

SOUTHERN GULF LUMBER : IN THE CIRCUIT COURT OF  
 CO., A CORP., D/E/A : BALDWIN COUNTY, ALABAMA  
 DELANEYS PLAINTIFF :  
 VS: : AT LAW  
 EMMITT F. PUGH :  
 DEFENDANT : NO. 3027

COUNT ONE

THE PLAINTIFF CLAIMS OF THE DEFENDANT THE  
 FOLLOWING PERSONAL PROPERTY, VIZ:

ONE MAYTAG WASHER, MODEL No. N2L,  
 SERIAL No. 373935P

WITH THE VALUE OF HIRE OR USE THEREOF DURING  
 THE DETENTION VIZ: FROM THE 24TH DAY OF MARCH, 1956.

PLAINTIFF AVERS THAT THE ABOVE DESCRIBED  
 PROPERTY WAS PURCHASED BY THE DEFENDANT BY VIRTUE OF  
 A CONDITIONAL SALES CONTRACT, WHEREIN HE AGREED TO  
 PAY A REASONABLE ATTORNEY'S FEE, AND THE PLAINTIFF  
 AVERS THAT IT SHOULD BE AWARDED A REASONABLE FEE  
 IN THE SUM OF THIRTY FIVE AND 00/100 (\$35.00)  
 DOLLARS.

PLAINTIFF FURTHER AVERS THAT IN SAID CON-  
 DITIONAL SALES CONTRACT WHEREIN THE TITLE TO THE  
 ABOVE DESCRIBED GOODS WAS RETAINED BY THE PLAINTIFF  
 THAT THE DEFENDANT DID WAIVE ALL RIGHTS IN AND TO  
 HIS EXEMPTION TO PERSONAL PROPERTY UNDER THE  
 CONSTITUTION AND LAWS OF THE STATE OF ALABAMA.

COLLINS, GALLOWAY & MURPHY

By: Glenn W. Galloway  
 ATTORNEYS FOR PLAINTIFF

ADDRESS OF  
 DEFENDANT:  
 ROUTE 1  
 SUMMERDALE, ALABAMA

FILED

SEP 7 1956

ALICE J. BUCK, Clerk

THE PLAINTIFF, SOUTHERN GULF LUMBER COMPANY,  
A CORPORATION, D/E/A DELANEYS HAVING MADE AFFIDAVIT  
AND GIVEN BOND, AS REQUIRED BY TITLE 7, SECTION  
918, OF THE CODE OF ALABAMA, THE SHERIFF IS RE-  
QUIRED TO TAKE THE PROPERTY MENTIONED IN THE  
WITHIN COMPLAINT INTO HIS POSSESSION, UNLESS THE  
DEFENDANT GIVE BOND, PAYABLE TO THE PLAINTIFF,  
WITH SUFFICIENT SURETY IN DOUBLE THE AMOUNT OF THE  
VALUE OF THE PROPERTY, WITH CONDITIONS THAT IF THE  
DEFENDANT IS CAST IN THE SUIT, WILL, WITHIN THIRTY  
DAYS THEREAFTER, DELIVER THE PROPERTY TO THE  
PLAINTIFF, AND PAY ALL COSTS AND DAMAGES WHICH  
MAY ACCRUE FROM THE DETENTION THEREOF.

Wm. J. Wicks  
CLERK

STATE OF ALABAMA

County of ~~MOBILE~~

SOUTHERN GULF LUMBER Co., A CORP., D/E/A

BALDWIN  
KNOW ALL MEN BY THESE PRESENTS, That we, DELANEYS  
IRENE COCHRAN & PETER V. CROLICHas Principal, and D/E/A UNION ~~XXX~~ BONDING Co., as Sureties, are held and firmly bound  
unto EMMITT F. PUGH

in the sum of THREE HUNDRED FIFTY AND 00/100 (\$350.00) DOLLARS

for the payment of which well and truly to be made we, jointly and severally, bind ourselves and  
each of us, our heirs, executors and administrators. Sealed with our seals and dated this 31<sup>st</sup>  
day of AUGUST in the year of our Lord, one thousand, nine hundred and FIFTY SIX

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said

So. GULF LUMBER Co., A CORP., D/E/A DELANEYS

did, on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, sue out in the CIRCUIT Court  
of ~~MOBILE~~ County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, com-  
BALDWIN  
manding him to take into his possession the following described property, to-wit:

ONE MAYTAG WASHER, MODEL No. N22, SERIAL No. 373935P

which said writ was placed in the hands of TAYLOR WILKINS  
Sheriff of the County of ~~MOBILE~~ BALDWIN, on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_ by taking into his  
possession the following described property, to-wit:

ONE MAYTAG WASHER, MODEL No. N22, SERIAL No. 373935P

and whereas the said EMMITT F. PUGH  
defendant in said writ, has failed and neglected, for the space of five days from the execution of said  
writ, to give bond and take possession of said property as authorized by law.

