

COMMERCIAL CREDIT CORPORATION,
a corporation

Plaintiff

vs

CLAUDE ELLIS and LUCILLE
JACKSON

Defendants

:

:

:

:

:

:

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

28th JUDICIAL CIRCUIT

AT LAW

NO.

4105

The plaintiff claims of the defendants the following personal property,
to wit:

One Ford automobile, Year Model 1959, Fairlane, Serial No. B9LV104129,

with the value of the hire or use thereof during the detention.

Paul W. Brunson

Paul W. Brunson, attorney

Address of defendants:

47

Route 1, Box 37, Daphne, Ala.

The State of Alabama, }
Baldwin County

CIRCUIT COURT

No. _____

_____ 19____

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon ~~Claude Ellis and Lucille Jackson~~ _____

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 _____

~~Commercial Credit Corporation, a corp~~ _____

Witness my hand this 17 day of Dec 1959

W. J. Smith, Clerk

COMPLAINT

Plaintiff Versus _____ Defendant

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

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

from _____ 19____, to _____ 19____

Plaintiff's Attorney.

State of Alabama
Baldwin County

CIRCUIT COURT

Commercial Credit
Corp. a corp.
Plaintiff

VS.

Claude Ellis &
Lucille Jackson
Defendant

Detinue Summons and Complaint

Filed FILED, 19__

DEC 17 1959

ALICE J. DUCK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

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 Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Alice J. Duck Clerk

Executed 12-22-1959
By serving copy on
Claude Ellis &
Lucille Jackson and
Attaching the within
described property
and leaving at my place
Edleigh Steadham
Big make bond 12/28/59
copy property returned to my
place
Taylor Wickens
By
Edleigh Steadham D.S.
Belforest, Ala

Defendant lives at

Received in office

, 19__

, Sheriff

I have executed this summons

this _____, 19__

by leaving a copy with

, Sheriff

, Deputy Sheriff

Printed by Moore Printing Co.

THE STATE OF ALABAMA,
Mobile County

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, Commercial Credit Corporation, a
corporation, as principal, and United States Fidelity & Guaranty Company, as surety

are held and firmly bound unto Claude Ellis and Lucille Jackson

and their _____ heirs, executors and administrators, in the
sum of Five Thousand and No/100 (\$5,000.00) 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 17 day of December, A. D. 19 59

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

Commercial Credit Corporation has, on
the 17 day of December 19 59, sued out from the office of the
Clerk of the Circuit Court of Baldwin County,
Mobile in the State of Alabama, a Writ of Detinue, returnable to the present
term of said Circuit Court of Baldwin County
Mobile against the said Claude Ellis and Lucille Jackson

_____ for the recovery of the following property.

to-wit: _____

One Ford automobile, Year Model 1959, Fairlane, Serial No. B9LV104129

NOW, if the said Commercial Credit Corporation, a corporation, shall fail

in said suit, and shall pay to the said Claude Ellis and Lucille Jackson
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.

COMMERCIAL CREDIT CORPORATION

Paul W. Brunson (Seal)
by Paul W. Brunson as attorney in fact

UNITED STATES FIDELITY AND GUARANTY COMPANY (Seal)

BY J. L. Weed (Seal)
J. L. WEED, Attorney-in-Fact

THE STATE OF ALABAMA
Mobile County
Baldwin

DETINUE AFFIDAVIT

PERSONALLY appeared before me, Alice Duck Baldwin
John E. Mandeville, Clerk of the Circuit Court of Mobile County, Ala.

Paul W. Brunson, attorney for Commercial Credit Corporation,
who, being duly sworn, deposes and says, that the property sued for in the complaint of _____
Commercial Credit Corporation vs Claude Ellis and Lucille Jackson
to-wit _____

One Ford automobile, Year Model 1959, Fairlane, Serial No. B9LV104129

belongs to Commercial Credit Corporation the said Plaintiff.

Sworn to and subscribed the _____ day
of Dec, 1959, before me.
Kene J. Hester Clerk.

Paul W. Brunson
Paul W. Brunson, attorney for
Commercial Credit Corporation.

No. 14104

Circuit Court
BALDWIN
MOBILE COUNTY

{ Detinue Affidavit
VS. { and Bond

Filed _____ day of _____ 19____

FILED

DEC 17 - 59

ALICE J. DUCK
CLERK
Circuit Court of Mobile County
Baldwin

Attorney

STATE OF ALABAMA
County of Mobile.

KNOW ALL MEN BY THESE PRESENTS, That we, Commercial Credit Corporation, a corp.,
as Principal, and United States Fidelity & Guaranty Co., as Sureties, are held and firmly bound
unto Claude Ellis and Lucille Jackson

in the sum of Five Thousand and No/100 (\$5,000.00) 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 28
day of December 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
Commercial Credit Corporation, a corporation,
did, on the 17 day of December, 19 59, 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 Ford automobile, Year Model 1959, Fairlane, Serial No. B9LV104129

which said writ was placed in the hands of Taylor Wilkins,
Sheriff of the County of Baldwin, on the 22 day of December, 19 59 by taking into his
possession the following described property, to-wit:

Ford automobile described above

and whereas the said Claude Ellis and Lucille Jackson
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 if the said Commercial Credit Corporation, a corporation,

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.

COMMERCIAL CREDIT CORPORATION
by Paul W. Brunson (Seal)
Paul W. Brunson as attorney in fact
UNITED STATES FIDELITY AND GUARANTY CO. (Seal)

BY J. L. Weed (Seal)
J. L. WEED, Attorney-in-Fact

Taken and approved this the 28 day

December 19 59
Taylor Wilkins
Sheriff, Baldwin County, Alabama
Baldwin