

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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48  
You are hereby commanded to summon H. Styron, Marion R. Styron and Raymond Styron to appear within thirty days from the service of this writ in the Circuit Court of said county at the place of holding same, then and there to answer the complaint of Virginia-Carolina Chemical Corporation.

WITNESS my hand this 25<sup>th</sup> day of April, 1956.

Alice J. Duck

Clerk of the Circuit Court.

Defendants reside near  
Foley, Alabama.

\* \* \* \* \*

VIRGINIA-CAROLINA CHEMICAL )  
CORPORATION, )  
Plaintiff, )  
VS. )  
H. STYRON, MARION R. STYRON )  
and RAYMOND STYRON, )  
Defendants. )

FILED  
VBI 1504022  
IN THE CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 2911

The plaintiff claims of the defendants the sum of Two Thousand Dollars (\$2,000.00), the balance due on a promissory waive note for Forty-five Hundred Dollars (\$4500.00) made by the defendants on, to-wit, July 14, 1953, and payable to the plaintiff on November 15, 1953, which note is the property of the plaintiff and, together with the interest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of the said note the defendants waived all rights of personal property exemptions as to the debt evidenced thereby and agreed to pay a reasonable attorney's fee that may accrue in the collection of the said obligation, which attorney's fee the plaintiff alleges to be \$425.00 and which it herewith claims.

J. B. Blackburn  
Attorney for plaintiff

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon H. Styron, Marion R. Styron and Raymond Styron to appear within thirty days from the service of this writ in the Circuit Court of said county at the place of holding same, then and there to answer the complaint of Virginia-Carolina Chemical Corporation.

WITNESS my hand this 25<sup>th</sup> day of April, 1956.

Alice J. DeLoach  
Clerk of the Circuit Court.

Defendants reside near  
Foley, Alabama.

\* \* \* \* \*

VIRGINIA-CAROLINA CHEMICAL CORPORATION,	)	
	)	
VS.	)	Plaintiff,
	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
H. STYRON, MARION R. STYRON	)	
and RAYMOND STYRON,	)	AT LAW
	)	NO. <u>2911</u>
	)	
	)	Defendants. )

The plaintiff claims of the defendants the sum of Two Thousand Dollars (\$2,000.00), the balance due on a promissory waive note for Forty-five Hundred Dollars (\$4500.00) made by the defendants on, to-wit, July 14, 1953, and payable to the plaintiff on November 15, 1953, which note is the property of the plaintiff and, together with the interest thereon, is still due and unpaid.

Plaintiff avers that in and by the terms of the said note the defendants waived all rights of personal property exemptions as to the debt evidenced thereby and agreed to pay a reasonable attorney's fee that may accrue in the collection of the said obligation, which attorney's fee the plaintiff alleges to be \$425.00 and which it herewith claims.

J. B. Blackburn  
Attorney for plaintiff

SUMMONS AND COMPLAINT

VIRGINIA-CAROLINA CHEMICAL CORPORATION,

Plaintiff,

VS.

H. STYRON, MARION R. STYRON and  
RAYMOND STYRON,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 2911

FILED

APR 25 1956

AUGIE J. DUCK, Clerk

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

Received 25 day of April  
and on 18 day of May 1956  
I served a copy of the within 182  
of Marion R. Styron 4-28-56  
At Styrons 5-18-56  
By service on 5-18-56

TAYLOR WILKINS, Sheriff

By Childress

By

Deputy Sheriff

Returned 18 day of May 1956  
Not found in my county after diligent search and in-  
quiry. as to Raymond Styron  
Taylor Wilkins, Sheriff

Sheriff claims 160 miles at

Ten Cents per mile Total \$ 16.00

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

VIRGINIA-CAROLINA CHEMICAL CORPORATION,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
H. STYRON, MARION R. STYRON	)	AT LAW
and RAYMOND STYRON,	)	
	)	
Defendants.	)	

## GARNISHMENT AFFIDAVIT

STATE OF ALABAMA )  
 \*  
 BALDWIN COUNTY )

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is the attorney for the plaintiff in the above entitled cause; that the defendants, H. Styron, Marion R. Styron and Raymond Styron, are indebted to the said plaintiff, Virginia-Carolina Chemical Corporation, in the sum of approximately \$2825.00, for the recovery of which it has commenced suit by summons and complaint now pending in the Circuit Court of Baldwin County, Alabama, Law Side, against the said H. Styron, Marion R. Styron and Raymond Styron; that he believes that the process of garnishment against J. A. Corte and A. A. Corte and Sons, a partnership composed of A. I. Corte, Adele Corte, Albert Corte, F. A. Corte, J. Arthur Corte, Julio Corte and the Estate of E. D. Corte, is necessary to obtain satisfaction of the said indebtedness, and that the said J. A. Corte and A. A. Corte and Sons, a partnership, composed of A. I. Corte, Adele Corte, Albert Corte, F. A. Corte, J. Arthur Corte, Julio Corte and the Estate of E. D. Corte, are supposed to be indebted to or have effects of the said defendants in their possession or under their control.

*J. B. Blackburn*

Sworn to and subscribed before me on  
 this the 8th day of May, 1956.

*John R. O.*  
 Notary Public, Baldwin County, Alabama

VIRGINIA-CAROLINA CHEMICAL CORPORATION,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
H. STYRON, MARION R. STYRON	)	AT LAW
and RAYMOND STYRON,	)	
Defendants.	)	

## GARNISHMENT BOND

STATE OF ALABAMA )  
 \*  
 BALDWIN COUNTY )

KNOW ALL MEN BY THESE PRESENTS: THAT we, Virginia-Carolina Chemical Corporation, as Principal, and the undersigned, as Surety, are held and firmly bound unto H. Styron, Marion R. Styron and Raymond Styron in the sum of \$5700.00, for the payment of which, well and truly to be made, the Principal and Surety bind themselves, their successors and assigns, jointly and severally, firmly by these presents.

