CECIL G. CHASON ATTORNEY-AT-LAW FOLEY, ALABAMA

March 12, 1957



Mrs. Alice J. Duck, Clerk Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Answer in the action of Riemers Company, Inc., -vs- Raymond Styron.

A copy of this Answer has this day been sent to Forest Christian, the attorney for the Plaintiff.

Yours very truly

& Chason

CGC:fm

cc: Mr. Forest Christian

Attorney at Law Foley, Alabama

SULMONS

THE STATE OF ALABAMA,)

BALLWIN COUNTY.

TO AMY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon RAYMOND STYRON, H. STYRON, RAIPH STYRON, Individually, and doing business as STYRON FARMS, to appear and plead, unswer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, against RAYMOND STYRON, H. STYRON, AND RAIPH STYRON, Individually, and doing business as STYRON FARMS, by RIRMERS COMPANY, INC.

WITNESS my hand this the 23rd day of January, 1957.

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COMPLAINT

RIGMERS COMPANY, INC.,

PLAINTIFF.

IN THE CIRCUIT COURT OF

VIII:

BALIWIN COUNTY, ALABAMA

RAMPOND STYRON, H. STYRON, RAIPH STYRON, Individually, and doing business as STYRON FARMS, AT LAW

DEFENDANTS

COUNT I:

The Plaintiff claims of the defendants NINE HUNDRED EIGHTY THREE & 14/100 DOLLARS (\$983.14), due by promissory note made by them on the 24th day of April, 1956, and payable on the 2nd day of July, 1956, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$196.00.

COUNT II:

The plaintiff claims of the defendants THREE THOUSAND FOUR HUNDRED ONE & 13/100 DOLLARS (\$3,401.13), due by promissory note made by them on the 6th day of January, 1955, and payable on the 6th day of January, 1955, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$560.00.

Sulf Mult

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.

to any sheriff of the state of Alabama, greeting:

You are hereby commanded to summon RAYMOND STYRON, H. STYRON, RALPH STYRON, Individually, and doing business as STYRON FARMS, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, against RAYMOND STYRON, H. STYRON, AND RALPH STYRON, Individually, and doing business as STYRON FARMS, by RIEMERS COMPANY, INC.

WITNESS my hand this the 23rd day of January, 1957.

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COMPLAINE

RIMMERS COMPANY, INC.,

PLANTE

IN IME CIRCUIT COURT OF

175

BALDWIN COUNTY, ALABAMA

RAYMOND STYRON, H. STYRON, RAIPH STYRON, Individually, and doing business as STERON FARMS,

AT LAW

DEFENDANTS

COUNT I:

The Plaintiff claims of the defendants NINE HUNDRED ENGHTY THREE & 14/100 DOLLARS (\$983.14), due by promissory note made by them on the 24th day of April, 1956, and payable on the 2nd day of July, 1956, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$196.00.

COUNT II:

The plaintiff claims of the defendants THREE THOUSAND FOUR MUNDRED ONE & 13/100 DOLLARS (\$3,401.13), due by promissory note made by them on the 6th day of January, 1955, and payable on the 6th day of January, 1955, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$560.00.

Actorney for Plaintiff

20 July 18

THE STATE OF ALADAMA,)

PALININ COUNTY,

TO ARY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to suppose RAYMOND STYRON, H. STYRON, RALPH STYRON, Individually, and doing business as STYRON PAIMS, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Raidwin County, Alabama, at Bay Minette, against RAYMOND STYRON, M. STYRON, AND RALPH STYRON, Individually, and doing business as STYRON FARMS, by RIPHIRS COMPANY, INC.

WIINESS my hand this the 23rd day of January, 1957.

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COPTAIN

RIMERS CREART, INC.,

IN THE CIRCUIT COURT OF

VS z

Baldwin County, Alabama

RAIMOND STRON, H. STRON, RAIPH STYRON, Individually, and doing business as STRON FARRS,

AT LAW

COUNT I:

The Plaintiff claims of the defendants NINE HUNDRED ENGHTY THREE & 14/100 DOLLARS (\$903.14), due by promissory note made by them on the 24th day of April, 1956, and payable on the 2nd day of July, 1956, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$196.00.

