

JOHN V. DUCK
~~DUCK & LACEY~~

Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

11/22

DATE November 22, 1966

Re: Dr. A. V. Mortenson vs. Odell Gipson

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed together with copy of same and
Summons to be served.

Sincerely,

John V. Duck
(12)

SIGNED

SIGNED

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7292

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ODELL GIPSON

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

ODELL GIPSON, Defendant

by DR. A. V. MORTENSON

Plaintiff

Witness my hand this 25 day of Nov 1966

Alice J. Week Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DR. A. V. MORTENSEN

Plaintiffs

vs.

ODELL GIPSON

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
205 Young Street,
Fairhope, Alabama

Received In Office

..... 19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

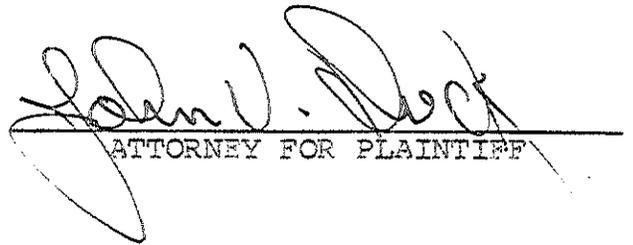
Sheriff

Deputy Sheriff

DR. A. V. MORTENSON,)
Plaintiff,)
vs.)
ODELL GIPSON,)
Defendant.)

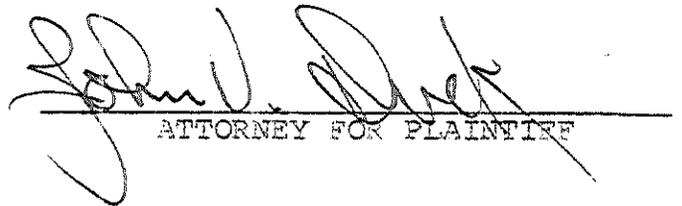
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the Defendant the sum of TWO HUNDRED
TEN (\$210.00) DOLLARS due from him by open account from on, to-
wit: the 20th day of March, 1964 until on, to-wit: the 1st day
of March, 1965, which sum of money with the interest thereon is
still unpaid.


ATTORNEY FOR PLAINTIFF

NOTE: The account sued on is hereby evidenced by an itemized and
verified statement of the account.

FILED
NOV 25 1966
CLERK
REGISTER


ATTORNEY FOR PLAINTIFF

COUNTY OF MOBILE

STATE OF ALABAMA

Be it remembered, that on this 14 day of March A. D., 1966, personally appeared before me, the undersigned authority, Dr. A. V. Mortensen known to me

who being duly sworn, upon his oath stated that he is of a corporation organized and doing business under the laws of the State of and has been duly authorized by said corporation to make this affidavit a partnership composed of

a sole trader doing business as physician

and that as such he makes this affidavit: that he is familiar with the books and business of said Odell Gipson of 205 Young St. Fairhope, Ala.

is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said Odell Gipson

at its their his special instance and request, that credit has been duly given for all payments and

just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of Two Hundred Ten & 00/100 Dollars (\$ 210.00) with interest from 19 is justly due and remains unpaid.

W. Mortensen MD X

I hereby certify under my official seal that I am authorized as a Notary Public to administer oaths under the laws of the State of and that the foregoing was subscribed and sworn to before me on the day and year first above stated.

[Signature] Notary Public

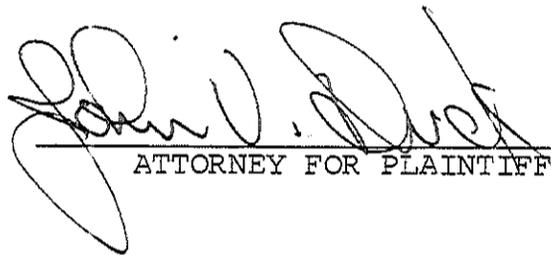
DR. A. V. MORTENSON,)
Plaintiff,)
vs.)
ODELL GIPSON,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

