

THOMAS HOSPITAL,
A Corporation

Plaintiff

-VS-

BOBBY L. JOHNSON

Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW.

5823

COUNT ONE:

Plaintiff claims of the Defendant the sum of THREE HUNDRED SEVENTY-THREE DOLLARS (\$373.00), due by Promissory Note made by him on the 28th day of September, 1961, and payable in monthly installments of Thirty-Seven and 30/100 (\$37.30) DOLLARS, beginning on October 30th, 1961.

Plaintiff avers that in and by the terms of said, default on any one payment, at the option of the holder, would mature the entire balance, and the plaintiff now claims the entire balance due and payable.

Plaintiff further avers that in and by the terms of said note, the Defendant promised to pay all cost of collection, in the event of a default, whether secured by suit or otherwise, including a reasonable Attorneys fee, and the Plaintiff now claims the further and additional sum of Eighty-Five Dollars as a reasonable attorneys fee.

Plaintiff further avers that in and by the terms of said Note, the Defendant waived as to personalty, all rights under the Constitution and Laws of Alabama, as to the exemption therein, and the Plaintiff now claims the benefit of said waiver.

COUNT TWO:

Plaintiff claims of the Defendant the sum of THREE HUNDRED SEVENTY-THREE DOLLARS (\$373.00) due by account on the 13th day of March, 1962, which sum of money with the interest thereon is still unpaid.

373.00
85.00
458.00

Deft. resides at Rt. 2
Box 73, Fairhope, Ala.
on Marlow Road.

FILED

NOV 15 1963

ALICE J. DICK, CLERK
REGISTER

John J. Duck
Attorney for Plaintiff

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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 BOBBY L. JOHNSON

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 _____

BOBBY L. JOHNSON

Defendant

by _____

THOMAS HOSPITAL, A Corporation

Plaintiff

Witness my hand this 15 day of

Nov

1963

Beinf. weck

Clerk

Exp. - 11-18-63

No. 5823

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Thomas Hospital

a corp.

Plaintiffs

vs.

Bobby L. Johnson

% Willie Nelson

Defendants

Summons and Complaint

Filed

FILED

19

NOV 15 1963

Clerk

**ALICE I. DUCK, CLERK
REGISTERS**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Rt. 2 Box 73, Fairhope, Ala.

on Marlow Road.

Received In Office

Nov. 15, 1963

Sheriff.

I have executed this summons

this 18th Nov. 1963

by leaving a copy with

Bobby L. Johnson

Sheriff claims

Ten Cents per mile Total \$ 10.00 miles at
TAYLOR WILKINS Sheriff
BY Jan Eastman Deputy Sheriff

Taylor Wilkins Sheriff.
Jan Eastman Deputy Sheriff.
Barnwell, Ala.