

SOUTHERN GULF LUMBER : IN THE CIRCUIT COURT
CO., INC., A CORP., :
d/b/a DELANEYS : OF BALDWIN COUNTY
Plaintiff : ALABAMA
VS: : AT LAW
JOHN H. BISHOP : NO. 3524
Defendant :

COUNT ONE

The Plaintiff claims of the Defendant the following
personal property, viz:

One Maytag Washer, Model No. E2LP
Serial No. E 140591G

One Victory Deep Freeze, Model No. O-19
Serial No. O-533573

With the value of hire or use thereof during the detention
viz: From the 10th day of November, 1957.

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 EIGHTY AND 00/100 (\$80.00)
DOLLARS.

Plaintiff further avers that in said conditional 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 of personal property under
the Constitution and laws of the State of Alabama.

COLLINS, GALLOWAY & MURPHY

BY: Thomas W. Galloway
ATTORNEYS FOR PLAINTIFF

ADDRESS OF DEFENDANT:

Route 1, Box 125C
Fairhope, Alabama

The Plaintiff, Southern Gulf Lumber Company, Inc., a Corporation, d/b/a Delaneys, having made affidavit and given bond, as required by Title 7, Section 918, of the Code of Alabama, the Sheriff is required to take the property mentioned in the within complaint into his possession, unless the Defendant gives 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.

Reice J. Wacker
Clerk

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3524

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John H. Bishop

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

JOHN H. BISHOP

, Defendant

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

, Plaintiff

Witness my hand this 25 day of April 1958

Alice J. Duck, Clerk

THE STATE OF ALABAMA,
-Mobile County-
Baldwin County

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Southern Gulf Lumber Co., Inc.
a Corp., d/b/a Delaneys & Irene Cochran & Peter V. Crolich

are held and firmly bound unto John H. Bishop
his heirs, executors and administrators, in the
sum of Eight Hundred and 00/100 (\$800.00) Dollars, for
the payment of which, we bind ourselves, our and each of our heirs, executors, and administrators, jointly
and severally, firmly by these presents.

Sealed with our seals and dated this 22nd day of April, A. D. 1958

The Condition of the above Obligation is such, That whereas the above bounden Southern
Gulf Lumber Co., Inc., a Corp., d/b/a Delaneys has, on
the _____ day of _____ 19____, sued out from the office of the
Baldwin
Clerk of the Circuit Court of Mobile, in the State of Alabama, a Writ of Detinue, returnable to the present
Baldwin
term of said Circuit Court of Mobile against the said John H. Bishop

_____ for the recovery of the following property.

to-wit: One Maytag Washer, Model No. E2LP, Serial No. E 140591G

One Victory Deep Freeze Model No. 0-19, Serial No. 0-533573

NOW, if the said So. Gulf Lumber Co., Inc., a Corp., d/b/a Delaneys shall fail
in said suit, and shall pay to the said John H. Bishop
the defendant in said writ all such costs and damages as he may sustain by the wrongful suing out of said
Writ of Detinue, then this obligation to be void, otherwise to remain in full force and benefit.

So. Gulf Lumber Co., Inc., a Corp., d/b/a Delaneys

BY: [Signature] (Seal)
its agent

Irene Cochran & Peter V. Crolich (Seal)

by B.L. Sturtevant atty in Fact (Seal)

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, Ala.

THE STATE OF ALABAMA
Mobile County

DETINUE AFFIDAVIT

Thomas M. Galloway Notary Public, State of Alabama, at Large
PERSONALLY appeared before me, ~~John E. Mandeville, Clerk of the Circuit Court of Mobile County,~~
Tom Tuggle

who, being duly sworn, deposes and says, that the property sued for in the complaint of Southern
Gulf Lumber Co., Inc., a Corp., d/b/a Delaneys vs. John H. Bishop

to-wit

One Maytag Washer, Model No. E2LP, Serial No. E140591G

One Victory Deep Freeze Model No. 0-19, Serial No. 533573

belongs to So. Gulf Lumber Co., Inc., a Corp., d/b/a Delaneys the said Plaintiff.

Sworn to and subscribed the 22nd day

of April, 1958, before me.

Thomas M. Galloway Clerk,
Notary Public, State of Alabama, at Large

Tom Tuggle

RECORDED

No. 35224

Circuit Court

MOBILE COUNTY

VS. { Detinue Affidavit
and Bond

Filed 19

FILED

APR 25 1958

Clerk Circuit Court, Mobile County

ALICE I. BUCK, Clerk

Attorney

STATE OF ALABAMA

County of Mobile

Baldwin

Southern Gulf Lumber Co., Inc., a

KNOW ALL MEN BY THESE PRESENTS, That we, Corporation d/b/a Delaneys

Irene Cochran & Peter V. Crolich

as Principal, and _____ and _____, as Sureties, are held and firmly bound unto John H. Bishop

in the sum of Eight Hundred and 00/100 (\$800.00) 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 22nd day of April in the year of our Lord, one thousand, nine hundred and Fifty eight

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said Southern Gulf Lumber Co., Inc., a Corp., d/b/a Delaneys

did, on the _____ day of April, 19 58, sue out in the Circuit Court of Baldwin County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, com-

manding him to take into his possession the following described property, to-wit: _____

One May tag Washer, Model No. E2LP, Serial No. E 140591G

One Victory Deep Freeze Model No. 0-19, Serial No. 0-533573

which said writ was placed in the hands of Taylor Wilkins Sheriff of the County of Mobile, on the _____ day of _____, 19 _____ by taking into his

possession the following described property, to-wit: _____

One Maytag Washer, Model No. E2LP, Serial No. E 140591G

One Victory Deep Freeze, Model No. 0-19, Serial No. 0-533573

and whereas the said John H. Bishop 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, Inc., a Corporation, d/b/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.

So. Gulf Lumber Co. Inc., a Corp., d/b/a Delaneys

By: Tommy Taylor (Seal)
its agent

Irene Cochran & Peter V. Crolich (Seal)

By: Peter V. Crolich (Seal)

Taken and approved this the 20 day May, 19 58

Taylor Wilkins
Sheriff, Mobile County, Alabama

I, the undersigned, do hereby certify that if the above bond were presented to me as Circuit Clerk, here in Mobile, Alabama, I would approve the same.

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