

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, as
assignee of Drs. G. J. Mitchell,
F. B. Jones and L. F. Traveis, d/b/a
The Woman's Clinic

Plaintiff

vs

WOODROW M. HINOTE

Defendant

X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 2726

Comes the defendant and for demurrer to the complaint filed
in said cause shows as follows:

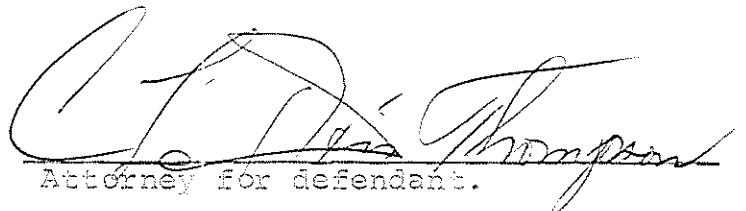
1. Count one of said complaint fails to state a cause of
action.

2. Count two of said complaint fails to state a cause of
action.

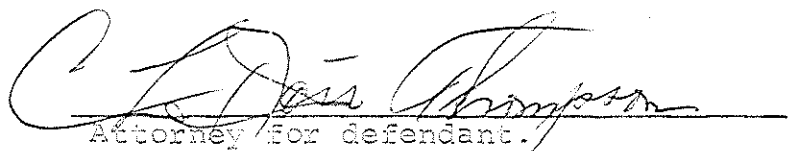
3. That the alleged statement of services rendered fails
to name the said defendant as the patient.

4. That said itemized statement sued on and sworn to
alleges that the said defendant received the services sued
on.

5. That said itemized statement fails to itemize
"old balance \$55.00".


Attorney for defendant.

Defendant respectfully requests trial by jury.


Attorney for defendant.

FILED

JUN 18 1969

ALICE J. DUCK CLERK
REGISTER

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF DRS. G. J. MITCHELL,
F. B. JONES and L. F. TRAVEIS, d/b/a
THE WOMAN'S CLINIC

Plaintiff

VS.

WOODROW M. HINOTE

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8726

Comes now the Plaintiff in the above styled cause and to partial answer
to the demurrer filed by the Defendant in this cause, files the attached copies
of account cards of the Woman's Clinic, Mobile, Alabama.

WILTERS, BRANTLEY & NESBIT

BY: *Thyllis L Nesbit*

Attorney for Plaintiff

VOL 63 PAGE 855

FILED

JUL 17 1969

ALICE J. DICK

CLERK
REGISTER

6194

Mrs. W. M. Hinote, Loxley, Ala.

 THE MODERN SYSTEM
 1557 Spring Hill Ave.
 Mobile, Alabama

Copyright the modoc system 1963 - PATIENT LEDGER Co.

PATIENT NUMBER	1	2	3	4	5	6	7	8	9	10
1	1	1	1	1	1	1	1	1	1	1
2	2	2	2	2	2	2	2	2	2	2
3	3	3	3	3	3	3	3	3	3	3
4	4	4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9	9
10	10	10	10	10	10	10	10	10	10	10

DATE	DOCTOR	SERVICE	CHARGE	CREDIT	BALANCE
09/12/60			11.00		
09/16/60			11.00		
09/13/60		50	100.00		100.00
09/19/60		21	2.00		102.00
09/26/60		17	2.00		104.00
10/10/60		19	1.00		105.00
10/24/60		19	1.00		106.00
03/11/67		00		50.00	56.00
03/14/67		52	7.00		63.00
03/14/67		00		7.00	56.00

6194

#2

Mrs. W. M. Hinote, Loxley, Ala. 36551

Copyright the modoc system 1963 - PATIENT LEDGER Co.

PATIENT NUMBER	1	2	3	4	5	6	7	8	9	10
1	1	1	1	1	1	1	1	1	1	1
2	2	2	2	2	2	2	2	2	2	2
3	3	3	3	3	3	3	3	3	3	3
4	4	4	4	4	4	4	4	4	4	4
5	5	5	5	5	5	5	5	5	5	5
6	6	6	6	6	6	6	6	6	6	6
7	7	7	7	7	7	7	7	7	7	7
8	8	8	8	8	8	8	8	8	8	8
9	9	9	9	9	9	9	9	9	9	9
10	10	10	10	10	10	10	10	10	10	10

DATE	DOCTOR	SERVICE	CHARGE	CREDIT	BALANCE
04/24/67		00	5.00		5.00 Bal. 55
1/18/68		13	9.00		14.00
1/18/68		00		9.00	5.00
2/6/68		11	12.00		17.00
2/6/68		00		12.00	5.00
2/28/68		10	5.00		10.00
02/28/68		00		5.00	5.00
03/14/68		50	350.00		355.00
03/14/68		52	50.00		405.00
3/26/68		51	2.00		407.00

Service Code Key:

- 14 Office Visit & Pap Smear
- 00 Payment
- 50 Surgery
- 21 Post Op & Lab
- 19 Office Visit Included in previous
- 13 Office Visit & Lab
- 10 Office Visit
- 52 Assistant Fee

DATE	DESCRIPTION	AMOUNT	BALANCE
10/10/19	1000	1000	1000
10/11/19	1000	1000	1000
10/12/19	1000	1000	1000
10/13/19	1000	1000	1000
10/14/19	1000	1000	1000
10/15/19	1000	1000	1000
10/16/19	1000	1000	1000
10/17/19	1000	1000	1000
10/18/19	1000	1000	1000
10/19/19	1000	1000	1000
10/20/19	1000	1000	1000
10/21/19	1000	1000	1000
10/22/19	1000	1000	1000
10/23/19	1000	1000	1000
10/24/19	1000	1000	1000
10/25/19	1000	1000	1000
10/26/19	1000	1000	1000
10/27/19	1000	1000	1000
10/28/19	1000	1000	1000
10/29/19	1000	1000	1000
10/30/19	1000	1000	1000
10/31/19	1000	1000	1000

Service Code Key:

- 10 Office Visit
19 Included in previous charge
05 Referred to collection agency

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF DRs. G. J. MITCHELL,
F. B. JONES and L. F. TRAVEIS, d/b/a
THE WOMAN'S CLINIC

Plaintiff

VS.

