

Original

No. **RECORDED** Page

State of Alabama,
Baldwin County.

Circuit Court

Consolidated State Bank
a corporation, By
consolidation Successor
to State Bank of
Silverhill.
vs
F.O. Tilton.

Defendants

Detinue Summons and Complaint

Filed Jan 9th, 1932. 192-
J. M. Piccini, Clerk.

Plaintiff's Attorney
Defendant's Attorney

Lloyd A. Magney
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

J. M. Piccini, Clerk.

Defendant lives at

Received in office

Jan 9th 1932
W. M. Stewart Sheriff

I have executed this summons

this 9th January 1932
by leaving a copy with

unto my possession
a 1926 Buick Roadster
Eight Model Automobile
The deft. F. O. Tilton
not found in
State

W. M. Stewart
SHERIFF.

DEPUTY SHERIFF.

STATE OF ALABAMA)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commaned to summon F. O. Tilton to appear within thirty (30) 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 Consolidated State Bank, a corporation, by consolidation successor to State Bank of Silverhill.

WITNESS MY HAND this 7 day of January, 1932.

W. R. [Signature]
Clerk.

CONSOLIDATED STATE BANK, A CORPORATION, BY CONSOLIDATION SUCCESSOR TO STATE BANK OF SILVERHILL,

PLAINTIFF

VS

F. O. TILTON,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT.

Plaintiff claims of the Defendant the following personal property, viz: One (1) Studebaker Straight Eight, Roadster Model, Automobile with the value of the hire or use thereof during the detention, namely from the 7th day of November, 1930.

Stuart [Signature]
Attorney for Plaintiff.

STATE OF ALABAMA)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon F. O. Tilton to appear within thirty (30) 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 Consolidated State Bank, a corporation, by consolidation successor to State Bank of Silverhill.

WITNESS MY HAND this 4 day of January, 1932.

D. W. Rickman
Clerk.

CONSOLIDATED STATE BANK, A CORPORATION, BY CONSOLIDATION SUCCESSOR TO STATE BANK OF SILVERHILL,

PLAINTIFF

vs

F. O. TILTON,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

COMPLAINT.

Plaintiff claims of the Defendant the following personal property, viz: One (1) Studebaker Straight Eight, Roadster Model, Automobile with the value of the hire or use thereof during the detention, namely from the 7th day of November, 1930.

Stanley M. M. M. M.
Attorney for Plaintiff.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CONSOLIDATED STATE BANK,
A CORPORATION, BY CON-
SOLIDATION SUCCESSOR TO
STATE BANK OF SILVERHILL,

PLAINTIFF

VS

F. O. TILTON,

DEFENDANT

Filed for 9/21/32
W. H. Magney
per

COPY SUMMONS & COMPLAINT

LLOYD A. MAGNEY,
ATTORNEY FOR PLAINTIFF.

The State of Alabama,

No. {

CIRCUIT COURT.

192

To any Sheriff of the State of Alabama:

You are hereby commanded to summon

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

Witness my hand this

day of

192

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

192

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Plaintiff's Attorney.

No. _____ Page _____

State of Alabama,
Baldwin County.

Circuit Court

Consolidated State Bank
a corporation by
consolidation, Successor
to State Bank of Baldwin
vs. Plaintiffs

F.O. Tilton

Defendants
Detinue Summons and Complaint

Filed Jan 9th, 1932. 192
_____, Clerk.

Lloyd A. Hagney.

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

J. B. Reemery Clerk.

Defendant lives at

Received in office

192

Sheriff

I have executed this summons

192

by leaving a copy with

SHERIFF.

DEPUTY SHERIFF.

LLOYD A. MAGNEY
ATTORNEY AND COUNSELLOR AT LAW
FOLEY, ALABAMA

January 8, 1932.

Hon. T. W. Richerson,
Clerk of Circuit Court,
Bay Minette, Ala.

