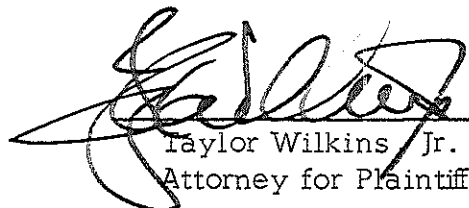


| | | |
|---|---|-------------------------|
| LEONARD W. BOYETT and BETTY J. BOYETT | X | IN THE CIRCUIT COURT OF |
| | X | BALDWIN COUNTY, ALABAMA |
| PLAINTIFFS | X | AT LAW |
| VS | X | |
| DELTA CORPORATION OF AMERICA, a Corporation, | X | |
| DEFENDANT | X | CASE NO: 10,493 |

The Plaintiffs claim of the Defendant SEVEN THOUSAND FIVE HUNDRED (\$7,500.00) DOLLARS, as damages for a trespass by the Defendant, its agents, servants or employees, while acting within the line and scope of their employment as such, on the following tract of land, viz.:

From the Southeast corner of Section 6, Township 7 South, Range 3 East, run North, 576 feet to a point; run thence North, 74° 30' West, 479 feet to the POINT OF BEGINNING; run thence South, 39° West, 100 feet to a point; run thence North, 74° 30' West, 112 feet, more or less, to the East margin of Fish River; run thence North, 39° East along the East margin of Fish River 100 feet to a point; run thence South, 74° 30' East, 112 feet to the POINT OF BEGINNING, being otherwise described as Lots 1 and 2 in Marlow Haven on Fish River, according to the official map or plat thereof which is recorded in Map Book 4, page 282, Baldwin County Probate Records, Baldwin County, Alabama.

belonging to the Plaintiffs, and for damaging and destroying certain structures existing upon said property and attached to a mobile home situated on, and anchored to the above described real property, which the Defendant, its agents, servants or employees, while acting within the line and scope of their employment as such, removed from said property without the permission of the Plaintiffs, on, to-wit: the 3rd day of November, 1971, and the Plaintiffs claim punitive damages.


Taylor Wilkins Jr.
Attorney for Plaintiffs

Plaintiffs respectfully demand
a trial of this cause by jury.


Attorney for Plaintiffs

FILED

JUL 14 1972

EUNICE B. BLACKMON CIRCUIT CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,492

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonDELTA CORPORATION OF AMERICA, a
corporation.....
.....
.....

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

.....Delta Corporation of America, a corporation....., Defendant.....

byLeonard W. Boyett and Betty J. Boyett.....

....., Plaintiff.....

witness my hand this.....14.....day of.....July.....1972.....

Emilee B. Blackmore Clerk

No. 10,493

Page.....

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Leonard W. Boyett and Betty J.

Boyett

Plaintiffs

VS.

Delta Corporation of America, a
corporation

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

Clerk

JUL 14 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

Taylor Wilkins, Jr.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Serve: Fred S. Ball, Jr.

Attorney at Law
200 South Lawrence St.
Montgomery, Alabama

Received in Office

JUL 19 1972

19.....

M. S. BUTLER Sheriff

have executed this summons

EXECUTED BY SERVING
A COPY OF THE WITHIN

this 19.....

by leaving a copy with

*at agent for
Delta Corp. of
America*

This the 20 day of July 1972

M. S. BUTLER

Sheriff Montgomery County

County, Alabama

Deputy Sheriff

serving process(es) and \$1.00

travel expense on each of 1

process(es) or a total of 250

Deputy Sheriff

Sheriff

Deputy Sheriff

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
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W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNOMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

August 21, 1972

Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Leonard W. Boyett and Betty J. Boyett
vs. Delta Corporation of America
Case Number: 10,493

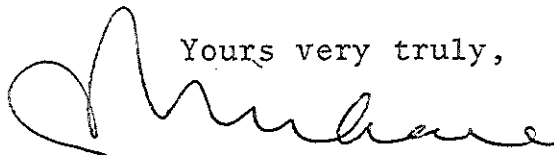
Dear Mrs. Blackmon:

I have enclosed herein a demurrer on behalf of the defendant, Delta Corporation of America, in the above-styled cause, and request that you file the same herein. Would you please acknowledge receipt of this demurrer by signing and returning the enclosed tissue copy of this letter.

