

EAST POINT MOTORS, INC.,
a corporation

PLAINTIFF

VS

JOHN CHARLES HEATON alias
JOHN CHARLES HEATON JR.,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CASE NO. 3414

Come the parties to the above styled cause and agree to a consent judgment whereby the Defendant releases to the Plaintiff the said automobile sued for and the Plaintiff accepts said automobile in full satisfaction of the debt.

It is further agreed that costs be on the Plaintiff.

East Point Motors, Inc., a corporation

BY:


PLAINTIFF.


DEFENDANT.

EAST POINT MOTORS, INC.,
a corporation

PLAINTIFF

VS

JOHN CHARLES HEATON alias
JOHN CHARLES HEATON JR.,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CASE NO. _____

Come the parties to the above styled cause and agree to a consent judgment whereby the Defendant releases to the Plaintiff the said automobile said for and the Plaintiff accepts said automobile in full satisfaction of the debt.

It is further agreed that costs be on the Plaintiff.

East Point Motors, Inc., a corporation

BY:

C. L. D. Thompson
PLAINTIFF.

J. C. Heaton Jr.
DEFENDANT.

EAST POINT MOTORS, INC.,
a corporation

PLAINTIFF

VS

JOHN CHARLES HEATON alias
JOHN CHARLES HEATON JR.,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CASE NO. _____

Come the parties to the above styled cause and agree to a consent judgment whereby the Defendant releases to the Plaintiff the said automobile sued for and the Plaintiff accepts said automobile in full satisfaction of the debt.

It is further agreed that costs be on the Plaintiff.

East Point Motors, Inc., a corporation

BY:

C. L. Davis Thompson
PLAINTIFF.

J. C. Heaton Jr.
DEFENDANT.

STATE OF ALABAMA

BALDWIN

COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

Before me, T. C. Hand, a Notary Public in and for said County,
personally appeared C. LeNoir Thompson who being by me

duly sworn deposes and says that the property sued for in the complaint of

East Point Motors, Inc., a corporation filed in said Court, to-wit:

One Red & White 1956 Ford Convertible, serial number M6EC131371, tag

number, Maryland GK 3230.

belongs to East Point Motors, Inc., a corporation, the plaintiff.

Sworn to and subscribed before me this 2

day of December, 1957.

T. C. Hand
Notary Public

STATE OF ALABAMA

BALDWIN

COUNTY

IN THE CIRCUIT COURT OF

BALDWIN

COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, East Point Motors, Inc., a corporation,
Principal, and
Sureties, are held and
firmly bound unto John Charles Heaton alias John Charles Heaton Jr., his heirs, executors and admin-
istrators in the sum of Two Thousand (\$2,000.00) Dollars,
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-
trators.

Sealed with our seals and dated the day of December, 1957.

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

East Point Motors, Inc., a corporation has on the day of

December, 1957 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said John Charles Heaton
alias John Charles Heaton Jr., for the recovery of the following
described property, to-wit:

One Red & White 1956 Ford Convertible, serial number M6EC131371, tag number

Maryland GK 3230

Now, if the said East Point Motors, Inc., a corporation shall fail in said suit
and shall pay to the said John Charles Heaton alias John Charles Heaton Jr., the defendant in
said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to
be void, otherwise, to remain in full force and effect.

Taken and approved this 2 day of

Dec, 1957

Archie Duck
Clerk, Circuit Court

East Point Motors, Inc. (SEAL)

C. LeNoir Thompson (SEAL)

A. C. Jernigan (SEAL)

STATE OF ALABAMA

COUNTY

IN THE CIRCUIT COURT OF

COUNTY

Before me, _____, a Notary Public in and for said County,
personally appeared _____ who being by me
duly sworn deposes and says that the property sued for in the complaint of _____

_____ filed in said Court, to-wit:

belongs to _____, the plaintiff.

Sworn to and subscribed before me this _____

day of _____, 19____

Notary Public

STATE OF ALABAMA

Baldwin

COUNTY

IN THE CIRCUIT COURT OF

Baldwin

COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, _____

East Point Motors Inc., _____, Principal, and

UNITED STATES FIDELITY AND GUARANTY COMPANY

a corporation under the laws of the State of Maryland, and
having its principal office in the City of Baltimore, Maryland

_____; Sureties, are held and

firmly bound unto John Charles Heaton, alias John _____, his heirs, executors and admin-

istrators in the sum of Three Thousand* - - - - - Dollars,
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-

Sealed with our seals and dated the 2nd day of December, 19 57.

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

East Point Motors Inc., _____

has on the 2nd day of

December, 19 57 sued out a writ of detinue in the Circuit Court of Baldwin

County, returnable to the said Circuit Court against the said _____

John Charles Heaton, alias John Charles Heaton / Jr. for the recovery of the following
described property, to-wit:

1956 Ford Convertible, Serial Number M6E0131374, Red and White
color, Tag No. Maryland - OK 3230

Now, if the said East Point Motors Inc., _____

shall fail in said suit
Heaton Jr.

and shall pay to the said John Charles Heaton alias John Charles _____, the defendant in
said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to
be void, otherwise, to remain in full force and effect.

Taken and approved this _____ day of _____

Clerk, Circuit Court

UNITED STATES FIDELITY AND GUARANTY COMPANY (SEAL)

BY _____

J. L. WEED, Attorney-in-Fact

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 John Charles Heaton alias John Charles

Heaton, Jr.,

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 _____

East Point Motors, Inc., a corporation

Witness my hand this 2 day of Dec, 1957

Wince J. Wink, Clerk.

COMPLAINT

East Point Motors, Inc., a

John Charles Heaton alias John

corporation

Plaintiff

Versus

Charles Heaton, Jr. Defendant

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

One Red & White 1956 Ford Convertible, serial number M6E0131374, tag
number, Maryland CK 3230.

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

from November 1, 1957, to _____ date _____, 19____

C. L. Thompson Plaintiff's Attorney.