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Said note provides for a reasonable accorney's fee, which plaintiff alleges to be \$560.00.

Sulfiller R

LAW OFFICE OF

FOREST A. CHRISTIAN FOLEY, ALABAMA

January 25, 1957

Mrs. Alice J. Duck Clerk of Court Bay Minette, Alabama

Dear Mrs. Duck:

I have decided to take a non-suit in Case No. 3135, Riemers Company, Inc., vs: Raymond Styron, H. Styron and Ralph Styron, individually, and doing business as Styron Farms, and I am enclosing two new complaints involving some of the same parties. Although it might be possible for me to amend and save a few dollars court costs, I do not believe it would be worthwhile. Accordingly, in case No. 3135 I have completely dismissed the complaint and both garnishments.

Yours very truly,

FOREST A. CHRISTIAN

Enclosures

LAW OFFICE OF

FOREST A. CHRISTIAN FOLEY, ALABAMA

January 25, 1957

Hon. Taylor Wilkins, Sheriff Bay Minette, Alabama

Dear Taylor:

I have decided to take a non suit in the case of Riemers Company, Inc., vs: Raymond Styron, H. Styron and Ralph Styron, individually, and doing business as Styron Farms, Case No. 3135, which I requested you to hold in your desk the other day, but I am re-filing two new cases, one against Raymond Styron and one against H. Styron.

Thank you for helping me with all of this.

Yours very truly

FOREST A. CHRISTIAN

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The	State	- ot	Alabama)	<u> </u>						
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is neces	ssary to ob	tain sa	tisfaction of sa	id claim;	and that	the said	FARME	RS_&_1	MERCHANT	ישוא אם אי	
is belie	vea to be o	charge	able as Garnish	ee in said	l cause; ar	id that t	his Writ is	not sued	out for th	e purpose	
or vexi.	ng or nara	ssing s	aid Defendant_	5 , or c	other impro	oper mot	ives.	W//	11/1	acto	inly
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	STATE OF ALABAMA Baldwin County.	CIRCUIT			•			dav Su			rinked by Moore Ptg. Co.
No.	STA Balc	RC						Affiç			inted
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	THE			! !				Bond and Affidavit in Garnishment on Summons	Filed this		
								Son	锰		

RIEMERS COMPANY, INC.,) An Alabama Corporation,	
Plaintiff,)	IN THE CIRCUIT COURT OF
-vs-	BALDWIN COUNTY, ALABAMA
RAYMOND STYRON,	AT LAW
Defendant.	

ANSWER

Comes the Defendant in the above styled cause, and for Answer to the Complaint heretofore filed therein, says:-

1. That the allegations of the Complaint are untrue.

Attorney for the Defendant

Defendant demands trial by Jury.

Attorney for the Defendant

C. G. C.

BOND

The State of Alabama, Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

NOW ALL MEN DI TILLES TRACESTOR
THAT WE, RUEMERS COMPANY, INC., W. H. RIEMER, R. I. RIEMER AND
R C HARDING, IR
re held and firmly bound unto RAYMOND STYRON, H. STYRON AND RALPH STYRON,
Individually and doing business as STYRON FARMS
n the sum of EIGHT THOUSAND EIGHT HUNDRED & 09/100 (\$8,800) DOLLARS,
o be paid to the said_RAYMOND_STYRON, H. STYRON, AND RALPH_STYRON, Individu
and doing business as STYRON FARMS, their
neirs, executors, administrators or assigns, for which payment well and truly to be made, we bind our- selves, and each of us, our and each of our heirs, executors and administrators jointly, severally and firmly
by these Presents.
Sealed with our seals, and dated this 23rd day of January, 1957
THE CONDITION OF THE ABOVE OBLIGATION IN SUCH, That whereas, the above bound
RIEMERS CEMPANY, INC.
ha commenced suit in the Circuit Court of said County by summons and complaint, which have issued
from said Court, to recover of said RAYMOND STYRON, H. STYRON AND RALPH STYRON,
Individually and doing hasiness as STYRON FARMS
the sum of <u>FOUR THOUSAND THREE HUNDRED EIGHTY FOUR & Q7/100</u> Dollars, (\$4,384.27) and hason the day of the date hereof, prayed that Writ of Garnishment issue out of said Court to
WARLEY: FRUIT & PRODUCE CO.
summoning h_12_ to answer what 12 28indebted to said Defendant, or what effects of said
Defendant_SithaSinitS possession, or underitScontrol; and
said Plaintiff having made oath as required by law in such cases, said Writ is about to issue out of said
Court, returnable to the next Term of the Circuit Court, to be holden for Baldwin County.
NOW, if the said Plaintiffshall prosecute the Garnishment to effect, and pay the Defendant all
such costs and damages as theymay sustain, by reason of the wrongful or vexatious suing out of
this Garnishment, then this obligation to be void; otherwise to remain in full force and effect.
AND WE, and each of us, hereby waive all rights of claim of exemption we, or either of us have
now, or may hereafter have, under the Constitution and laws of Alabama, andWe hereby severally
certify that have property free from all incumbrance, to the full amount of the
above bond. BY: Downer PRES (SEA
Halos hommer Individually (Seal)
M. Milmur (Seal)
K.C. Harding (Seal)
A. D., 1957.
Approved thisday of
line f- aluek Clerk

