

CHARLES W. GASTON and GEORGE B. X  
HALLIDAY, d/b/a MATTIE L. RHODES  
HOSPITAL X

Plaintiffs X

vs X

MAMIE WHITE X

Defendant X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5966

Comes the defendant in the above styled cause and for answer  
to the complaint filed in said cause shows unto this Honorable  
Court as follows:

1. She denies the allegations of said complaint as untrue.
2. The defendant for answer to the said complaint, saith that  
she has paid the debt for the recovery of which this suit was  
brought, before the action was commenced.

THOMPSON & WHITE

BY:

Attorneys for defendant.

FILED

MAY 20 1964

ALICE J. DUCK, CLERK  
REGISTER

CHARLES W. GASTON and GEORGE B.  
HALLIDAY, d/b/a MATTIE L. RHODES  
HOSPITAL

Plaintiffs

vs

MAMIE WHITE

Defendant

X

X

X

X

X

X

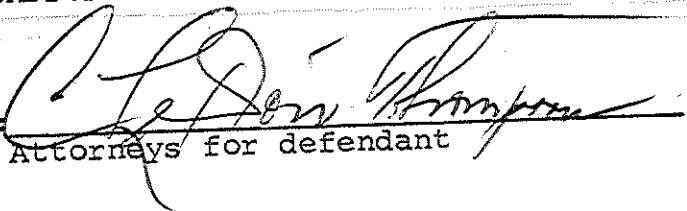
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 5966

Comes the defendant by Thompson & White, her attorneys of  
record and demurs to the allegations of said complaint as follows:

1. That said complaint fails to state a cause of action.
2. That said complaint fails to attach an itemized statement  
of said alleged account.
3. That said account fails to state the said indebtedness was  
incurred by said Mamie White.

THOMPSON & WHITE

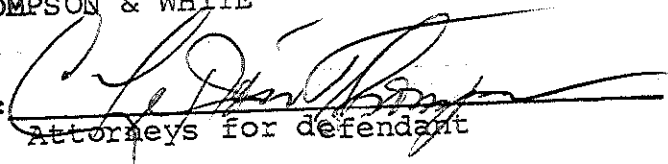
BY:

  
Attorneys for defendant

Defendant requests trial by jury.

THOMPSON & WHITE

BY:

  
Attorneys for defendant

FILED

APR 7 1964

ALICE I. DICK  
CLERK  
REGISTER

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mamie White to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Charles W. Gaston and George B. Halliday, doing business as Mattie L. Rhodes Hospital.

WITNESS my hand this 4 day of March, 1964.

Alice J. Duck  
Clerk

The defendant's address is  
Route 2, Box 166, Bay Minette, Alabama.  
She lives on the road leading from Little Dutchman to the old  
Pensacola Road.

\* \* \* \* \*

CHARLES W. GASTON and GEORGE B.  
HALLIDAY, d/b/a Mattie L. Rhodes  
Hospital,

Plaintiffs,

VS.

MAMIE WHITE,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

5966

C O M P L A I N T

COUNT ONE

The plaintiffs claims of the defendant SIX HUNDRED SIXTY-NINE AND 94/100 DOLLARS (\$669.94) due from her by account on the 27th day of December, 1963, which sum of money with the interest thereon, is still unpaid.

J. R. O.  
Attorney for Plaintiff

FILED

MAR 6 1964

ALICE J. DUCK, CLERK  
REGISTER

EX-3-20-64

5966

Charles W. Gaston Ad

vs.

Marnie White

Received 6 day of Nov 1944  
d on 20 day of May 1944  
served a copy of the within Q & C  
Marnie White

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Jallard D. S.

14 miles North of B14

Sheriff claims 8 miles at  
Ten Cents per mile Total \$ 80¢

TAYLOR WILKINS, Sheriff  
BY J. Allert  
DEPUTY SHERIFF

FILED

MAY 6 1944

MADE BY J. D. DICK, CLERK

James R. Usher

CHARLES W. GASTON and GEORGE B.  
HALLIDAY, d/b/a Mattie L. Rhodes  
Hospital

Plaintiffs

vs

MAMIE WHITE

Defendant

X  
X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 5966

Comes the defendant in the above styled cause and amends her  
answer heretofore filed in said cause to read as follows:

1. She denies the allegations of said complaint as untrue.
2. The defendant for answer to the said complaint, saith that  
she has paid the debt for the recovery of which this suit was  
brought, before the action was commenced.
3. She further avers that she is married and is the wife of  
Ralph White and that the debt sued upon is the debt of her husband,  
Ralph White.
4. Comes your defendant in the above styled cause and enters  
a plea: that of defense by coverture.

THOMPSON & WHITE

BY:

*[Signature]*  
Attorneys for defendant.

FILED  
AUG 28 1964  
ALICE L. DUCK, CLERK  
REGISTER