

10,388

STATE OF ALABAMA  
Baldwin County

IN THE CIRCUIT COURT OF  
Baldwin County

Before me, \_\_\_\_\_ a Notary Public in and for said County,  
personally appeared C. L. DeLoach Thompson who being by me  
duly sworn deposes and says that the property sued for in the complaint of J. W. Hayles vs  
Dewitt McGhee and Mavis McGhee filed in said Court, to-wit:  
One 1962 Champion Wolverine Trailer House, serial number  
GAL 271.  
belongs to J. W. Hayles, the plaintiff.

Sworn to and subscribed before me this 9<sup>th</sup>  
day of May, 1972  
Lois M. Wilson  
Notary Public

C. L. DeLoach Thompson  
att'y for J.W. Hayles

STATE OF ALABAMA  
Baldwin County

IN THE CIRCUIT COURT OF  
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, J. W. Hayles and C. L.  
Lilly, Principal, and  
Sureties, are held and  
firmly bound unto Dewitt McGhee and Mavis McGhee, his heirs, executors and admin-  
istrators in the sum of One Hundred & no/100 (\$100.00) - - - - - 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 J.W. Hayles  
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 \_\_\_\_\_  
Dewitt McGhee and Mavis McGhee for the recovery of the following  
described property, to-wit:  
One 1962 Champion Wolverine Trailer House, serial number  
GAL 271.

Now, if the said J. W. Hayles shall fail in said suit  
and shall pay to the said Dewitt McGhee and Mavis McGhee, 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 12<sup>th</sup> day of May, 1972 (SEAL)  
Ernie B. Blackmon (SEAL)  
Clerk, Circuit Court

clerk

No. \_\_\_\_\_

THE STATE OF ALABAMA

\_\_\_\_\_ COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

Filed this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Clerk

J. W. HAYLES,

X

Plaintiff,

X

IN THE CIRCUIT COURT OF

X

vs.

X

BALDWIN COUNTY, ALABAMA

DEWITT AND MAVIS MCGHEE

X

AT LAW NO. 10,388

Defendants.

X

PLEA

Come now the Defendants in the above styled cause by and through their attorney of record and for plea to the Complaint heretofore filed against them say separately and severally as follows:

1. The allegations of the Complaint are untrue.

CHASON, STONE & CHASON

By: John E. Chason

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 23 day

at May 1972

John E. Chason

FILED

MAY 17 1972

EUNICE B. BLACKMON CIRCUIT CLERK

STATE OF ALABAMA }  
Baldwin County }

CIRCUIT COURT

No. ....

19.....

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon DEWITT McGHEE and MAVIS McGHEE

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 .....

J. W. HAYLES

Witness my hand this 12<sup>th</sup> day of May 1972...

Eunice B. Blackmon Clerk

COMPLAINT

J. W. HAYLES

DEWITT McGHEE and

Plaintiff...

Versus MAVIS McGHEE

Defendant...

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

One 1962 Champion Wolverine Trailer House, serial  
number GAL 271 of the value of \$1,020.00.

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

from June of 1971 19....., to date 1972.

FILED

MAY 12 1972

*C. L. Thompson*

Plaintiff's Attorney

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

J. W. Hayles

Plaintiff....

VS.

De Witt Mc Ghee &  
Mavis Mc Ghee

Defendant....

Detinue Summons and Complaint

Filed May 12, 1972

Ernie B. Blackman Clerk

MAY 12 1972

TAYLOR WILKINS

C. L. Thompson

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.

Ernie B. Blackman Clerk

Defendant lives at

Received in office  
MAY 12 1972

19.....

WINS

Sheriff

I have executed this summons

this May 12, 1972  
by leaving a copy with

De Witt Mc Ghee  
Mavis Mc Ghee  
attached one

1962 Champion Wolverine  
Trailer House Ser No HAS  
271

Sheriff claims 120 miles at

Ten Cents per mile Total \$ 12.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff  
W. J. Talbot Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

Blackshere ala

# BAILEE'S RECEIPT

BAY MINETTE, ALA., May ..... 19 72

The State of Alabama, }  
Baldwin County }

I hereby agree to take, care for and preserve as the Bailee of Taylor Wilkins.....  
Sheriff of Baldwin County, Alabama, the following described personal property this day levied upon  
under Writ of Fieri Facias, Attachment, Detinue, issued out of the Circuit Justice Civil Court of Baldwin  
County, Alabama, in the above styled case, to-wit:

One (1) 1962 Champson Wolverine Trailer House, serial Number GAL 271 of the  
value of \$1,020.00

I further agree to deliver the above described personal property to the said Taylor Wilkins.....

SHERRIFF OF BALDWIN COUNTY ALA. 10-11-97

THE STATE OF ALABAMA, }

CIRCUIT

COURT.

BALDWIN

COUNTY. }

MAY

Term, 1972

KNOW ALL MEN BY THESE PRESENTS:

That we, DEWITT McGEHEE and MAVIS McGEHEE AS PRINCIPALS  
AND T. J. EARLE, JR AND LOUIS R. McELWINE as sureties  
are held and firmly bound unto J. W. HAYLES

in the sum of \$2,040.00 Dollars,

for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators,  
jointly and severally, firmly by these presents.

Sealed with our seals and dated, this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

The Condition of the above Obligation is Such, That whereas the said J. W. HAYLES

\_\_\_\_\_ did on the 12<sup>th</sup> day  
of MAY 1972, sue out of the CIRCUIT

Court of said County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding  
him to take into his possession the following property, sued for in action of detinue, to wit:

ONE 1962 CHAMPION WOLVERINE TRAILER  
HOUSE, Serial No. GAL 271 0

which said writ was placed in the hands of TAYLOR WILKINSSheriff of the County of BALDWIN, on the 12<sup>th</sup> dayof MAY 1972, and executed by him on the 12<sup>th</sup> day of

MAY 1972 by taking into his possession the  
above trailer

and whereas the above bound DEWITT McGEHEE and MAVIS McGEHEE

has within five days from the execution of said writ entered into this bond as required by law, and here-  
by obtain possession of said property.

Now, if the said DEFENDANTS shall well and truly, within  
thirty days after the determination of said suit, if the said DEFENDANTS  
be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for de-  
tention as may accrue from said detention, then this obligation to be void, otherwise to remain in full  
force and effect.

And we, and each of us, hereby waive all rights of claim of exemption we or either of us have  
now, or may hereafter have, under the Constitution and Laws of Alabama, and we hereby  
severally certify that we have property free from all encumbrance to the full amount of the  
above bond.

Witness our hands and seals, this May day of 1972

Taken and approved,

May 16 1972  
Taylor Wilkins  
Sheriff.  
by: JM Byrd

Dewitt M. Eshel (L.S.)  
Mavis McElhee (L.S.)  
Thomas J. Earle Jr. (L.S.)  
Ann K. McDonald (L.S.)

No. _____	
The State of Alabama,	
COUNTY _____	
COURT _____	
SHERIFF'S OFFICE	
Plaintiff.	
vs.	
Defendant.	
DETINUE REPLEVIN BOND, DEFENDANT.	
70	82
VOL	Filed
19	
Sheriff.	
Sheriff's Execution Docket, page _____	