In addition, would you please provide me with xerox copies of the complete file including pleadings, affidavits, bonds, etc. in your case number 10,034, probably styled Delta Corporation of America, a corporation, vs. Wade C. Parker, Larry Boyett and D. Z. Grove, which is an action in detinue. We will, of course, reimburse you for any costs incurred in making these xerox copies. If you need our check for costs in advance, however, please call my secretary or drop me a line and tell me what the costs will be and I'll send you our draft.

Best regards.

Yours very truly,



For the Firm

MDK.er

| | | |
|-------------------------|---|-------------------------|
| LEONARD W. BOYETT and |) | IN THE CIRCUIT COURT OF |
| BETTY J. BOYETT, |) | |
| Plaintiffs, |) | BALDWIN COUNTY, ALABAMA |
| |) | AT LAW |
| vs. |) | |
| DELTA CORPORATION OF |) | |
| AMERICA, a corporation, |) | |
| Defendant. |) | CASE NO. 10,493 |

D E M U R R E R

Comes now the defendant in the above-styled cause, Delta Corporation of America, a corporation, and demurs to the plaintiffs' complaint and each count thereof, and as separate and several grounds of its said demurrer, sets down and assigns the following, separately and severally:

1. For that said count fails to state a cause of action against this defendant.

2. For that said count is vague, indefinite and uncertain in that it does not apprise this defendant with sufficient certainty against what act or acts it is called upon to defend.

3. For that said count does not allege that the structures existing on said property and allegedly damaged and destroyed by this defendant were the property of the plaintiffs.

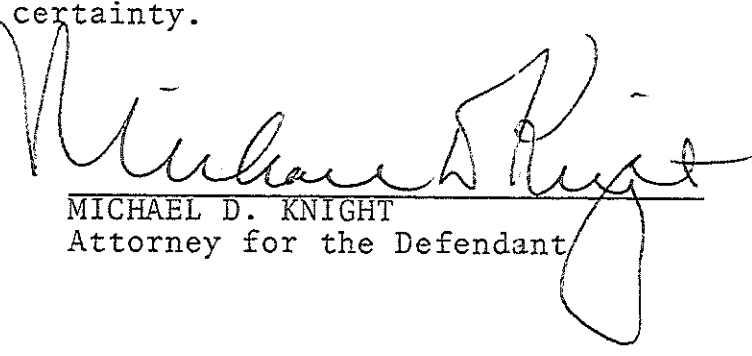
4. For that there is a misjoinder of causes of action.

5. For aught that appears from the allegations of said count, said count joins actions in trespass and actions

on the case.

6. For that it affirmatively appears from the allegations of said count that there is a misjoinder of causes of action.

7. For that the date of the alleged trespass is not alleged with sufficient certainty.

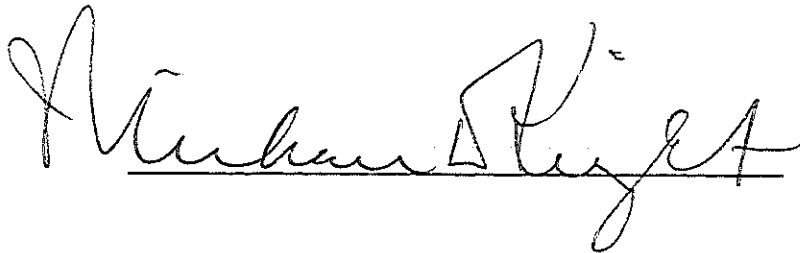

MICHAEL D. KNIGHT
Attorney for the Defendant

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing "Demurrer" to Taylor Wilkins, Esquire, Attorney for the Plaintiff, by depositing a copy of the same in the United States mail, postage prepaid, addressed to said attorney at his office in Bay Minette, Alabama, on this, the 22 day of August, 1972.



