

VIRGINIA-CAROLINA CHEMICAL
CORPORATION,

VS.

Plaintiff,

MIKE KAISER, SR., MIKE
KAISER, JR., and JOHN KAISER,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2659

The plaintiff claims of the defendants the sum of Twenty-one Hundred Sixty-four and 38/100 Dollars (\$2164.38), the balance due on a promissory waive note for Twelve Thousand Five Hundred Dollars (\$12,500) made by the defendants on the 2nd day of January, 1954, and payable to the plaintiff on demand, which note is the property of the plaintiff and, together with the interest thereon, is still due and unpaid. Plaintiff avers that it has heretofore made demand on the defendants for the payment of the said note. Plaintiff avers that in and by the terms of the said note the defendants waived all rights of personal property exemptions as to this debt and agreed to pay a reasonable attorney's fee for the collection of same, which attorney's fee the plaintiff alleges to be Four Hundred Twenty-five Dollars (\$425.00).

Attorney for plaintiff.

VIRGINIA-CAROLINA CHEMICAL
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Plaintiff

-versus-

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Come now the defendants herein, MIKE KAISER, SR., MIKE KAISER, JR., and JOHN KAISER, and for answer to the complaint heretofore filed, say as follows, jointly and severally:

1. That they are not guilty of the matters alleged therein.

2. That the allegations thereof are untrue.

3. In short by consent, the general issue, with leave to give in evidence any matter that might be specially pleaded and to have effect as if so pleaded.


ATTORNEYS FOR DEFENDANTS

Defendants demand a trial by jury of this cause.


ATTORNEYS FOR DEFENDANTS

STATE OF ALABAMA)

BALDWIN COUNTY)

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MIKE KAISER, SR., MIKE KAISER, JR., and JOHN KAISER to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said county at the place of holding same, then and there to answer the complaint of the VIRGINIA-CAROLINA CHEMICAL CORPORATION.

WITNESS my hand this 12 day of July, 1955.

David J. Smith
Clerk of the Circuit Court.