STATE OF ALABAMA)

BALDWIN COUNTY)



TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. K. McDONALD and DOCIA B. McDONALD to appear within thirty days from the service of this writ in the Circuit Court of said County at the place of holding same, then and there to answer the complaint of TRAILER CREDIT CORPORATION.

WITNESS my hand this 18th day of March, 1959.

alight heren

Defendants can be located at Fairhope Trailer Court, Section Street, Fairhope, Alabama.

TRAILER CREDIT CORPORATION,

IN THE CIRCUIT COURT OF

Plaintiff,

BALDWIN COUNTY, ALABAMA

C. K. McDONALD AND DOCIA
B. McDONALD,

VS.

AT LAW.

Defendants.

COMPLAINT:

The Plaintiff claims of the Defendants the following described personal property, viz:

One (1) 1958 Villa 35 foot one bedroom Trailer, Color Gray Buck Skin Natural Aluminum; Manufacturer's Serial Number 58-35-1019,

with the value of the hire or use thereof during the detention viz, from the 1st day of March, 1959.

Attorney for Plaintiff.

TO THE SHERIFF OF SAID COUNTY:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law, you are hereby required to take the property mentioned in the complaint into your possession unless the Defendants give bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendants are cast in the suit, they will, within thirty days thereafter, deliver the property to the Plaintiff and pay all damages and costs which may accrue from the detention thereof.

here french

700,3174

SUMMONS AND COMPLAINT

TRAILER CREDIT CORPORATION,
Plaintiff,

vs.

C. K. McDONALD AND DOCIA B. McDONALD,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.



MAR 18: 1959

ALC I DIMY RESIDEN

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

by alloching on 1958 Vila 35 food one bed drown houstbuilty Simal H 58-35-1019

Off Jaled to make

Sond Siff made

Sond By made

Cachi Corp By Josephlo

Cachi Corp By Josephlo

Donali Jr Aro, Fedelity

9 Casualty Or By Omid

Supplying Supply

Sullased to Lef

Sheriff claims ______miles at
Ten Cents per mile Total \$ / ____
TAYLOR WILKINS, Sheriff
BY ______

DEPUTY SHERIFF

Jaylor Withing Johnsons

TRAILER CREDIT CORPORATION,

Plaintiff,

Vs.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

C. K. McDONALD and DOCIA B.

McDONALD,

Defendants.

DETINUE BOND:

STATE OF ALABAMA)
**
BALDWIN COUNTY)

KNOW ALL MEN BY THESE PRESENTS: That we, Trailer Credit Corporation, as Principal, and the undersigned as Surety, are held and firmly bound unto C, K. McDonald and Docia B. McDonald, their heirs, executors and administrators, in the sum of One Hundred Dollars (\$100.00), for the payment of which we, jointly and severally, bind ourselves, our heirs, executors, administrators, successors and assigns, firmly by these presents.

Sealed with our seals and dated the 18th day of March, 1959.

The condition of the above obligation is such that, Whereas, the above bounden Trailer Credit Corporation, has on the 18th day of March, 1959, sued out from the office of the Clerk of the Circuit Court of Baldwin County, Alabama, a writ of detinue returnable to the said Circuit Court against the said C. K. McDonald and Docia B. McDonald for the recovery of the following described property, to-wit:

One (1) 1958 Villa 35 foot one bedroom Trailer, Color Gray Buck Skin Natural Aluminum; Manufacturer's Serial Number 58-35-1019.

Now, if the said Trailer Credit Corporation, shall fail in the said suit and shall pay to the said C. K. McDonald and Docia B. McDonald, Defendants in said writ, all such costs and damages as they may sustain by the wrongful suing out thereof, then this obligation to be void, otherwise to remain in full force and effect.

TRAILER CREDIT CORPORATION, (SEAL)

As Agent and Attorney.

...

FIDELITY AND CASUALTY COMPANY OF NEW YORK, a corporation. (SEAL)

By: Hollon Lade

As its Attorney-in-Fact

Taken and approved on this the 18th day of March, 1959.

