

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - 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 WILLIAM JUNIOR MORGAN

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.....

..... WILLIAM (JUNION) MORGAN Defendant.....
BURTON H. SILVERSTEIN, d/b/a ASSIGNMENT SERVICE . as assignee
by of DRS. JOHN E. FOSTER AND JULIUS MICHAELSON, d/b/a MEDICAL

ARTS CENTER Plaintiff.....

Witness my hand this..... 17 day of August, 1967.

EX - 9-13-67

..... Clerk

Bon Secours

No. *2688*

Page.....

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.

WILLIAM (JUNIOR) MORGAN

Orange Ave
Foley, Ala
Defendants
SUMMONS AND COMPLAINT

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

..... AUG 17 1967 Clerk

ALICE J. DUCK CLERK
REGISTER

WILTERS, BRANTLEY AND NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 2 Foley

works Wallace Shrimp co.

eo

Received In Office
RECEIVED

..... AUG 17 1967 19.....

..... TAYLOR WILKINS, Sheriff

I have executed this summons

this *Sept 13* 19*67*.....

by leaving a copy with

William Morgan

Debt claims *72* Infiled at *2*
Total \$ *2*
TAYLOR WILKINS, Sheriff
J.M. Eastburn
DEPUTY SHERIFF

Taylor Wilkins Sheriff
J.M. Eastburn 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

WILLIAM (JUNIOR) MORGAN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7688

1.

The Plaintiff claims of the Defendant the sum of SIX HUNDRED FIVE AND 00/100 (\$605.00) DOLLARS, due from him by account between the Defendant and Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center, on the 22nd day of September, 1966, 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.

2.

The Plaintiff claims of the Defendant the sum of SIX HUNDRED FIVE AND 00/100 (\$605.00) DOLLARS, due from him by account between the Defendant and Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center, on the 22nd day of September, 1966, 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.

WILTERS, BRANTLEY AND NESBIT

BY: [Signature]
Attorneys for Plaintiff

FILED

AUG 17 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 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 22 day of September, 1966, that WILLIAM (JUNIOR) MORGAN was indebted to said MEDICAL ARTS CENTER in the amount of \$ 605⁰⁰. Further that this indebtedness is still due and unpaid.

Mary Fulford

Sworn to and subscribed before me this 8 day of August, 1967.

J. L. H. Schwartz
Notary Public,

My Commission Expires Aug. 17, 1968