FILED

AUG 24 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

IN THE CIRCUIT COURT FOR BALDWIN COUNTY,
ALABAMA

| | | |
|---|-------------|-------------------------|
| LEONARD W. BOYETT and BETTY J. BOYETT | (((| |
| Plaintiffs | (| |
| VS | (| CIVIL ACTION NO: 10,493 |
| DELTA CORPORATION OF AMERICA, a Corporation, | ((| |
| Defendant | (| |

AMENDED COMPLAINT

Come now the Plaintiffs, Leonard W. Boyett and Betty J. Boyett, having first obtained leave of Court to file this amendment to their complaint, they allege as follows:

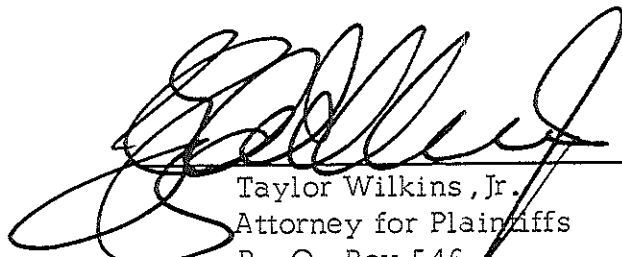
2. The Defendant wrongfully took from the possession of the Plaintiffs the following goods and chattels, the property of the Plaintiffs, to-wit: One 1969 Princess mobile home, serial number F 1859.

WHEREFORE, Plaintiffs demand judgment against the Defendant in the sum of SEVEN THOUSAND FIVE HUNDRED (\$7,500.00) DOLLARS, with costs.

3. The Defendant sued out a Writ of Detinue against the Plaintiff, Leonard W. Boyett, in the Baldwin County Circuit Court on the 21st day of September, 1971, being case number 10.034, wherein the Defendants were Wade C. Parker and Larry Boyett, being the one and same person as Leonard C. Boyett; that after having failed to perfect service upon either of these Defendants, the Defendant joined as a party defendant, B. Z. Grove by an amended complaint, filed October 15, 1971, and subsequently, on October 22, 1971, the Defendant again filed an amended complaint and joined D. Z. Grove, acting as agent for the Defendants, as a party defendant. Plaintiffs further aver that D. Z. Grove was served with a copy of the amended detinue summons and complaint and the Defendant subsequently took possession of the mobile home after posting a

replevy bond with the Baldwin County Sheriff. Plaintiffs further aver that at no time was D. Z. Grove at said time and place as aforesaid, the agent for Larry Boyett or Leonard Boyett, being one and the same person; that D. Z. Grove, at said time and place, did not have possession of the said mobile home and had no interest in the same. Plaintiffs further aver that D. Z. Grove was wrongfully joined as a party defendant, and it was known to the Defendant, Delta Corporation of America, that D. Z. Grove did not have any interest in or possession of said mobile home, and Plaintiffs aver that D. Z. Grove was joined for the sole purpose of allowing the Defendant to wrongfully obtain service of process in the case filed against the Plaintiff, Leonard W. Boyett, and as a result thereof, the Defendant wrongfully and maliciously obtained possession of said mobile home, and that the Plaintiffs, Leonard W. Boyett and Betty J. Boyett, were never served or given notice of the case pending against Larry Boyett or Leonard W. Boyett, being one and the same person, for the possession of said mobile home.

WHEREFORE, Plaintiffs demand judgment against the Defendant in the sum of SEVEN THOUSAND FIVE HUNDRED (\$7,500.00) DOLLARS, and costs.


Taylor Wilkins, Jr.
Attorney for Plaintiffs
P. O. Box 546
Bay Minette, Alabama

I, the undersigned, Taylor Wilkins, Jr., do hereby certify that I have served a copy of the foregoing Amended Complaint upon Mr. Michael D. Knight, Attorney at Law, Mobile, Alabama, by mailing the same in the United States Post Office, properly addressed, with first class postage paid thereon.

DONE this 9th day of November, 1973.


Attorney for Plaintiffs

FILED

NOV 14 1973

UNICE B. BLACKMON CIRCUIT CLERK

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
VIVIAN G. JOHNSTON, JR.
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MICHAEL D. KNIGHT
G. HAMF UZZELLE, III
BENJAMIN T. ROWE
G. L. LEATHERBURY, JR.
WILLIAM C. ROEDDER, JR.

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

January 2, 1974

Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama, 36507

RE: Leonard W. Boyett and Betty J. Boyett
vs. Delta Corporation of America
Civil Action Number 10,493
Circuit Court of Baldwin County, Alabama

Dear Mrs. Blackmon:

I have enclosed herein Motion for More Definite Statement and Motion to Dismiss to be filed in the above styled cause on behalf of the defendant, Delta Corporation of America. Would you please acknowledge receipt of same by signing and returning the enclosed carbon copy of this letter.

