

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 7687

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN WOODYARD

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

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 WOODYARD....., Defendant.....

by BURTON H. SILVERSTEIN, d/b/a AAA ASSIGNMENT SERVICE, AS ASSIGNEE
OF DRS. JOHN E. FOSTER AND DR. JULIUS MICHAELSON, d/b/a MEDICAL
ARTS CENTER....., Plaintiff.....

Witness my hand this 17th day of AUGUST 19 67.

Ex 8-23-67 Alice Dilbeck Clerk

No. 7687

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, As
assignee of DRS. JOHN E. FOSTER
AND JULIUS+MICHAELSON, d/b/a
MEDICAL ARTS CENTER

Plaintiffs

vs.

JOHN WOODYARD

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

WILTERS, BRANTLEY AND NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at Foley
and works at Foley Hardware
Company in the shop as a
mechanic

Received In Office

AUG 17 1967 19.....

TAYLOR WILKINS, Sheriff

I have executed this summons

this August 23, 1967

by leaving a copy with

John Woodyard

Sheriff's claim 72 Miles 88

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff
BY J. M. Eastman
DEPUTY SHERIFF

Taylor Wilkins Sheriff

J. M. Eastman Deputy Sheriff

Foley, Ala.

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF DRS. JOHN E. FOSTER
AND JULIUS MICHAELSON, d/b/a
MEDICAL ARTS CENTER

Plaintiff

VS

JOHN WOODYARD

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2687

1.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY NINE AND 00/100 (\$339.00) DOLLARS, due from him by account between the Defendants and Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center, on the 15th day of July, 1967, which sum of money, with interest thereon, is still unpaid and is the property of the Plaintiff by assignment made to him by Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center, on April 1, 1967. A copy of the assignment and an itemized statement of the account sued on and assigned, verified by the affidavit of a competent witness, is attached hereto as Exhibits "A" and "B" and made a part hereof.

2.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED THIRTY NINE AND 00/100 (\$339.00) DOLLARS, due from him by account between the Defendants and Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center, on the 15th day of July, 1967, which sum of money with interest thereon, is still unpaid and is the property of the Plaintiff by assignment made to him by Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center, on April 1, 1967.

WILTERS, BRANTLEY AND NESBIT

BY: Thos. J. Nesbit
Attorneys for Plaintiff

FILED

AUG 17 1967

625
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 FULLORD, who after first being duly sworn deposes and says that she is the bookkeeper of the MEDICAL ARTS CENTER 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 19 day of July, 1966, that JOHN WOODWARD was indebted to said MEDICAL ARTS CENTER in the amount of \$ 341.50. Further that this indebtedness is still due and unpaid.

MARY FULLORD
Sworn to and subscribed before me this

8 day of August

1967.

Hubert J. [Signature]
Notary Public,

My Commission Expires Aug. 17, 1968