

THOMAS HOSPITAL,
A Corporation
Plaintiff

-VS-

WILMER TAYLOR and
MARY LEE LYNAM, JOINTLY
and individually.

Defendants

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA

) AT LAW.
) *no. 5422*
)
)
)

BILL OF COMPLAINT

COUNT ONE:

Plaintiff claims of the Defendants the sum of NINETY-
EIGHT and 70/100 DOLLARS (\$98.70), due from them by account on
the 8th day of June, 1962, which sum of money, with the interest
thereon is due and unpaid.

COUNT TWO:

Plaintiff claims of the Defendants the sum of NINETY-
EIGHT and 70/100 DOLLARS (\$98.70), for work and labor done for
the defendants by the Plaintiff on the 8th day of June, 1962,
at their request, which sum of money, with the interest thereon,
is still unpaid.

John L. Duck
Attorney for Plaintiff

Wilmer Taylor may be
served at Montrose, Ala.

Mary Lee Lynam at Daphne,
Alabama.

FILED

NOV 15 1963

ALICE L. DUCK, CLERK
REGISTERED

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 WILMER TAYLOR and MARY LEE LYNAM, jointly
and Individually

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 Wilmer Taylor
and Mary Lee Lynam, Jointly & Individually, Defendant

by _____

THOMAS HOSPITAL, a Corporation, Plaintiff

Witness my hand this 15 day of Nov 1963

64-11-18-63

Reing. [Signature], Clerk

ml
5822

3987
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STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Thomas Hospital
a corp.

Plaintiffs

vs.

Wilmer Taylor
Mary Lee Lynam
Montrose

Defendants

Summons and Complaint

Filed

1679
FILED
NOV 15 1963

19

Clerk

Send to mobile to
serve on Mary Lee Lynam
address:

316 Lawrence St.
Mobile, Ala.

Plaintiff's Attorney

Defendant's Attorney

RECEIVED

3987

Defendant lives at
Wilmer Taylor, Montrose, Ala.

Mary Lee Lynam-Daphne, Ala.

SHERIFF'S OFFICE

Received in Office

This 16 day of Dec, 1963

by serving a copy of 10:00 within or

Mary Lee Lynam
RAY D. BRIDGES, Sheriff.

I have executed this summons D.S.

By this 18 Nov 1963

by leaving a copy with

Wilmer Taylor

Returned 21 day of Nov 1963

Not found in my county after diligent search and inquiry. as to *Mary Lee Lynam*

Taylor Wilkins, Sheriff

By *John Eastman*
Deputy Sheriff

See front side
for address of
Mary Lee Lynam

Sheriff claims 5.5 miles at

Ten Cents per mile Total \$ 5.50

TAYLOR WILKINS, Sheriff

BY *John Eastman*
DEPUTY SHERIFF

Taylor Wilkins
Seibert & Eastman
Sheriff.
Deputy Sheriff.

Montrose, Ala