Best regards.

Yours very truly,



For the Firm

MDKslm
enclosures

| | | |
|-------------------------|---|--------------------------|
| LEONARD W. BOYETT and |) | IN THE CIRCUIT COURT OF |
| BETTY J. BOYETT, | (| BALDWIN COUNTY, ALABAMA. |
| Plaintiffs, |) | |
| VS: | (| |
| DELTA CORPORATION OF |) | |
| AMERICA, a corporation, |) | |
| Defendant. | (| CIVIL ACTION NO. 10,493 |

MOTION FOR MORE DEFINITE STATEMENT
AND
MOTION TO DISMISS

MOTION FOR MORE DEFINITE STATEMENT

Comes now the defendant in the above styled cause, DELTA CORPORATION OF AMERICA, a corporation, and respectfully moves the court to require the plaintiff to make a more definite statement of paragraph 3 of his complaint as last amended in that the same is so vague or ambiguous that this defendant cannot reasonably be required to frame a responsive pleading thereto, on the following separate and several grounds:

1. It is unclear from the allegations of paragraph 3 of the plaintiffs complaint as last amended what the plaintiffs claim is, that is, whether it is for trespass, conversion, abuse of process, or otherwise.

2. For aught that appears, paragraph 3 of the plaintiffs complaint is in the nature of a plea in abatement contesting the original jurisdiction of the court to authorize repossession of the property by the defendant herein, which is not a plea in bar as the allegations of the complaint as last amended would now aver.

3. For that it is unclear from the allegations of paragraph 3 of the plaintiffs complaint as last amended whether his cause of action is in trespass or in case.

In the alternative, this defendant moves the court to dismiss the plaintiffs complaint as last amended and each cause of action therein contained on the grounds that the same fails to state a claim against this defendant upon which relief can be granted.

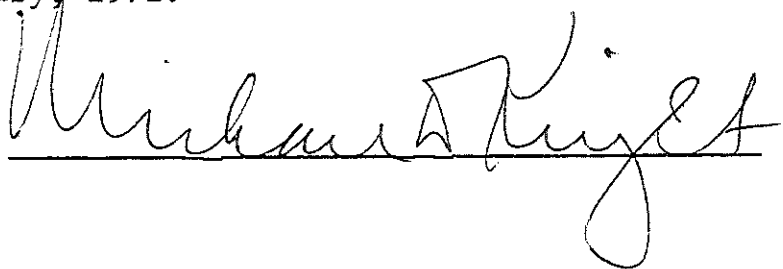

MICHAEL D. KNIGHT, Attorney for the
Defendant

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing motion to TAYLOR WILKINS, JR., Esquire, attorney for the plaintiffs, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office address in Bay Minette, Alabama, on this 2nd day of January, 1972.



FILED

JAN 3 1974

EUNICE B. BLACKMON CIRCUIT
CLERK

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
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J. THOMAS HINES, JR.
DONALD F. PICRCE
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STEPHEN G. CRAWFORD
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W. RAMSEY MCINNIS, JR.
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EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
BENJAMIN T. ROWE
G. L. LEATHERBURY, JR.
WILLIAM C. ROEDDER, JR.

April 5, 1974

Mrs. Eunice Blackmon, Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama, 36507

RE: Blanche Booth vs. Paul Clifford
Tracy, Case No. 10,900

Carl J. Booth vs. Paul Clifford
Tracy, Case No. 10,901

Leonard W. Boyett and Betty J.
Boyett vs. Delta Corporation of
America, Case No. 10,493

Dana M. Fishback, as Administratrix,
vs. Warrnel L. Thomas and Max Sullivan,
Case No. 37,971

Dear Mrs. Blackmon:

In conjunction with my conversation with you at the Courthouse on April 4, 1974, when you told me that you all would probably have a jury docket the second Monday in July, which appears to be the week beginning July 8, 1974, I indicated to you at that time that I would be out of the City of Mobile during that entire week. You asked that I simply write you a letter and let you know what cases I had on Judge Mashburn's docket, and you would do what you could to see that they did not get set during that week.

*Do not
set in July '74
out of court
& court house
agreed
by both
parties*

Mrs. Eunice Blackmon, Clerk
April 5, 1974
Page Two

Whatever assistance you can be to me in not setting
the above styled matters would be greatly appreciated.

