

CODE 205  
Telephone: 928-9836

LAW OFFICES

Mailing Address  
P.O. BOX 471

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

June 26, 1967

Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

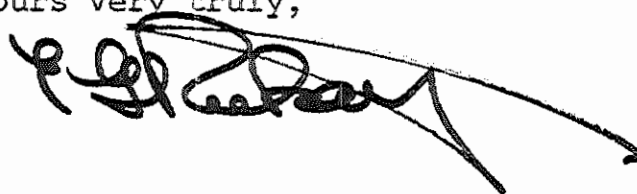
Dear Mrs. Duck:

Inre: The Jordan Clinic, Inc.  
Vs: Cuyler Frederick Volking  
File: 67-252

Enclosed find Summons & Complaint in the above-styled cause,  
together with itemized and verified statement of account.  
Please hand copy of same to Sheriff and advise when this has  
been processed and send bill.

Thank-you.

Yours very truly,

A handwritten signature in dark ink, appearing to read 'E. G. Rickarby', with a long, sweeping horizontal line extending to the right.

jlb  
Encls.  
7-11-67

LAW OFFICES

E. G. R I C K A R B Y

35 SOUTH SECTION STREET  
FAIRHOPE, ALABAMA 36532

June 26, 1967

Mrs. Alice Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

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Inre: The Jordan Clinic, Inc.  
Vs: Cuylar Frederick Volking  
File: 67-252

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Yours very truly,

jlb  
Encls.  
7-11-67

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

August 21, 1967

Honorable Telfair J. Mashburn  
Circuit Judge  
Bayminette, Alabama

Dear Judge Mashburn:

Inre: Jordan Clinic, Inc.  
Vs: Cuyler F. Volking  
Case No: 7592

Request you take this case under submission and rule on the demurrers filed by Defendant to Plaintiffs complaint.

Yours very truly,



EGR/gk  
cc: Mr. Arthur Epperson  
9-26-67

8-28-67

Demurrers overruled

signed

Alice French  
Clerk

CODE 205  
Telephone: 928-9836

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FAIRHOPE, ALABAMA 36532

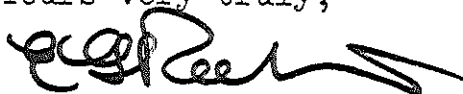
August 23, 1967

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

Dear Mrs. Duck:

Here is a letter to Telfair. Please get out the file of  
Jordan versus Volking and put it on his desk. The case  
is #7592. Thanks.

Yours very truly,



EGR/gk  
9-1-67

THE JORDON CLINIC, INC. )  
a Corporation, )  
Plaintiff )  
Vs. )  
CUYLER FREDERICK VOLKING )  
Defendant )


IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

7592

DEMURRERS

Comes the defendant in the above styled cause and demurs separately and severally to each count of the complaint and assigns thereto separately and severally the following grounds of demurrer:

1. From aught that appears the plaintiff is a foreign corporation and not licensed to do business in Alabama.
2. The count does not state a cause of action.
3. For ought that appears the attached statement of account is not verified by an officer or agent of the corporation plaintiff.
4. For aught that appears the attached itemized statement is not a part of the complaint.
5. For ought that appears the statement of account is not properly verified.
6. For ought that appears the itemized statement of account is not properly sworn to,
7. The statement of account contains an appendage of extraneous matter.

  
Arthur C. Epperson  
Attorney for Defendant

FILED

JUL 20 1967

ALICE J. DUCK CLERK  
REGISTER

Our File No. 67-252

Your File No. \_\_\_\_\_

Law Offices

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

CODE 205  
Telephone: 928-9836

Mailing Address  
P. O. BOX 471

March 17, 1969

Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: Jordan Clinic vs. Cuyler F. Volking

With this Jordan Clinic is sending you their check for \$23.50  
in the above mentioned case, Case No. 7592.

Request you mark this case "Satisfied", and recall any execu-  
tion, if it is out. I have cancelled Judgment in Probate Court.

Yours very truly,



EGR/jlb

Encl.

cc: Honorable Chris C. DeLaney  
Attorney at Law  
1005 Government Street  
Mobile, Alabama.

