

AETNA FINANCE COMPANY OF
MOBILE, INC., a corporation,

Plaintiff,

-vs-

JAMES ALBERT SNIPES,

Defendant.

*

IN THE CIRCUIT COURT OF

*

BALDWIN COUNTY, ALABAMA

*

*

NO. 4680

COUNT ONE

Plaintiff claims of the Defendant the following personal
property, viz:

One (1) New Zenith T.V. Model E 3005M - Ser #1161509

Together with the hire or use thereof during the detention thereof
from, to-wit: December 6, 1960.

MAYER W. PERLOFF

Mayer W. Perloff
Attorney for Plaintiff

Defendant may be served:

Address: I-3 Spanish Fort Motel
Spanish Fort, Alabama

Emp: Manager of Spanish Fort Restaurant

FILED

APR 13

ALICE L. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 4680

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES ALBERT SNIPES

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

JAMES ALBERT SNIPES

Defendant

by AETNA FINANCE COMPANY OF MOBILE, INC., A Corporation

Plaintiff

Witness my hand this 13 day of April 1961

Alice J. Duck Clerk

No. 4680

Page

The State of Alabama
Baldwin County

CIRCUIT COURT

AETNA FINANCE COMPANY OF MOBILE

INC., A Corporation

Plaintiffs

vs.

JAMES ALBERT SNIPES

Defendants

Summons and Complaint

Filed April 13, 1961

Alice J. Duck

Clerk

Mayer W. Perloff

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

4/13 1961

Sheriff

I have executed this summons

this 19

by leaving a copy with

Returned 4/28/61
By Deputy
City of Mobile

Sheriff

Deputy Sheriff

THE STATE OF ALABAMA,
Mobile County

DETINUE BOND AND AFFIDAVIT.

KNOW ALL MEN BY THESE PRESENTS, That We, AETNA FINANCE CO., OF MOBILE,
INC. and THE FIDELITY and CASUALTY COMPANY of NEW YORK,

are held and firmly bound unto JAMES ALBERT SNIPES

his heirs, executors and administrators, in the
sum of SEVEN HUNDRED AND NO/100 (\$700.00) 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 _____ day of _____, A. D. 19____

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

AETNA FINANCE CO. OF MOBILE, INC. has, on

the _____ day of _____ 19____, sued out from the office of the

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

BALDWIN
term of said Circuit Court of Mobile against the said JAMES ALBERT SNIPES

_____ for the recovery of the following property.

to-wit: one (1) New Zenith T.V. Model #3005M Ser. # 1161509

NOW, if the said AETNA FINANCE CO. OF MOBILE, INC. shall fail

in said suit, and shall pay to the said JAMES ALBERT SNIPES

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.

AETNA FINANCE CO. OF MOBILE, INC. (Seal)

BY [Signature] (Seal)

THE FIDELITY & CASUALTY COMPANY OF NEW YORK (Seal)

BY [Signature]

FILED

APR 13 1961

ALICE J. DUCK, CLERK
REGISTER

THE STATE OF ALABAMA,
Mobile County

DETINUE AFFIDAVIT

PERSONALLY appeared before me, ~~John H. Mandaville, Clerk of the Circuit Court of Mobile County,~~
the undersigned Notary Public
C.F. WALKER

who, being duly sworn, deposes and says, that the property sued for in the complaint of
AETNA FINANCE CO. OF MOBILE, INC. -vs- JAMES ALBERT SNIPES
to-wit One (1) New Zenith T.V. Model #E3005M, Ser. # 1161509

belongs to Aetna Finance Co. of Mobile, Inc. the said Plaintiff.

Sworn to and subscribed the 13th day
of March, 1961, before me.
Robert Eugene Jorgensen Clerk.

[Signature]

No.

CIRCUIT COURT
MOBILE COUNTY

VS. { Detinue Affidavit
and Bond

FILED

Filed APR 13 1961
day of APRIL 1961
CLERK, REGISTER

Clerk Circuit Court, Mobile County

Attorney

The Fidelity and Casualty Company of New York

GENERAL POWER OF ATTORNEY

Know all men by these Presents, That the FIDELITY AND CASUALTY COMPANY OF NEW YORK has made, constituted, and appointed, and by these presents does make, constitute, and appoint

I. Huston Carter of Mobile, Alabama

its true and lawful attorney for it and in its name, place and stead to execute on behalf of the said Company, as surety, bonds, undertakings and contracts of suretyship to be given to

all obligees

provided that no bond or undertaking or contract of suretyship executed under this authority shall exceed in amount the sum of FIFTY THOUSAND (\$50,000) DOLLARS.

~~XXXXXX~~

This Power of Attorney is granted and is signed and sealed by facsimile under and by the authority of the following Resolution adopted by the Board of Directors of THE FIDELITY AND CASUALTY COMPANY OF NEW YORK at a meeting duly called and held on the 16th day of October, 1957:

"RESOLVED, that the Chairman of the Board, the President, an Executive Vice President or any Vice President of the Company, be, and that each or any of them hereby is, authorized to execute Powers of Attorney qualifying the attorney named in the given Power of Attorney to execute in behalf of THE FIDELITY AND CASUALTY COMPANY OF NEW YORK, bonds, undertakings and all contracts of suretyship; and that any Secretary or any Assistant Secretary be, and that each or any of them hereby is, authorized to attest the execution of any such Power of Attorney, and to attach thereto the seal of the Company.