Best regards.

Yours very truly,

A handwritten signature in cursive script, appearing to read "William".

For the Firm

MDKslm

| | | |
|-------------------------|---|--------------------------|
| LEONARD W. BOYETT |) | IN THE CIRCUIT COURT OF |
| and BETTY J. BOYETT, | (| BALDWIN COUNTY, ALABAMA. |
| Plaintiffs, |) | |
| VS: | (| |
| DELTA CORPORATION OF |) | |
| AMERICA, a corporation, | (| |
| Defendant. | (| CIVIL ACTION NO. 10,493 |

A N S W E R

Comes now the defendant in the above styled cause, DELTA CORPORATION OF AMERICA, a corporation, and for answer to the plaintiffs' complaint and each cause of action therein contained, separately and severally, says as follows, separately and severally:

1. The defendant admits that it took possession of a mobile home located in Baldwin County, Alabama, in November, 1971. The defendant denies the remaining allegations of the plaintiffs' First Cause of Action.

2. The defendant denies the allegations of paragraph numbered 2 of plaintiffs' amended complaint.

3. The defendant admits that a writ of detinue was issued September 21, 1971, being Case Number 10,034, wherein the defendants were WADE C. PARKER and LARRY BOYETT, and that said complaint in detinue was amended on, to-wit, October 15, 1971, and on, to-wit, October 22, 1971, so that D. Z. GROVE was added as a defendant. The defendant admits that said D. Z. GROVE was served with a copy of the amended detinue summons and complaint and that subsequent to posting the required bond, the defendants took possession of a 1969 Princess Mobile Home, Serial #F 1859. The defendant denies the remaining allegations of paragraph 3 of plaintiffs' amended complaint.

4. The defendant denies each allegation of the plaintiffs' complaint as last amended and each cause of action therein contained, separately and severally, not heretofore specifically admitted or denied.

FIRST AFFIRMATIVE DEFENSE

As a further defense, this defendant avers that plaintiffs' complaint as last amended and each cause of action therein contained, separately and severally, fail to state a claim against this defendant upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

As a further defense, this defendant avers that at the time and place it obtained possession of the 1969 Princess Mobile Home, Serial #F 1859, the defendant was the owner of said mobile home pursuant to its purchase from the Dixie National Bank of Miami, Florida, of a certain Retail Installment Contract assigned to said bank by the seller of said mobile home to the purchaser, WADE C. PARKER, and dated January 17, 1969. Said contract was, at all material times hereto, in default by the said WADE C. PARKER, and upon locating said mobile home, the defendant filed a complaint in detinue in the Circuit Court of Baldwin County, Alabama, claiming said property and in support thereof filed an appropriate bond. Said writ of detinue was issued out of the Circuit Court of Baldwin County, Alabama, and pursuant thereto the Sheriff of Baldwin County, Alabama, took possession of said mobile home. No bond having been given by the defendants named therein (in said writ of detinue), and having posted appropriate bond as required by the statutes of Alabama, and upon deliverance of said mobile home to the defendant herein by

the Sheriff of Baldwin County, Alabama, this defendant took possession of the same. At said time, the property in question was that of the defendant named herein, and defendant's actions on the occasion complained of were under due and legal process of law as heretofore and hereinabove set forth; hence, plaintiffs should not recover.

THIRD AFFIRMATIVE DEFENSE

As a further defense, this defendant avers that heretofore and on, to-wit, January 17, 1969, a Retail Installment Contract was entered into by and between WADE C. PARKER and GLORIA PARKER and WATERS TRAILER SALES of Pensacola, Florida, by the terms of which said WATERS TRAILER SALES, as Seller, sold a 1969 Princess Mobile Home, Serial #F 1859, to the said WADE C. PARKER and GLORIA PARKER for valuable consideration. Said Retail Installment Contract was thereafter assigned to the Dixie National Bank of Miami, Florida, and subsequently thereto purchased by the defendant herein, DELTA CORPORATION OF AMERICA. Said contract provides among other things that title to the motor vehicle shall remain in the Seller until all amounts owing are fully paid in case, and, if the Buyer defaults on any obligation or breaches any agreement or warranty under the contract, or if Seller has reasonable cause or deem itself insecure, the unpaid portion of the contract price shall become due, and Seller may, without notice or demand for performance of legal process, lawfully enter any premises where said vehicle could be found and take possession of the same. Said contract further provides that upon default in payments thereunder, the vehicle purchased thereunder might be repossessed and sold at public sale.