Clerk of the Circuit Court.

MAR 20 1959 MOE J. DUM, REGISTER

TRAILER CREDIT CORPORATION,

Plaintiff,

VS.

BALDWIN COUNTY, ALABAMA

C. K. McDONALD and DOCIA B.

McDONALD,

Defendants.

FORTHCOMING BOND

STATE OF ALABAMA)

BALDWIN COUNTY)

KNOW ALL MEN BY THESE PRESENTS: That we, Trailer Credit Corporation, as Principal, and the Fidelity and Casualty Company of New York, a corporation, as Surety, are held and firmly bound unto C. K. McDonald and Docia B. McDonald in the sum of Fifty-five Hundred Dollars (\$5500.00), for the payment of which well and truly to be made the Principal and Surety bind themselves, their successors and assigns, jointly and severally, firmly by these presents.

Sealed with our seals and dated this 3 oth day of March,

The condition of the above obligation is such that,
Whereas, the said Trailer Credit Corporation did, on the 18th day
of March, 1959, sue out of the Circuit Court of Baldwin County,
Alabama, a writ of detinue directed to any sheriff of the State
of Alabama, commanding him to take into his possession the following described property sued for in the said action of detinue,
to-wit:

One 1958 Villa 35-foot one bedroom trailer, color gray, buckskin and natural aluminum; Manufacturer's Serial No. 58-35-1019,

which said writ was placed in the hands of Taylor Wilkins, Sheriff of Baldwin County, Alabama, on the 18th day of March, 1959, and executed by him on the 21st day of March, 1959, by taking into his possession the property described above; and,

WHEREAS, the said C. K. McDonald and Docia B. McDonald, the defendants in the said suit, have failed and neglected for the

space of five days from the taking into possession of the said property by the said sheriff aforesaid to give bond and take possession of the said property as authorized by law:

NOW, THEREFORE, if the said Trailer Credit Corporation, plaintiff in this suit, shall deliver the above described property to the said C. K. McDonald and Docia B. McDonald, the defendants in the said suit, within thirty days after judgment in case the plaintiff shall fail to recover the same in its said suit, and pay all damages for the detention of the property and the costs of suit, then in that event this obligation to be void, otherwise to remain in full force and effect.

TRAILER CREDIT CORPORATION

Dv

Joseph E. Bonelli, Jr., As its President.

ATTEST:

Encely O. Therese

Emily O. Harper, As its Secretary.

FIDELITY AND CASUALTY COMPANY OF NEW

YORK, a corporation

Вy

Nand D. Vac

Countersigned for Surety

in Alabama:

As its Attorney in Fact

Taken and approved on this the

304 day of March, 1959.

Glork of the Circuit Court of Baldwin

County, Alabama.

TRAILER CREDIT CORPORATION,

Plaintiff,

VS.

C. K. McDONALD and DOCIA B. McDONALD,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

TRAILER CREDIT CORPORATION, IN THE CIRCUIT COURT OF Plaintiff, IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

C. K. McDONALD and DOCIA B. IN THE CIRCUIT COURT OF McDONALD, AT LAW.

Defendants. I

DETINUE AFFIDAVIT:

STATE OF ALABAMA : BALDWIN COUNTY :

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who after by me first duly and legally sworn, deposes and says:

That he is the attorney for the Plaintiff in the above entitled cause; that the property sued for in the complaint of Trailer Credit Corporation, Plaintiff, vs. C. K. McDonald and Docia B. McDonald, Defendants, to-wit:

One (1) 1958 Villa 35 foot one bedroom Trailer, Color Gray Buck Skin Natural Aluminum; Manufacturer's Serial Number 58-35-1019,

belongs to Trailer Credit Corporation, the said Plaintiff.

Sworn to and subscribed before me on this the 18th day of March, 1959.

Office L. Miller

119

Notary Public, Baldwin County, Alabama.

MAR 18 1959

MAR 18 LERK
REGISTER