

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

March 12, 1957

3135



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,


C. G. Chason


CGC:fm

cc: Mr. Forest Christian
Attorney at Law
Foley, Alabama

SUMMARY

THE STATE OF ALABAMA,)

CLARK 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.

~~Clerk of Court~~

COMPLAINT

RIEMERS COMPANY, INC.

PLANT

IN THE CIRCUIT COURT OF

Figure 1

BALDWIN COUNTY, ALABAMA

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



REFERENCES

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.

CONTINUED

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.

Attorney for Plaintiff

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.

~~Clerk of Court~~

COMPLAINT

FLIMMERS COMPANY, INC.

PLANET

IN THE CIRCUIT COURT OF



BALDWIN COUNTY, ALABAMA

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

AT 145

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 11

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.

Attorney for Plaintiff

SUBPOENA

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.

Archie J. Smith
Clerk of Court

COMPLAINT

RIEMERS COMPANY, INC.,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

RAYMOND STYRON, H. STYRON,
RALPH 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.

J. M. [Signature]
Attorney for Plaintiff

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

The State of Alabama

Baldwin County

Before me, ALICE J. DUCK, Clerk of Circuit Court,

in and for said County, personally appeared Forest A. Christian, Attorney for
Riemers Company, Inc.

who, being duly sworn, doth depose and say S. that RAYMOND STYRON, H. STYRON,
and RALPH STYRON, individually and doing business as STYRON FARMS

indebted to plaintiff in the sum of \$4,384.27 Dollars,

and that it ha S. commenced on suit by summons and complaint on said indebtedness
against the said RAYMOND STYRON, H. STYRON and RALPH STYRON, individually
and doing business as STYRON FARMS

and that THE FARMERS & MERCHANTS BANK of Foley, Alabama

supposed to be indebted to the said Defendant S., or to have effects of the said Defendant S., in its
possession, or under its control, and that he believe that process of Garnishment against the said
FARMERS & MERCHANTS BANK of Foley, Alabama

is necessary to obtain satisfaction of said claim; and that the said FARMERS & MERCHANTS BANK
is believed to be chargeable as Garnishee in said cause; and that this Writ is not sued out for the purpose
of vexing or harassing said Defendant S., or other improper motives.

Sworn to and subscribed before me this 24th day of January 1957.

Forest A. Christian, Attorney for Riemers Company, Inc.
Alice J. Duck, Clerk Circuit Court.

116

No. 3135

THE STATE OF ALABAMA
Baldwin County.

CIRCUIT COURT

Plaintiff

TO

Defendant

Bond and Affidavit in Garnishment
on Summons

Filed this _____ day of _____, 19____

Clerk.

Printed by Moore Ptg. Co.

RIEMERS COMPANY, INC.,
An Alabama Corporation,

Plaintiff,

-vs-

RAYMOND STYRON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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

BOND

The State of Alabama, }
Baldwin County

CIRCUIT COURT

KNOW ALL MEN BY THESE PRESENTS:

THAT WE, RIEMERS COMPANY, INC., W. H. RIEMER, R. T. RIEMER ANDR. C. HARDING, JR.are held and firmly bound unto RAYMOND STYRON, H. STYRON AND RALPH STYRON,Individually and doing business as STYRON FARMSin the sum of EIGHT THOUSAND EIGHT HUNDRED & 00/100 (\$8,800) DOLLARS,to be paid to the said RAYMOND STYRON, H. STYRON, AND RALPH STYRON, Individually,and doing business as STYRON FARMS, their

heirs, executors, administrators or assigns, for which payment well and truly to be made, we bind ourselves, 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 COMPANY, INC.

has 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 business as STYRON FARMSthe sum of FOUR THOUSAND THREE HUNDRED EIGHTY FOUR & 27/100 Dollars,and has (\$4,384.27) on the day of the date hereof, prayed that Writ of Garnishment issue out of said Court toWARLEY:FRUIT & PRODUCE CO.

summoning it to answer what it is indebted to said Defendant, or what effects of said Defendant it has in its possession, or under its control; 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 Plaintiff shall prosecute the Garnishment to effect, and pay the Defendant all such costs and damages as they may 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, and we hereby severally

certify that we have property free from all incumbrance, to the full amount of the above bond.

RIEMERS COMPANY, INC.

BY: W. H. Riemer PRES (SEAL)W. H. Riemer Individually (Seal)R. T. Riemer (Seal)R. C. Harding (Seal)Approved this 23rd day of January, A. D., 1957Arice J. Hester Clerk.

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting :

Whereas, RIEBERS COMPANY, INC.

