

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, DANIEL A. BENTON, a Notary Public in and for said County,
 personally appeared Arthur H. Allen, Jr. who being by me

duly sworn deposes and says that the property sued for in the complaint of FIRST NATIONAL
BANK OF FAIRHOPE, a banking corporation vs. THOMAS N. SEAY filed in said Court, to-wit:

ONE 1966 DODGE MONACO SEDAN, VEHICLE IDENTIFICATION
NO. DH 41G661260211

belongs to FIRST NATIONAL BANK OF FAIRHOPE, a banking corp., the plaintiff.

Sworn to and subscribed before me this 30th
 day of June, 19 71

Arthur H. Allen, Jr.
 Affiant

Daniel A. Benton
 Notary Public

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we, FIRST NATIONAL BANK OF
FAIRHOPE, a banking corporation, Principal, and
WILBURN L. ODOM and GEORGE DYSON, JR., Sureties, are held and
 firmly bound unto THOMAS N. SEAY, his heirs, executors and admin-
 istrators in the sum of EIGHT HUNDRED SEVENTY-FOUR AND 80/100 Dollars,
 for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the _____ day of _____, 19 _____

The condition of the above obligation is such that whereas, the above bound FIRST NATIONAL
BANK OF FAIRHOPE, a banking corporation has on the _____ day of _____
 _____, 19 _____ sued out a writ of detinue in the Circuit Court of Baldwin
 _____ County, returnable to the said Circuit Court against the said THOMAS N. SEAY
 _____ for the recovery of the following
 described property, to-wit:

ONE 1966 DODGE MONACO SEDAN, VEHICLE IDENTIFICATION
NO. DH 41G661260211

Now, if the said FIRST NATIONAL BANK OF FAIRHOPE, a banking corporation, shall fail in said suit
 and shall pay to the said THOMAS N. SEAY, 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 6 day of _____, 19 71

1st National Bank of Fairhope by
William L. Odom (SEAL)
George Dyson, Jr. (SEAL)
Cashier

Carroll B. Blackburn
 Clerk, Circuit Court

No. 9903

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

FIRST NATIONAL BANK OF FAIRHOPE
a banking corporation

Plaintiff

vs.

Thomas N. Seay

Defendant

Detinue — Affidavit and Bond

Filed this **FILED** day of 19

JUL 1 1971

EUNICE B. BLACKMON CIRCUIT CLERK Clerk

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, DANIEL A. BENTON, a Notary Public in and for said County,
 personally appeared Arthur H. Allen, Jr.
~~WILBURN L. ODOM~~ who being by me

duly sworn deposes and says that the property sued for in the complaint of FIRST NATIONAL
BANK OF FAIRHOPE, a banking corporation vs. THOMAS N. SEAY filed in said Court, to-wit:

ONE 1966 DODGE MONACO SEDAN, VEHICLE IDENTIFICATION

NO. DH 41G661260211

belongs to FIRST NATIONAL BANK OF FAIRHOPE, a banking corp., the plaintiff.

Sworn to and subscribed before me this 30th

day of June, 19 71

Daniel A. Benton
 Notary Public

Arthur H. Allen, Jr.

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

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

FAIRHOPE, a banking corporation

, Principal, and

WILBURN L. ODOM and GEORGE DYSON, JR., Sureties, are held and

firmly bound unto THOMAS N. SEAY, his heirs, executors and admin-

istrators in the sum of EIGHT HUNDRED SEVENTY-FOUR AND 80/100 Dollars,

for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the _____ day of _____, 19 _____

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

BANK OF FAIRHOPE, a banking corporation has on the _____ day of

_____, 19 _____ sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said THOMAS N. SEAY

for the recovery of the following described property, to-wit:

ONE 1966 DODGE MONACO SEDAN, VEHICLE IDENTIFICATION

NO. DH 41G661260211

Now, if the said FIRST NATIONAL BANK OF FAIRHOPE, a banking corporation shall fail in said suit

and shall pay to the said THOMAS N. SEAY, 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 _____ day of _____, 19 _____

1st National Bank of Fairhope by

W. Wilburn L. Odom (SEAL)
 Vice President

George Dyson, Jr. (SEAL)
 Cashier

(SEAL)

Clerk, Circuit Court

No. 9903

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

FIRST NATIONAL BANK OF FAIRHOPE
a banking corporation

Plaintiff

vs.

Thomas N. Seay

Defendant

Detinue — Affidavit and Bond

Filed this FILED 19__

JUL 6 1971

Clerk

EUNICE B. BLACKMON
CIRCUIT
CLERK

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) 928-2508

July 2, 1971

Mrs. Eunice Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Re: First National Bank of Fairhope
v. Thomas N. Seay
Case No. 9903

Dear Mrs. Blackmon:

I left the summons and complaint in this matter with you on Thursday, but had to get the affidavit signed. I am herewith forwarding the affidavit and bond, and would appreciate it if you would rush this on down to the Sheriff with the letter which I have also enclosed.

Yours very truly,



Daniel A. Benton

DAB:w
Enc.

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

August 2, 1971

Mrs. Eunice Blackmon
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Re: First National Bank of Fairhope
v. Thomas N. Seay
Case No. 9903

Dear Mrs. Blackmon:

Please take the enclosed letter, along with the docket sheet, to the Judge for his action, and send me a complete cost bill as quickly as possible. I would also appreciate your immediately notifying the Sheriff's office of this dismissal, so that the defendant can pick up his car.