Sealed with our seals and dated the 8<sup>th</sup> day of May, 1956.

The condition of the above obligation is such that, Whereas, the above bounden Virginia-Carolina Chemical Corporation has brought a suit now pending against the said H. Styron, Marion R. Styron and Raymond Styron in the Circuit Court of Baldwin County, Alabama, Law Side, to recover of the said H. Styron, Marion R. Styron and Raymond Styron the sum of \$2,000.00, interest and attorney's fees, and has this day prayed that a writ of garnishment issue to J. A. Corte and A. A. Corte and Sons, a partnership composed of A. I. Corte, Adele Corte, Albert Corte, F. A. Corte, J. Arthur Corte, Julio Corte and the Estate of E. D. Corte, to answer what they are indebted to or what effects of the said defendants they have in their possession or under their control, and the said plaintiff, by its attorney, having made oath and entered into this bond, as required by law, has obtained said writ of garnishment returnable to the next term of the said court.

NOW, if the said plaintiff shall prosecute its said suit to effect, and pay the defendants all such damages as they may sustain by the wrongful or vexatious suing out of said garnishment, then this obligation to be void, otherwise, to remain in full force and effect.

VIRGINIA-CAROLINA CHEMICAL CORPORATION  
(SEAL)

By

(SEAL)  
J. B. Sparkman

~~As~~ its Attorney

FIDELITY AND CASUALTY COMPANY OF NEW  
YORK, a corporation, (SEAL)

By

\_\_\_\_\_, a corporation, (SEAL)  
William L. Lindsey

As its Attorney in Fact

Taken and approved this 8th  
day of May, 1956.

Clerk of the Circuit Court

2911

GARNISHMENT BOND

VIRGINIA-CAROLINA CHEMICAL COR-  
PORATION,

Plaintiff,  
VS.

H. STYRON, MARION R. STYRON and  
RAYMOND STYRON,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

FILED

MAY 3 1956

ALICE L. MURPHY, Clerk

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

VIRGINIA-CAROLINA CHEMICAL CORPORATION,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
H. STYRON, MARION R. STYRON	)	AT LAW
and RAYMOND STYRON,	)	
	)	
Defendants.	)	

## WRIT OF GARNISHMENT ON SUMMONS AND COMPLAINT

STATE OF ALABAMA )  
 \*  
 BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, on the 25th day of April, 1956, Virginia-Carolina Chemical Corporation filed a complaint in the Circuit Court of Baldwin County, Alabama, Law Side, claiming of H. Styron, Marion R. Styron and Raymond Styron the sum of \$2,000.00, interest and attorney's fees, on which a summons has issued, and plaintiff's attorney having made affidavit that J. A. Corte and A. A. Corte and Sons, a partnership composed of A. I. Corte, Adele Corte, Albert Corte, F. A. Corte, J. Arthur Corte, Julio Corte and the Estate of E. D. Corte, are supposed to be indebted to or have in their possession or under their control goods, effects or things in action belonging to the said defendants, and that he believes process of garnishment against the said J. A. Corte and A. A. Corte and Sons, a partnership composed of A. I. Corte, Adele Corte, Albert Corte, F. A. Corte, J. Arthur Corte, Julio Corte and the Estate of E. D. Corte, is necessary to obtain satisfaction of the said claim.

You are, therefore, hereby commanded to summons the said J. A. Corte and A. A. Corte and Sons, a partnership composed of A. I. Corte, Adele Corte, Albert Corte, F. A. Corte, J. Arthur Corte, Julio Corte and the Estate of E. D. Corte, to be and appear before the Circuit Court of Baldwin County, Alabama, Law Side, at the courthouse thereof within thirty days, as required by law, then and there to answer on oath whether they were indebted to the above named defendants or any of them at the time of the service of the



garnishment in the above stated cause, or at the time of making their answer hereto, and in what sum or sums; and whether they will not be indebted in the future to the said defendants or any of them by a contract then existing or at the time of the service of this summons; and whether they have not in their possession or under their control real or personal property or things in action belonging to the said H. Styron, Marion R. Styron and Raymond Styron, or any of them, defendants.

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

WITNESS my hand on this the 8 day of May, 1956.

Alfred J. Duck

Clerk of the Circuit Court.

2911

WRIT OF GARNISHMENT ON SUMMONS  
AND COMPLAINT

Received 8 day of May 1956  
and on 17 day of May 1956  
served a copy of the within Writ of Sum.  
on A. A. Corte & Sons

By service on A. A. Corte - Pres.

TAYLOR WILKINS, Sheriff

By Shadham D. S.

7044

VIRGINIA CAROLINA CHEMICAL COR-  
PORATION,

Plaintiff,

VS.

H. STYRON, MARION R. STYRON and  
RAYMOND STYRON,

Defendants.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

Received 8 day of May 1956  
and on 14 day of May 1956  
I served a copy of the within Writ of Sum.  
on J. A. Corte

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Carlisle Anderson D. S.

7044 72 mi

Sheriff claims 112 miles at

Ten Cents per mile Total \$ 11.20

TAYLOR WILKINS, Sheriff

BY Childress & Shadham  
DEPUTY

J. B. BLACKBURN

ATTORNEY AT LAW

BAY MINETTE, ALABAMA

Filed: 5/8/56  
Clerk, and J. Shadham