

5474

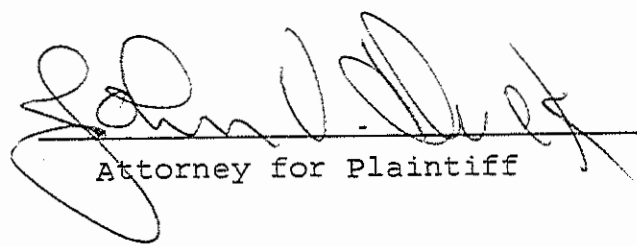
BEASLEY NURSING HOME, INC., a)	IN THE CIRCUIT COURT OF
Corporation,)	
Plaintiff,)	BALDWIN COUNTY, ALABAMA
)	
vs.)	
)	AT LAW
MRS. JOANNA ROGERS,)	
)	
Defendant.)	

COUNT ONE

Plaintiff claims of the Defendant the sum of FOUR HUNDRED FORTY-SEVEN AND 01/100 DOLLARS (\$447.01) due from her by account from on, to-wit, the 30th day of June, 1961, until on, to-wit, the 30th day of June, 1962, which sum of money, with the interest thereon, is still unpaid.

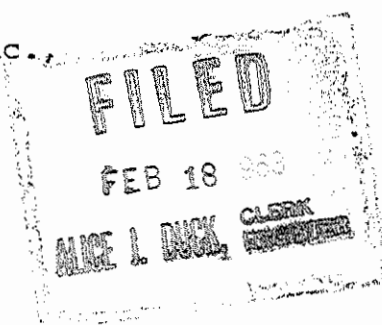
COUNT TWO

Plaintiff claims of the Defendant the sum of FOUR HUNDRED FORTY-SEVEN AND 01/100 DOLLARS (\$ 447.01) on account stated between the Plaintiff and the Defendant on the 10th day of July, 1962, which sum of money, with the interest thereon, is still unpaid.


Attorney for Plaintiff

Defendant may be served at

Beasley Nursing Home, Inc.,
Church Street
Fairhope, Alabama



SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon MRS. JOANNA ROGERS, of Beasley Nursing Home,
Inc., Church Street, Fairhope, Alabama

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 MRS. JOANNA ROGERS

_____, Defendant

by BEASLEY NURSING HOME, INC., a Corporation

_____, Plaintiff.....

Witness my hand this 15 day of February 1963

E. J. 2-21-63 Alice P. [Signature] Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

~~BEASLEY NURSING HOME, INC.,~~ a

~~Corporation~~

Plaintiffs

vs.

~~MRS. JOANNA ROGERS~~

Defendants

SUMMONS and COMPLAINT

Filed 2-18, 1962

Aliefrech, Clerk

~~JOHN V. DUCK~~

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

~~(Beasley Nursing Home)~~

RECEIVED IN OFFICE

Feb 18, 1963

Sheriff

I have executed this summons

this 21st day of Feb, 1963

by leaving a copy with

Mrs. Joanna Rogers

Sheriff claims 20 miles at

Ten Cents per mile Total \$ 2.00

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff

Fred L. Lusk Deputy Sheriff

I have

JOHN V. DUCK
RICHARD C. LACEY
ATTORNEYS AT LAW
FAIRHOPE, ALABAMA
June 6th, 1963

Mrs. Alice J. Duck
Clerk of Circuit Court
P. O. Box 239
Bay Minette, Alabama

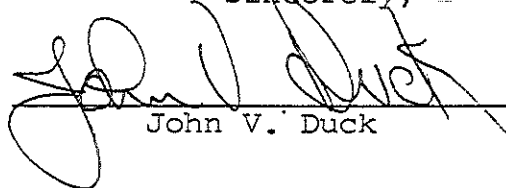
5473
5474

Dear Mrs. Duck"

I have two cases pending, Beasley Nursing Home-vs-
Rogers and Beasley Nursing Home -vs- Rouse.

This is on the law side of the docket non-jury.
Would you please have Judge Hall enter a non-suit on both cases
and forward the cost bill to my office.

Sincerely, I


John V. Duck

JVD/oq

T
O

Mr. J. Lee ...
Birmingham, Alabama
My Kinship, Alabama

F
R
O
M

Mr. J. Lee
Birmingham, Alabama
BIRMINGHAM, ALABAMA

SUBJECT:

Re: ...
...
...

DATE:

May 13, 1940

FOLD A THIS IS NCR (NO CARBON REQUIRED) PAPER.

JUST TYPE (OR WRITE) ON ORIGINAL. YOUR IMPRESSION
WILL AUTOMATICALLY APPEAR ON COPIES BENEATH.

Message - Reply

Form 87 - New England Business Service, Inc., Townsend, Mass.

M
E
S
S
A
G
E

Dear Mr. Lee:

I am enclosing herewith the original and one copy
of a summons and complaint to be filed in the above styled cause.

Sincerely,

SIGNED:

DATE OF REPLY:

REPLY TO:

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

R
E
P
L
Y