

First National Bank Of Bay	:	
Minette, a National Banking	:	
Corporation.	:	
	:	In The Circuit Court
Plaintiff	:	Of
vs.	:	Baldwin County, Alabama
Bill Marshall	:	At Law
Defendant	:	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.

*Bill Marshall*  


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*Arthur Z. Hoop, Attorney*

By

**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

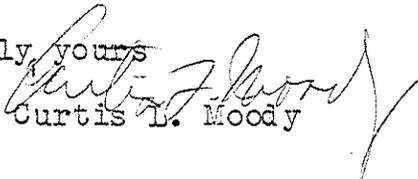
Mrs Alice Duck  
Clerk Of Circuit Court Baldwin County  
Bay Minette, Alabama

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

Dear Mrs Duck,

I as attorney in a bankruptcy proceeding here  
am forwarding 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 Comanded 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.

Alice 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    

J. Cannon Curtis, Jr. Plaintiff's Attorney.



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.

*Ray C. Stephens*

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. J. ...*  
Clerk, Circuit Court

FIRST NATIONAL BANK OF BAY MINETTE  
a national banking association,  
BY: *Ray C. Stephens* (SEAL)  
*W. M. Kelly* (SEAL)

No. 1660

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 J. DUCK, CLERK  
REGISTER