MATTIE B. CUMBIE,)
Plaintiff,	IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA
JOHN T. CUMBIE,) AT LAW NO. 9975
Defendant.	,
	.

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,

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Page.....

THE STATE OF ALABAMA Baldwin County

CIRCUIT COURT

MATTIE B. CUMBIE

Plaintiff....

VS.

JOHN T. CUMBIE

Defendant....

Detinue Summons and Complaint

Filed					19
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		11	()	<u>:</u>	
	2				Clerk

AUC 06 197

Denneth 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.

Gennie B. Blackmouton

Defendant lives at

Received in office AUG 0 6 1971

19....

Sheri

I have executed this summons

leaving a copy with

John T Cumbie

Callached

Pickup Ser.

F10CD251375

and storeing at Baldwin Co Jail

Leylor Welder Sherif W & Tolle Debuty Sherif

Moore Printing Co. - Bay Minette, Ala.

Palm

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, ersonally appeared Mattie R. Cumbie)	
Mattie B. Cumbie Mattie B. Cu	Before me, <u>Martha M. Bankester</u> , a N	Notary Public in and for said County,
Mattie B. Cumbie filed in said Court, to-wit One 1962 Ford Pickup, vehicle identification number F100D251375 Sections to	ersonally appeared <u>Mattie B. Cumbie</u>	who being by me
Mattie B. Cumbie filed in said Court, to-wit One 1962 Ford Pickup, vehicle identification number F100D251375 Sections to		
One 1962 Ford Pickup, vehicle identification number F10CD251375 belongs to	Mattie B. Cumbie	filed in said Court, to-wit:
identification number F10CD251375 belongs to Mattie E. Cumbie the plaintification of Mattie E. Cumbie the plaintification number f10CD251375 belongs to Mattie E. Cumbie the plaintification number f10CD251375 belongs to Mattie E. Cumbie the plaintification number f10CD251375 Now, if the said Mattie E. Cumbie the defendant said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation be void, otherwise, to remain in full force and effect.		
Sworn to and subscribed before me this 3rd	M	
August 19.71 Mattle A. Commission Expires: Oct. 6, 1974 STATE OF ALABAMA Baldwin County KNOW ALL MEN BY THESE PRESENTS. That we. Mattle B. Cumble Duncan Turnbull Sureties, are held an instrators in the sum of Fifty (\$50.00) The condition of the above obligation is such that whereas, the above bound Mattle B. Cumble August 19.71 The condition of the above obligation is such that whereas, the above bound Mattle B. Cumble August 19.71 A		asset, and the second of the s
August 19.71 Mattle B. Cumbie Mattle M. Cumbie Mattle M. Cumbie Mattle M. Cumbie Mattle M. Cumbie	pelongs to	the plaintiff.
August 19.71 Mattle B. Cumbie Mattle M. Cumbie Mattle M. Cumbie Mattle M. Cumbie Mattle M. Cumbie	Sucre to and subscribed before me this 3rd	
MATTIE B. CUMBLE IN THE CIRCUIT COURT OF Baldwin County KNOW ALL MEN BY THESE PRESENTS. That we. Mattie B. Cumble Nouncan Turnbull Sureties, are held an Sureties, are held an instrators in the sum of Fifty (\$50.00) Dollar for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrator Scaled with our seals and dated the day of August The condition of the above obligation is such that whereas, the above bound Mattie B. Cumble 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. Cumble described property, to-wit: One 1962 Ford Pickup, vehicle identification number F10CD251375 Now, if the said Mattie B. Cumble shall fail in said such said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation be void, otherwise, to remain in full force and effect.		matical Cultura
STATE OF ALABAMA Baldwin County KNOW ALL MEN BY THESE PRESENTS. That we. Mattie B. Cumbie Principal, an Duncan Turnbull Sureties, are held an firmly bound unto John T. Cumbie his heirs, executors and administrator Scaled with our seals and dated the Mattie B. Cumbie August 19 71 The condition of the above obligation is such that whereas, the above bound Mattie B. Cumbie August 19 71sued 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 followir described property, to-wit: One 1962 Ford Pickup, vehicle identification number F100D251375 Now, if the said Mattie B. Cumbie shall fail in said so and shall pay to the said John T. Cumbie number of the said John T. Cumbie shall fail in said so and shall pay to the said John T. Cumbie one 1962 Ford Pickup, vehicle identification number F100D251375 Now, if the said John T. Cumbie shall fail in said so and shall pay to the said John T. Cumbie August One 1962 Ford Pickup, vehicle identification Now, if the said John T. Cumbie shall fail in said so and shall pay to the said John T. Cumbie August One 1962 Ford Pickup, vehicle identification Now, if the said John T. Cumbie August SEAL Now, if the said John T. Cumbie August August August John T. Cumbie Shall fail in said so and shall pay to the said John T. Cumbie August August August August August John T. Cumbie Shall fail in said so and shall pay to the said John T. Cumbie August	Martha Mankester ATE AT LARGE Notary Public STATE OF ALABAMA	ATTIE B. CUMBIE
Baldwin County KNOW ALL MEN BY THESE PRESENTS. That we. Mattie B. Cumbie	Commission Expires: Oct. 6, 1974	
Baldwin County KNOW ALL MEN BY THESE PRESENTS. That we. Mattie B. Cumbie	STATE OF ALABAMA) IN	THE CIRCUIT COURT OF
Mattie B. Cumbie	\	Baldwin County
Mattie B. Cumbie Principal, an Sureties, are held an firmly bound unto John T. Cumbie , his heirs, executors and admir istrators in the sum of Fifty (\$50.00) ——————————————————————————————————		
Duncan Turnbull John T. Cumbie , his heirs, executors and admir istrators in the sum of Fifty (\$50.00) for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrator Sealed with our seals and dated the		
firmly bound unto		
Scaled with our seals and dated the		
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Scaled with our seals and dated the	for the payment of which we jointly and severally bind ourselves.	our heirs, executors and administrators
The condition of the above obligation is such that whereas, the above bound Mattie B. Cumbie has on the day of the 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 sund shall pay to the said John T. Cumbie the defendant said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation be void, otherwise, to remain in full force and effect.		
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COUNTY

CIRCUIT COURT

Plaintiff

JOHN TO CUMBIE

Defendant

Detinue - Affidavit and Bond

Filed this___

Clerk

THA. Whecking Co.

WRECKER BILL

For towing

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(AMB)