Defendant further avers that in November, 1971, when it obtained possession of said mobile home, the registered owner

of said mobile home in accordance with the records of the State of Florida as indicated by the attached certified copies of the records of the Florida Division of Motor Vehicles which said records are attached hereto and made a part hereof by reference, was the said WADE C. PARKER, and that in November, 1971, the contract referred to herein was in default in payment. Defendant avers that it took possession of said mobile home pursuant to its rights under the contractual provisions set out hereinabove; hence, plaintiffs ought not recover.

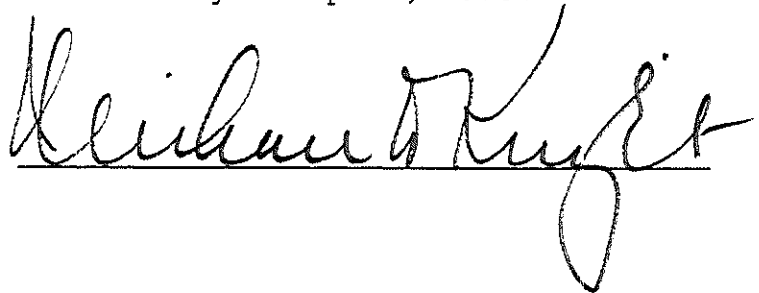

MICHAEL D. KNIGHT, Attorney for the
Defendant

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the above and foregoing Answer on TAYLOR D. WILKINS, JR., Esquire, attorney for the plaintiffs, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at his office address in Bay Minette, Alabama, on this 10th day of April, 1975.



FILED

APR 11 1975

EUNICE B. BLACKMON CIRCUIT
CLERK

LIEN SATISFACTION
STATE OF FLORIDA

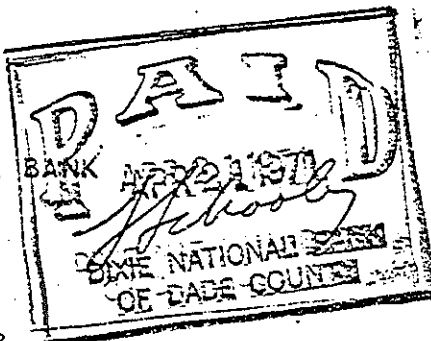
MOTOR NUMBER ALL MAKES THROUGH 1954 - IDENTIFICATION NUMBER 1955 AND LATER

| | | | |
|---------------|--------------|--------------------------------|---|
| MAKE PRINC | BODY MH | IDENTIFICATION NUMBER F1859 | TITLE NUMBER 7954266 |
| MODEL | DMV | CODE USE ONLY 60 | THIS VEHICLE IS OR HAS PREVIOUSLY BEEN USED AS A |
| YR. MK. 69 | CYLS WHLS | USE PVT | STATE PREV. REC. NEW |
| | | CTY 1 | |

REGISTERED OWNER (LAST NAME FIRST)
PARKER WADE C
NAVY TRL PARK
KEY WEST FLA

DATE OF ISSUE
MO. DAY YR.
5 23 69

1ST LIEN HOLDER
DIXIE NATIONAL
BOX T
MIAMI FLA



DATE
MO. DAY YR.
1 23 69

AMOUNT OF LIEN
\$9,225.60

2ND LIEN HOLDER

DATE
MO. DAY YR.

AMOUNT OF LIEN

LIEN SATISFACTION —

ADDITIONAL LIENS —

THE UNDERSIGNED HOLDER OF ABOVE DESCRIBED LIEN OR (LIENS) ON THE MOTOR VEHICLE DESCRIBED HEREON HEREBY ACKNOWLEDGES FULL PAYMENT AND SATISFACTION THEREOF. NOTE: IF LIEN HOLDER IS SAME ON 1ST AND 2ND LIENS AND ONLY ONE LIEN IS BEING SATISFIED, COMPLETE PROPER SPACE BELOW. DO NOT PERFORATE OR USE PAID STAMP.

