

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3777

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLIAM HARVILLE and SADIE HARVILLE,

separately and severally

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 WILLIAM HARVILLE and  
SADIE HARVILLE, separately and severally-----, Defendant.

by SOUTHERN GULF LUMBER COMPANY, A Corp., d/o/a DELANEY'S-----  
-----, Plaintiff.

Witness my hand this 27-----day of February-----1959-----

Deirdre J. [Signature]-----, Clerk

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The State of Alabama

Baldwin County

CIRCUIT COURT

SOUTHERN GULF LUMBER COMPANY, A Corp.

d/b/a DELANEY'S

Plaintiffs

vs.

WILLIAM HARVILLE, and SADIE HARVILLE

Separately and severally

Defendants

Summons and Complaint

Filed 2/27/59 1959

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

2/27 1959

\_\_\_\_\_, Sheriff

I have executed this summons

this 3-2 1959

by leaving a copy with

William Harville  
Sadie Harville

One propane tank,  
Model No. 150 A.H., Serial  
No. 3052  
one full size Welbilt  
Range, Serial No 195945  
Pkg made bond  
3/18/59. Signed by Delaney  
By: Tom Suggs.  
Property released to Pkg

Taylor Wilkins Sheriff

W. A. Zeller Deputy Sheriff

Sherriff Wilkins Deputy Sheriff

Ten Cents per mile Total \$ 1.20

TAYLOR WILKINS, Sheriff

Zeller

3777

STATE OF ALABAMA

County of MobileBALDWIN

SOUTHERN GULF LUMBER Co., INC.,

KNOW ALL MEN BY THESE PRESENTS, That we, ACCORP., D/E/A DELANEY'Sas Principal, and E. F. DELANEY and E. A. TRIGG, as Sureties, are held and firmly bound unto WILLIAM HARVILLE AND SADIE HARVILLE

in the sum of THREE HUNDRED FIFTY AND 00/100 (\$350.00) 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 23 day of Feb. in the year of our Lord, one thousand, nine hundred and FIFTY NINE

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas, the said SOUTHERN GULF LUMBER Co., INC., A CORP., D/E/A DELANEY'S did, on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, sue out in the CIRCUIT Court of Mobile County, Alabama, a writ in detinue, direct to any Sheriff of the State of Alabama, commanding him to take into his possession the following described property, to-wit:

ONE PROPANE TANK, MODEL No. 150AG, SERIAL No. 2352.ONE FULL SIZE WELEILT RANGE, SERIAL No. 195945

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 PROPANE TANK, MODEL No. 150AG, SERIAL No. 2352.ONE FULL SIZE WELEILT RANGE, SERIAL No. 195945

and whereas the said WILLIAM HARVILLE AND SADIE HARVILLE 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 Co., INC., A CORP., D/E/A DELANEY'S 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.

SOUTHERN GULF LUMBER Co., INC., A CORP., D/E/A DELANEY'SBY: Tommy Tuggle (Seal)[Signature] (Seal)[Signature] (Seal)Taken and approved this the 10 day March, 1959Taylor Wilkins  
Sheriff, Mobile County, Alabama

State of Alabama, County of Mobile I, the undersigned, JOHN E. MANDEVILLE, Clerk of the Circuit Court of Mobile County, Alabama, do hereby certify that were the above bond submitted to me, I would approve the same. Done this 24 day of February 1959.

99

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

No. \_\_\_\_\_

COURT

MOBILE COUNTY

VS.

{ Detinue Forthcoming  
Bond by Plaintiff

THE STATE OF ALABAMA, }  
BALDWIN MOBILE County

Know All Men by These Presents, That we SOUTHERN GULF LUMBER Co., INC., A  
CORP., D/E/A DELANEY'S AND E. E. DELANEY AND E. A. TRIGG

are held and firmly bound unto JOHN M. WATERS, SR. of BALDWIN  
(\$500.00)  
County, in the sum of FIVE HUNDRED & 00/100 Dollars, and costs to be paid to the said

JOHN M. WATERS, SR., HIS

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, severally,  
and firmly, by these presents. Sealed with our seals and dated this \_\_\_\_\_ day of

195\_\_\_\_\_

The condition of the above obligation is such, that whereas the above bound \_\_\_\_\_  
SOUTHERN GULF LUMBER Co., INC., A CORP., D/E/A DELANEY'S

on the day of the date hereof hath obtained at the suit of ITSELF

A Summons and complaint for the recovery of personal chattels in specie against \_\_\_\_\_

JOHN M. WATERS, SR.

and asks an endorsement on the summons, "That the Sheriff is required to take the property men-  
tioned in said Complaint into his possession," as required by law in such cases, which Summons and  
CIRCUIT COURT OF BALDWIN  
Complaint are returnable to the ~~Court of General Sessions of~~ Mobile County, on the \_\_\_\_\_ day  
of \_\_\_\_\_, 195\_\_\_\_, and which endorsement is made upon the plaintiff entering  
into this Bond.

Now, if the said Plaintiff shall fail in this suit, and pay the Defendant all such costs and damages

JOHN M. WATERS, SR.

may sustain by reason of the wrongful complaint

in said cause, then this obligation to be void; otherwise to remain in full force and effect.

SO. GULF LUMBER Co., INC., A CORP., D/E/A DELANEY'S

Approved:

By: John Trigg (L.S.)

John E. Vandeville (L.S.)

John E. Vandeville (L.S.)

Beirf. White  
Clerk of The Court of General Sessions of Mobile County.

State of Alabama, County of Mobile } I, the undersigned, JOHN E. VANDEVILLE, Clerk  
of the Circuit Court of Mobile County, Alabama, do hereby certify that were the  
above bond submitted to me, I would approve the same. Done this 24 day of Febru  
1953.

THE STATE OF ALABAMA, }  
Mobile County

MARY L. GRIMSLEY, NOTARY PUBLIC, MOBILE COUNTY, ALABAMA,  
Before me, ~~Mr. Wright, Clerk of the Court of General Sessions of Mobile County~~, personally

appeared TOM TUGGLE

who, being duly sworn, deposeth and saith: That the property sued for in the complaint of  
SO. GULF LUMBER CO., INC., A  
CORP., D/E/A DELANEY'S vs. JOHN M. WATERS

to-wit:  
ONE G. E. REFRIGERATOR, MODEL NO. LM11N, SERIAL NO. SN673535

belongs to  
SOUTHERN GULF LUMBER COMPANY, INC., A CORP., D/E/A DELANEY'S  
the said Plaintiff.

*Tom Tuggle* (Seal)

Sworn to and subscribed before me this 20  
day of February, A. D., 1957

*Mary L. Grimsley*  
~~Clerk of the Court of General Sessions of Mobile County~~  
NOTARY PUBLIC, MOBILE COUNTY, ALA.

No. <u>3777</u>	DETINUE	vs.
Bond and Affidavit		