3-28-69

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

CIRCUIT COURT, BALDWIN COUNTY  
NO. \_\_\_\_\_  
\_\_\_\_\_ TERM, 1967.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are Hereby Commanded to Summon CUYLER FREDERICK VOLKING 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 CUYLER FREDERICK VOLKING, Defendant, by THE JORDAN CLINIC, INC., a Corporation, Plaintiff.

WITNESS my hand this 28 day of June, 1967.

Clifford A. Clark Clerk.

THE JORDAN CLINIC, INC., a  
Corporation,

Plaintiff,

VS.

CUYLER FREDERICK VOLKING,

Defendant.

§  
§  
§  
§  
§  
§

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

C O M P L A I N T

Count I.

The Plaintiff claims of the Defendant SEVEN HUNDRED SEVENTY-SIX AND NO/100 (\$776.00) DOLLARS due from him by account, on, to-wit, the 21st day of October, 1966, which sum of money with the interest thereon is still unpaid. The account sued on is evidenced by an itemized and verified statement of account filed herewith.

Count II.

The Plaintiff claims of the Defendant the sum of SEVEN HUNDRED SEVENTY-SIX AND NO/100 (\$776.00) DOLLARS due from him by account stated between the Plaintiff and the Defendant on, to-wit, the 21st day of October, 1966, which sum of money with the interest thereon is still unpaid.

FILED

JUL 28 1967

E. G. Rickarby  
E. G. RICKARBY, Attorney for Plaintiff.

Defendant's address is Route 2, Box 215, Fairhope, Alabama.

JORDAN CLINIC, INC.  
25 North Section Street  
Fairhope, Alabama

ITEMIZED STATEMENT OF ACCOUNT:

Mr. Cuyler Fredrick Volking  
~~P. O. Box 502~~ *Rte 2 - Box 215*  
Fairhope, Alabama

WIFE: Alice  
DAUGHTERS: Alice  
Audry

February 7, 1956	Office Call	3.00		3.00
February 8, 1956	X-Ray	15.00		18.00
February 8, 1956	Laboratory	5.00		23.00
February 8, 1956	Office Call	5.00		28.00
February 10, 1956	Office Call	3.00		31.00
February 16, 1956	Office Call	3.00		34.00
March 19, 1957	Office Call	3.00		37.00
March 19, 1957	Laboratory	3.00		40.00
March 20, 1957	Surgery-Alice	125.00		165.00
March 20, 1957	Laboratory	3.00		168.00
March 20, 1957	Operating Room	30.00		198.00
March 20, 1957	Anesthesia	25.00		223.00
March 20, 1957	Anesthesia	10.00		233.00
March 20, 1957	Assist	25.00		258.00
March 20, 1957	Room & Board	10.00		268.00
March 20, 1957	Medication	5.50		273.50
March 21, 1957	Room & Board	10.00		283.50
March 21, 1957	Medication	2.00		285.50
March 22, 1957	Room & Board	10.00		295.50
March 22, 1957	Medication	2.00		297.50
March 22, 1957	Office Call	3.00		300.50
March 22, 1957	Laboratory	5.00		305.50
March 23, 1957	Laboratory	2.00		307.50
March 23, 1957	Laboratory	1.00		308.50
March 23, 1957	Surgery- Mrs.	125.00		433.50
March 23, 1957	Assist	25.00		458.50
March 23, 1957	Anesthesia	30.00		488.50
March 23, 1957	Operating Room	30.00		518.50
March 23, 1957	Medication	10.00		528.50
March 23, 1957	Room & Board-Mrs.	10.00		538.50
March 23, 1957	Medication	3.00		541.50
March 23, 1957	Room & Board-Alice	10.00		551.50
March 23, 1957	Medication	1.00		552.50
March 24, 1957	Room & Board-Alice	8.00		560.50
March 24, 1957	Room & Board-Mrs.	8.00		568.50
March 24, 1957	Medication	1.00		569.50
March 25, 1957	Room & Board-Alice	8.00		577.50
March 25, 1957	Room & Board-Mrs.	8.00		585.50
March 26, 1957	Credit		200.00	385.50
March 26, 1957	Room & Board-Mrs.	8.00		393.50
March 26, 1957	Medication	1.00		394.50
March 27, 1957	Room & Board-Mrs.	8.00		402.50
March 28, 1957	Room & Board-Mrs.	8.00		410.50
March 28, 1957	Anesthesia	5.00		415.50
March 28, 1957	Laboratory	5.00		420.50
March 28, 1957	Laboratory	3.00		423.50
March 28, 1957	Medication	3.50		427.00
March 29, 1957	Error in Posting		5.00	422.00
March 29, 1957	Credit		200.00	222.00
April 15, 1957	Surgery-Audry	125.00		347.00
April 15, 1957	Laboratory	5.00		352.00
April 15, 1957	Laboratory	2.00		354.00
April 15, 1957	Assist	25.00		379.00
April 15, 1957	Anesthesia	35.00		414.00
April 15, 1957	Operating Room	30.00		444.00
April 15, 1957	Room & Board-Audry	10.00		454.00
April 15, 1957	Medication	4.00		458.00
April 16, 1957	Room & Board-Audry	10.00		468.00
April 16, 1957	Medication	3.00		471.00
April 17, 1957	Room & Board-Audry	10.00		481.00
April 17, 1957	Medication	1.50		482.50
April 18, 1957	Room & Board-Audry	10.00		492.50
April 19, 1957	Room & Board-Audry	10.00		502.50
April 19, 1957	Medication	2.00		504.50
April 20, 1957	Room & Board-Audry	10.00		514.50
April 21, 1957	Medication	1.00		515.50

