

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

No. 9957

19.....

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Marie Chisenhall, as executrix of the estate of G. L. Chisenhall, deceased,

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 The Bank of Atmore, a corporation,

Witness my hand this 30th day of July 1971.

Eunice B. Blackmon Clerk

COMPLAINT

THE BANK OF ATMORE,
a corporation, Plaintiff...

MARIE CHISENHALL, as executrix of the estate of G. L. Chisenhall, deceased, Defendant...

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

Grumman Canopy, combination dust-high volume spray system, full electrical 12V system with navigation lights, Jacobs 300 HP Engine and Grumman Prop., together with all equipment and accessories attached or used in connection with the following aircraft: Grumman G-164, Serial #366; Grumman Ag-Cat, Serial #82; Piper PA-11, Serial #11-118

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

from January 11 1967, to July 30 1971.

FILED

J. R. Owen

Plaintiff's Attorney

JUL 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK

70-436

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Plaintiff....
VS.

Defendant....

Detinue Summons and Complaint

FILED

Filed 19.....

JUL 30 1971

EUNICE B. BLACKMON CIRCUIT CLERK

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

Goley, Ala.

Received in office

July 30 1971

Taylor Wilkins Sheriff

I have executed this summons

this *13 Aug* 1971

by leaving a copy with *cl*

Marie Chishall

Sheriff claims *72* miles at

Ten Cents per mile Total \$ *7.20*

TAYLOR WILKINS, Sheriff

BY *[Signature]* DEPUTY SHERIFF

Taylor Wilkins Sheriff
[Signature] Deputy Sheriff

Aug 13-71
I have searched for the within mentioned property. None found.

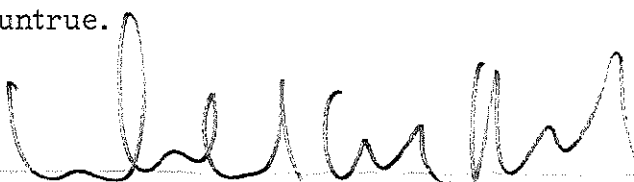
Taylor Wilkins S.

Charles [Signature] DS

THE BANK OF ATMORE,)	IN THE CIRCUIT COURT OF
a corporation,)	BALDWIN COUNTY, ALABAMA,
Plaintiff,)	AT LAW
vs.)	
MARIE CHISENHALL, as)	
executrix of the estate of)	
G. L. CHISENHALL,)	
deceased,)	
Defendant.)	CASE NO. 9957

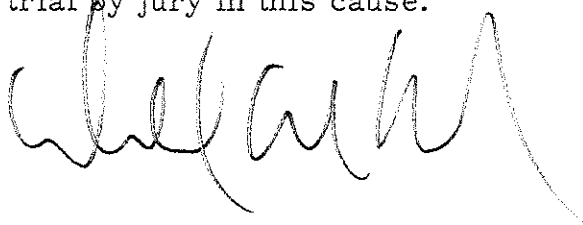
Comes now the defendant by and through her attorney and for answer to the complaint says the following:

1. Not guilty.
2. The allegations are untrue.
3. Not detinet.



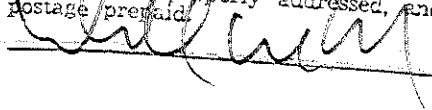
Donald M. Briskman Attorney for defendant

Defendant respectfully demands a trial by jury in this cause.



Copy to: Hon. James Owens
Attorney at Law
Bay Minette, Alabama

CERTIFICATE OF SERVICE
I do hereby certify that I have on this 25th day of Aug, 1971, served a copy of the foregoing pleading on counsel for parties to this proceeding by mailing the same by United States mail, properly addressed, and first class postage prepaid.



FILED

AUG 27 1971

EUNICE B. BLACKMON CIRCUIT CLERK

9957

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

Baldwin County

Baldwin County

Before me, Ernestine R. Sims, a Notary Public in and for said County,

personally appeared James R. Owen who being by me

duly sworn deposes and says that the property sued for in the complaint of The Bank of
doing business as Chisenhall Agricultural Service
Atmore vs. G. L. Chisenhall, individually and/ filed in said Court, to-wit:

Grumman Canopy, combination dust-high volume spray system, full
electrical 12V system with navigation lights, Jacobs 300 HP Engine

and Grumman Prop., together with all equipment and accessories attached or
used in connection with the following aircraft: Grumman G-164, Serial #366;
Grumman Ag-Cat, Serial #82; Piper PA-11, Serial #11-118, the plaintiff.
belongs to The Bank of Atmore, a corporation,

Sworn to and subscribed before me this 30th
day of July, 1971.

[Signature]
Attorney for the Bank of Atmore

Mary Lou Blackburn
Notary Public

STATE OF ALABAMA

IN THE CIRCUIT COURT OF

Baldwin County

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we, The Bank of Atmore,

a corporation, Principal, and

estate of G. L. Chisenhall, deceased
firmly bound unto Marie Chisenhall, executrix of the heirs, executors and admin-
istrators in the sum of One Hundred 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 30 day of July, 19 71.

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

The Bank of Atmore, a corporation, has on the 30th day of

July, 1971 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said Marie Chisenhall

as executrix of the estate of G. L. Chisenhall for the recovery of the following
described property, to-wit:

Grumman Canopy, combination dust-high volume spray system, full
electrical 12V system with navigation lights, Jacobs 300 HP engine and
Grumman prop., together with all equipment and accessories attached or
used in connection with the following aircraft: Grumman G-164, Serial
#366; Grumman Ag-Cat, Serial #82; Piper PA-11, Serial #11-188.

Now, if the said The Bank of Atmore, a corporation, shall fail in said suit
estate of G. L. Chisenhall, deceased,
and shall pay to the said Marie Chisenhall, as executrix of the 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. The Bank of Atmore, a Corporation

Taken and approved this 30th day of By: [Signature] (SEAL)
July, 1971. As it's Attorney (SEAL)

Ernie B. Blackburn (SEAL)
Clerk, Circuit Court