

OBIE LEE SALTER, d/b/a  
FOLEY USED CAR CENTER

Plaintiff

VS.

LAUREL STANFORD

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10494

Before me, Carol S. Stallings, a Notary Public, personally appeared Laurel Stanford, who is known to me and who by me being first duly sworn, doth depose and say that she is the Defendant in the case of Obie Lee Salter, d/b/a Foley Used Car Center vs. Laurel Stanford, now pending in the Circuit Court of Baldwin County; that no issue has been joined between the parties in this action; that she, the said Defendant, does not claim title to the property sued for; but that one Beckey Stanford, a person who is not a party to this suit without collusion with affiant, the said Defendant, claims the property sued for.

Defendant prays the Court to make an order requiring said Beckey Stanford to come in and defend said action.

Laurel M. Stanford  
Laurel Stanford

Sworn to and subscribed before me this 24 day of July,  
1972.

Carol S. Stallings  
Notary Public

#### CERTIFICATE OF SERVICE

I do hereby certify that I have on this 31 day of July, 1972, served a copy of the foregoing pleading on each of all parties to the proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Thelma L. Nesbit

FILED

JUL 31 1972

EUNICE B. BLACKMON CIRCUIT CLERK

OBIE LEE SALTER, d/b/a  
FOLEY USED CAR CENTER

Plaintiff

VS.

LAUREL STANFORD

Defendant

and

BECKEY STANFORD

THIRD PARTY DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 10,494

ANSWER

Comes now Beckey Stanford, Third Party Defendant, and  
for answer to the Plaintiffs Bill of Complaint says as follows:

1.

The allegations of the Complaint are untrue.

WILTERS, BRANTLEY & NESBIT

BY: Phyllis S. Nesbit

Attorneys for Third Party Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 31 day of July,  
1972 served a copy of the foregoing pleading on counsel for all  
parties to this proceeding by mailing the same by United States  
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Phyllis S. Nesbit

*Filed July 31, 1972*  
*Erinice B. Blackman*

10,494

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

Before me, Sarah S. Presley, a Notary Public in and for said County, personally appeared Taylor Wilkins, Jr. who being by me duly sworn deposes and says that the property sued for in the complaint of Obie Lee Salter, d/b/a Foley Used Car Center filed in said Court, to-wit: One 1965 Ford Automobile, serial number 5A54X208125

belongs to Obie Lee Salter, d/b/a Foley Used Car Center, the plaintiff.

Sworn to and subscribed before me this 14 day of July, 19 72

Sarah Presley  
Notary Public

Taylor Wilkins, Jr.

STATE OF ALABAMA

Baldwin County

IN THE CIRCUIT COURT OF

Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, Taylor Wilkins, Jr., Principal, and Laurel Stanford, Sureties, are held and firmly bound unto Laurel Stanford, his heirs, executors and administrators in the sum of Fifty (\$50.00) Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 14 day of July, 19 72

The condition of the above obligation is such that whereas, ~~the above bound~~ Obie Lee Salter, d/b/a Foley Used Car Center has on the 14 day of July, 19 72 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Laurel Stanford

for the recovery of the following described property to-wit: One 1965 Ford automobile, serial number 5A54X208125

Now, if the said Obie Lee Salter shall fail in said suit and shall pay to the said Laurel Stanford, 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 14 day of July, 19 72

Eunice B. Blackmon  
Clerk, Circuit Court

Taylor Wilkins, Jr.

# The State of Alabama, {

## Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, Laurel Stanford  
and Becky Sanford

and

are held and firmly bound unto Obie Lee Salter, d/b/a Foley Used Car Center

in the sum of \$1,200.00 Dollars, for the payment of  
which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated this \_\_\_\_\_ day of July 19 72

The condition of the above obligation is such that whereas the said \_\_\_\_\_

Obie Lee Salter, d/b/a Foley Used Car Center did, on the 14th day  
of July 19 72 sue out of the Circuit Court of Baldwin County  
a writ of detinue directed to any Sheriff of said State and commanding him to take into his possession the  
following property, to-wit: \_\_\_\_\_

1965 Ford Automobile, Serial Number 5A54X208125

with the alternate value of \$600.00

which said writ was placed in the hands of Taylor Wilkins, Sr.,  
Sheriff of Baldwin County, Alabama, on the 14th day of July, 19 72,  
and executed by him on the 17th day of July, 19 72, by taking into his  
possession the following property, to-wit: \_\_\_\_\_

1965 Ford Automobile, Serial Number 5A54X208125

with the alternate value of \$600.00

And whereas the above bound Laurel Stanford and Becky Stanford,

Defendant in said suit, has, within five days from the execution of said writ, entered into and executed this bond as required by law and thereby obtained possession of said property seized under this writ.

Now if the said Laurel Stanford and Becky Stanford is cast in said  
suit and within thirty days after judgment deliver the property aforesaid to the Plaintiff and pay all costs  
and damages which may accrue from the detention thereof, then this obligation to be void, otherwise to  
remain in full force and effect.

Laurel Stanford (SEAL)  
Becky Sanford (SEAL)  
Becky Sanford (SEAL)

Taken and approved this 20 day of July 19 72

Taylor Wilkins  
Sheriff, Baldwin County, Ala.  
By Robert L. Williams

**THE STATE OF ALABAMA,**  
BALDWIN COUNTY.

**Circuit Court, Baldwin County**

**REPLEVY BOND  
OF DEFENDANT**

Obie Lee Salter, d/b/a

Foley Used Car Center

vs.

Laurel Stanford

Taken and approved this

day of \_\_\_\_\_, 193\_\_\_\_

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

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

19\_\_

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon LAUREL STANFORD

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 \_\_\_\_\_

OBIE LEE SALTER, d/b/a Foley Used Car Center

Witness my hand this 14 day of July 19 72

Eunice B. Blackmon, Clerk

COMPLAINT

Obie Lee Salter, d/b/a Foley Used Laurel Stanford

Car Center Plaintiff Versus Defendant

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

1965 Ford Automobile, Serial Number 5A54X208125, with the alternate value  
of SIX HUNDRED (\$600.00) DOLLARS.

FILED

JUL 14 1972

EUNICE B. BLACKMON CIRCUIT CLERK

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

from July 1 19 72, to July 19 72

Taylor Wilkins, Jr.

Plaintiff's Attorney.

State of Alabama

Baldwin County

CIRCUIT COURT

Obie Lee Salter, d/b/a Foley Used

Car Center

Plaintiff

VS.

Laurel Stanford

Defendant

Detinue Summons and Complaint

Filed \_\_\_\_\_, 19\_\_\_\_

EUNICE B. BLACKMON CIRCUIT CLERK, Clerk

Defendant may be served at:

Summerdale, Alabama

Taylor Wilkins, Jr.

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

JUL 14 1972

TAYLOR WILKINS

July 12  
Det 44  
Laurel Stanford

TAYLOR WILKINS, Sheriff

Defendant lives at

Received in office

\_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this 17 July, 1972

by leaving a copy with

Laurel Stanford  
And making in possession  
(1) 1965 Ford Automobile  
Reg# 5A34X208125  
And storing at Foley  
Jail

Taylor Wilkins, Sheriff  
Deputy Sheriff

Printed by Moore Printing Co.

Sheriff claims \_\_\_\_\_ miles at  
60  
Ten Cents per mile Total \$ 6.00  
TAYLOR WILKINS, Sheriff  
Deputy Sheriff

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