

# The State of Alabama

Baldwin County

CIRCUIT COURT

No. 137

April

Term, 1936

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of

Defendants,

you cause to be made the sum of 2792.52 Dollars,

which Virginia Parahies Clinical Co Plaintiffs

recovered of \$100 on the 12 day of April, 1936, by

the Judgment of our Circuit Court held for the County of Baldwin, besides the sum of

Dollars

costs of suit, and have the same to render to the said

and make return of this Writ and the execution thereof, according to law.

Interest from , 193 to date of collection.

Witness my hand, this day of , 193

Clerk

CLERK'S FEES	AMOUNT	SHERIFF'S FEES	AMOUNT
For every Summons & Complaint	\$1.25	For Levying an Attachment	\$3.00
Each copy thereof	30	Entering and Returning Attachment	25
Entering a Sheriff's Return	20	Summoning Garnishee	1.30
Docketing	25	Serving Summons on Writ	1.50
Entering Appearance	20	Serving Notice Sci. Fa. Notice, etc.	65
Filings	10	Serving Subpoenas	65
Every order made in Court	30	Empanelling Jury	75
Copy thereof	25	Entering and Returning Execution	25
Every trial with or without Jury	75	Collecting Cost Executions	1.50
Entering up Judgment or copy thereof	30	Executing a Writ of Possession	2.50
Issuing Execution	50	Taking and Approving Bonds	1.00
Docketing Execution	25	Commissions	1.75
Entering Return on Execution	20	and return	
Issuing Subpoenas	30	Witness Fees	
Administering Oath	25		
Issuing each Attachment and taking bond	1.00		
Filing Attachment	10		
Each Summons for Garnishee	50		
Taking Answer to Garnishee	50		
Commissions to take Depositions or Copy	75		
Order to Execute Writ of Inquiry	30		
Copy of Interrogatories, 15c per 100 words or	50		
Filing each Deposition and endorsing same	20		
Final Record, per 100 words	15		
Every Certificate requiring Seal	50		
Taking Bond not otherwise provided for	75		
Witness Certificates	25		
Continuance	10		
Certificate of Judgment	50		

## RECAPITULATION

Judgment for	for \$2792.52
Interest from 1-13-36	
Damages	820
Clerk's Fees	175
Sheriff's Fees	
Justice of Peace Fees	
Witness Fees in Justice of Peace Court	
Constable's Fees	
Commissioner's Fees	
Printer's Fees	
Witness Fee in Circuit Court	
Former Clerk's Fees	
Stenographer's Fee	\$5.00
Trial Tax	3.00

820.00 1295

2800.47

VIRGINIA CAROLINA CHEMICAL  
CORPORATION, a Corporation,

Plaintiff,

VS.

JOE KRAUSS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

And now comes the Defendant and for answer to the  
Plaintiff's complaint, and to each count thereof, separately  
and severally, says:

FIRST:

That the facts therein alleged are untrue.

Beebe & Hae  
Attorneys for Defendant.

The Defendant demands a trial by jury.

Beebe & Hae  
Attorneys for Defendant.

137  
~~RECORDED~~  
quick

VIRGINIA CAROLINA CHEMICAL  
CORPORATION, a Corporation,

Plaintiff,

VS.

JOE KRAUSS.

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW

ANSWER

Filed this 15<sup>th</sup> day of May,  
1935.

Robert S. Duck  
Clerk.

CERTIFICATE OF JUDGMENT

**The State of Alabama**  
Baldwin County

Circuit Court, APRIL Term, 19 36

VIRGINIA-CAROLINA CHEMICAL COMPANY

PLAINTIFF.

Vs.

JOE KRAUSS

DEFENDANT.

I, ROBERT S. DUCK, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 15th day of APRIL 19 36

a Judgment was rendered by said Court in the above stated cause, wherein

VIRGINIA-CAROLINA CHEMICAL COMPANY

was Plaintiff and

JOE KRAUSS

was Defendant, in

favor of the said Plaintiff and against the said Defendant for the sum of

TWO THOUSAND SEVEN HUNDRED NINETY-TWO & 52/100 (\$2792.52) DOLLARS,

and for the sum of TWELVE & 92/100 (\$12.92) DOLLARS,

the costs in said suit and that LLOYD A. MAGNEY

is  
are the Attorneys of record for the Plaintiff  
in said cause.