WOODROW M. HINOTE

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8726

1.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY TWO and NO/100 DOLLARS (\$462.00), due from him by account between the Defendant and Drs. G. J. Mitchell, F. B. Jones and L. F. Traveis, d/b/a The Woman's Clinic, on the 7th day of May, 1968, which sum of money with interest thereon is still unpaid and is the property of the Plaintiff by assignment made to him by Drs. G. J. Mitchell, F. B. Jones and L. F. Traveis, d/b//a The Woman's Clinic, on March 11, 1969.

2.

The Plaintiff claims of the Defendant the sum of FOUR HUNDRED SIXTY TWO AND NO/100 DOLLARS (\$462.00) due from him by account between the Defendant and Drs. G. J. Mitchell, F. B. Jones and L. F. Traveis, d/b//a The Woman's Clinic, on the 7th day of May, 1968, which sum of money with interest thereon is still unpaid and is the property of the Plaintiff by assignment made to him by Drs. G. J. Mitchell, F. B. Jones and L. F. Traveis, d/b/a The Woman's Clinic, on March 11, 1969. 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: Hubert J. Nesbit

Attorney for Plaintiff

FILED

MAY 28 1969

ALICE J. COOK CLERK
REGISTER

Mobile, Ala.
March 11, 1969

For value received, I/we, Dr. G. J.
Mitchell, Dr. F. B. Jones, Dr. L. F.
Travels, d/b/a The Woman's Clinic do
hereby assign and set over to B. H.
Silverstein d/b/a AAA Assignment
Service the account owed us by

W. M. H. NOTE, balance of, \$162.00

THE WOMAN'S CLINIC

by B. Jones

SOURCE

Woman's Clinic 6194

MORTG

DUE DATE

ACCT. NO.

NAME

AGE

OCCUPATION

8F-1465

Hinote, W. M.

Irma

AGE

R

W

S

RGS

ADD Gen. Del. Loxley, Ala.

ADD

PH 964-5673

ADD

PH

FOR Transfer truck drivers

PH

ONE FOR

BAL

YRS

PH

OTHER FOR

ONE

BAL

YRS

PH

ONE FOR

ONE

BAL

YRS

PH

OTHER INCOME

ONE

BAL

YRS

PH

AUTO

TAG NO

YR

PREV ACCT

REF

ADD

PH

REF

ADD

PH

SOC SEC NO

SPENT 122

PH

DATE

SERVICE

CHARGES

PAYMENTS

BALANCE

DLA 5-7-68

Charge for surgery \$350.00 & assistant fee \$50.00, 12.00
 office calls & Lab. fee, last March. Old balance 55.00.

DATE ASSIGNED 3-11-69

BALANCE AS OF DATE ASSIGNED

462.00

SLOW AGREEMENT YES

TERMS

SIGNED
NOTEYES
NOYES
WHOMT
%

DUE DATE

AMT DUE

DATE PAID

INTEREST

PRINCIPAL

BALANCE

REMARKS

OPEN ACCT

BALANCE

OPEN ACCT

BALANCE

OPEN ACCT

BALANCE

VOL

63 MAY 8 1962

STATE OF Alabama
COUNTY OF Baldwin

Personally appeared before me, the undersigned authority, in and for said County and State, F. B. Jones, M.D., who after first being duly sworn deposes and says that he is the doctor of the WOMANS CLINIC and as such officer he has the supervision and custody of all the records of the said WOMANS CLINIC including the accounts. Affiant further says that on the 7 day of May, 1968, that W. M. & IRMA KNOTE was indebted to said WOMANS CLINIC in the amount of \$ 462.00. Further that this indebtedness is still due and unpaid.

Sworn to and subscribed before me this 16 day of May, 1969.

[Signature]
Notary Public, State at Large
My commission expires Aug. 5 1972

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 Woodrow M. Hinote.....

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.....

Woodrow M. Hinote
..... Defendant.....

by Burton H. Silverstein, d/b/a AAA Assignment Service, as Assignee of Drs.

G. J. Mitchell, F. B. Jones and L. F. Traveis, d/b/a Woman's Clinic
..... Plaintiff.....

Witness my hand this.....day of..... 1969...

..... Clerk

24
5-30-69

No. 8726

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Burton H. Silverstein, d/b/a

AAA Assignment Service

Plaintiffs

vs.

Woodrow M. Hinote

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

MAY 29 1969

Clerk

ALEX J. LEE
CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

General Delivery, Loxley, Ala.

Received in Office

MAY 29 1969

19.....

~~TAYLOR WILKINS~~

Sheriff

I have executed this summons

this 30 - May 1969

by leaving a copy with

Woodrow M. Hinote

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Brown
DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. J. Brown Deputy Sheriff

40 miles R. T.
Loxley.