

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 9975

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause, says:

1. The allegations of the complaint are untrue.

~~Attorney for Plaintiff~~

FILED

AUG 24 1971

EUNICE B. BLACKMON CIRCUIT
CLERK

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT
No. 9975

August 1971

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon

John T. Cumbie

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

Mattie B. Cumbie

Witness my hand this 5 day of August 1971

Emmie B. Blackburn Clerk

COMPLAINT

MATTIE B. CUMBIE

JOHN T. CUMBIE

Plaintiff... Versus ... Defendant...

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

One 1962 Ford Pickup, vehicle identification
number F1OCD251375

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

from July 1, 1971, to August 1971

Mattie B. Cumbie Plaintiff ~~X~~ Attorney

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MATTIE B. CUMBIE

Plaintiff....

VS.

JOHN T. CUMBIE

Defendant....

Detinue Summons and Complaint

Filed 19.....

....., Clerk

AUG 06 1971

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. Blanton Clerk

Defendant lives at

Received in office

AUG 06 1971

..... 19.....

SHERIFF

....., Sheriff

I have executed this summons

this Aug - 9 1971

by leaving a copy with

John T Cumbie
Attached

one 1962 Ford
Pickup Ser.

F10CD251375
and storing at Baldwin Co Jail.

Taylor Wilkins Sheriff
W A Tolbert Deputy Sheriff

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, Martha M. Bankester, a Notary Public in and for said County,
personally appeared Mattie B. Cumbie who being by me

duly sworn deposes and says that the property sued for in the complaint of

Mattie B. Cumbie filed in said Court, to-wit:

One 1962 Ford Pickup, vehicle

identification number F10CD251375

belongs to Mattie B. Cumbie, the plaintiff.

Sworn to and subscribed before me this 3rd

day of August, 19 71

Martha M. Bankester

Mattie B. Cumbie
MATTIE B. CUMBIE

STATE AT LARGE Notary Public STATE OF ALABAMA
My Commission Expires: Oct. 6, 1974

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS. That we,

Mattie B. Cumbie, Principal, and

✓ Duncan Turnbull, Sureties, are held and

firmly bound unto John T. Cumbie, 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.

Scaled with our seals and dated the _____ day of August, 19 71

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

Mattie B. Cumbie has on the _____ day of

August, 19 71 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said _____

John T. Cumbie for the recovery of the following
described property, to-wit:

One 1962 Ford Pickup, vehicle identification
number F10CD251375

Now, if the said Mattie B. Cumbie shall fail in said suit
and shall pay to the said John T. Cumbie, 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 5 day of ✓ Mattie B. Cumbie (SEAL)

August, 19 71 ✓ Duncan Turnbull (SEAL)

Ernie B. Blackman (SEAL)
Clerk, Circuit Court

No. 9975

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MATTHE B. GUMBLE

Plaintiff

vs.

JOHN T. GUMBLE

Defendant

Detinue — Affidavit and Bond

Filed this _____ day of _____ 19____

Clerk

T & H. Wrecking Co.

WRECKER BILL
For towing
truck in
\$15.⁰⁰

JMB