

PAUL M. GOLDFARB, M.D. and
IRVING A. KOFFLER, M.D.

PLAINTIFF'S

VS

KENNETH WHITE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6712

1.

The Plaintiff's claim of the Defendant the sum of ONE HUNDRED TWENTY-TWO AND NO/100 (\$122.00), due from him by account on the 15th day of March, 1963, which sum of money with the interest thereon, is still unpaid.

2.

The Plaintiff's claim of the Defendant the sum of ONE HUNDRED TWENTY-TWO AND NO/100 (\$122.00), due on account stated, between the Plaintiffs and Defendant on the 15th day of March, 1963, which sum of money with the interest thereon, is still unpaid.

3.

The Plaintiff's claim of the Defendant the sum of ONE HUNDRED TWENTY-TWO AND NO/100 (\$122.00), due from him by account on, to-wit, March 15, 1963, 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.

FILED

SEP 30 1963

ALICE L. DUCK, CLERK
REGISTERED

WILTERS, BRANTLEY & NESBIT

By:

Thurman S. Nesbit
Attorneys for Plaintiff's

PAUL M. GOLDFARB, M.D. and : IN THE CIRCUIT COURT OF
IRVING A. KOFFLER, M.D. :
Plaintiff's, :
Vs. : BALDWIN COUNTY, ALABAMA
KENNETH WHITE, : AT LAW
Defendant. : NO. 6712

DEMURRER

Comes now the defendant, in the above styled cause, by his attorney and demurs 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 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 P. M. Goldfarb, M.D.,
who being by me duly sworn, deposes and says, that he is a
member of ~~for~~ the firm of DRS. GOLDFARB AND KOFFLER;
that the annexed statement of the account of said firm against
KENNETH WHITE of BAY MINETTE, in the State
ALABAMA, is just, true and correct; that there is now due
on said account the sum of \$ 122.00, after deducting all credits,
set-offs or counter-claims.

Paul M. Goldfarb
Sworn to and subscribed before me this 20th day of September,
1906.

James D. Odom
Notary Public,

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, James D. Odom, a Notary Public, in
and for said County and State, personally appeared P. M. Goldfarb, M.D.,
who being by me duly sworn, deposes and says, that he is a
member of ~~for~~ the firm of DRS. GOLDFARB AND KOFFLER;
that the annexed statement of the account of said firm against
KENNETH WHITE of BAY MINETTE, in the State
ALABAMA, is just, true and correct; that there is now due
on said account the sum of \$ 122.00, after deducting all credits,
set-offs or counter-claims.

Paul M. Goldfarb

Sworn to and subscribed before me this 30th day of September,
1906.

James D. Odom
Notary Public,

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

PAUL M. GOLDFARB, M.D. and IRVING A. KOFFLER, M.D.

....., Plaintiff.....

Witness my hand this.....20.....day of.....Sept.....1965.....

Alice J. Duck..... Clerk

No. 6712 Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

PAUL M. GOLDFARB, M.D. and

IRVING A. KOFFLER, M.D.

Plaintiffs

vs.

KENNETH WHITE

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

SEP 30 1965

Clerk

ALICE I. DICK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
810 Newport Parkway
Bay Minette, Alabama

Received In Office

SEP 30 1965 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this Oct 4 1965

by leaving a copy with

Taylor Wilkins Sheriff

W. O. Zilber Deputy Sheriff

DRE. GOLDFARB AND KOFFLER

2700 SPRING HILL AVENUE
MOBILE, ALABAMA
MA 8-8634

Mrs. Kenneth R. White
810 Newport Parkway
Bay Minette, Ala.

PAY Last
AMOUNT
IN COL.

