriff of the County of Baldwin, on the 4 day

of February 1971, and executed by him on the 4 day of February 1971, by taking into his possession One 1966 Ford Station Wagon ID # 6W78X124385

and whereas the above bound Frank B. Geiger

has within five days from the execution of said writ entered into this bond as required by law, and hereby obtain possession of said property.

Now, if the said Frank B. Geiger shall well and truly, within
thirty days after the determination of said suit, if the said Frank B. Geiger
be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for de-
tention as may accrue from said detention, then this obligation to be void, otherwise to remain in full
force and effect.

And we, and each of us, hereby waive all rights of claim of exemption we or either of us have
now, or may hereafter have, under the Constitution and Laws of Alabama, and we hereby
severally certify that we have property free from all encumbrance to the full amount of the
above bond.

Witness our hands and seals, this 5 day of February 1971

Taken and approved,

5 February 1971
Taylor Wilkins
by J. M. Byrd Sheriff.
Deputy Sheriff

X Frank Geiger (L.S.)
Ira D. Skinner (L.S.)
James E. Reed (L.S.)
Wm. G. Grimes, Jr. (L.S.)
Harris Clayton 10

No. _____

The State of Alabama,

Circuit County

COURT.

SHERIFF'S OFFICE

First Nat Bank of Fairhope

Plaintiff.

vs.

Frank B. Geiger

Defendant.

DETINUE REPLEVIN BOND, DEFENDANT.

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Sheriff.

Sheriff's Execution Docket, page _____

933-223

STATE OF ALABAMA)
COUNTY OF BALDWIN)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 9662

Before me, DANIEL A. BENTON, a Notary Public in and for said county, personally appeared WILBURN L. ODOM, as Vice President of the FIRST NATIONAL BANK OF FAIRHOPE who being by me first duly sworn deposes and says that the property sued for in the complaint of FIRST NATIONAL BANK OF FAIRHOPE vs FRANK B. GEIGER filed in said Court, to wit: One 1966 Ford Country Squire Station Wagon Automobile, Vehicle Identification Number 6W78X124385 belongs to the FIRST NATIONAL BANK OF FAIRHOPE, the plaintiff in this cause.

Wilburn L. Odom
WILBURN L. ODOM, as Vice President
FIRST NATIONAL BANK OF FAIRHOPE.

Sworn to and subscribed before me this 31 day of February, 1971

Daniel A. Benton
Notary Public

FILED

FEB 4 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA, }
 Baldwin County. }

KNOW ALL MEN BY THESE PRESENTS, That We, FIRST NATIONAL BANK OF

FAIRHOPE

as principal, and GEORGE DYSON, JR., and WILBURN L. ODOM

as surety, are held and firmly bound unto FRANK B. GEIGER

in the sum of \$2586.02 DOLLARS,

to be paid to the said FRANK B. GEIGER, his heirs, executors, administrators or assigns; for which payment, well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals, and dated this _____ day of _____

in the year of our Lord, 19-----

The condition of the above obligation is such, That whereas the above bound FIRST NATIONAL

BANK OF FAIRHOPE, on the day of the date hereof hath obtained at the suit of

FIRST NATIONAL BANK OF FAIRHOPE vs. FRANK B. GEIGER,

a summons and complaint for the recovery of personal property in specie against said defendant and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of said County, and which said endorsement is made upon the plaintiff entering into this bond.

Now, if the said Plaintiff shall fail in this suit, and shall pay the Defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

FIRST NATIONAL BANK OF FAIRHOPE

John M. Beasley (L. S.)
 By JOHN BEASLEY, its President

Wilburn L. Odom (L. S.)
 WILBURN L. ODOM

George Dyson, Jr. (L. S.)
 GEORGE DYSON, JR.

Approved this 4 day of Feb 1971

FILED

FEB 4 1971

Eunice B. Blackmon
 Clerk.

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EUNICE B. BLACKMON
 CIRCUIT CLERK

The State of Alabama,
Baldwin County

CIRCUIT COURT
No. 9668

February 3, 1971

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon FRANK B. GEIGER

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 FIRST NATIONAL
BANK OF FAIRHOPE

Witness my hand this 4 day of Feb 1971

Eunice B. Blackmon, Clerk

COMPLAINT

FIRST NATIONAL BANK OF FAIRHOPE, FRANK B. GEIGER,
a Banking Corporation, Plaintiff Versus Defendant

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

One 1966 Ford Country Squire Station Wagon Automobile, Vehicle
Identification Number 6W78X124385

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

from August 11, 1969, to 19

FILED

Daniel A. Benton
Daniel A. Benton

Plaintiff's Attorney.

FEB 4 1971

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EUNICE B. BLACKMON CIRCUIT
CLERK

No. 966P Page _____

State of Alabama

Baldwin County

CIRCUIT COURT

First National Bank
of Fairhope, a Banking Corp
Plaintiff

VS.

Frank B. Seiger
Defendant

Detinue Summons and Complaint

FILED

Filed _____, 19__

FEB 4 1971

EUNICE B. BLACKMON CIRCUIT CLERK, Clerk

Daniel A. Benter
Plaintiff's Attorney

Defendant's Attorney

Sheriff claim 60 miles at

Ten Cents per mile Total \$ 6.00

TAYLOR WILKINS, Sheriff

JM Byrd
DEPUTY SHERIFF

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.

Eunice B. Blackmon Clerk

Defendant lives at

Received in office

Feb 4, 1971

Taylor Wilkins, Sheriff

I have executed this summons

this Feb 4, 1971

by leaving a copy with

Frank B. Seiger and
taking into possession one
1966 Ford Station Wagon
I.D. # 6W78X124385 and
holding same at the
Baldwin Co. Jail

Taylor Wilkins, Sheriff

JM Byrd, Deputy Sheriff

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