

First National Bank Of Bay	:	
Minette, a National Banking	:	
Corporation.	:	
	:	In The Circuit Court
Plaintiff	:	Of
vs.	:	
	:	Baldwin County, Alabama
Bill Marshall	:	
Defendant	:	At Law No 4660
	:	

Now comes defendant Bill Marshall in the above styled cause and suggest to this Honorable court that he has this date filed in the Southern Division of the Southern District of Alabama a petition under Chapter 13 of the Bankruptcy Acts, and said petition is now pending in said court, Wherefore he prays that this cause be stayed in this court pending disposition of his petition as aforesaid.

By

Bill Marshall
Curtis Z. Hoof, Attorney

FILED

APR 18 1961

ALICE J. DUCK, CLERK
 REGISTER

CURTIS L. MOODY
ATTORNEY-AT-LAW
ROOMS 421-425 GRAYSTONE BUILDING
P. O. Box 1182
MOBILE, ALABAMA

April 12, 1961
Mrs Alice Duck

Mrs Alice Duck
Clerk Of Circuit Court Baldwin County
Bay Minette, Alabama

Re: First National Bank of Bay
Minette vs Bill Marshall
No. 4660.

Dear Mrs Duck,

I as attorney in a bankruptcy proceeding here
am fowarding this suggestion of bankruptcy which I trust you will
mark filed in this cause.

Very truly yours


Curtis L. Moody

DETINUE SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

No. _____

MARCH

1961

To Any Sheriff of the State of Alabama:

You Are Hereby Commanded to Summon Bill Marshall

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 _____

First National Bank of Bay Minette, a national
banking association,

Witness my hand this 29 day of March, 1961.

Alfred J. Luck Clerk.

COMPLAINT

First National Bank of Bay
Minette, a national banking
association

Bill Marshall

Plaintiff Versus Defendant

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

1956 Pontiac 4-Dr. Star Chief Custom

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

from January 7, 1961, to date, 19

James C. Curtis, Jr. Plaintiff's Attorney.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

First National Bank of Bay
Minette, a national banking
association,
Plaintiff.

VS.

Bill Marshall
Defendant.

DETINUE SUMMONS AND COMPLAINT

FILED
Filed _____, 19____
MAR 29 1961
ALICE J. DUCK, CLERK
REGISTER

J. Connor Owens, Jr.
Plaintiff's Attorney
Defendant's Attorney

Defendant resides in Daphne,
Alabama, near Sims Store.

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 pro-
perty mentioned in Complaint into your posses-
sion unless the Defendant gives bond payable to
the Plaintiff with sufficient surety in double the
amount of the value of the property, with condi-
tion 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.

L
Alice J. Duck, Clerk.

*on the 4th of April 1961
I served a copy on Bill
Marshall. The within
described property not found*

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Garnier
DEPUTY SHERIFF

Taylor Wilkins, Sheriff
W.O. Barnes, C.D.S.
Belforest

Defendant lives at _____

Received in office

3/29, 1961
_____, Sheriff.

I have executed this summons

this _____, 19____
by leaving a copy with _____

_____, Sheriff
_____, Deputy Sheriff

STATE OF ALABAMA }

IN THE CIRCUIT COURT OF

BALDWIN COUNTY }

BALDWIN COUNTY

Before me, J. Connor Owens, Jr., a Notary Public in and for said County, personally appeared Ray C. Stephens who being by me duly sworn deposes and says that the property sued for in the complaint of First National Bank of Bay Minette, a national banking association, filed in said Court, to-wit:

1956 Pontiac 4-Dr. Star Chief Custom

belongs to First National Bank of Bay Minette, the plaintiff.

Sworn to and subscribed before me this 29th

day of March, 1961.

J. Connor Owens, Jr.
Notary Public

STATE OF ALABAMA }

IN THE CIRCUIT COURT OF

BALDWIN COUNTY }

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we, First National Bank of Bay Minette, Alabama, a national banking association, Principal, and Ray C. Stephens and W.M. Kelly, Sureties, are held and firmly bound unto Bill Marshall, his heirs, executors and administrators in the sum of Thirty and No/100 (\$30.00) Dollars, for the payment of which we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 29th day of March, 1961.

The condition of the above obligation is such that whereas, the above bound First National Bank of Bay Minette, a national banking association, has on the 29th day of March, 1961 sued out a writ of detinue in the Circuit Court of Baldwin County, returnable to the said Circuit Court against the said Bill Marshall for the recovery of the following described property, to-wit:

1956 Pontiac 4-Dr. Star Chief Custom

Now, if the said First National Bank of Bay Minette shall fail in said suit and shall pay to the said Bill Marshall, the defendant in said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to be void, otherwise, to remain in full force and effect.

Taken and approved this 29 day of

March, 1961
W. M. Kelly
Clerk, Circuit Court

First National Bank of Bay Minette,
a national banking association,
BY: Ray C. Stephens (SEAL)

Ray C. Stephens (SEAL)
W. M. Kelly (SEAL)

No. 4660

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

First National Bank of Bay
Minette, a national banking
association, Plaintiff

vs.

Bill Marshall Defendant

Detinuc — Affidavit and Bond

Filed this FILED day of _____, 19____.

MAR 29 1961

ALICE L. DUCK, CLERK
REGISTER

Clerk