DATE	CODE	CHARGES	CREDITS	BALANCE
MAR 30 62	3	85.00		85.00
Admitted Mobile Infirmary 8-31-62				
APR 4 62	11	10.00		35.00
APR 4 62	16	9.00		44.00
APR 4 62	14	8.00		52.00
APR 4 62	15	3.00		55.00
APR 4 62	19	10.00		65.00
APR 4 62	17	4.00		69.00
APR 4 62	21	3.00		72.00
APR 6 62	1	No charge		72.00
3-10-63 Admitted Mobile Infirmary				
MAR 15 63	23	50.00		122.00

1. Office visit.
2. First examination
3. Complete history and physical examination
4. House visit
5. House visit and injection

6. Lumber puncture.
7. Consultation.
10. Extended office examination
11. X-ray examination.
12. Blood metabolism.

13. Urinalysis.
16. Blood chemistry.
17. Stool examination.
18. Glucose tolerance.
19. Liver function test
20. Kidney function test

22. Injection.
23. Hospital treatment.
24. Miscellaneous.
25. E. R. Treatment
26. Paracentesis.
27. Annual physical

DRS. GOLDFARB AND KOFFLER

1720 SPRING HILL AVENUE

MOBILE, ALABAMA

ME 6-2434

Mrs. Kenneth R. White

810 Newport Parkway

Bay Minette, Ala.

PAY Last
ACCOUNT
IN COL.

DATE	CODE	CHARGES	CREDITS	BALANCE
MAR 30 62	3	25.00		25.00
Admitted Mobile Infirmary 8-31-62				
APR 4 62	11	10.00		35.00
APR 4 62	16	9.00		44.00
APR 4 62	14	8.00		52.00
APR 4 62	15	3.00		55.00
APR 4 62	19	10.00		65.00
APR 4 62	17	4.00		69.00
APR 4 62	21	3.00		72.00
APR 6 62	1	No charge		72.00
3-10-63	Admitted Mobile Infirmary			
MAR 15 63	23	50.00		122.00

- Office visit.
- First examination
- Complete history and physical examination
- House visit
- House visit and injection
- Office treatment
- Proctoscopy examination.

- Lumber puncture.
- Consultation.
- Extended office examination
- X-ray examination.
- Basal metabolism.
- Electrocardiogram.
- Blood count.

- Urinalysis.
- Blood chemistry.
- Stool examination.
- Glucose tolerance.
- Liver function test
- Kidney function test
- Miscellaneous lab.

- Injection.
- Hospital treatment.
- Miscellaneous.
- E. R. Treatment
- Paracentesis.
- Annual physical
- Prothrombin time

DRS. GOLDFARB AND KOFFLER

1720 SPRING HILL AVENUE

MOBILE, ALABAMA

ME 8-8434

Mrs. Kenneth R. White
810 Newport Parkway
Bay Minette, Ala.

PAY LAST
AMOUNT
IN COL.

DATE	CODE	CHARGES	CREDITS	BALANCE
MS 30 62	3	85.00		85.00
Admitted Mobile Infirmary 8-31-62				
MP 4 62	11	10.00		35.00
MP 4 62	16	9.00		44.00
MP 4 62	14	8.00		52.00
MP 4 62	15	3.00		55.00
MP 4 62	19	10.00		65.00
MP 4 62	17	4.00		69.00
MP 4 62	21	3.00		72.00
MP 6 62	1	No charge		72.00
3-10-63	Admitted Mobile Infirmary			
MAR 15 63 <	23	50.00		122.00

- | | | | |
|--|---------------------------------|--------------------------|-------------------------|
| 1. Office visit. | 8. Lumbar puncture. | 18. Urinalysis. | 28. Injection. |
| 2. First examination | 9. Consultation. | 19. Blood chemistry. | 29. Hospital treatment. |
| 3. Complete history and physical examination | 10. Extended office examination | 17. Stool examination. | 30. Miscellaneous. |
| 4. House visit | 11. X-ray examination. | 18. Glucose tolerance. | 31. P. R. Treatment |
| 5. House visit and injection | 12. Basal metabolism. | 19. Liver function test | 32. Paracentesis. |
| 6. Office treatment | 13. Electrocardiogram. | 20. Kidney function test | 33. Annual physical |
| 7. Proctoscopic examination. | 14. Blood count. | 21. Miscellaneous lab. | 34. Prothrombin time |