*atty*  
*Letter Last Page*



May 22, 1957	Office Call	3.00		518.50
May 22, 1957	X-Ray	10.00		528.50
May 22, 1957	Credit		5.00	523.50
August 19, 1957	Office Call	3.00		526.50
August 23, 1957	Office Call	3.00		529.50
August 28, 1957	Credit		4.00	525.50
August 28, 1957	2 Office Calls	6.00		531.50
December 17, 1957	Office Call	3.00		534.50
December 17, 1957	X-Ray	10.00		544.50
December 17, 1957	Office Call	3.00		546.50
April 1, 1958	Credit		5.00	541.50
April 19, 1958	Office Call	3.00		544.50
April 19, 1958	Credit		3.00	541.50
April 26, 1958	Credit		12.50	529.00
May 19, 1958	Office Call	3.00		532.00
May 19, 1958	Credit		5.00	527.00
May 19, 1958	Laboratory	3.00		530.00
June 20, 1958	Office Call	3.00		533.00
June 24, 1958	Office Call	3.00		536.00
June 25, 1958	Office Call	3.00		539.00
July 15, 1958	Office Call	3.00		542.00
September 12, 1958	Credit		5.00	537.00
May 6, 1959	Surgery-Son	10.00		547.00
May 6, 1959	Operating Room	5.00		552.00
May 11, 1959	Credit		15.00	537.00
July 10, 1959	Laboratory-CBC	5.00		542.00
July 10, 1959	Laboratory-Type	5.00		547.00
July 10, 1959	Laboratory-Crossmatch	5.00		552.00
July 10, 1959	Surgery-Mrs. D & C	50.00		602.00
July 10, 1959	Operating Room	30.00		632.00
July 10, 1959	Anesthesia	25.00		657.00
July 10, 1959	Private Duty Nurse	5.00		662.00
July 10, 1959	Room & Board	10.00		672.00
July 10, 1959	Medication	10.00		682.00
July 10, 1959	Medication	3.00		685.00
July 11, 1959	Laboratory	5.00		690.00
July 11, 1959	Laboratory	2.00		692.00
July 11, 1959	Room & Board	10.00		702.00
July 11, 1959	Medication	3.00		705.00
July 12, 1959	Room & Board	10.00		715.00
July 12, 1959	Medication	2.00		717.00
July 13, 1959	Medication	2.30		719.30
July 13, 1959	Credit		117.30	602.50
July 13, 1959	Credit		70.50	532.00
July 27, 1959	Surgery-Mrs.	55.00		587.00
July 27, 1959	Room & Board	12.00		599.00
July 27, 1959	Medication	5.00		604.00
July 27, 1959	Medication	3.00		607.00
July 27, 1959	Operating Room	20.00		627.00
July 27, 1959	Private Duty Nurse	5.00		632.00
July 27, 1959	Anesthesia	30.00		662.00
July 28, 1959	Credit		75.00	587.00
July 28, 1959	Credit		55.00	532.00
July 28, 1959	Credit		5.00	527.00
August 3, 1959	Office Call	3.00		530.00
August 3, 1959	Laboratory	5.00		535.00
August 3, 1959	Laboratory	2.00		537.00
August 5, 1959	Office Call	3.00		540.00
August 5, 1959	Laboratory	2.00		542.00
August 15, 1959	Professional Service	5.00		547.00
August 15, 1959	Operating Room	3.00		550.00
August 15, 1959	Medication	2.00		552.00
September 3, 1959	Credit		10.00	542.00
September 3, 1959	Office Call	3.00		545.00
June 30, 1960	Credit		10.00	535.00
December 7, 1960	Credit		5.00	530.00
January 1, 1961	Office Call	3.00	5.00	530.00
January 2, 1961	Office Call	3.00	3.00	530.00
January 24, 1961	Office Call	3.00		533.00

