

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

October 1, 1971

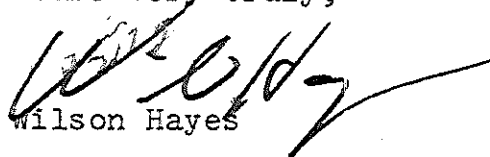
* Mrs. Eunice B. Blackmon, Clerk
Circuit Court, Baldwin County
Bay Minette, Alabama 36507

Dear Eunice:

* Please file the enclosed suit for Baldwin Furniture
Company of Bay Minette, Inc. and have it served on Boycher
Fore. When this is sent to the Sheriff's Department please
forward the attached letter.

With kind regards, I am

Yours very truly,


Wilson Hayes

WH/mm
Enc.

10,061

Moore Printing Co. - Bay Minette, Alabama

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, Mary C. Stiers McGuff, a Notary Public in and for said County,

personally appeared Jon Knight who being by me
 duly sworn deposes and says that the property sued for in the complaint of Baldwin Furniture
 Company of Bay Minette, Inc., a Corporation filed in said Court, to-wit:
1 4001 Steam iron; 1 Roll Radio; 1 #100 Antena; 1 7-piece
 Dinette; Mattress and box springs; 1 Gas heater; Vesta gas
 range; 1 CFB 20 Chest freezer; Maytag Washer; Kitchen cabinet
 belongs to Baldwin Furniture Company of Bay Minette, Inc., the plaintiff.

Sworn to and subscribed before me this 1st
 day of October, 1971

Mary C. Stiers McGuff
 Notary Public

BALDWIN FURNITURE CO. OF BAY MINETTE, INC.

By: Jon C. Knight
 Manager

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, _____

Baldwin Furniture Company of Bay Minette, Inc., a Corp., Principal, and
 _____, Sureties, are held and
 firmly bound unto Boycher Fore, his heirs, executors and admin-
 istrators in the sum of Fifty (\$50) 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 October, 19 71

The condition of the above obligation is such that whereas, the above bound Baldwin
 Furniture Company of Bay Minette, Inc., a Corp has on the _____ day of
October, 19 71 sued out a writ of detinue in the Circuit Court of Baldwin
 _____ County, returnable to the said Circuit Court against the said _____

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

1 4001 Steam iron; 1 Roll Radio; 1 #100 Antena; 1 7-piece
 Dinette; Mattress and box springs; 1 Gas heater; Vesta gas
 range; 1 CFB 20 Chest freezer; Maytag Washer; Kitchen cabinet

Now, if the said Baldwin Furniture Company of Bay Minette, Inc. shall fail in said suit
 and shall pay to the said Boycher Fore, 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
October, 19 71

BALDWIN FURNITURE CO. OF BAY MINETTE, INC.

By: Jon C. Knight (SEAL)
 Manager

(SEAL)

(SEAL)

Ernie B. Blackburn
 Clerk, Circuit Court

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, Mary C. Stiers McGuff, a Notary Public in and for said County, personally appeared Jon Knight who being by me

duly sworn deposes and says that the property sued for in the complaint of Baldwin Furniture Company of Bay Minette, Inc., a Corporation filed in said Court, to-wit:
1 4001 Steam iron; 1 Roll Radio; 1 #100 Antena; 1 7-piece
Dinette; Mattress and box springs; 1 Gas heater; Vesta gas
range; 1 CFB 20 Chest freezer; Maytag Washer; Kitchen cabinet
 belongs to Baldwin Furniture Company of Bay Minette, Inc., the plaintiff.

BALDWIN FURNITURE CO. OF BAY MINETTE, INC.

Sworn to and subscribed before me this 1st
 day of October, 1971

By:

Manager

Mary C. Stiers McGuff
 Notary Public

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, _____
Baldwin Furniture Company of Bay Minette, Inc., a Corp. Principal, and
 _____, Sureties, are held and
 firmly bound unto Boycher Fore, his heirs, executors and admin-
 istrators in the sum of Fifty (\$50) 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 October, 19 71

The condition of the above obligation is such that whereas, the above bound Baldwin
Furniture Company of Bay Minette, Inc., a Corp has on the _____ day of
October, 19 71 sued out a writ of detinue in the Circuit Court of Baldwin
 _____ County, returnable to the said Circuit Court against the said _____

Boycher Fore

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

1 4001 Steam iron; 1 Roll Radio; 1 #100 Antena; 1 7-piece
Dinette; Mattress and box springs; 1 Gas heater; Vesta gas
range; 1 CFB 20 Chest freezer; Maytag Washer; Kitchen cabinet

Now, if the said Baldwin Furniture Company of Bay Minette, Inc. shall fail in said suit

and shall pay to the said Boycher Fore, 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.

BALDWIN FURNITURE CO. OF BAY MINETTE, INC.

Taken and approved this _____ day of
October, 19 71

By:

Manager

(SEAL)

(SEAL)

(SEAL)

Clerk, Circuit Court

STATE OF ALABAMA }
Baldwin County }

No.

CIRCUIT COURT

October 1971

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon

Boycher Fore, Route 2, Box 230, Daphne, Ala.

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

Baldwin Furniture Company of Bay Minette, Inc. a Corporation

Witness my hand this 6 day of Oct. 1971

Eunice B. Blackmon Clerk

COMPLAINT

Baldwin Furniture Company

Boycher Fore

of Bay Minette, Inc., Plaintiff... Versus ... Defendant...
a Corporation

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

1 4001 Steam iron; 1 Roll Radio; 1 #100 Antenna; 1 7-piece
Dinette; Mattress and box springs; 1 Gas heater; Vesta gas
range; 1 - CFB 20 Chest freezer; Maytag Washer; Kitchen cabinet (fore-up)
gone

alternate value of \$725.71

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

from September 17 1971 to October 1 1971

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED TWENTY-FIVE AND 71/100 (\$725.71) DOLLARS, as balance due on a promissory note for \$919.29 made by him on the 12th day of December, 1969 and payable September 17, 1971 with interest thereon.

The note contains provision for a reasonable Attorney's fee and waiver of exemption whereof Plaintiff claims benefit.

Wilson Hayes

Plaintiff's Attorney

OCT 6 1971

EUNICE B. BLACKMON CIRCUIT CLERK

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Baldwin Furniture
Co.

Plaintiff....

VS.

Boyer Fore

1:00 P.M. 10/9/71

Defendant....

(MARBIS RESTAURANT)

Detinue Summons and Complaint

FILED

Filed 19.....

OCT 6 1971

Clerk

EUNICE B. BLACKMON
CIRCUIT CLERK

W. Hayes
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

Received 6 day of October 1971
and on 19 day of Nov 1971

I served a copy of the within Detinue
on Boyer Fore

By service on Boyer Fore

TAYLOR WILKINS, Sheriff
By W. Cook D. S.

Sheriff claims 50 miles or

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY W. Cook
DEPUTY SHERIFF

Defendant lives at

Received in office

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Boyer Fore and attaching

- 1) 1 # 100 Antenna
- 2) 7 Piece Dinette Suit
- 3) Mattress & Box Springs
- 4) Gas Heater
- 5) Vester Gas Range
- 6) 1 CFB 20 Deep Freezer
- 7) Kitchen Cabinets (fore up)

Taylor Wilkins Sheriff

W. Cook Deputy Sheriff

Picked up by Baldwin Furniture Co.

Truck at 4:30 P.M.

W. Cook 11/9/71