

S U M M O N S

THE STATE OF ALABAMA  
COUNTY OF BALDWIN

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA - - - - - GREETING:

You are hereby commanded to summons RIEMERS COMPANY, INC. to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of PIONEER SEED COMPANY, a corporation.

Witness my hand this 24 day of Apr, 1958.

Archie Duck  
Clerk

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C O M P L A I N T

PIONEER SEED COMPANY  
a corporation  
VS: PLAINTIFF  
RIEMERS COMPANY, INC.  
DEFENDANT

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

I.

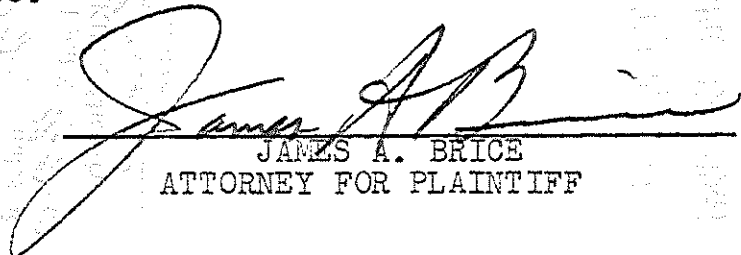
The Plaintiff claims of the defendant the sum of One Thousand Six Hundred Fifty-two & NO/100 Dollars (\$1,652.00), due by promissory note made by the defendant on the 13th day of September, 1957, and payable on the 12th day of October, 1957, with interest thereon.

II.

The plaintiff claims of the defendant the sum of One Thousand Six Hundred Fifty-two & NO/100 Dollars (\$1,652.00), due by promissory note made by the defendant on the 13th day of September, 1957, and payable on the 12th day of October, 1957, with interest from the 13th day of September, 1957, at the rate of Six per cent. (6%) per annum.

Plaintiff avers that in and by the terms of the said note the defendant waived all right to exemption under the Constitution and Laws of Alabama as to personal property and of this waiver plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said note, the defendant agreed to pay all costs of collecting or securing, or attempting to collect or secure said note, including a reasonable attorney's fee, and the plaintiff further claims of the defendant the further and additional sum of Two Hundred Dollars (\$200.00), as such reasonable attorney's fee.

  
JAMES A. BRICE  
ATTORNEY FOR PLAINTIFF

THE defendant may be served  
at its place of business at  
Foley, Alabama.

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

July 1, 1958

POST OFFICE BOX 298

WHITEHALL 3-3601

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

Re: Pioneer Seed Company  
Vs: Riemers Company, Inc.  
Law 3518

Dear Mrs. Duck:

The above case should not have been  
dismissed. Rather, summons and complaint  
should be served on defendant here in Foley.

Please advise.

Sincerely,

  
James A. Brice

JAB:ecg

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

October 7, 1958

WHITEHALL 3-3601

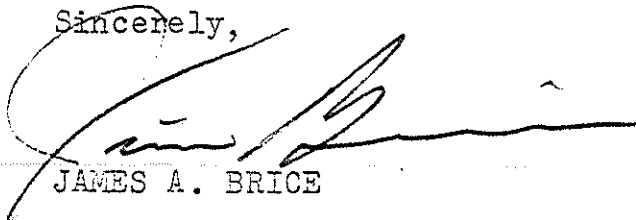
Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

Re: Pioneer Seed Company  
Vs: Riemers Company, Inc.  
Law 3518

Dear Mrs. Duck:

I enclose the promissory note, foundation of the judgment.  
Thank you for the judgment.

Sincerely,



JAMES A. BRICE

JAB:bp

Enclosure

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

August 18, 1958

WHITEHALL 3-3601

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

Re: Pioneer Seed Company  
Vs: Riemers Company, Inc.  
Law 3518

Dear Mrs. Duck:

Please schedule the above case for judgement by default on October 1, 1958. This extention of time was granted the defendant by agreement.

Thank you.

Sincerely,

  
JAMES A. BRICE

JAB:bp