

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT  
No. 9683

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon

BUFORD JAMES KELLY, JR.  
UNIT NUMBER 5  
OLEANDER MOTEL  
GULF SHORES, ALABAMA

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

GENERAL MOTORS ACCEPTANCE CORPORATION, a corporation

Witness my hand this 10th day of February, 1971

Eunice B. Blackmon Clerk.

GENERAL MOTORS ACCEPTANCE CORPORATION, a corporation COMPLAINT

BUFORD JAMES KELLY, JR.,

Plaintiff Versus Defendant

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

One (1) 1969 Chevrolet 1/2 Ton Pickup Truck, olive green color  
Serial No. CE 149A860764, Fla. Tag No. 9<sup>G</sup><sub>K</sub> 7036

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

from September 12, 1970, to date, 19      

**FILED**

FEB 10 1971

EUNICE B. BLACKMON CIRCUIT CLERK

J. Lamar Reese, Jr. Plaintiff's Attorney.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

GENERAL MOTORS ACCEPTANCE  
CORPORATION, a corporation,

Plaintiff.

vs.

BUFORD JAMES KELLY, JR.

Defendant.

## DETINUE SUMMONS AND COMPLAINT

Filed FEBRUARY 10, 19 71

Clerk.

J. CONNOR OWENS, JR.,

Bay Minette, Ala. 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.

Eunice B. Blackman, Clerk.

Defendant lives at  
UNIT 5, OLEANDER MOTEL  
GULF SHORES, ALABAMA

Received in office

—, 19

Sheriff.

I have executed this summons

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

by leaving a copy with

**Sheriff**

Deputy Sheriff

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

No. 9683

19

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon BUFORD JAMES KELLY, JR.  
UNIT NUMBER 5  
OLEANDER MOTEL  
GULF SHORES, ALABAMA

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GENERAL MOTORS ACCEPTANCE CORPORATION, a corporation

Witness my hand this 10th day of February, 1971

Eunice B. Blackmon Clerk.

GENERAL MOTORS ACCEPTANCE  
CORPORATION, a corporation

COMPLAINT

BUFORD JAMES KELLY, JR.,

Plaintiff Versus Defendant

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

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Serial No. CE 149A860764, Fla. Tag No. 9<sup>G</sup><sub>K</sub> 7036

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

from September 12, 1970, to date, 19

FILED

FEB 10 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

J. Samuel Crenshaw, Jr. Plaintiff's Attorney.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT

GENERAL MOTORS ACCEPTANCE  
CORPORATION, a corporation,  
Plaintiff.

VS.

BUFORD JAMES KELLY, JR.  
Defendant.

DETINUE SUMMONS AND COMPLAINT

Filed FEBRUARY 10, 19 71

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

*Returned Order of  
the Court. 2-16-71*

J. CONNOR OWENS, JR.,  
Bay Minette, Ala. 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.

*Ernie B. Blackmon*, Clerk.

CH

Defendant lives at  
UNIT 5, OLEANDER MOTEL  
GULF SHORES, ALABAMA

Received in office

*Feb. 10*, 19 *71*

*Taylor Wilkins*, Sheriff.

I have executed this summons

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

by leaving a copy with

*Buford Jas Kelly, Jr.*

Sheriff claims 100 miles at

Ten Cents per mile Total \$ 10.00

*TAKE NO. WILKINS, Sheriff*

*Childress*

*Deputy Sheriff*

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

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

*Traveled 100 mi in  
attempt to levy. Paper  
returned w/o action  
by order of court.*

9683

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 J. CONNOR OWENS, JR., who being by me  
duly sworn deposes and says that the property sued for in the complaint of GENERAL MOTORS ACCEPTANCE CORPORATION, a corporation filed in said Court, to-wit:  
Buford James Kelly, Jr.  
One (1) 1969 Chevrolet onehalf ton Pick-up Truck, Serial #CE149A860764  
Fla. Tag No. 9-G 7036

belongs to General Motors Acceptance Corporation, the plaintiff.

Sworn to and subscribed before me this 9th  
day of February, 19 71

Alice L. Miller  
Notary Public

J. Connor Owens, Jr.  
**FILED**  
FEB 10 1971

STATE OF ALABAMA

Baldwin County

EUNICE B. BLACKMON CIRCUIT CLERK  
IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, GENERAL MOTORS ACCEPTANCE CORPORATION, a corporation, Principal, and  
FIDELITY & CASUALTY COMPANY OF NEW YORK, Sureties, are held and  
firmly bound unto BUFORD JAMES KELLY, JR., his heirs, executors and admin-  
istrators in the sum of FIFTY AND NO/100----- Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 9th day of February, 19 71

The condition of the above obligation is such that whereas, the above bound General Motors Acceptance Corporation has on the 9th day of  
February, 19 71 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Buford James Kelly, Jr., for the recovery of the following  
described property, to-wit:

One (1) 1969 Chevrolet 1/2 Ton Pick-up Truck, Serial #CE-149A860764,  
Fla. Tag No. 9-G 7036

Now, if the said General Motors Acceptance Corporation shall fail in said suit  
and shall pay to the said Buford James Kelly, Jr., 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 10th day of February, 19 71 By: J. Connor Owens, Jr. (SEAL)  
FIDELITY & CASUALTY COMPANY OF NEW YORK (SEAL)

Eunice B. Blackmon By: Alice L. Miller (SEAL)  
Clerk, Circuit Court

- 757

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

DAHLBERG BUILDING

P. O. BOX 729

BAY MINETTE, ALABAMA 36507

February 9, 1971

TELEPHONE NO. 937-4661

Mr. W. O. Garner  
Office of Sheriff  
Bay Minette, Alabama

Subject: Detinue - General Motors Acceptance Corporation  
vs. Buford James Kelly, Jr.

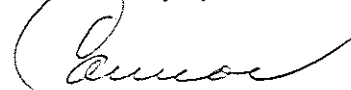
Dear Willard:

This is a memorandum for your information in connection with the service of the above detinue suit this day filed.

The defendant, Buford James Kelly, Jr., has the truck with him at this time in Louisiana; however, according to information obtained from the manager of the Oleander Motel at Gulf Shores, from the wife of Kelly, he is supposed to return to Gulf Shores this week-end. If Kelly is tipped off that he is to be served with these papers, he will again take off and it has taken GMAC four months to locate him. Therefore, the service of these papers on Mr. Kelly should be handled in such a manner that he would not have time to leave without first obtaining possession of the truck. They are the only people registered at the Oleander at this time and according to the manager of this motel, she would give you her full cooperation in order to obtain service. We feel, by no means, should the wife know that Mr. Kelly is being sought. Perhaps a telephone call from the manager of the Motel when Mr. Kelly returns could be worked out.

Your consideration in this matter will be appreciated.

Sincerely yours,



J. Connor Owens, Jr.

JCO:am