CIRCUIT COURT

THE STATE OF ALABAMA, BALDWIN COUNTY

	:	
ether, at the time of the service of this garnishment, or at the me intervening between the time of serving the garnishment and of the defendant, and whether, you will not be indebted to him in the payment of money which may be discharged by the delivery of personal property, and whether you have not in your possession elonging to the defendant.	wer, upon oath, whe answer, or at any tin you were indebted to act then existing, ar all property, or for t which is payable in	and there to ans to ent in and there to an inaking your string the answer, ye future by a contractory of person reonal property, or
·61	no, aniwblas do yan	holden for the Cou
e next Court, to	pe and appear at the	01
is believed to be chargeable as garnishee in the cause.		
EVENERS & MERCHANTS BANK OF FOLEY, ALA	y Plaintiff, and that	nay be recovered b
s believed to be necessary to obtain satisfaction of such judgment	ess of garnishment is	OUR & 27/100
in the sum of FOUR THOUSAND THREE HUNDRED EIC	######################################	RON FARMS ndebted to Plant processes, and that processes, and that processes.
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28 27/100 (\$4,384.27) 29 COMPANY, TMC. As required by law that the said Action of such judgment in the sum of EOUR THOUSAND THREE HUNDRED ETC. In the sum of EOUR THOUSAND THREE HUNDRED ETC. In the sum of EOUR THOUSAND THREE HUNDRED ETC.	RIEMER and made affidavit a RALPH STYRON (\$4,384.27) ess of garnishment is	the sum of OUR. CHYRON and Gebted to PLOUR & STYRON PARMS adebted to PLOUR & PLOUR
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The sum of FOUR THOUSAND THREE HUNDRED EIGHT of said in the sum of PORS and doing Dusiness as required by law that the said RAYMOND STYRON. Individually and doing Dusiness as in the sum of FOUR THOUSAND THREE HUNDRED EIGHT in the sum of FOUR THOUSAND THREE HUNDRED EIGHT in the sum of FOUR THOUSAND THREE HUNDRED EIGheved to be necessary to obtain satisfaction of such judgment specieved to be necessary to obtain satisfaction of such judgment	Summons and Comingers as STYR THOUSAND THRE And made affidavit a RALPH STYRON Aintiff (\$4,384.27) ess of garnishment is	Whereas, commenced suit by nty, against RAY d doing bus: the sum offolia: STYRON FARMS Jachted to PL adebted to PL adebted to PL Jachted to PL Jach

Witness my hand this 24th day of day of January Witness my hand this Oter Clerk.

