

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

Baldwin County

Baldwin County

Before me, J. F. Seaver, a Notary Public in and for said County,  
personally appeared S. M. Wright who being by me  
duly sworn deposes and says that the property sued for in the complaint of Michigan  
National Bank, Grand Rapids, Michigan, filed in said Court, to-wit:

belongs to Michigan National Bank, Grand Rapids, Michigan, the plaintiff.

Sworn to and subscribed before me this 18  
day of March, 19 71

MICHIGAN NATIONAL BANK,  
Grand Rapids, Michigan,

Notary Public  
My Commission Expires Jan. 23, 1972  
STATE OF ALABAMA  
My Commission Expires

By: S. M. Wright  
ATTORNEY-IN-FACT

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

Baldwin County

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, S. M. Wright,  
Attorney-in-Fact, Principal, and  
Kenneth Cooper, Sureties, are held and  
firmly bound unto James E. Dailey & Mamie L. Dailey, his heirs, executors and admin-  
istrators in the sum of Fifty (\$50.00) Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the March, 19 71.

The condition of the above obligation is such that whereas, the above bound Michigan  
National Bank, Grand Rapids, Michigan, has on the March day of  
1971 sued out a writ of detinue in the Circuit Court of Baldwin  
County, returnable to the said Circuit Court against the said James E.  
Dailey and Mamie L. Dailey for the recovery of the following  
described property, to-wit:

One 1966 Casa Manana Trailer, 50 ft. X 10 ft.,  
serial number 815.

Now, if the said Michigan National Bank shall fail in said suit  
and shall pay to the said James E. Dailey & Mamie L. Dailey, 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 23 day of March, 19 71  
Ernie B. Blackburn (SEAL)  
Clerk, Circuit Court  
Kenneth Cooper (SEAL)  
S. M. Wright (SEAL)

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

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MICHIGAN NATIONAL BANK,  
Grand Rapids, Michigan,  
Plaintiff

vs.

JAMES E. DAILEY and  
MAMIE L. DAILEY,  
Defendant

Detinue — Affidavit and Bond

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

Clerk

The State of Alabama,  
Baldwin County

CIRCUIT COURT  
No. 9761

19 71

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon James E. Dailey and  
Mamie L. Dailey

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

Michigan National Bank, Grand Rapids, Michigan,

Witness my hand this 23 day of March 19 71

Eunice B. Blackmon, Clerk

COMPLAINT

MICHIGAN NATIONAL BANK, Grand Rapids, Michigan, Plaintiff  
JAMES E. DAILEY and MAMIE L. DAILEY, Defendant  
Versus

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

One 1966 Casa Manana Trailer, 50 ft. X 10 ft.,  
serial number 815,

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

from January 1, 19 70, to March 19 71

FILED

MAR 23 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

Kenneth Cooper Plaintiff's Attorney.

State of Alabama  
Baldwin County

CIRCUIT COURT

MICHIGAN NATIONAL BANK,  
Grand Rapids, Michigan,  
Plaintiff

VS.

JAMES E. DAILEY and  
MAMIE L. DAILEY,  
Defendant

Detinue Summons and Complaint

Filed **FILED**, 19

MAR 23 1971, Clerk

EUNICE B. BLACKMON  
CIRCUIT CLERK

KENNETH COOPER  
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. Blackmon Clerk

Defendant lives at

General Delivery, Loxley, Alabama  
Trailer occupied by Leo and Joyce  
Finkley, behind Loxley Prison Camp.  
Received in office

Mar. 23, 19 71

Taylor Wilkins, Sheriff

I have executed this summons

this 3-29, 19 71

by leaving a copy with

BR

James E. Dailey

Mamie L. Dailey

Sheriff claims 40 + 40 miles at

10¢ per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY Brown  
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

A. J. Brown, Deputy Sheriff

Printed by Moore Printing Co.

4/02/71

Executed by attaching  
~~the~~ one 1966 Casa Manana  
Trailer, serial # 815 -  
retainer bond made by  
defendant and property  
released -

Taylor Wilkins  
Sheriff  
by JMB:gd

THE STATE OF ALABAMA, }

*Baldwin*

COUNTY. }

*Circuit*

COURT.

Term, 19

KNOW ALL MEN BY THESE PRESENTS:

That we *James E. + Mamie L. Wailey*  
are held and firmly bound unto *Michigan Nat Bank*

in the sum of *Six thousand + 00/100* Dollars,

for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated, this \_\_\_\_\_ day of \_\_\_\_\_ 19

The Condition of the above Obligation is Such, That whereas the said *Michigan Nat Bank* did on the *23* day of *March* 1971, sue out of the *Circuit*

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:

*One house trailer, 1966 Casa Manana, 50 x 10, Serial # 815*

which said writ was placed in the hands of *Taylor Wilkins*

Sheriff of the County of *Baldwin*, on the *23* day of *March* 1971, and executed by him on the *29* day of

~~March~~ *March* 1971, by taking into his possession *One Casa Manana Trailer, Serial # 815*

and whereas the above bound *James E. + Mamie L. Wailey*

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 James C. & Mamie L. Bailey shall well and truly, within thirty days after the determination of said suit, if the said \_\_\_\_\_ be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for detention 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 \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Taken and approved,

April 2 1971  
Taylor Wilkins  
by JMB Sheriff.

James C. Bailey (L.S.)  
Mamie L. Bailey (L.S.)  
John Fountain (L.S.)  
Ellen Fountain (L.S.)  
Frank M. McGee (L.S.)  
West Bethel

James C. Bailey  
U. F. White  
Alton White

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

The State of Alabama,

COUNTY. \_\_\_\_\_

COURT. \_\_\_\_\_

SHERIFF'S OFFICE

VOL

67 PAGE 821

Plaintiff.

vs.

Defendant.

DETINUE REPLEVIN BOND, DEFENDANT.

19

Filed

Sheriff.

Sheriff's Execution Docket, page \_\_\_\_\_

MICHIGAN NATIONAL BANK  
Grand Rapids, Michigan

Plaintiff

VS.

JAMES E. DAILEY and  
MAMIE L. DAILEY

Defendants

I  
IN THE CIRCUIT COURT OF

I  
BALDWIN COUNTY, ALABAMA

I  
AT LAW

I  
CASE NO. 9761

PLEAS

1.

Not Guilty.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

Attorney for Defendants

**CERTIFICATE OF SERVICE**

I do hereby certify that I have on this 1 day of April  
1971 served a copy of the foregoing pleading on counsel for all  
parties to this proceeding by mailing the same by United States  
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Phyllis S. Nesbit

**FILED**

APR 1 1971

EUNICE B. BLACKMON  
CIRCUIT CLERK

# 9761

Michigan National  
Bank

VS

James E. Dailey  
and

Merric L. Dailey

Answer

**FILED**

APR 1 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

Kenneth Cooper  
Plaintiffs Attorney

W. H. Lee, Brantley & Nesbit  
Defendants Attorney