FURTHER RESOLVED, that the signatures of such officers and the seal of the Company may be affixed to any such Power of Attorney or to any certificate relating thereto by facsimile, and any such Power of Attorney or certificate bearing such facsimile signatures or facsimile seal shall be valid and binding upon the Company when so affixed and in the future with respect to any bond, undertaking or contract of suretyship to which it is attached."

In Witness Whereof THE FIDELITY AND CASUALTY COMPANY OF NEW YORK has caused its official seal to be hereunto affixed, and these presents to be signed by one of its Vice Presidents and attested by one of its Secretaries this 7th day of April, 1958.

THE FIDELITY AND CASUALTY COMPANY OF NEW YORK

Attest:

By

J. Miller

Secretary



Carroll R. Young

Vice-President

STATE OF NEW YORK, }
COUNTY OF NEW YORK, } ss.:

On this 7th day of April, 1958, before me personally came Carroll R. Young, to me known, who being by me duly sworn, did depose and say: that he resides in Berkeley Heights in the County of Union, State of New Jersey, at 23 Ridge Drive East; that he is a Vice-President of THE FIDELITY AND CASUALTY COMPANY OF NEW YORK, the corporation described in and which executed the above instrument; that he knows the seal of the said corporation; that the seal affixed to the said instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation and that he signed his name thereto by like order.



CERTIFICATE

Harold E. Peterson

HAROLD E. PETERSON
Notary Public, State of New York 41-3075000
Qualified in Queens County
Certificate Filed in New York County
Commission Expires March 30, 1959

STATE OF NEW YORK, }
COUNTY OF NEW YORK, } ss.:

I, the undersigned, a Secretary of THE FIDELITY AND CASUALTY COMPANY OF NEW YORK, a New York corporation, DO HEREBY CERTIFY that the foregoing and attached Power of Attorney remains in full force and has not been revoked; and furthermore that the Resolution of the Board of Directors, set forth in the said Power of Attorney, is now in force.

Signed and sealed at the City of New York. Dated the 9th day of March, 19 61.



J. Miller

Secretary

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4680

TERM, 19

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JAMES ALBERT SNIPES

, Defendant

by AETNA FINANCE COMPANY OF MOBILE, INC., A Corporation

, Plaintiff

Witness my hand this 13 day of April 1961

Clerk

No. 4680

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The State of Alabama

Baldwin County

CIRCUIT COURT

AETNA FINANCE COMPANY OF MOBILE

INC., A Corporation

Plaintiffs

vs.

JAMES ALBERT SNIPES

Defendants

Summons and Complaint

Filed April 13, 19 61

Alice J. Duck Clerk

Mayer W. Perloff

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

, Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

AETNA FINANCE COMPANY OF
MOBILE, INC., a corporation,

Plaintiff,

-VS-

JAMES ALBERT SNIPES,

Defendant.

* IN THE CIRCUIT COURT OF

* BALDWIN COUNTY, ALABAMA

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* NO. _____

COUNT ONE

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property, viz:

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Together with the hire or use thereof during the detention thereof
from, to-wit: December 6, 1960.

MAYER W. PERLOFF

Mayer W. Perloff

Attorney for Plaintiff

Defendant may be served:

Address: I-3 Spanish Fort Motel
Spanish Fort, Alabama

Emp: Manager of Spanish Fort Restaurant

AETNA FINANCE COMPANY OF
MOBILE, INC., a corporation,

Plaintiff,

-vs-

JAMES ALBERT SNIPES,

Defendant.

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IN THE CIRCUIT COURT OF

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BALDWIN COUNTY, ALABAMA

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MAYER W. PERLOFF

Attorney for Plaintiff

Defendant may be served:

Address: I-3 Spanish Fort Motel
Spanish Fort, Alabama

Emp: Manager of Spanish Fort Restaurant

MAYER W. PERLOFF
ATTORNEY AT LAW
SUITE 605 VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
HEMLOCK 3-5412

April 12, 1961

4680

Mrs. Alice Duck, Register
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Aetna Finance Company -v- JAMES A SNIPES

Dear Mrs. Duck:

I am enclosing herein a Bill of Complaint for the detinue of one (1) Zenith T. V. and also a detinue bond and affidavit with a power of attorney from the bonding company.

I will appreciate your proceeding with the attachment of the property described in the Bill of Complaint. When service has been had please notify me.

Very truly yours,


MAYER W. PERLOFF

MWP:rms

Enc/3

MAYER W. PERLOFF
ATTORNEY AT LAW
SUITE 605 VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
HEMLOCK 3-5412

April 12, 1961

4680

Mrs. Alice Duck, Register
Circuit Court of Baldwin County
Bay Minette, Alabama

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I will appreciate your proceeding with the attachment of the property described in the Bill of Complaint. When service has been had please notify me.

Very truly yours,


MAYER W. PERLOFF

MWP:rms

Enc/3

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.

Reinefrank Clerk

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.

Reinefrank Clerk