

JAMES A. BRICE

ATTORNEY AT LAW
FOLEY, ALABAMA

P. O. Box 298

WHITEHALL 3-3601

February 25, 1963

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

Re: Providence Hospital
Vs: Mrs. A. E. Buzbee
At Law, Jury, No. 5388

Re: Providence Hospital
Vs: Alfred Buzbee
At Law, Jury, No. 5402

Dear Mrs. Duck:

In both the above cases, please make note of my appearance as an additional counsel for the defendant, associated with J. M. Matranga, Esq.

Thank you.

Sincerely,

James A. Brice

JAB:j

C

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P

Y

PROVIDENCE HOSPITAL

X

Plaintiff

X

IN THE CIRCUIT COURT OF

VS

X

BALDWIN COUNTY, ALABAMA

ALFRED BUZBEE

X

AT LAW

NO. 5402

Defendant

X

-1-

Plaintiff claims of the defendant \$1616.95 due from him by account on April 15, 1961, which sum of money together with interest thereon is still unpaid.

-2-

Plaintiff claims of the defendant \$1616.95 due from him by account stated between the plaintiff and the defendant on the 15th day of April, 1961, which sum of money together with interest thereon is still unpaid.

-3-

The plaintiff claims of the defendant \$1616.95 due from him for goods and services rendered by the plaintiff for the benefit of the defendant at the request of the said defendant on to-wit, April 15, 1961, which sum of money with interest thereon is still unpaid.

THOMPSON & WHITE

BY: 

Attorneys for plaintiff.

Suit is made on itemized verified account.

FILED

DEC 7 1962

ALICE L. DICK, CLERK
REGISTER

COUNTY OF Mobile
STATE OF Alabama

Be it remembered, that on this 30th. day of November
A. D., 19 61, personally appeared before me, the undersigned authority, Sister Bernice known to me
who being duly sworn, upon his oath stated that he is business manager
of Providence Hospital
{ a corporation organized and doing business under the laws of the State of Alabama
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____
a sole trader doing business as _____
and that as such he makes this affidavit; that he is familiar with the books and business of
said Providence Hospital; that the attached account against
Alfred Buzbee of Star Route - Daphne, Ala.
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Alfred Buzbee
at { its } special instance and request, that credit has been duly given for all payments and
{ their }
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of One-thousand-six-hundred sixteen and 96/100 dollars
(\$ 1616.95) with interest from _____ 19 _____ is justly due and
remains unpaid.

Sister Bernice X

I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of Alabama
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

William R. Abbott
Notary Public
Mobile County, Ala.
My Commission expires 7-23-65

MOBILE 17, ALA.

Date Mar. 16, 19 67

for-- Mrs. Virginia Ann Ireland Buzbee

Form C-7 Nominating

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 5402

TERM, 19--

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Alfred Buzbee

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, State of Alabama, at Bay Minette, against

Alfred Buzbee, Defendant

by Providence Hospital

Witness my hand this 7 day of Dec 1962

Ex-12-10-62, Clerk

No. 5402

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Providence Hospital

Plaintiffs

vs.

Alfred Buzbee

Defendants

Summons and Complaint

Filed

FILED

19

DEC 7 1962

ALICE J. DUCK, CLERK
REGISTER

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Spanish Fort, Ala.

Received In Office

12/7, 1962

Sheriff.

I have executed this summons

this 10th day of Dec. 1962

by leaving a copy with

Alfred Buzbee

Sheriff claims 44 miles at

Ten Cents per mile Total \$ 4.40

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

This is a good and sufficient receipt for

to me in my county I have

TAYLOR WILKINS, Sheriff

Taylor Wilkins

Sheriff.

Fred L. Smith

Sp. Fort

Deputy Sheriff.

PROVIDENCE HOSPITAL,

Plaintiff

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY,

ALABAMA

VS:

) AT LAW

ALFRED BUZBEE,

Defendant

)

) CASE NO. 5402

Comes now the defendant in the above styled cause
and for answer to the complaint filed herein against him
says as follows:

1. The allegations of the complaint are untrue.
2. The defendant is not indebted to the plaintiff.

3. The defendant further states that the account sued
on by the plaintiff was extinguished and rendered for naught
and that no recovery can be had thereon for that on the 15th
day of April, 1961, the plaintiff, Providence Hospital,
accepted a promissory note applicable to the alleged account
and that said acceptance of said promissory note constituted
a novation, thereby limiting the plaintiff's action to the
said promissory note.

4. The defendant further states under oath that he
denies the account in its entirety and each and every aspect
thereof.

Alfred E. Buzbee
ALFRED E. BUZBEE

Sworn and subscribed to before me on this 6th day
of March, 1963.

Mildred K. Hope
NOTARY PUBLIC, MOBILE COUNTY,
ALABAMA

J. M. Matranga
J. M. MATRANGA
Attorney for Defendant

James A. Brice
JAMES A. BRICE

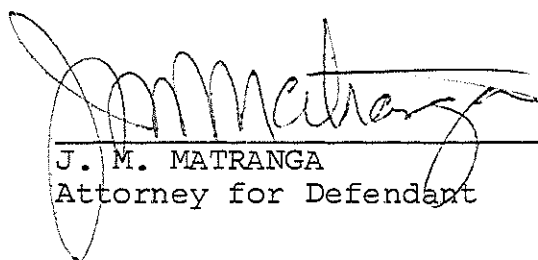
FILED

MAR - 63

ALICE J. DICK, CLERK

PROVIDENCE HOSPITAL,) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY,
) ALABAMA
VS:) AT LAW
ALFRED BUZBEE,)
) CASE NO. 5462
) Defendant

Comes now the defendant in the above styled cause
and demands trial by jury.



J. M. MATRANGA
Attorney for Defendant

FILED
DEC 22 1962
ALICE I. DUCK, CLERK
REGISTER