1ST LIEN _____ BY _____
(LIEN HOLDER) (SIGNATURE AND TITLE)

2ND LIEN _____ BY _____
(LIEN HOLDER) (SIGNATURE AND TITLE)

SWORN AND SUBSCRIBED BEFORE ME THIS _____ 19 _____

AT _____ FLORIDA _____ (NOTARY PUBLIC OR OTHER OFFICER HAVING SEAL)

MY COMMISSION EXPIRES _____ (AFFIX SEAL)

11. MAY 60 2 87 PM

A 1037717

Tallahassee, Florida
October 5, 1973

I, John D. Calvin, Director, Division of
Motor Vehicles of the State of Florida
hereby certify that this is a true and
correct copy of the original on file in
this office.

JOHN D. CALVIN, DIRECTOR
DIVISION OF MOTOR VEHICLES
DEPT. OF HIGHWAY SAFETY AND
MOTOR VEHICLES

By: *Jacqueline Thomas*
Jacqueline Thomas, Chief
Title and Lien Services

"T. C. BODY FILE"

MOTOR NUMBER ALL MAKES THROUGH 1954 - IDENTIFICATION NUMBER 1955 AND LATER

| | | | | | | | |
|---------------|------|------------|------------|--------------------------------|----------|---|--|
| MAKE PRINC | | BODY MH | | IDENTIFICATION NUMBER F1859 | | TITLE NUMBER 7954266 | |
| MODEL | | OMV | CODE | USE | ONLY | THIS VEHICLE IS OR HAS PREVIOUSLY BEEN USED AS A | |
| | | | | | 60 | | |
| YR. MK. 69 | CYLS | WHLs | USE PVT | STATE PREV. REG. NEW | CTY 1 | | |

REGISTERED OWNER (LAST NAME FIRST)

PARKER MADE C

NAVY TRL PARK

KEY WEST FLA

DATE OF ISSUE
MO. DAY YR.
5/23/69

1ST LIEN HOLDER
DIXIE NATIONAL BANK

BOX T

MIAMI FLA

DATE
MO. DAY YR.
5/23/69

AMOUNT OF LIEN
\$9,225.60

2ND LIEN HOLDER

DATE
MO. DAY YR.

AMOUNT OF LIEN

ADDITIONAL LIENS —

A 1037717

Tallahassee, Florida
October 5, 1973

I, John D. Calvin, Director, Division of
Motor Vehicles of the State of Florida
hereby certify that this is a true and
correct copy of the original on file in
this office; and I further certify that
title to the said vehicle has been
continuously registered in the name of
Wade C. Parker

without change from May 23, 1969,
to the present date.

JOHN D. CALVIN, DIRECTOR
DIVISION OF MOTOR VEHICLES
DEPT. OF HIGHWAY SAFETY AND
MOTOR VEHICLES

By: *Jacqueline Thomas*
Jacqueline Thomas, Chief
Title and Lien Services

FILED

APR 11 1975

EUNICE B. BLACKMON CIRCUIT
CLERK

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. G. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
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J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. MCDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III
BENJAMIN T. ROWE
G. L. LEATHERBURY, JR.
WILLIAM C. ROEDDER, JR.
DAVID A. BAGWELL

April 10, 1975

Mrs. Eunice Blackmon
Circuit Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama, 36507

RE: Leonard W. Boyett and Betty J.
Boyett versus Delta Corporation
of America, #10,493

Dear Mrs. Blackmon:

I have enclosed herein the original Answer to be filed in this case on behalf of the defendant, Delta Corporation of America. Would you please acknowledge receipt and filing of same by signing the enclosed copy of this letter and returning it to me. I have also enclosed a self-addressed stamped envelope for your convenience.

Thank you for your assistance.

Yours very truly,



For the Firm

MDKslm
enclosures

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

LAWYERS

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G. L. LEATHERBURY, JR.
WILLIAM C. ROEDDER, JR.
DAVID A. BAGWELL

August 11, 1975

Mrs. Eunice Blackmon
Circuit Clerk
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama, 36507

Re: Leonard W. Boyett and Betty J.
Boyett versus Delta Corporation
of America, #10,493

Dear Mrs. Blackmon:

I have enclosed herein our firm draft payable to your order in the amount of \$29.00 as court costs in this case. Please send me a receipt for payment of these costs at your convenience.

Best regards.

Yours very truly,

For the Firm

MDK.kb
Enc.