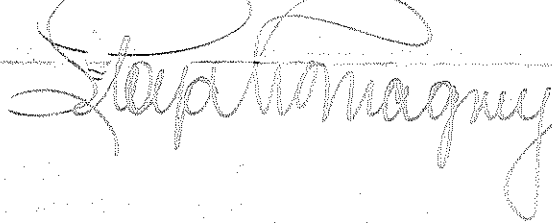
Dear Mr. Richerson:-

I enclose herewith Summons and Complaint,
Affidavit and Bond in the case of Consolidated
State Bank vs F. O. Tilton, an action in det-
inue.

The property sued for is now in the Klumpp
Garage in Fairhope and may be found there by the
Sheriff.

Please file these papers, issue writ of
detinue and deliver the same to the Sheriff for
service and oblige.

Very truly yours,



3 encl.

lam/lff

CONSOLIDATED STATE BANK, A CORP-
ORATION, BY CONSOLIDATION SUCCESS-
OR TO STATE BANK OF SILVERHILL,

PLAINTIFF

vs

F. O. TILTON,

DEFENDANT

STATE OF ALABAMA)

BALDWIN COUNTY.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

AFFIDAVIT

A. E. Jackson, being first duly sworn on his oath, deposes and says that he is agent for the Plaintiff; that the property sued for in the Complaint of the above named Plaintiff, to-wit: One (1) Studebaker Straight Eight Roadster Model Automobile , belongs to the said Plaintiff and the Plaintiff is entitled to the immediate possession thereof by reason of a certain chattel mortgage thereon executed by the Defendant to the Plaintiff on the 7th day of November, 1930.

Subscribed in my presence and sworn to before me this 8th day of January, 1932.

Notary Public.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CONSOLIDATED STATE BANK,
A CORPORATION, BY CON-
SOLIDATION SUCCESSOR TO
STATE BANK OF SILVERHILL,

PLAINTIFF

VS

F. O. TILTON,

DEFENDANT

AFFIDAVIT

LLOYD A. MAGNEY
ATTORNEY FOR PLAINTIFF.

Filed for filing 1/32
W. M. McInnis
clerk

CONSOLIDATED STATE BANK, A CORPORATION, BY CONSOLIDATION SUCCESS-
OR TO STATE BANK OF SILVERHILL,

PLAINTIFF

vs

F. O. TILTON,

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BOND.

STATE OF ALABAMA)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, that we, Consolidated State Bank, a corporation, as principal and H. E. Marker and W. P. Baldwin as sureties are held and firmly bound unto F. O. Tilton, his heirs, executors and administrators, in the sum of THREE HUNDRED & 00/100 (\$300.00) DOLLARS for the payment of which we, jointly and severally, bind ourselves, our heirs, executors and administrators, firmly by these presents.

Sealed with our seals and dated this 8th day of January, 1932.

The condition of the above obligation is such that, whereas, the above bounden Consolidated State Bank has, on the 9th day of January, 1932, sued out from the office of the Clerk of the Circuit Court of Baldwin County in said State, a writ of detinue, returnable to the said Circuit Court, against the said F. O. Tilton, for the recovery of the following described property, to-wit: One (1) Studebaker Straight Eight, Roadster Model, Automobile;

Now if the said Consolidated State Bank shall fail in said suit, and shall pay to the said F. O. Tilton, Defendant in said writ, all such costs and damages as he may sustain by the wrongful suing out thereof, then this obligation to be void, otherwise to remain in full force and effect.

CONSOLIDATED STATE BANK

Approved
Jan 9th 1932
D. W. [Signature]
Clerk.

BY

Agent.

A. E. Jackson
H. E. Marker
W. P. Baldwin

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CONSOLIDATED STATE BANK,
A CORPORATION, BY CON-
SOLIDATION SUCCESSOR
TO STATE BANK OF SILVER-
HILL,

PLAINTIFF

vs

F. O. TILTON,

DEFENDANT

*Delivered Jan 1932
T. O. Tilton
C. O. Tilton*

BOND.

LLOYD A. MAGNEY
ATTORNEY FOR PLAINTIFF.

Wm. A. ...