

LAW OFFICES

MAILING ADDRESS  
P. O. Box 471

E. G. RICKARBY  
35 SOUTH SECTION STREET  
FAIRHOPE, ALABAMA 36532

September 1, 1965

Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

6463

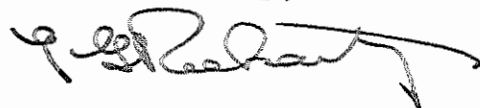
Dear Mrs. Duck:

Inre: Baldwin County Eastern Shore Hospital Board  
Vs: John Thomas  
Our File: 65-67

Service was had over thirty days ago. Request Judgment by Default on promissory note for \$150.95, being \$138.95, plus a \$35.00 fee, less \$20.00 credit.

Am enclosing note.

Yours very truly,



EGR/jlb

Encl.

cc: Thomas Hospital  
9-15-65

BALDWIN COUNTY EASTERN SHORE  
HOSPITAL BOARD, a Corporation,  
PLAINTIFF,  
VS.  
JOHN THOMAS, Defendant,  
DEFENDANT.

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


6463

C O M P L A I N T

COUNT I

The Plaintiff claims of the Defendant ONE HUNDRED THIRTY-EIGHT AND 95/100 (\$138.95) DOLLARS due by promissory note made by him on, to-wit, the 4<sup>th</sup> day of June, 1964, and payable in weekly installments of TEN AND NO/100 (\$10.00) DOLLARS beginning June 13<sup>th</sup>, 1964; and the Plaintiff avers that the Defendant defaulted in the payment due on the 13<sup>th</sup> day of June, 1964, and the Plaintiff under the terms of said note declared the entire unpaid balance due and payable;

And the Plaintiff avers that in said note and as a part of the consideration thereof, the Defendant has expressly waived his rights to claim personal property as exempt to him under the Constitution and laws of the State of Alabama and agreed to pay an attorneys fee for the collection thereof and the Plaintiff hereby claims the further sum of THIRTY-FIVE AND NO/100 (\$35.00) DOLLARS as such attorneys fee.

  
E. G. RICKARBY,  
Attorney for the Plaintiff.

FILED  
APR 5 1965  
MADE I RICK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6463

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John Thomas

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.....  
.....John Thomas....., Defendant.....

BALDWIN COUNTY EASTERN SHORE HOSPITAL BOARD, A corporation.

.....Plaintiff.....

Witness my hand this.....5.....day of.....April.....1965.....

Ex-4-7-65

Alfred J. Duck....., Clerk

No. 6463 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BALDWIN COUNTY EASTERN SHORE

HOSPITAL BOARD, a corp.,  
Plaintiffs

vs.

JOHN THOMAS,

Defendants

SUMMONS AND COMPLAINT

Filed April 5 1965

Oliver J. Webb Clerk

E. G. Rickarby

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1, Box 41, Robertsedale,  
Ala.

Received In Office

April 5 1965

....., Sheriff

I have executed this summons

this 7 Apr 1965

by leaving a copy with

John Thomas

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Charles Children  
DEPUTY SHERIFF

James Wilkins Sheriff

Charles Children Deputy Sheriff

R. W. Cole