

COMPLAINT

DRS. CLAUDE WARREN, JR.,  
JACK HAYS AND JACK YEAGER

PLAINTIFFS

VS.

C. M. NORTHCUTT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

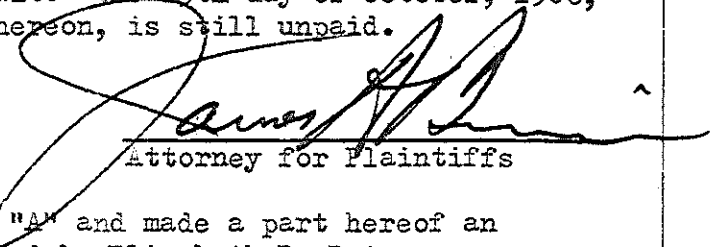
5671

I.

The plaintiffs claim of the defendant the sum of One Hundred Fifty Nine and no/100(\$159.00) Dollars, due from him on account, to-wit: the 15th day of October, 1960, which sum of money, with interest thereon, is still unpaid.

II.

The plaintiffs claim of the defendant One Hundred Fifty Nine and no/100(\$159.00) Dollars, due from him for services done by the plaintiffs to the defendant on, to-wit: the 15th day of October, 1960, which sum of money, with interest thereon, is still unpaid.

  
Attorney for Plaintiffs

There is attached hereto as Exhibit "A" and made a part hereof an itemized statement of account verified by Elizabeth R. Peters, a competent witness, sworn to before a Notary Public, which statement shows the amount due on this account as of the 15th day of November, 1960, and due at present.

The defendant lives in Robertsedale, Alabama.

FILED

AUG 15 1963

ALICE J. DUCK, CLERK  
REGISTER

# DRS. WARREN, HAYS, AND YEAGER

EYE, EAR, NOSE AND THROAT  
SUITE 101 — 1720 SPRING HILL AVENUE  
MOBILE MEDICAL CENTER  
MOBILE, ALABAMA

DIAL HEMLOCK 3-2564

CLAUDE M. WARREN, JR., M. D.  
JACK ROSS HAYS, M. D.  
JACK O. YEAGER, M. D.

IN ACCOUNT WITH

To

For Mr. C. M. Northcutt

DATE	ITEM	CHARGES	CREDITS	BALANCE
8-11-60	O. V. & Injection operation	7.00		
8-15-60	O. V. & Injection	10.00		
8-23-60	O. V. & Injection	7.00		
8-30-60	O. V. & Injection	7.00		
8-30-60	Operation	7.00		
9-6-60	O. V. & Injection	200.00		
9-9-60	O. V. & Injection	7.00		
9-12-60	O. V. & Injection	7.00		
9-16-60	Miscellaneous	10.00		
10-15-60		7.00		
8-23-60	for insufficient funds check - previously paid this amount and check returned	10.00	BC 10.00 BC 100.00	259.00 159.00
				32.000

COUNTY OF Mobile

STATE OF Alabama

Be it remembered, that on this 5th day of August  
A. D., 1963, personally appeared before me, the undersigned authority, Elizabeth R. Peters known to me  
who being duly sworn, upon his oath stated that he is Secretary  
of Drs. Claude Warren, Jr., Jack Hays and Jack Yeager  
~~a corporation organized and doing business under the laws of the State of~~  
~~and has been duly authorized by said corporation to make this affidavit~~  
~~a partnership composed of~~ them

~~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 partnership; that the attached account against

C. M. Northeutt of  
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 C. M. Northeutt

at its  
their special instance and request, that credit has been duly given for all payments and  
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 Hundred Fifty-nine + 10/100 Dollars  
(\$ 159.00) with interest from September 16 1960 is justly due and  
remains unpaid.

Elizabeth R. Peters, Secy 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.

James M. Reese  
Notary Public

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon

C. M. Northcutt

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 -----

C. M. Northcutt

-----, Defendant-----

by Drs. Clude Warren, Jr., Jack Hays and Jack Yaeger

-----, Plaintiff S-----

Witness my hand this

15

day of

August

1963

N.F.

Alice J. Duck

-----, Clerk

No. 5671

Page \_\_\_\_\_

**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Drs. Claude Warren, Jr., Jack

Hays and Jack Yaeger

Plaintiffs

vs.

C. M. Northcutt

Defendants

**Summons and Complaint**

**FILED**

Filed \_\_\_\_\_ 19\_\_\_\_

AUG 15 1963

Clerk

ALICE J. DUCK CLERK  
REGISTER

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Robertsdale, Alabama

Received In Office

Aug 15, 1963

Sheriff.

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with

Returned 23 day of Sep 2 1963  
Not found in my county after diligent search and in  
my files.  
Boyd Wilkins, Sheriff  
James A. Brice  
Deputy Sheriff

Sheriff.

Deputy Sheriff.