

SECURITIES INVESTMENT CORPORATION, IN THE CIRCUIT COURT OF  
A Corporation, BALDWIN  
MOBILE COUNTY, ALABAMA,

Plaintiff,

AT LAW.

VS

CASE NO. 3841

EARL J. TEFFT,

DEFENDANT.

Plaintiff claims of the Defendant the following personal property, viz: One (1) 1958 Volvo Automobile, Motor Number 1958P444, Serial Number 181545, with the hire or use thereof during the detention, viz: October 28, 1958.

Plaintiff further claims of the Defendant \$75.00 as attorney's fee as contracted for and agreed upon by written contract entered into between Plaintiff and Defendant; and Plaintiff avers that in said contract Defendant waived all right of exemption to personal property under the Constitution and laws of the State of Alabama or any other state.

Donald E. Brutkiewicz  
DONALD E. BRUTKIEWICZ, Attorney for  
Plaintiff

Defendant may be served at:

126 N.

51 South Section St., Fairhope, Ala.

FILED

MAY 21 1959

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3841

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EARL J. TEFFT

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-----

EARL J. TEFFT

-----, Defendant-----

by ~~Securities~~ Securities Investment Corporation, A Corporation

-----, Plaintiff-----

Witness my hand this 22 day of May 1959.

81

Eric L. Duck, Clerk

No. 3841 Page       

The State of Alabama  
Baldwin County

CIRCUIT COURT

SECURITIES INVESTMENT CORP.

A CORP.

Plaintiffs

vs.

EARL J. TEFFT

Defendants

Summons and Complaint

Filed May 21 1959

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

May 22 1959

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

I have executed this summons

this 5-23 1959

by leaving a copy with

Earl J. Tefft  
And taking in possession  
the within described  
property

and storing at the  
Sheriff's office in  
Joley, Ala. City.

made Bond 5/22/59  
Signed by: Securities  
Investment Corp by  
C. J. Rayburn 1st Vice Pres  
Bank of Alabama Ind. Co  
by C. J. Jones 2nd Vice Pres  
Property released to City

Taylor Wilkins Sheriff

Edith Stedman Sheriff

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Jarhope, Ala Stedman  
DEPUTY SHERIFF

THE STATE OF ALABAMA,  
Mobile County  
BALDWIN

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Securities Investment Corporation  
A Corporation and Standard Accident Insurance Company, A Corporation

are held and firmly bound unto Earl J. Tefft

heirs, executors and administrators, in the

sum of Three Thousand Four Hundred and No/100 (\$3400.00) - - - - 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 19th day of May, A. D. 19 59

The Condition of the above Obligation is such, That whereas the above bounden

Securities Investment Corporation, A Corporation has, on

the \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_, sued out from the office of the

Clerk of the Circuit Court of Mobile, in the State of Alabama, a Writ of Detinue, returnable to the present

term of said Circuit Court of Mobile against the said Earl J. Tefft

for the recovery of the following property.

to-wit: One (1) 1958 Volvo Automobile, Motor # 1958P444, Serial #  
181545

NOW, if the said Securities Investment Corporation, A Corporation shall fail

in said suit, and shall pay to the said Earl J. Tefft

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.

BY:  
Its

ATTEST:

BY:  
Its

BY:

SECURITIES INVESTMENT CORPORATION  
Its C. L. Rayburn (Seal)

STANDARD ACCIDENT INSURANCE COMPANY (Seal)

BY:

Its E. S. Jenkins (Seal)

attorney in fact

approved  
5-21-59

Dee Jenkins  
clerk

How  
26576

THE STATE OF ALABAMA  
Mobile County

DETINUE AFFIDAVIT

the undersigned Notary Public, Mobile County,  
PERSONALLY appeared before me, ~~John E. Conners, Clerk of the Circuit Court of Mobile County,~~  
Alabama,

C. L. Rayburn,

who, being duly sworn, deposes and says, that ~~the property sued for in the complaint of~~ he is Office  
Manager of Securities Investment Corporation, a corporation and as such has auth-  
ority to make this affidavit; that the property sued for in the complaint of  
~~Securities Investment Corporation, a corporation, versus, Earl J. Tefft, to-wit:~~  
One (1) 1958 Volvo Automobile, Motor # 1958P444, Serial #181545

belongs to Securities Investment Corporation, a corporation the said Plaintiff.

Sworn to and subscribed the 19th day  
of May 1959, before me.

E. Elizabeth C. Brinkley Clerk  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA

C. L. Rayburn

3841  
No. 3841  
Circuit Court  
MOBILE COUNTY

{ Detinue Affidavit  
VS. { and Bond

Filed day of 19

FILED

MAY 21 1959  
Clerk Circuit Court, Mobile County

ALICE J. DUCK, CLERK  
REGISTER

Attorney

STATE OF ALABAMA

County of ~~Mobile~~  
Baldwin

KNOW ALL MEN BY THESE PRESENTS, That we, Securities Investment Corporation,  
A Corporation Insurance Company, a corpora-  
as Principal, ~~and~~ and Standard Accident as Sureties, are held and firmly bound tion,  
onto Earl J. Tefft

in the sum of Three Thousand Four Hundred and No/100 (\$3400.00) 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 27th day  
of May 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

Securities Investment Corporation, a corporation  
did, on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, sue out in the Circuit Court  
of Baldwin 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 (1) 1958 Volvo Automobile,

Motor # 1958P444, Serial # 181545,

which said writ was placed in the hands of Taylor Wilkins  
Ray D. Bridges  
Sheriff of the County of Baldwin, on the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_, by taking into his  
possession the following described property, to-wit: One (1) 1958 Volvo Automobile,

Motor # 1958P444, Serial # 181545

and whereas the said Earl J. Tefft  
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 Earl J. Tefft

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.

BY:  
Its  
ATTEST:

BY: SECURITIES INVESTMENT CORPORATION  
Its C. L. Rayburn (Seal)  
BY: STANDARD ACCIDENT INSURANCE COMPANY  
Its C. L. Rayburn (Seal)

BY: Attorney in fact  
Its \_\_\_\_\_  
Taken and approved this the 29 day of May, 1959

Taylor Wilkins  
Sheriff, Baldwin County, Alabama

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

Circuit

COURT

BALDWIN  
MOBILE COUNTY

SECURITIES INVESTMENT CORPORATION,  
A Corporation

VS. { Detinue Forthcoming  
Bond by Plaintiff

EARL J. TEFFT  
51 South Section Street  
Fairhope, Ala.

