

ORIGINAL

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.

WILLIE L. HOLMES

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CASE NO. 8469

1.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED NINETEEN AND NO/100 (\$419.00) 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 5th day of March, 1968, which sum of money, with interst 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 FOUR HUNDRED NINETEEN and NO/100 (\$419.00) 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 5th day of March, 1968, which sum of money with interst 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 & NESBITT

BY: *Superscript*

Attorney for Plaintiff

FILED

DEC 12 1968

ALICE J. DUCK

CLERK
REGISTER

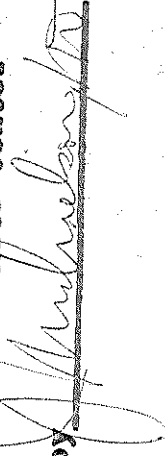
Foley, Alabama
April 1, 1967

For value received, we Dr. John E. Foster
and Dr. Julius Michaelson d/b/a/
Medical Arts Center do hereby assign and
set over to B.H. Silverstein d/b/a
AAA Assignment Service the account
owed us by

Willie L. Apple Holmes.

Medical Arts Center

by



STATEMENT

MEDICAL ARTS CENTER

Box 610

FOLEY, ALABAMA

36835

FAMILY CODE:

1 Betty Ann3 Willie Lee3 Annie Clie4 Barbara3 Betty Annette

0 _____

7 _____

0 _____

Willie L. & Annie C. Holmes
c/o Mr. Paul Keiser, Jr. Farm
Rt. 2
Foley, Ala.

7

NUMBER

1 25487

2 _____

3 239444 259935 29191

6 _____

7 _____

8 _____

ACCOUNTS DUE AND PAYABLE WITHIN 30 DAYS

DATE	CODE		CHARGES	CREDITS	BALANCE
	Doctor	Family			

BALANCE FORWARDED

Nov 1 '66 3 3 7
Feb 24 '64 3 2 14
Aug 24 '64 2 1 1
Nov 27 '64 3 3 1
Dec 2 '64 3 3 7
Dec 5 '64 3 3 2
Dec 26 '64 1 4 1
Dec 26 '64 2 4 6
Dec 31 '64 1 4 1
Sep 10 '66 1 1 7
Nov 19 '66 1 3 1
Dec 2 '66 1 5 1
Dec 6 '66

150.00
5.00
4.00
5.00
150.00
3.00
4.00
24.00
6.00
75.00
3.00

3.00

2.00

AAA ASSIGNMENT SERVICE
FIRST FEDERAL SAVINGS BLDG,
MOBILE, ALABAMA 36602
5.00

350.00
155.00
159.00
164.00
314.00
317.00
321.00
318.00
342.00
348.00
423.00
426.00
424.00

Mar '68

338

DOCTOR CODE

1 Dr. J. Michaelson
2 Dr. John E. Foster

PAYMENT CODE

11 From Insurance

1 Office Visit
2 Injection
3 Complete Exam
4 House Call
5 Night Call

SERVICE RENDERED CODE

6 Hospital Care
7 Surgery
8 X-Ray
9 EKG
10 Physiotherapy
11 Orthopedic Care or Cast
12 Laboratory
13 Sunday Call
14 Emergency Room Care

Pay Last Amount
in this Column

15 OS Fee

PRINT IN ALABAMA

STATE OF Alabama

COUNTY OF Baldwin

Personally appeared before me, the undersigned authority, in and for said County and State, Daniela Blackwell, 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 5 day of March, 1968, that Willie L. & Annie C. Holmes was indebted to said Medical Arts Center in the amount of \$ 419.00. Further that this indebtedness is still due and unpaid.

Daniela L. Blackwell

Sworn to and subscribed before me this 25 day of November, 1968.

Robert H. Evers
Notary Public,

State of Alabama
My Commission Expires Aug. 5, 1972

339

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 WILLIE L. HOLMES

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.....

..... WILLIE L. HOLMES Defendant.....

by 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.....

Witness my hand this..... 12 day of..... 1968

Alice Silver
..... Clerk

24:
12/13/68

ORIGINAL

No. *81169* Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Burton, H. Silvestre, a/b/a.

AAA Assignment Service

Plaintiffs

vs.

Willie L. Holmes

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FILED

DEC 12 1968 Clerk

ALICE J. DICKS
CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY: Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
May be served at:

Paul Kaiser, Jr. Farm
Rt 2, Foley, Ala
Received in Office
DEC 14 1968

DEC 12 1968 19.....

WALTER WILKINS Sheriff

I have executed this summons

this 1-14 1968

by leaving a copy with

Willie L. Holmes

Sheriff claims 12- Jones AR

Ten Cents per mile Total \$ 1.25

TAYLOR WILKINS Sheriff

BY *Charles Keller*

DEPUTY SHERIFF

James M. Wilkins Sheriff

Richard D. Jones Deputy Sheriff

Deery

MOTION FOR JUDGMENT BY DEFAULT

STATE OF ALABAMA

IN THE

COURT

Baldwin COUNTY

CASE No.

8469Barton Silverstein, PLAINTIFF

VS

Willie L. Holmes, DEFENDANT

Comes now the Plaintiff in the above styled cause and moves the court to enter a default judgment against the Defendant upon writ of inquiry, and assigns the following grounds:

1. Summons and complaint were personally served upon the Defendant on the 14th day of

January, 1969

2. The Defendant has failed to appear, demur, plead, or answer the said summons and complaint and has wholly defaulted.

3. More than thirty days has lapsed since said service.

Thayer A. Nash
Attorney

AMOUNT OF JUDGMENT \$ 419.00ATTORNEY'S FEE \$ 00INTEREST \$ 22.99TOTAL \$ 441.99

FILED

FEB 14 1969

ALICE J. DUCK

CLERK
REGISTER