Yours very truly,


Daniel A. Benton

DAB:w
Enc.

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

August 2, 1971


Honorable Telfair J. Mashburn
Judge of the Circuit Court
Bay Minette, Alabama 36507

Re: First National Bank of Fairhope
v. Thomas N. Seay
Case No. 9903

Dear Sir:

We request that the detainee suit in the above-styled cause be dismissed, as the defendant has paid the plaintiff in full and would now like to pick up his car.

Respectfully,


Daniel A. Benton

DAB:w

FIRST NATIONAL BANK OF FAIRHOPE, a banking corporation,)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
Plaintiff)	AT LAW
vs.)	
THOMAS N. SEAY,)	
Defendant)	CASE NO. _____

FORTHCOMING BOND

KNOW ALL MEN BY THESE PRESENTS, that we, FIRST NATIONAL BANK OF FAIRHOPE, as Principal, and ^{John M. Beasley}~~GEORGE DYSON, JR.~~, and WILBURN L. ODOM, as Sureties, are held and firmly bound unto THOMAS N. SEAY in the sum of EIGHT HUNDRED SEVENTY AND NO/100 DOLLARS (\$870.00) for the payment of which well and truly to be made, we bind ourselves and each of us, our, and each of our, heirs, executors, administrators, jointly, severally, and firmly, by these presents.

Sealed with our hands and dated this the 9th day of July, 1971.

The condition of the above obligation is such that, WHEREAS the said FIRST NATIONAL BANK OF FAIRHOPE did on the 6th day of July, 1971, sue out of the Circuit Court of Baldwin County, Alabama, a writ in detinue directed to any sheriff of the State of Alabama and commanding him to take in his possession the following property sued for in said action of detinue, to-wit:

One 1966 Dodge Monaco automobile Vehicle
Identification Number DH 41G661260211,

which said writ was placed in the hands of TAYLOR WILKINS, Sheriff of the County of Baldwin, on the 6th day of July, 1971, and executed by him on the 8th day of July, 1971, by taking into his possession the following property, to-wit:

One 1966 Dodge Monaco automobile Vehicle
Identification Number DH 41G661260211,

and,

WHEREAS, the said THOMAS N. SEAY, the Defendant in said suit, has failed and neglected for the space of five (5) days from the taking into possession of said property by said Sheriff aforesaid to give bond and take possession of said property as authorized by law;

NOW, THEREFORE, if the said FIRST NATIONAL BANK OF FAIRHOPE, the Plaintiff in said suit, shall deliver the above described property to the said THOMAS N. SEAY, Defendant in said suit, within thirty (30) days after judgment, in case Plaintiff shall fail to recover the same in said suit, and pay all damages for the detention of property and cost of suit, then, in that event, this obligation be void, otherwise, to remain in full force and effect.

FIRST NATIONAL BANK OF FAIRHOPE,
a banking corporation

By John M. Beasley
~~GEORGE DYSON, JR.~~ John M. Beasley
Its Cashier President

By Wilburn L. Odom
WILBURN L. ODOM, Individually

By John M. Beasley
~~GEORGE DYSON, JR.~~, individually
John M. Beasley

Approved this 15 day of July, 1971.

Taylor Wilkins
TAYLOR WILKINS, Sheriff, Baldwin County, Alabama

The State of Alabama, }
Baldwin County

CIRCUIT COURT
No. 9963

19

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon THOMAS N. SEAY

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, a banking corporation

Witness my hand this 6 day of July 1971

Eunice B. Blackmon Clerk

COMPLAINT

FIRST NATIONAL BANK OF FAIRHOPE,

a banking corporation Plaintiff Versus THOMAS N. SEAY Defendant

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

ONE 1966 DODGE MONACO SEDAN, VEHICLE IDENTIFICATION

NO. DH 41G661260211

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

from _____ 19____, to _____ 19____

FILED

Daniel A. Banta

Plaintiff's Attorney.

JUL 6 1971

EUNICE B. BLACKMON CIRCUIT CLERK

State of Alabama

Baldwin County

CIRCUIT COURT

FIRST NATIONAL BANK OF FAIRHOPE,

a banking corporation

Plaintiff...

VS.

THOMAS N. SEAY

Defendant...

Detinue Summons and Complaint

Filed _____, 19____

FILED

_____, Clerk

JUL 6 1971

EUNICE B. BLACKMON CIRCUIT CLERK

RICKARBY & BENTON
Fairhope, Alabama

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

*Executed by attaching
one 1966 Dodge
Monaco + storing at
Dick Turners Wrecking
Yard in Fairhope, Ala.*

*W. Crook
7.8.71*

Defendant lives at
366 Wisteria Street
Fairhope, Alabama

Received in office

July 10, 1971

Taylor Wilkins, Sheriff

I have executed this summons

this July 8, 1971

by leaving a copy with _____ CR

Thomas N. Seay

W. Crook, Sheriff

W. Crook, Deputy Sheriff

Printed by Moore Printing Co.

Fairhope 70 miles

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY W. Crook
DEPUTY SHERIFF