

21

STATE OF ALABAMA, |  
: |  
COUNTY OF BALDWIN. |

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

You are hereby commanded to summon P. J. EDWARDS 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 2<sup>nd</sup> day of February, 1934.

M. A. Stone (CLERK)

VIRGINIA-CAROLINA CHEMICAL CORPORATION, a Corporation,  
Plaintiff,

vs.

P. J. EDWARDS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

COUNT ONE: Plaintiff claims of the Defendant the sum of Nine Hundred Eighty-Seven and 49/100 (\$987.49) Dollars, balance due from him by promissory note made by him on the 5th day of July, 1932, and payable the 15th day of March, 1933, which sum of money, with the interest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of the note hereinabove sued upon 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 note, including a reasonable attorney's fee, which Plaintiff claims, to-wit, One Hundred Seventy-Five and 00/100 (\$175.00) Dollars.

D. J. Gray  
ATTORNEYS FOR PLAINTIFF

NO. 21

RECORDED  
*act*

VIRGINIA CAROLINA CHEM. CO.

VS

P. J. EDWARDS,

SUMMONS & COMPLAINT

Filed Feb. 8<sup>th</sup> 1934  
W. A. Stone  
Gluck

Entered February 8<sup>th</sup> 1934  
by serving copy of within Summons and  
Complaint on

PJ Edwards Esq

RECORDED  
*act*

WR Street Sheriff

By \_\_\_\_\_ Deputy Sheriff

Faint, mostly illegible text, possibly a transcript or a very faded document. Some words like "summons" and "complaint" are faintly visible.

*Handwritten signature or initials*

Bay Minette, Ala.,

*July 9*

193

*Mrs. Regina Gray*

IN ACCOUNT WITH  
**G. W. ROBERTSON**  
JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance

Privilege Tax

Rec. Fee

Total

Deed  
Rec. Mort. from

*to* *J. Edwards*

*50*

*Pd. 7/9/35*  
*G. W. Robertson Judge*  
*Bay Minette Ala.*

BAY MINETTE, ALA.

Jan 25, 1935

*M. H. Watkins*

M

# THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$1.50 PER YEAR IN ADVANCE  
ADVERTISING RATES GIVEN ON APPLICATION

~~at the office - Prof. Ed. J. Co. Chem Co~~  
W. P. Edwards

140 no 37rd

526  
525

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he will be barred.  
Gill Ptg. & Sta. Co., Mobile—Re-Order No. 720

THE STATE OF ALABAMA  
BALDWIN COUNTY

S.D. Page No. 150  
Case No. 21

CIRCUIT COURT

August Term, 1934

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon Harold La Caste

if to be found in your County, at the instance of the Defendants

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 10 o'clock of the forenoon, on the 20 day of August 1934

and from day to day and term to term of said Court until discharged by law, then and there to testify, and the truth to

say, in a certain cause pending, wherein Virginia Carolina Chemical Co. Plaintiff

and H. J. Edwards Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 15 day of August 1934

W. O. Stone  
Clerk.

Received in office this.....day of

193.....

Sheriff.

I have executed this writ

ORIGINAL

No. *21*

Page *150*

THE STATE OF ALABAMA  
BALDWIN COUNTY

*34*  
*10*

CIRCUIT COURT

*Virginia Carolina*  
*Chemical Company*  
Plaintiff

VS.

*R. J. Edwards*

Defendant

CIVIL SUBPOENA

Issued this.....day of

*15*

.....day of

*August*

193*14*

*W. A. Stone*

Clerk.

*W. R. Burnett*

Sheriff.

VIRGINIA-CAROLINA CHEMICAL  
COMPANY, a Corporation,

Plaintiff,

-vs-

P. J. EDWARDS,

Defendant.

