

IN THE CIRCUIT COURT - LAW SIDE

Witness my hand this 26th day of September, 1956.

Alice J. Duck
Clerk

COUNT ONE:

By:

Attorneys for Plaintiff

3041

RECORDED

SHIRLEY WRIGHT,
individually and doing
business as WRIGHT MOTORS,
PENSACOLA, FLORIDA,

Plaintiff,

vs.

MRS. O. GIVENS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

SUMMONS AND COMPLAINT

FILED

SEP 26 1956

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

Received 28 day of Sept 1956
and on 1 day of Oct 1956
served a copy of the within detainer
on Mrs. O. Givens and taking
the within property in my
y service of possession
Bond made by pleft
TAYLOR WILKINS, Sheriff
By Taylor Wilkins D.S.
Seminole 90 mi
Sheriff claims 9.00 files at
Pen Coms per mile Total 3.90
TAYLOR WILKINS, Sheriff
BY Wilkins
DEPUTY SHERIFF


STATE OF ALABAMA

AFFIDAVIT

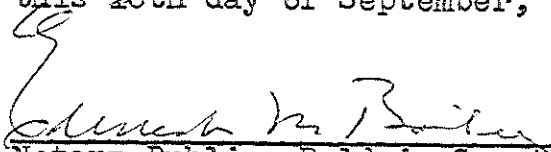
BALDWIN COUNTY

Before me, Ernest M. Bailey, a Notary Public, in and for said County in said State personally appeared Norborne C. Stone, who is known to me and after being by me first duly and legally sworn did depose and say under oath as follows:

That he is one of the Attorneys of Record for the Plaintiff in that certain cause in the Circuit Court of Baldwin County, Alabama, at law, wherein Shirley Wright, individually and doing business as Wright Motors is the Plaintiff and Mrs. O. Givens is the Defendant. That the property sued for in said cause belongs to the Plaintiff.


Norborne C. Stone

Sworn to and subscribed before me
this ^{26th} ~~18th~~ day of September, 1956.


Notary Public, Baldwin County, Ala.

RECORDED

SHIRLEY WRIGHT,
individually and doing
business as WRIGHT MOTORS,
PENSACOLA, FLORIDA,

Plaintiff,

vs.

MRS. O. GIVENS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IAW SIDE

AFFIDAVIT

FILED

SEP 26 1956

ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE

BAY MINETTE, ALABAMA

SHIRLEY WRIGHT, individually,
and doing business as WRIGHT
MOTORS, PENSACOLA, FLORIDA,

PLAINTIFF

VS

MRS. O. GIVENS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Comes now the Defendant in the above styled cause and says that she
is not guilty of the matters alleged therein.

Wilters & Brantley

BY:

John M Brantley
Attorneys for the Defendant

The Defendant demands a trial by jury.

Wilters & Brantley

BY:

John M Brantley
Attorneys for the Defendant

The State of Alabama, }
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, Mrs. O. Givens

and _____

are held and firmly bound unto Shirley Wright and 1/2 Wright Motor
 in the sum of \$3,000 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 _____ 1956

The condition of the above obligation is such that whereas the said Shirley Wright
individually and 1/2 Wright Motor did, on the 26th day
 of Sept 1956 sue out of the Circuit Court of Baldwin Co. Ala.
 a writ of detinue directed to any Sheriff of said State and commanding him to take into his possession the
 following property, to-wit: One 1955 V-8 Chevrolet Bel Air
Sport Coupe Motor No. VC 55S0 46672

which said writ was placed in the hands of Jaylor Wilkum

Sheriff of Baldwin County, Alabama, on the 28th day of Sept, 1956,

and executed by him on the _____ day of _____, 19____, by taking into his
 possession the following property, to-wit:

One 1955 V-8 Chevrolet Bel Air Sport
Coupe Motor No. VC 55S0 46672

And whereas the above bound Mrs. O. Givens,

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 Mrs. O. Givens 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.

X Mrs. O. Givens (SEAL)

Quinn Givens (SEAL)

William C. Meacham (SEAL)

Taken and approved this 1st day of Oct 1956

Jaylor Wilkum
 Sheriff, Baldwin County, Ala.

STATE OF ALABAMA,
Baldwin County. }

KNOW ALL MEN BY THESE PRESENTS, That We, Shirley Wright, individually
and doing business as WRIGHT MOTORS.

as principal, and The Fidelity & Casualty Company of New York.
a corporation.

as surety, are held and firmly bound unto Mrs. O. Givens

in the sum of One Hundred and No/100 (\$100.00) DOLLARS,

to be paid to the said Mrs. O. Givens, her 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 26th day of September
in the year of our Lord, 1956.

