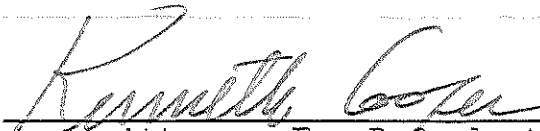


PROVIDENCE HOSPITAL, A	:	IN THE CIRCUIT COURT OF
Corporation,	:	
	:	
Plaintiff,	:	BALDWIN COUNTY, ALABAMA
	:	
Vs	:	AT LAW
	:	
KENNETH WHITE,	:	
	:	
Defendant.	:	NO. 6710

DEMURRER

Comes now the defendant, in the above styled cause, by his attorney and demur to the complaint, and separately and severally to each and every count thereof, and for grounds for demurrer, assigns separately and severally, the following:

1. Said count is vague and uncertain.
2. Count three is repetitious of Count 1, and does not state a different cause of action.
3. No itemized statement of the account sue on was attached to the complaint, as set forth in the last paragraph thereof.

  
 Attorney For Defendant

Attorney For Plaintiff

Hon Phyllis Nesbit  
 Attorney At Law  
 Robertsdale, Alabama

FILED  
 OCT 29 1967  
 ALICE L. DICK, CLERK  
 PROBATE

PROVIDENCE HOSPITAL, a corporation	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
PLAINTIFF	)	
	)	AT LAW
VS	)	
	)	
KENNETH WHITE,	)	NO. <u>6718</u>
	)	
DEFENDANT	)	

1.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED NINE AND 80/100 DOLLARS (\$309.80), due from him by account on the 30th day of November, 1962, which sum of money with the interest thereon, is still unpaid.

2.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED NINE AND 80/100 DOLLARS (\$509.80), due on account stated, between the Plaintiff and Defendant on the 30th day of November, 1962, which sum of money with the interest thereon, is still unpaid.

3.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED NINE AND 80/100 DOLLARS (\$309.80), due from him by account on, to-wit, November 30, 1962, which sum of money with the interest thereon is still unpaid.

An itemized statement of the account sued on, verified by the affidavit of a competent witness, is attached hereto as Exhibit "A" and made a part hereof.

WILTERS, BRANTLEY & NESBIT

By:

Thyllis S. Nesbit  
Attorneys for Plaintiff

FILED

SEP 30 1965

ALICE I. DUCK, CLERK  
REGISTER

STATE OF ALABAMA

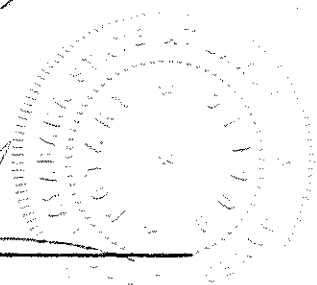
COUNTY OF MOBILE

Before me, James D. Odom, a Notary Public, in  
and for said County and State, personally appeared Verna M. Mistrot,  
who being by me duly sworn, deposes and says, that she is Credit Manager  
for the firm of PROVIDENCE HOSPITAL;  
that the annexed statement of the account of said firm against KENNETH R. WHITE  
of BAY MINETTE, in the State  
ALABAMA, is just, true and correct; that there is now due  
on said account the sum of \$ 309.80, after deducting all credits,  
set-offs or counter-claims.

X Verna M. Mistrot

Sworn to and subscribed before me this 20th day of September,  
1965.

James D. Odom  
Notary Public,



MOBILE, ALABAMA 36604

Date 9-16-65 19 65

Miss Pamela Summerlin

Resp Party: Kenneth R. White

				Charges		Credits		Balance	
Room, Meals, Professional Nursing Care ✓									
Room	10 Days @ \$18.00	From 11-20-62	To 11-30-62	180	00				
Semi	Days @ \$	From	To						
Ward	Days @ \$	From	To						
Nursery	Days @ \$	From	To						
Dressings									
Intravenous Trays & Treatments									
Operating Room, Service & Supplies									
Anesthetic									
Routine Laboratory Fee				8	00				
Special Laboratory Fee				105	00				
Pharmacy				38	58				
X-ray				20	00				
Oxygen Therapy									
Physio-Therapy Treatment									
Basal Metabolism									
Electrocardiogram									
Delivery Room									
Blood									
Telephone Service					45				
EKG				55	00				
COT				9	00				
tray (guest)				41	05				
KINDLY RETAIN THIS STATEMENT FOR TAX PURPOSES.				457	08				
TOTAL				Paid	147	28			

**PROVIDENCE HOSPITAL**  
1504 Springhill Avenue  
MOBILE, ALABAMA 36604

Accommodation No. 15789

Date 9-16-65 19   

Miss Pamela Summerlin

Resp Party: Kenneth R. White

	Charges	Credits	Balance
Room, Meals, Professional Nursing Care			
Room 10 Days @ \$ 18.00 From 11-20-62 To 11-30-62	180 00		
Semi Days @ \$ From To			
Ward Days @ \$ From To			
Nursery Days @ \$ From To			
Dressings			
Intravenous Trays & Treatments			
Operating Room, Service & Supplies			
Anesthetic			
Routine Laboratory Fee	8 00		
Special Laboratory Fee	105 00		
Pharmacy	38 58		
X-ray	20 00		
Oxygen Therapy			
Physio-Therapy Treatment			
Basal Metabolism			
Electrocardiogram			
Delivery Room			
Blood			
Telephone Service	15		
EKG	55 00		
COT	9 00		
tray (guest)	41 05		
<b>TOTAL</b>	<b>457 08</b>		
<b>PAID</b>	<b>147 23</b>		
<b>BALANCE DUE</b>	<b>309 85</b>		

KINDLY RETAIN THIS STATEMENT  
FOR TAX PURPOSES.

PAVABLE WEEKLY IN ADVANCE

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

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 KENNETH WHITE

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.....

KENNETH WHITE....., Defendant.....

by .....

PROVIDENCE HOSPITAL, a corporation....., Plaintiff.....

Witness my hand this.....day of..... 19.....

....., Clerk

24:10-4-65

No. 6718

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

PROVIDENCE HOSPITAL,

a corporation

Plaintiffs

vs.

KENNETH WHITE

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

Clerk

**FILED**  
SEP 30 1965  
ALEX L. DICK, CLERK  
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

810 Newport Parkway

Bay Minette, Alabama

**RECEIVED**

Received In Office

SEP 30 1965

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this Oct 4 1965

by leaving a copy with

Taylor Wilkins Sheriff

W. P. Zeller Deputy Sheriff