IN THE CIRCUIT COURT-AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Now comes the Defendant, and for plea to the Complaint  
says:-

- 1st. That the Defendant pleads non-assumpsit.
- 2nd. That the allegations of the Complaint are untrue.
- 3rd. That the Note which is the basis of this suit was paid by the Defendant to the Plaintiff prior to the bringing of said suit.
- 4th. That the consideration of the demand involved in this suit was for fertilizer which was sold by the Plaintiff to the Defendant, and Defendant avers that the Plaintiff had no license to engage in the fertilizer business in Alabama at the time of said sale.
- 5th. That the demand which is the basis of this suit was given for fertilizer sold by the Plaintiff to the Defendant, and Defendant avers that at the time said fertilizer was sold by said Plaintiff to him that Plaintiff did not have a license from the Commissioner of Agriculture & Industries of Alabama to sell said fertilizer.
- 6th. That the consideration of the obligation sued on was and is illegal in this: That the Plaintiff did not have a license from the Commissioner of Agriculture & Industries of Alabama to make the sale of the fertilizer for which the obligation sued on was given.

Attorneys for Defendant.

P L E A.

VIRGINIA-CAROLINA CHEMICAL  
COMPANY, a Corporation,

Plaintiff,

P. J. EDWARDS,

Defendant.

IN THE CIRCUIT COURT-AT LAW

STATE OF ALABAMA

BALDWIN COUNTY.

Filed \_\_\_\_\_, 1934

\_\_\_\_\_  
Clerk.



VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,  
Plaintiff,

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

-vs-

P. J. EDWARDS,

Defendant.

Comes the Defendant and demurs to the Complaint in this  
cause filed, and to each and every count thereof, separately and  
severally, and as grounds therefor says:-

FIRST:

That said Complaint does not state a cause of action.

*Hybert, Head & Chason*  
Attorneys for Defendant.

27  
RECORDED  
MAR 14 1934  
DEMURRER.

VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,

Plaintiff,

-vs-

P. J. EDWARDS,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Filed March 8th, 1934

M. A. Stone  
Clerk.



No. 21

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT

*W. H. ...*

*P. G. ...*

vs.  
Plaintiffs

Defendants

CIVIL EXECUTION

Judgment for 1100.90 for \$

Interest from 193 to 193 \$

Damages 12 \$

Costs 11.46 \$

Total 1193.82 \$

Civil Fee Book 44 Page 95

Execution Docket 4 Page 295

Filed 1935

Clerk:

Plaintiff's Attorney:

Defendant's Attorney:

COLLECT COST FROM

THE STATE OF ALABAMA,  
Baldwin County

I hereby certify that the within Judgment and Costs in this case are correct, and there was a waiver of exemption as to personal property under the Constitution and Laws of Alabama.

This 20 day of June 1935

Clerk.

RECEIVED IN OFFICE

Feb-20 1935

*M. A. Williams*

Sheriff

Sheriff's Execution Docket, Page 15

Sheriff's Fee Book, Page

Clerk's Civil Fee Book, Page

Clerk's Civil Execution Docket, Page

*Wagon, 1800  
Bump, 1800  
Cattle, 1800  
Horse, 1800  
Mules, 1800*

The State of Alabama  
Baldwin County

By virtue of the within execution, I have, at \_\_\_\_\_ o'clock, \_\_\_\_\_ M., this

\_\_\_\_\_ day of \_\_\_\_\_ 193\_\_\_\_, levied on the following described property of the Defendant situated in Baldwin County, Alabama, to-wit:

Southeast Quarter of the Southwest Quarter; Southwest quarter of the Southwest quarter of Section 7, Township 6 South Range 4 East, together with the improvements thereon; ~~Three head of cattle, one wagon and three mules.~~

*M. A. Williams*  
Sheriff, Baldwin County, Ala.

I have further executed the within writ by advertising and selling the Southeast Quarter of the Southwest Quarter; Southwest Quarter of the Southwest Quarter of Section 7, Township 6 South, Range 4 East, together with the improvements thereon, to the Southern Land Sales Corporation, for the sum of \$50.00, which said sale was held on June 24, 1935.

Dated this 24th day of June, 1935.

*\$26.85 was turned over to M. B. Dozier attorney for Plaintiff and \$23.15 was turned over to R. S. Duck, Clerk of the court for cost*

*M. A. Williams*  
Sheriff, Baldwin County, Ala.

Case No 21

Virginia Carolina  
Chemical Co.

VS

P. J. Edwards -

Witness for Defendant  
Harold La Caste -

Summoned - 8/15/34