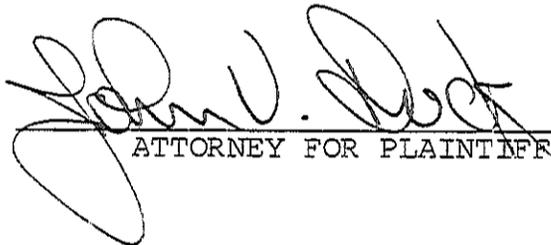
7292

Plaintiff claims of the Defendant the sum of TWO HUNDRED TEN (\$210.00) DOLLARS due from him by open account from on, to-wit: the 20th day of March, 1964 until on, to-wit: the 1st day of March, 1965, which sum of money with the interest thereon is still unpaid.


ATTORNEY FOR PLAINTIFF

NOTE: The account sued on is hereby evidenced by an itemized and verified statement of the account.

FILED
NOV 25 1968
ALICE I. DICK, CLERK
REGISTER


ATTORNEY FOR PLAINTIFF

COUNTY OF MOBILE

STATE OF ALABAMA

Be it remembered, that on this 14 day of March A. D., 19 66, personally appeared before me, the undersigned authority, Dr. A. V. Mortensen known to me

who being duly sworn, upon his oath stated that he is of

{ a corporation organized and doing business under the laws of the State of and has been duly authorized by said corporation to make this affidavit { a partnership composed of

a sole trader doing business as physician

and that as such he makes this affidavit; that he is familiar with the books and business of said Odell Gipson; that the attached account against Odell Gipson of 205 Young St. Fairhope, Ala.

is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said Odell Gipson

at { its their his } special instance and request, that credit has been duly given for all payments and

just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of Two Hundred Ten & 00/100 Dollars (\$ 210.00) with interest from 19 is justly due and remains unpaid.

Signature of Dr. A. V. Mortensen MD X

I hereby certify under my official seal that I am authorized as a Notary Public to administer oaths under the laws of the State of and that the foregoing was subscribed and sworn to before me on the day and year first above stated.

Signature of Joseph W. Boykin Notary Public

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 7292

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonODELL GIPSON.....

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.....

.....ODELL GIPSON....., Defendant.....

byDR. A. V. MORTENSON.....

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

Witness my hand this.....25.....day of.....Nov.....1966

W. F.

Alvie J. Leuck Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DR. A. V. MORTENSEN

Plaintiffs

vs.

ODELL GIPSON

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Moved out of state

RECEIVED

Defendant lives at
205 Young Street,
Fairhope, Alabama

OCT 9 1967

Received In Office

NOV 25 1966

TAYLOR WILKINS

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Returned to day of
Not found in my county after diligent search and in-
quiry.

By Roy Randle
Deputy Sheriff

FILED
NOV 27 1966
CLERK

DRS. JACK HYMAN and)	IN THE CIRCUIT COURT OF
JOHN C. FRIDGE, a Co-)	BALDWIN COUNTY, ALABAMA
Partnership,)	
)	AT LAW
Plaintiffs,)	
)	CASE NO. _____
Vs.)	
)	
G. R. GODBOLD,)	
)	
Defendant.)	

DEMURRER

Comes now the Defendant in above-styled cause, and demurs to the complaint, and separately and severally to each count thereof, and for grounds of demurrer, assigns, separately and severally, the following, to-wit:

1. The complaint is vague.
2. The complaint does not state a legal cause of action.
3. The complaint is uncertain.
4. The allegation that interest is due is a mere conclusion of the pleader.

5. The allegations of the complaint are contrary to the terms of the itemized and verified statement of the account upon which this suit is based.

Kenneth Cooper
ATTORNEY FOR DEFENDANT

I hereby certify that I have served a copy of the foregoing Demurrer on Hon. John V. Duck, Attorney At Law, Fairhope, Alabama, counsel for plaintiffs herein by depositing a copy of same in the United States mail at Bay Minette, Alabama, addressed to him as above indicated by first class mail, postage prepaid, on this 20 day of December, 1966.