Now is the said SOUTHERN GULF LUMBER COMPANY, A CORPORATION

D/E/A DELANEYS

upon his failing in said suit, shall deliver the said property to the defendant within thirty days  
after judgment, and pay damages for the detention of the property and costs of suit, then this  
obligation to be void, otherwise to remain in full force and effect.

SOUTHERN GULF LUMBER Co., A CORP., D/E/A DELANEYS

By: [Signature] (Seal)  
ITS AGENT

IRENE COCHRAN &amp; PETER V. CROLICH (Seal)

By: [Signature] (Seal)

Taken and approved this the 23 day Oct. 1956

Taylor Wilkins

Sheriff, MOBILE County, Alabama

BALDWIN

D.S.

THE STATE OF ALABAMA,  
Mobile County

Know All Men by These Presents, That we SOUTHERN GULF LUMBER Co., A CORP., D/E/A  
DELANEYS, AND IRENE COCHRAN & PETER V. CROLICH D/E/A UNION BONDING Co.

are held and firmly bound unto EMMITT F. PUGH of BALDWIN

County, in the sum of THREE HUNDRED FIFTY Dollars, and costs to be paid to the said

EMMITT F. PUGH

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, severally,

and firmly, by these presents. Sealed with our seals and dated this 31<sup>st</sup> day of

August 1956

The condition of the above obligation is such, that whereas the above bound

SOUTHERN GULF LUMBER COMPANY, A CORP., D/E/A DELANEYS

on the day of the date hereof hath obtained at the suit of ITSELF

A Summons and complaint for the recovery of personal chattels in specie against

EMMITT F. PUGH

and asks an endorsement on the summons, "That the Sheriff is required to take the property men-  
tioned in said Complaint into his possession," as required by law in such cases, which Summons and  
Complaint are returnable to the Inferior Criminal Court of Mobile County, Civil Division on the  
day of \_\_\_\_\_, 195\_\_\_\_, and which endorsement is

made upon the plaintiff entering into this Bond.

Now, if the said Plaintiff shall fail in this suit, and pay the Defendant all such costs and damages

as HE  
may sustain by reason of the wrongful complaint

in said cause, then this obligation to be void; otherwise to remain in full force and effect.

SOUTHERN GULF LUMBER Co., A CORP., D/E/A DELANEYS  
Approved: \_\_\_\_\_ (L.S.)

Annie J. Hester  
Clerk of Inferior Criminal Court of Mobile County, Civil Division.

BY: J. B. Buck (L.S.)  
ITS AGENT

IRENE COCHRAN & PETER V. CROLICH (L.S.)

BY: Peter V. Crollich

THE STATE OF ALABAMA,  
Mobile County

THOMAS M. GALLOWAY, NOTARY PUBLIC, STATE OF ALABAMA, AT LARGE,  
Before me, ~~Wm. H. Kern, Clerk of the Superior Criminal Court of Mobile County, Civil Division,~~

personally appeared J. H. BECK

who, being duly sworn, depose and saith: That the property sued for in the complaint of  
SOUTHERN GULF LUMBER Co.,  
A CORP., D/E/A DELANEYS vs. EMMITT F. PUGH

to-wit:

ONE MAYTAG WASHER, MODEL No. N22, SERIAL No. 373935P

belongs to  
SOUTHERN GULF LUMBER COMPANY, A CORPORATION, D/E/A DELANEYS

the said Plaintiff.

Sworn to and subscribed before me this 31

day of August, A. D., 1956

Thomas M. Galloway  
Notary Public, State of Alabama,  
Civil Division

NOTARY PUBLIC, STATE OF ALA., AT LARGE

CLERK, CIRCUIT COURT, MOBILE COUNTY, ALABAMA.

I, the undersigned, John E. Mandeville, Clerk of the Circuit Court of Mobile County, Alabama, do hereby certify that were the bond herein presented to me as Clerk of this Court, I would approve the same.

STATE OF ALABAMA ) IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA.  
( MOBILE )

DETINUE  
BOND AND AFFIDAVIT

No. 3047

VS.

FILED

SEP 7 1956

ALICE L. MANN, Clerk

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3027

Sept. TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EMMITT F. PUGH

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

EMMITT F. PUGH, Defendant

by SOUTHERN GULF LUMBER CO. A CORP. d/b/a DELANEYS, Plaintiff

Witness my hand this 7th. day of September 19 56

Alice J. Duckey, Clerk

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THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

SOUTHERN GULF LUMBER CO. A CORP.

d/b/a DELANEYS

Plaintiffs

vs.

EMMITT F. PUGH

Defendants

SUMMONS and COMPLAINT

Filed SEPT. 7 19 56

Alice J. Duck

Clerk

Thomas M. Galloway

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

*Sept 7*, 19 *56*

, Sheriff

I have executed this summons

this *10-16*, 19 *56*  
by leaving a copy with

*Emmett F. Pugh*

Sheriff claims *60* miles at

Ten Cents per mile Total \$ *6.00*  
TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

*by taking into possession  
one maytag Washing  
machine Model # 724  
Serial # 3739351  
The Plaintiff made  
bond: 10-23-56*

*Taylor Wilkins* Sheriff

*Edleigh Stradman* Deputy Sheriff