

SUMMONS AND COMPLAINT

Circuit Court, Baldwin County

STATE OF ALABAMA
Baldwin County

No. TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Richard Ginright

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.....

Richard Ginright Defendant.....
by Burton H. Silverstein, d/b/a AAA Assignment Service, as Assignee
of Drs. John E. Foster and Julius Michaelson Plaintiff.....
d/b/a Medical Arts Center

Witness my hand this 24 day of August 1967.....

Richard Ginright Clerk

Et, 8-29-67

No. *July 7701*

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.

Richard Ginright

Defendants

SUMMONS AND COMPLAINT

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

..... AUG 24 1967 Clerk

ALICE J. BUCK CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

1911 Cedar Street July
FILED
Received in Office

..... AUG 24 1967

..... JAMES WILKINS, Sheriff
I have executed this summons

this August 29, 1967
by leaving a copy with

Richard Ginright

Sheriff claims *72*
Ten Cents per mile Total \$ *7.20*

BY *JAMES WILKINS* Sheriff
Deputy Sheriff
James Wilkins

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

Walter H. Wilkins Sheriff

James Wilkins Deputy Sheriff

July 7701

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

RICHARD GINRIGHT

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 7701

1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY AND 00/100 (\$130.00) 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 1st day of April, 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.

2.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY AND 00/100 (\$130.00) 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 1st day of April, 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.

WILTERS, BRANTLEY & NESBIT

By: *Thyllis S. Nesbit*

FILED

AUG 24 1967

13800
C10

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 1 day of April, 1967, that Richard Givright was indebted to said Medical Arts Center in the amount of \$ 130⁰⁰. Further that this indebtedness is still due and unpaid.

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

Mary Fulford
Notary Public,

My Commission Expires Aug. 17, 1968