March 25, 1961	Office Call	5.00		538.00
March 25, 1961	X-Ray	10.00		548.00
March 25, 1961	X-Ray	20.00		568.00
November 18, 1962	Credit		10.00	558.00
January 18, 1962	Office Call	3.00		561.00
July 2, 1962	Professional Service	40.00		601.00
July 6, 1962	Office Call	4.00		605.00
July 6, 1962	Office Call	5.00		610.00
July 6, 1962	Credit		9.00	601.00
July 13, 1962	Office Call	4.00	4.00	601.00
October 2, 1962	Office Call	4.00		605.00
October 9, 1962	Office Call	4.00		609.00
October 9, 1962	Credit		4.00	605.00
June 24, 1963	Office Call	4.00		609.00
June 23, 1963	Office Call	4.00		613.00
July 2, 1963	Surgery	25.00		638.00
July 9, 1963	Professional Service	40.00		678.00
July 9, 1963	Office Call	4.00	4.00	678.00
July 12, 1963	Office Call	4.00		682.00
August 7, 1963	Credit		10.00	672.00
August 31, 1963	Credit		15.00	657.00
September 4, 1963	Office Call	4.00		661.00
September 4, 1963	Credit		15.00	646.00
September 30, 1963	Office Call	5.00		651.00
October 4, 1963	Office Call	4.00		655.00
October 11, 1963	Office Call	4.00		659.00
October 21, 1963	Office Call	4.00		663.00
November 19, 1963	Office Call	4.00		667.00
January 17, 1964	Credit		30.00	637.00
February 10, 1964	Office Call	4.00		641.00
February 10, 1964	Laboratory	7.00		648.00
May 28, 1964	Office Call	4.00		652.00
May 28, 1964	Laboratory	2.00		654.00
May 28, 1964	Credit		6.00	648.00
May 29, 1964	Office Call	4.00		652.00
May 29, 1964	Laboratory	7.00		659.00
November 19, 1964	Credit		5.00	654.00
November 19, 1964	Office Call	4.00		658.00
November 19, 1964	Laboratory	7.00		665.00
November 21, 1964	Office Call	4.00		669.00
November 21, 1964	Laboratory	2.00		671.00
November 21, 1964	Credit		4.00	667.00
November 23, 1964	Office Call	4.00		671.00
November 23, 1964	Laboratory	2.00	5.00	668.00
February 4, 1965	Office Call	4.00		672.00
February 5, 1965	Laboratory	7.00		679.00
February 4, 1965	Credit		4.00	675.00
February 5, 1965	Office Call	4.00		679.00
March 15, 1965	Office Call	4.00	4.00	679.00
March 15, 1965	Credit		11.00	668.00
May 1, 1965	Office Call @ Thos. Hosp.	5.00		673.00
February 1, 1966	Credit		5.00	668.00
May 25, 1966	Office Call	5.00		673.00
May 26, 1966	Credit		5.00	668.00
June 1, 1966	Surgery- T & A.	60.00		728.00
June 17, 1966	Office Call	5.00		733.00
June 17, 1966	Laboratory	7.00		740.00
June 17, 1966	X-Ray	30.00		770.00
June 18, 1966	Office Call	5.00		775.00
June 18, 1966	Laboratory	10.00		785.00
June 18, 1966	Laboratory	10.00		795.00
June 18, 1966	Laboratory	2.00		798.00
June 20, 1966	Office Call	5.00		803.00
June 20, 1966	Credit		5.00	798.00
June 20, 1966	Credit-Insurance		45.00	753.00
June 24, 1966	Credit		20.00	733.00
June 25, 1966	Surgery	25.00		758.00
June 29, 1966	Medication @ Thos. Hosp.	1.00		759.00
July 9, 1966	Credit-Insurance		25.00	734.00
July 9, 1966	X-Ray	10.00		744.00
July 16, 1966	Credit-Blue Cross		10.00	734.00

