

2621

THE STATE OF ALABAMA )  
BALDWIN COUNTY )

KNOW ALL MEN BY THESE PRESENTS, That we, BONNIE P. DOWNING, as principal, and G.D. Luckie, as surety, are held and firmly bound unto JAMES DOWNING in the sum of FIVE HUNDRED (\$500.00) DOLLARS, to be paid to the said JAMES DOWNING, his heirs, executors, administrators or assigns; for which payment, well and truly to be made, we bind ourselves, and each of us, our and each of our heirs, executors and administrators, jointly and severally and firmly, by these presents. Sealed with our seals and dated this \_\_\_\_ day of May, 1955.

The condition of the above obligation is such, That whereas the above bound BONNIE P. DOWNING, on the day of the date hereof hath obtained at the suit of BONNIE P. DOWNING vs. JAMES DOWNING, a summons and complaint for the recovery of the plaintiff's property in specie against the defendant and asks an endorsement by the Clerk of this Court "That the Sheriff is required to take the property mentioned in said complaint into his possession," as required by law in such cases, which summons and complaint are returnable to the next term of the Circuit Court of Baldwin County, for said County, and which said endorsement is made upon the plaintiff entering into this bond.

Now, if the said plaintiff shall fail in this suit, and shall pay the defendant all such costs and damages as he may sustain by reason of the wrongful complaint in said case, then this obligation to be void, otherwise to remain in full force and effect.

Bonnie P. Downing (SEAL)  
G.D. Luckie (SEAL)

Approved this 27 day of May, 1955.

Arice J. French  
Clerk.

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE  
OF ALABAMA, GREETING:

You are hereby commanded to summon JAMES DOWNING to appear before the Circuit Court of Baldwin County, in and for said County, at the place of holding the same, within thirty days from the service of this summons and complaint, then and there to plead, answer or demur to the complaint of BONNIE P. DOWNING.

You are hereby commanded to execute this process instantler and make return as required by law.

Witness my hand this the 27 day of May, 1955.

David J. Henscher  
Clerk.

BONNIE P. DOWNING, )  
Plaintiff )  
vs. )  
JAMES DOWNING, )  
Defendant )

COUNT ONE:

The plaintiff claims of the defendant the following described personal property, to-wit: One (1) 1949 Chevrolet Business Coupe, Motor No. GAA-394027, the property of the plaintiff with the value of the use or hire thereof during the detention, to-wit, from the 20th day of May, 1955.

James A. Hendrix  
Attorney for Plaintiff.

Filed 27-2-55

David J. Henscher  
Clerk.

Defendant's Address:  
Robertsdale, Alabama.

RECORDED

Received 27 of May 1955  
and on 28 day of May 1955  
I served a copy of the within subpoena  
on James Downing

By service on James Downing

TAYLOR WILKINS, Sheriff

By Edna M. Ruffner

NO 2621

Bonnie P. Downing  
vs.  
James Downing

FILED

MAY 27 1955

ALICE L. DUCK, CLERK

BONNIE P. DOWNING,  
Plaintiff  
vs.  
JAMES DOWNING,  
Defendant

THE STATE OF ALABAMA )  
BALDWIN COUNTY )

Before me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County,  
in and for said County personally appeared JAMES A. HENDRIX, who, being duly  
sworn, deposeth and saith, That the property sued for in the complaint of BONNIE  
P. DOWNING vs. JAMES DOWNING, belongs to BONNIE P. DOWNING, the said plaintiff.

James A. Hendrix

Sworn to and subscribed before me this 27 day of May, 1955.

Alice J. Duck  
Clerk.

PLAINTIFF'S FORTHCOMING BOND

STATE OF ALABAMA )

BALDWIN COUNTY )

KNOW ALL MEN BY THESE PRESENTS: That we, BONNIE P. DOWNING, as principal, and G. D. LUCKIE and Edna Irwin, as sureties are held and firmly bound unto JAMES DOWNING in the sum of ONE THOUSAND DOLLARS (\$1,000.00), for payment of which well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors and administrators, jointly, severally and firmly by these presents.

Sealed with our seals, and dated this, the 4 day of June, 1955.

The condition of the above obligation is such, that whereas, the said BONNIE P. DOWNING did, on the 27th day of May, 1955, sue out of the Circuit Court of Baldwin County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding him to take in his possession the following property sued for in said action of detinue, to-wit: One (1) 1949 Chevrolet Business Coupe, Motor No. GAA-394027, which said writ was placed in the hands of TAYLOR WILKINS, Sheriff of the County of Baldwin on the 27th day of May, 1955, and executed by him on the 28th day of May, 1955, by taking into his possession the following property, to-wit: One (1) 1949 Chevrolet Business Coupe, Motor No. GAA-394027.

And whereas the said JAMES DOWNING, defendant in said suit has failed and neglected, for the space of five days from the taking into possession of said property by said Sheriff aforesaid, to give bond and take possession of said property as authorized by law.

Now therefore, if the said BONNIE P. DOWNING, plaintiff in said suit, shall deliver the above described property to the said JAMES DOWNING, defendant in said suit, within thirty days after judgment, in case plaintiff shall fail to recover the same in its said suit, and pay all damages for the detention of property and costs of suit, then, in that event, this obligation to be void, otherwise to remain in full force and effect.

Bonnie P. Downing (SEAL)

G. D. Luckie (SEAL)

Edna Irwin (SEAL)

Approved this 7 day of June, 1955.

Taylor Wilkins  
Sheriff, Baldwin County, Alabama.