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

Whereas,-	RIEMERS	COMPANY,	, INC.				
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s entered into	bond, and made at	fidavit as req	uired by law t	nat the said	447 E X 1 357 L V		 -
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indebted to _	1200 106 226	273	•				15
NOUN & 27.	/100 (\$4 , 384) at process of garnis	hment is belie	eved to be nec	essary to obt	ain satisfactio	on of such judgmen	nt
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YOU AI	RE THEREFORE	, commanded	l to summon t	he said 🏯 🚾		de la companya de la	mire and
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	to be and appea	ar at the	*****	<u></u>	term of	the Circuit Court,	το
e holden for t	he County of Bald	win, on —				19	
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me of making	your answer, or a	t any time in	tervening betv	veen the time	of serving t	he garnishment a	nd -
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The State of Alabama,

BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

Whereas RIEMERS COMPANY, INC.	Control of the Contro
has commenced suit by Summons and Complaint returnable to the next term of the Circuit	Court
of said County, against RAYMOND STYRON, H. STYRON, AND RAIPH STYRON,	
TNDEWIDUALLY AND DOTNG BUSINESS AS STYPON FARMS FOUR & 27/100 (\$ for the sum of FOUR THOUSAND THREE HUNDRED EIGHTY/ Dollars and whereas, the	4,384.27) ne said
WXXXX RIEMERS COMPANY, INC.	i iga
	100 100 100 100 100 100 100 100 100 100
has entered into bond, and made affidavit as required by law that the said	20 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
WARLEY FRUIT & PRODUCE GO. of 57 South Commerce Street, N	W 12 N
is indebted to defendants in the sum of FOUR THOUSAND THREE HUNDRED EXECUTE SECURIOR SECTION 100 DOLLARS (\$4,384.27). Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of the sum of FOUR THOUSAND THREE HUNDRED EXECUTED THREE HUNDRED HUNDRED EXECUTED THREE HUNDRED HUN	f such
judgment as may be recovered by Plaintiff, and that WARLEY FRUIT & PRODUCE CO	
is believed to be Chargable as granishee in the cause.	
YOU ARE THEREFORE, commanded to summon the said WARLEY FRUIT & PI	RODUCE CO.
57 S. Commerce	· · · · · · · · · · · · · · · · · · ·
to be and appear at theterm of the Circuit Co	eurt, to
be holden for the County of Baldwin, on, 1	9,
then and there to answer, upon oath, whether, at the time of the service of this garnishment at the time of making your answer, or at any time intervening between the time of serving garnishment and making the answer, you were indebted to the defendant, and whether will not be indebted to him in the future by a contract then existing, and whether by a contract then existing, you are liable to him for the delivery of personal property, or for the payr money which may be discharged by the delivery of personal property, or which is pay personal property, and whether you have not in your possession or under your control more effects belonging to the defendant. Witness my hand this 23rd day of January , 19 57.	ent, or ng the r, you ontract nent of able in
Alice J. Duck	

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon RAYMOND STYRON, H. STYRON, RALPH STYRON, Individually, and doing business as STYRON FARMS, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at Bay Minette, against RAYMOND STYRON, H. STYRON, AND RALPH STYRON, Individually, and doing business as STYRON FARMS, by RIEMERS COMPANY, INC.

WITNESS my hand this the 23rd day of January, 1957.

Clery of Court

COMPLAINT

RIEMERS COMPANY, INC.,

PLAINTIFF

IN THE CIRCULT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

RAYMOND STYRON, H. STYRON, RAIPH STYRON, Individually, and doing business as STYRON FARMS,

AT LAW

DEFENDANTS

COUNT 1:

The Plaintiff claims of the defendants NINE HUNDRED EIGHTY THREE & 14/100 DOLLARS (\$983.14), due by promissory note made by them on the 24th day of April, 1956, and payable on the 2nd day of July, 1956, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$196.00.

COUNT II:

The plaintiff claims of the defendants THREE THOUSAND FOUR HUNDRED ONE & 13/100 DOLLARS (\$3,401.13), due by promissory note made by them on the 6th day of January, 1955, and payable on the 6th day of January, 1955, with interest thereon.

Said note provides for a reasonable attorney's fee, which plaintiff alleges to be \$560.00.

Actorney for Plaintiff

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NO. 3135

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GRANG

SULLIONS AND COMPLAINT

RIMERS COMPANY, INC.,

PLAINTIFF

VS:

RAYMOND STYRON, H. STYRON, AND RALPH STYRON, INDIVIDUALLY AND DOING BUSINESS AS STYRON FARMS,

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

JAN 22 1957 PACE OF THE CASE OF CO.

LAW OFFICE OF FOREST A. CHRISTIAN FOLEY, ALABAMA