October 2, 1966	Minor Surgery	10.00		
October 12, 1966	Laboratory	2.00		744.00
October 12, 1966	Credit			746.00
October 17, 1966	Office Call		5.00	741.00
October 17, 1966	Laboratory	2.00		746.00
October 17, 1966	Laboratory	3.00		748.00
October 17, 1966	Professional Service	25.00		751.00
October 21, 1966	Office Call	5.00	5.00	776.00
				776.00
				TOTAL BALANCE 776.00

STATE OF ALABAMA  
COUNTY OF BALDWIN

Before me personally appeared H. C. Jordan, M. D., who being first duly sworn states that he is the owner of Jordan Clinic, Inc: that he is personally acquainted with the above itemized account and the same is true and correct and the balance due remains unpaid; that there are no off-sets or counter claims against the same.

H. C. Jordan  
H. C. JORDAN, M. D.

Sworn personally before me this the 29 day of March, 1967

[Signature]  
NOTARY PUBLIC  
State-at-Large

Fairhope, Alabama  
March 29 1967

Mr E. G. Rickarby, Atty  
P. O. Box #471, Fairhope, Alabama; Dear Mr. Rickarby; Mr. Cuyler F. Volking asked, and told me by telephone to go ahead with a garnishee, he did not care what we did about his account, that he never got credit for what he paid, so we have itemized the account to the last call. His wife recently in the hospital at Thomas Hospital, and then in Mobile Hospital, where she had surgery and he claimed we never gave him the insurance Credit on his two insurances, I explained Insurance paid on diagnosis, and wrote to both insurance companies and he has the reply from each see attached copy from Blue Cross, Mr. & Mrs. Volking got what was paid from Blue Shield and ~~Blue Cross~~ Pilot Ins. does not pay the Dr. unless there is Surgery. Last June 20 1966 Mr. Volking signed a note to pay 20.00 a month on this account and has made one (1) payment only, so please go forward with a garnishee, adding all costs and charges also Attorney fees and if Interest is allowable please add this also, Thanking you for giving this your attention, Most Sincerely,

COPY TO: MR. & MRS. CUYLER F. ~~VOLKING~~ (Mrs.) Florence G. Thames  
VOLKING Jordan Clinic of Fairhope, Inc.,  
RETURN RECIEPT DEMANDED: P. O. Drawer "L"  
Fairhope, Alabama 36532

Received 28 day of June 1967  
and on 29 day of June 1967

I served a copy of the within 8 & C  
on Cuyler Fredrick Volking

by service on Abame  
of type

TAYLOR WILKINS, Sheriff

By Roy Randall D.F.

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY RR  
DEPUTY SHERIFF

No. 7592

The Jordan Clinic

VS

Cuyler Fredrick Volking

FILED  
JUN 28 1967  
MALE L. DUK  
CLERK  
RECEIVED

E. G. R.