The condition of the above obligation is such, That whereas the above bound Shirley Wright

Shirley Wright, on the day of the date hereof hath obtained at the suit of
Shirley Wright vs. Mrs. O. Givens,

a summons and complaint for the recovery of personal property in specie against said 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 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 dam-
ages as ~~she~~ 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.

Individually and doing business (L. S.)
as WRIGHT MOTORS
THE FIDELITY & CASUALTY COMPANY (L. S.)
OF NEW YORK, a corporation

By: Lorothy Hand (L. S.)
As Its Attorney-in-Fact

Approved this 26 day of Sept 1956

Beice J. Hunk
Clerk.

The Fidelity and Casualty Company of New York

The Pioneer Bonding Company of the United States

BONDING DEPARTMENT

80 MAIDEN LANE, NEW YORK, N. Y.

Know all Men by these Presents:

That The Fidelity and Casualty Company of New York has made, constituted, and appointed, and by these presents does make, constitute, and appoint

Dorothy Hand of Bay Minette, Alabama

its true and lawful attorney for it and in its name, place, and stead to execute on behalf of the said Company, as surety, bonds, undertakings, and contracts of suretyship to be given to all obligees

provided that no bond or undertaking or contract of suretyship executed under this authority shall exceed in amount the sum of twenty five thousand dollars.

In Witness Whereof The Fidelity and Casualty Company of New York has caused its official seal to be hereunto affixed, and these presents to be signed by one of its vice presidents and attested by one of its assistant secretaries this 14th day of January, 1954

The Fidelity and Casualty Company of New York

By John C. Brodsky

Vice President.

Attest:

A. J. Miller

Assistant Secretary.

STATE OF NEW YORK,

COUNTY OF NEW YORK,

ss.:

A. J. Miller

, being duly sworn, deposes and says:

That he is an assistant secretary of The Fidelity and Casualty Company of New York, the corporation which is described in and which executed the instrument overleaf; that he knows the corporate seal of the said corporation; that the seal affixed to the instrument overleaf is the corporate seal of The Fidelity and Casualty Company of New York, and was thereto affixed by order and authority of the board of directors of the said Company; that he signed his name thereto by like order and authority; that he is acquainted with JOHN C. BRODSKY, and knows him to be a Vice President of the said Company; that the signature of the said JOHN C. BRODSKY subscribed to the said instrument is in the genuine handwriting of the said JOHN C. BRODSKY, and was thereto subscribed by order and authority of the said board of directors of the said Company; that the said Company is duly and legally incorporated under the laws of the State of New York, and has complied with and is now complying with the provisions of the Act of Congress of August 13, 1894, allowing certain corporations to be accepted as surety on bonds.

The deponent further states that the following is a true copy of an extract from the minutes of a meeting of the board of directors of the said Company held at its office in the City of New York on the 17th day of January, 1951, a quorum being present, and the resolution contained in the said extract was unanimously adopted and is now in full force and effect:

"RESOLVED, That FRANK A. CHRISTENSEN, President of the Company, J. VICTOR HERD, Executive Vice President of the Company, WILLIAM L. BATES and JOHN C. BRODSKY, each a Vice-President of the Company, be, and that each of them hereby is, authorized to execute powers of attorney qualifying the attorney named in the given power of attorney to execute in behalf of The Fidelity and Casualty Company of New York bonds, undertakings, and all contracts of suretyship; and that any Vice-President, or any Secretary, or any Assistant Secretary be, and that each of them hereby is, authorized to attest the execution of any such power of attorney, and to attach thereto the seal of the Company."

Sworn to before me this

A. J. Miller

Assistant Secretary.

14th day of January, 1954

Florence Carroll

COMMISSIONER OF DEEDS,

CITY OF NEW YORK.

I, H. Paliotto

, an attorney of The Fidelity and Casualty Company of New York, do hereby certify that I have compared the copy of the power of attorney overleaf and the foregoing copy of the affidavit annexed to the said power of attorney with the originals now on file in the home office of the said Company, and that the same are correct transcripts therefrom and of the whole of the said originals, and that the said power of attorney has not been revoked and is now in full force and effect.

In testimony whereof I have hereunto set my hand and affixed the seal of the said Company this 26th day of September, in the year of one thousand nine hundred and fifty-six.

H. Paliotto

Attorney.