

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

No. _____

_____, 19____

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon Joseph Pleasant and Marvie Lee Pleasant

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 _____

N. A. Graham Sr. d/b/a City Furniture Company,

Witness my hand this 15 day of March, 1957.

W. J. [Signature], Clerk.

COMPLAINT

N. A. Graham Sr. d/b/a City Furniture Co., Joseph Pleasant and Marvie Lee Pleasant

Plaintiff Versus _____ Defendant

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

- 1-X Wal #10 Bed Room Suite; 1-White Kitchen Cab.; 1-7 Pc. Green Mesco Dinette;
- 1-G.E. Iron; 3 9x12 rugs.

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

from _____, 19____, to _____, 19____

[Signature] Plaintiff's Attorney.

The State of Alabama, }
Baldwin County

KNOW ALL MEN BY THESE PRESENTS, That we, N. A. Graham Sr., d/b/a

City Furniture Company,

and _____

are held and firmly bound unto Joseph Pleasant and Marvie Lee Pleasant

in the sum of Five Hundred Seventy & 20/100 (\$570.20) 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 March, 1957

The condition of the above obligation is such that whereas the said N. A. Graham Sr.,

d/b/a City Furniture Company, did, on the 16th day

of March, 1957 sue out of the Circuit Court of Baldwin

County a writ of detinue directed to any Sheriff of the State of Alabama commanding him

to take into his possession the following property; to-wit: 1-K Wal #10 Bed Room Suite;

1-White Kitchen Cab.; 1-7 Pc. Green Mesco Dinette; 1-G.E. Iron; 3 9x12 rugs.

which said writ was placed in the hands of Taylor Wilkins,

Sheriff of Baldwin County, Alabama, on the 16th day of March, 1957,

and executed by him on the 18th day of March, 1957, by taking into his possession the following property, to-wit:

1-K Wal #10 Bed Room Suite; 1-White Kitchen Cab.; 1-7 Pc. Green Mesco

Dinette; 1-G.E. Iron; 3 9x12 rugs.

And whereas the said Joseph Pleasant and Marvie Lee Pleasant, 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 if the said N. A. Graham Sr., d/b/a City Furniture Company upon his failing in said suit shall deliver the said property to the Defendant within thirty days after judgment and pay all 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.

N. A. Graham Sr. (SEAL)

City Furniture Company (SEAL)

Leo A. Townsend (SEAL)

Taken and approved this 27th day of March, 1957

Taylor Wilkins
Sheriff, Baldwin County, Ala.

~~March 26th, 1957 - I, the undersigned, do hereby certify that if the above~~
~~and were presented to me, I would approve the same.~~

John E. Mandeville
JOHN E. MANDEVILLE, Clerk, Circuit Court, Mobile
Alabama.

STATE OF ALABAMA, }
Baldwin County.

KNOW ALL MEN BY THESE PRESENTS, That We, N. A. Graham Sr. d/b/a/ City Furniture Company, Baldwin County, Alabama

as principal, and _____

as surety, are held and firmly bound unto Joseph Pleasant and Marvie Lee Pleasant

in the sum of Five Hundred Seventy & 20/100 (\$570.20) DOLLARS,

to be paid to the said Joseph Pleasant and Marvie Lee Pleasant, their ~~XXX~~ 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 March

in the year of our Lord, 1957---

The condition of the above obligation is such, That whereas the above bound N. A. Graham Sr.

_____, on the day of the date hereof hath obtained at the suit of N.A. GRaham Sr. d/b/a City Furniture Co. vs. Jpseph Pleasant and Marvie Lee Pleasant,

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 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.

N.A. Graham Sr. (L. S.)

Ben Funderland (L. S.)

Leo A. Townsend (L. S.)

Approved this 15 day of March 1957

Archie - [Signature]
Clerk.

I hereby certify that if this bond were presented to me I would approve the same as good and sufficient surety.
March 11th, 1957.

JOHN E. MANDEVILLE, CLERK
BY Myrtle M. Grant
Deputy Clerk