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 RALPH STYRON, individually

and doing business as STYRON FARMS

& 27/100 (\$4,384.27) for the sum of FOUR THOUSAND THREE HUNDRED EIGHTY FOUR Dollars and whereas, the said

RIEBERS COMPANY, INC.

has entered into bond, and made affidavit as required by law that the said RAYMOND STYRON,

H. STYRON, and RALPH STYRON, individually and doing business as

STYRON FARMS

is indebted to Plaintiff in the sum of FOUR THOUSAND THREE HUNDRED EIGHTY FOUR & 27/100 (\$4,384.27) Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such judgment

as may be recovered by Plaintiff, and that FARMERS & MERCHANTS BANK OF FOLEY, ALABAMA

is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said FARMERS & MERCHANTS BANK

to be and appear at the next term of the Circuit Court, to

be holden for the County of Baldwin, on 19-----

then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you 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 payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 24th day of January, 1957

Clerk.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting :

Whereas, RIEMERS COMPANY, INC.

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 RALPH STYRON, individually
and doing business as STYRON FARMS

for the sum of FOUR THOUSAND THREE HUNDRED EIGHTY FOUR & 27/100 (\$4,384.27) Dollars and whereas, the said

RIEMERS COMPANY, INC.

has entered into bond, and made affidavit as required by law that the said RAYMOND STYRON,

H. STYRON, and RALPH STYRON, individually and doing business as
STYRON FARMS

is indebted to Plaintiff in the sum of FOUR THOUSAND THREE HUNDRED EIGHTY
FOUR & 27/100 (\$4,384.27)

Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such judgment

as may be recovered by Plaintiff, and that FARMERS & MERCHANTS BANK OF POLEY, ALABAMA

_____ is believed to be chargeable as garnishee in the cause.

YOU ARE THEREFORE, commanded to summon the said FARMERS & MERCHANTS BANK

_____ to be and appear at the next term of the Circuit Court, to

be holden for the County of Baldwin, on _____ 19____,
then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the
time of making your answer, or at any time intervening between the time of serving the garnishment and
making the answer, you were indebted to the defendant, and whether, you 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 payment of money which may be discharged by the delivery of
personal property, or which is payable in personal property, and whether you have not in your possession
or under your control money or effects belonging to the defendant.

Witness my hand this 24th day of January, 1957

Archie J. Duck
Clerk.

The State of Alabama,
BALDWIN COUNTY

Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

Whereas RIEMERS COMPANY, INC.

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 RALPH STYRON,

INDIVIDUALLY AND DOING BUSINESS AS STYRON FARMS
for the sum of FOUR THOUSAND THREE HUNDRED EIGHTY/ FOUR & 27/100 (\$4,384.27) Dollars and whereas, the said

XXXX RIEMERS COMPANY, INC.

has entered into bond, and made affidavit as required by law that the said

WARLEY FRUIT & PRODUCE CO. of 57 South Commerce Street, Mobile, Ala.

is indebted to defendants in the sum of FOUR THOUSAND THREE HUNDRED EIGHTY
FOUR & 27/100 DOLLARS (\$4,384.27)

Dollars, and that process of garnishment is believed to be necessary to obtain satisfaction of such judgment as may be recovered by Plaintiff, and that WARLEY FRUIT & PRODUCE CO.

is believed to be Chargeable as garnishee in the cause.

YOU ARE THEREFORE commanded to summon the said WARLEY FRUIT & PRODUCE CO.

57 S. Commerce

to be and appear at the _____ term of the Circuit Court, to be holden for the County of Baldwin, on _____, 19____, then and there to answer, upon oath, whether, at the time of the service of this garnishment, or at the time of making your answer, or at any time intervening between the time of serving the garnishment and making the answer, you were indebted to the defendant, and whether, you 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 payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether you have not in your possession or under your control money or effects belonging to the defendant.

Witness my hand this 23rd day of January, 1957.

Alice J. Duck
Alice J. Duck

Clerk.

SUMMONS

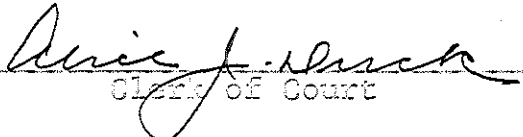
THE STATE OF ALABAMA,)

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.


Clerk of Court

%%%%%%%%%

COMPLAINT

RIEMERS COMPANY, INC.,

PLAINTIFF

IN THE CIRCUIT COURT OF

VS:

BALDWIN COUNTY, ALABAMA

RAYMOND STYRON, H. STYRON,
RALPH 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.


Attorney for Plaintiff

RECORDED

No. 3135

SUMMONS AND COMPLAINT

REIDERS 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

FILED

JAN. 22 1937

WACE & BUCK CO.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

*Returned 2/7/37
By order of J. J.
Atty.
Wayles & White
Birmingham*