

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 Cecil Godwin and Muriel Godwin

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 27 day of March, 1957

Reese J. French, Clerk.

COMPLAINT

N.A. Graham Sr. d/b/a City Furniture Co.

Cecil Godwin and Muriel Godwin

Plaintiff Versus Defendant

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

1-3 BP Cedar Robe & 34" Chest; 1-3A. NOFC Gold B.R. Suite; 2-Pink Vanity

Lamps. no lamps found.

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

from \_\_\_\_\_, 19\_\_\_\_, to \_\_\_\_\_, 19\_\_\_\_

Cecil Godwin 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 Cecil Godwin & Muriel Godwin

in the sum of THREE HUNDRED 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 \_\_\_\_\_ 19\_\_\_\_

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 27th 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: 1-3 BP Cedar Robe & 34" Chest;

1-3A. NOFC Gold B.R. Suite; 2-Pink Vanity Lamps.

which said writ was placed in the hands of Taylor Wilkins

Sheriff of Baldwin County, Alabama, on the 27th day of March, 1957

and executed by him on the 10th day of April, 1957, by taking into his possession the following property, to-wit:

1-3 BP Cedar Robe & 34" Chest; 1-3A. NOFC Gold B.R. Suite; 2 Pink Vanity

Lamps.

And whereas the said Cecil Godwin and Muriel Godwin 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 (SEAL)

Benjamin F. Frazier (SEAL)

Leo A. Townsend (SEAL)

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

Taken and approved this 18th day of April 1957 JOHN E. MANDEVILLE, CLERK  
Jerry Wilkins BY Myrtle M. Hall  
 Sheriff, Baldwin County, Ala. Deputy Clerk.

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 Cecil Godwin and Muriel Godwin

in the sum of Three Hundred & no/100 (\$300.00) - - - - - DOLLARS,

to be paid to the said Cecil Godwin and Muriel Godwin, their, ~~heirs~~ 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. Cecil Godwin and Muriel Godwin,

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.

[Signature] (L. S.)  
[Signature] (L. S.)  
[Signature] (L. S.)

Approved this 27 day of March 1957

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

[Signature]  
JOHN E. MANDEVILLE, Clerk, Circuit Court, Mobile  
County, Alabama.