FILED

DEC 22 1966

ALICE L. DUCK, CLERK
REGISTER

Kenneth Cooper
ATTORNEY FOR DEFENDANT

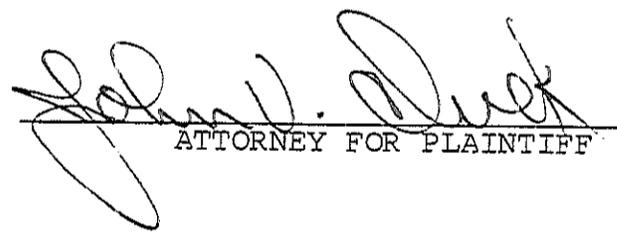
DRS. JACK HYMAN and JOHN C.)
FRIDGE, a Co-Partnership,)
Plaintiff,)
vs.)
G. R. GODBOLD,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
1293

Plaintiff claims of the Defendant the sum of TWO HUNDRED (\$200.00) DOLLARS due from him by account from on, to-wit: the 13th day of October, 1962 until on, to-wit: the 15th day of November, 1962, which sum of money with the interest thereon is still unpaid.


ATTORNEY FOR PLAINTIFF

NOTE: The account sued on is hereby evidenced by an itemized and verified statement of the account.


ATTORNEY FOR PLAINTIFF

FILED
NOV 25 1966
ALICE J. DICK, CLERK
REGISTER

COUNTY OF MOBILE

STATE OF ALABAMA

Be it remembered, that on this 14 day of March A. D., 19 66, personally appeared before me, the undersigned authority,

Dr. Jack Hyman known to me who being duly sworn, upon his oath stated that he is partner of Drs. Hyman & Fridge

a corporation organized and doing business under the laws of the State of and has been duly authorized by said corporation to make this affidavit a partnership composed of Drs. Jack Hyman & John Fridge

a sole trader doing business as and that as such he makes this affidavit; that he is familiar with the books and business of said Drs. Hyman & Fridge; that the attached account against G. R. Godbold of Rt. 1 Bay Minette, Ala.

is just and correct, within the knowledge of this affiant, that the items thereon stated and composing the said account were sold and delivered to said G. R. Godbold

at its their his special instance and request, that credit has been duly given for all payments and

just and lawful offsets to which said account is entitled as thereon stated, and that the balance thereof, amounting to the sum of Two Hundred & 00/100 Dollars (\$ 200.00) with interest from 19 is justly due and remains unpaid.

Jack Hyman, M. D. (Partner) X

I hereby certify under my official seal that I am authorized as a Notary Public to administer oaths under the laws of the State of and that the foregoing was subscribed and sworn to before me on the day and year first above stated.

DRS. HYMAN & FRIDGE 2720 SPRINGHILL AVE. MOBILE, ALA.

Joseph W. Boykin Notary Public

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA
Baldwin County



Circuit Court, Baldwin County

No. 7293

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonG. R. GODBOLD

.....
.....
.....

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.....

G. R. GODBOLD

....., Defendant.....

by DRS. JACK HYMAN and JOHN C. FRIDGE, a Co-Partnership

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

Witness my hand this

25

day of

Nov. 1966

EX-11-28-66

Alice J. [Signature]

Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DRS. JACK HYMAN and JOHN C.

FRIDGE, a Co-Partnership,
Plaintiffs

vs.

G. R. GODBOLD
Defendants

SUMMONS AND COMPLAINT

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

NOV 23 1966

Clerk

ALICE L. DUCK, CLERK
REGISTER

JOHN V. DUCK
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt. 1, Bay Minette, Alabama

RECEIVED

Received In Office

NOV 25 1966

19.....

TAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this Nov 28 1966

by leaving a copy with

G. R. Godbold

W. A. Gilbert

Taylor Wilkins Sheriff

W. A. Gilbert Deputy Sheriff

1 mile South of B...