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STATE OF ALABAMA,  
COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA.....GREETING:

You are hereby commanded to summon A. RIGGINS to appear before the Circuit Court of said County, at the place of holding the same, within thirty days from the service of this writ, then and there to answer the complaint of VIRGINIA-CAROLINA CHEMICAL CORPORATION, a Corporation, hereto attached.

WITNESS my hand this the 28<sup>th</sup> day of Apr, 1933.

W. A. Stone

CLERK

VIRGINIA-CAROLINA CHEMICAL CORPORATION, a Corporation,

Plaintiff,

vs.

A. RIGGINS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY,

ALABAMA.

COUNT ONE: Plaintiff claims of the Defendant the sum of One Hundred Seventy-Eight and 18/100 (\$178.18) Dollars due from him by promissory note made by him on the 22nd day of February, 1932, and payable the 1st day of June, 1932, which sum of money, with the interest thereon, is still due and unpaid.

COUNT TWO: Plaintiff claims of the Defendant the sum of Two Hundred Fifty-Eight and 20/100 (258.20) Dollars due from him by promissory note made by him on the 22nd day of February, 1932, and payable the 1st day of September, 1932, which sum of money, with the interest thereon, is still due and unpaid.

Plaintiff admits a credit of \$105.70 and avers there is a balance of \$330.68 due and unpaid.

Plaintiff avers that in and by the terms of the notes hereinabove sued upon in count one and count two, the Defendant waived all right to claim personal property as exempt from execution and sale or other process issued for the collection of same, and agreed to pay all cost of collecting, securing or attempting to collect or secure said notes, including a reasonable attorney's fee, which Plaintiff claims, to-wit, \$75.00.

Dorrie Gray

ATTORNEYS FOR PLAINTIFF

Defendant's address

Doxley, Ala.

No. 7  
Doc. 66

RECORDED

CIVIL CASE

VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,

VS.

A RIGGINS,  
Defendant.

Executed 11/29/33 1933  
by serving copy of within Summons and  
Complaint on  
A Riggins  
Defendant  
W R Stuart  
by Stuart  
Deputy Sheriff

Filed Nov. 28th 1933  
M. A. Stone  
Clerk.

VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,

Plaintiff

vs.

A. RIGGINS,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

Now comes the defendant and demurs to Count Two  
of said complaint, and as grounds therefor assigns the follow-  
ing:

1. Because said count claims Two Hundred Fifty-  
eight and 20/100 (\$258.20) Dollars, admits a credit of One  
Hundred Five and 70/100 (\$105.70) Dollars, and then alleges  
that the balance is Three Hundred Thirty and 68/100 (\$330.68)  
Dollars, which is more than the principal of the note sued  
for.

2. Because it is not averred or shown in said  
count that the plaintiff ever employed any attorney to col-  
lect said claim.

3. For aught that appears in said count, there  
has been no cost accrued on the part of the plaintiff in at-  
tempting to collect said note.

Gordon E. Wynn & Leigh  
ATTORNEYS FOR DEFENDANT

Defendant demands a trial by jury of the above  
said cause.

Gordon E. Wynn & Leigh  
ATTORNEYS FOR DEFENDANT

RECORDED

NO.

7

CIVIL JURY CIRCUIT COURT

VIRGINIA CAROLINA CHEM. CO.

VS

A. RIGGINS

DEMURRERS

Filed Dec. 12<sup>th</sup> 1933  
M. A. Stone  
Clerk of Circuit Court

VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,

Plaintiff

vs.

A. RIGGINS,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW.

Now comes the defendant and for pleas to Count  
One of the complaint says as follows:

1. THE GENERAL ISSUE.
2. That the plaintiff has not the legal title  
to the note sued upon.

*Gordon W. Smith & Leigh*  
ATTORNEYS FOR DEFENDANT

Defendant demands trial by jury of the above  
said cause.

*Gordon W. Smith & Leigh*  
ATTORNEYS FOR DEFENDANT

NO. 1007

RECORDED

CIVIL JURY , CIRCUIT COURT

VIRGINIA CAROLINA CHEM. CO

VS

A. RIGGINS,

666.

P L E A S

Filed Dec. 12<sup>th</sup> 1993

W. A. Stone,

Clerk of Circuit Court