Witness my hand this 20th day of APRIL 19 36.

Clerk, Circuit Court, Baldwin County, Alabama.

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CERTIFICATE OF JUDGMENT

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VIRGINIA-CAROLINA CHEMICAL CO.

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\_\_\_\_\_, Plaintiff

Vs.

JOE KRAUSS

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\_\_\_\_\_, Defendant

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MOORE PRINTING CO., RAY MINETTE, ALA.

STATE OF ALABAMA }  
BALDWIN COUNTY }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Joe Krauss to appear within thirty days (30) 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 Virginia-Carolina Chemical Corporation.

WITNESS my hand this 15 day of April, 1935.

Ruth S. Welch  
Clerk

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VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,  
Plaintiff,

- vs -

JOE KRAUSS,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

COMPLAINT

COUNT ONE

The plaintiff claims of the defendant FIFTEEN HUNDRED SIXTY-TWO & 28/100 (\$1582.28) DOLLARS due by promissory note made by him on the 23rd day of February, 1932, and payable on the first day of June, 1932, with interest thereon.

The plaintiff avers that in, by and as a part of the note here sued upon the defendant waived any and all homestead and exemption rights to which he may in any event be entitled under any provision of the Constitution or Laws, State or Federal, and of such waiver the plaintiff now claims the benefit.

COUNT TWO

The plaintiff claims of the defendant the further and additional sum of ONE HUNDRED FIFTY & 00/100 (\$150.00) DOLLARS for that in, by and as a part of the note sued upon in Count One hereof the defendant agreed to pay all costs of collection of said note, including a reasonable attorney's fee, if collected by law or through

an attorney at law and plaintiff avers that it has been necessary to bring action at law and employ an attorney at law in order to collect said note and that said sum of ONE HUNDRED FIFTY & 00/100 (\$150.00) DOLLARS is a reasonable attorney's fee for such services.

COUNT THREE

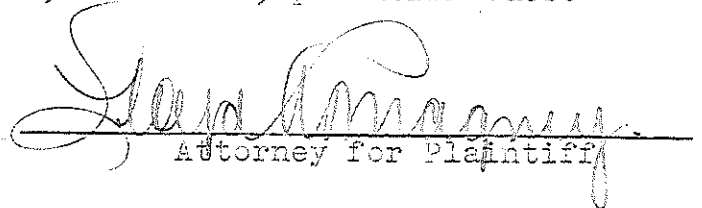
The plaintiff claims of the defendant FOUR HUNDRED SIXTY NINE & 55/100 (\$469.55) DOLLARS, being the balance due by promissory note made by him on the 9th day of March, 1933, and payable on the first day of May, 1933, with interest thereon from May 25th, 1933.

The plaintiff avers that in, by and as a part of the note sued upon in Count Three hereof, the defendant waived, as to said debt, all right of exemption as to personal property under the Laws of Alabama and of such waiver the plaintiff now claims the benefit.

COUNT FOUR

Plaintiff claims of the defendant the further and additional sum of FIFTY & 00/100 (\$50.00) DOLLARS for that in, by and as a part of the note sued upon in Count Three hereof, the defendant agreed to pay all expenses, attorney's fees or otherwise, that may accrue in the collection of this debt and plaintiff avers that the sum of FIFTY & 00/100 (\$50.00) DOLLARS is a reasonable fee for attorney's services in connection with said note.

That all of the sums mentioned in Counts One, Two, Three and Four hereof, are due and unpaid, WHEREFORE, plaintiff sues.

  
Attorney for Plaintiff

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

VIRGINIA-CAROLINA CHEMICAL  
CORPORATION, a Corporation,  
Plaintiff

- vs -

JOE KRAUSS,  
Defendant

SUMMONS AND COMPLAINT

Filed April 15 1935  
Robert S. Dicks  
Clerk

LLOYD A. MAGNEY  
ATTORNEY AT LAW  
FOLEY, ALABAMA

Rec'd in office  
4/11/35  
M. H. Wilkins  
Sheriff

Executed 19th day of April 1935  
by serving copy of within summons and  
Complaint on

Joe Krauss  
Defendant

M. H. Wilkins Sheriff  
By C. N. Anderson Deputy Sheriff