

SUMMONS AND COMPLAINT

MOORE PRINTING CO., 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

REALIE HOUSTON AND LENA HOUSTON

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.....

REALIE HOUSTON AND LENA HOUSTON

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

by BURTON H. SILVERSTEIN, d/b/a AAA Assignment Service,

Assignee of MEDICAL ARTS CENTER

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

Witness my hand this 3rd day of August 1967

Ex-8-9-67

Alice Diluck Clerk

No. 7665

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Burton H. Silverstein, d/b/a
AAA Assignment Service, assignee
of MEDICAL ARTS CENTER

Plaintiffs

vs.

REALIE HOUSTON AND LENA HOUSTON

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

healie works at Gulf Ice Co.
Lena works at So. Bald Hos.

Defendant lives at

Box 1641

Foley, Alabama

RECEIVED

Received In Office

AUG 3 1967 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this 9th August 1967

by leaving a copy with

Realie Houston
Lena Houston

Sheriff claims 15.24 miles at

10 Cents per mile Total \$ 1.52

TAYLOR WILKINS, Sheriff

BY Jm Eastman
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Jm Eastman Deputy Sheriff

Foley, Ala

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, Assignee
MEDICAL ARTS CENTER
Plaintiff

VS

REALIE HOUSTON AND LENA
HOUSTON

Defendants

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7665

1.

The Plaintiff claims of the Defendants THREE HUNDRED NINETY ONE AND 50/100 (\$391.50) DOLLARS due from them by account between the Defendants and Medical Arts Center, Foley, Alabama, on the 1st day of April, 1967, which sum of money, with the interest thereon, is still unpaid and is the property of the Plaintiff by assignment made to him by Medical Arts Center on April, 1, 1967.

WILTERS, BRANTLEY AND NESBIT

BY *Frederic J. Nesbit*

FILED

AUG 3 1967

ALICE J. DUCK

CLERK
REGISTER

STATE OF Alabama
COUNTY OF Baldwin

Personally appeared before me, the undersigned authority, in and for said County and State, Mary Fulford, who after first being duly sworn deposes and says that she is the bookkeeper of the Medical Arts Center, Foley, Ala. and as such officer he has the supervision and custody of all the records of the said Medical Arts Center including the accounts. Affiant further says that on the 1 day of April, 1967, that Reah & Lena Houston ^{were} ~~was~~ indebted to said Medical Arts Center in the amount of \$391.50. Further that this indebtedness is still due and unpaid.

Mary Fulford
Sworn to and subscribed before me this 25 day of July, 1967.

Hubert H. Sheskin
Notary Public, State of Georgia
My Commission Expires Aug 17, 1968

BURTON H. SILVERSTEIN, D/B/A
AAA ASSIGNMENT SERVICE, ASSIGNEE
MEDICAL ARTS CENTER,

PLAINTIFF

VS

REALIE HOUSTON AND LENA
HOUSTON,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7665

THE DEFENDANTS, FOR ANSWER TO THE BILL OF COMPLAINT HERETO-
FORE FILED IN THIS CAUSE, SAYS:

FIRST:

NOT GUILTY.

SECOND:

THAT THE ACCOUNT SUED FOR IS AN OPEN ACCOUNT AND IS BARRED
BY THE THREE YEAR STATUTE OF LIMITATION.

FILED

AUG 16 1967

ALICE L. HARRIS, CLERK
REGISTER

Ernest M. Bailey
ERNEST M. BAILEY
ATTORNEY FOR DEFENDANTS

BURTON H. SILVERSTEIN, D/B/A
AAA ASSIGNMENT SERVICE, ASSIGNEE
MEDICAL ARTS CENTER,

PLAINTIFF

VS

REALIE HOUSTON, AND LENA
HOUSTON,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO: 7665