

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.

LILLIE RIGSBY PICKENS

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8721

1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED THIRTY FOUR and NO/100 DOLLARS (\$134.00), balance due after all proper credits given on a promissory note made by the Defendant on the 8th day of October, 1968 and payable as follows: \$10.00 payments every other week until the principal has been paid, the first payment due October 18, 1968. The Plaintiff avers that the Defendant defaulted in the payments and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff further avers that the Defendant agreed in the promissory note to pay all expenses including reasonable attorney's fees incurred in the collecting same and the Plaintiff claims a reasonable attorney's fee in the amount of \$20.00. The Plaintiff avers that the Defendant waived all right of exemption under the laws of the State of Alabama as to personal property.

WILTERS, BRANTLEY & NESBIT

BY: *Julius J. Nesbit*
Attorney for Plaintiff

FILED

MAY 24 1969

ALICE J. BROWN CLERK
REGISTER

We the Jury find for the
Plaintiff in the amount
of \$134.00

Ralph P. Johnson
W. M. M.

8981

STATE OF Alabama
COUNTY OF Baldwin

Personally appeared before me, the undersigned authority, in and for said County and State, B.H. Silversen, who after first being duly sworn deposes and says that he is the owner of the AAA Assignment Service and as such officer he has the supervision and custody of all the records of the said AAA Assignment Service including the accounts. Affiant further says that on the 7 day of March, 1969, that Willie Mae Pickens was indebted to said AAA Assignment Service in the amount of \$ 134.00. Further that this indebtedness is still due and unpaid.

J. L. L.
Sworn to and subscribed before me this 5 day of May, 1969.

Mary W. Fulford
Notary Public, State at Large
My commission expires 6-30-71

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 Lillie Rigsby Pickens

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.....

Lillie Rigsby Pickens....., 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.....29.....day of.....May.....1959.....

Alice J. Black....., Clerk

ef
6-21-69

No. 8231

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Burton H. Silverstein d/b/a

AAA Assignment Service

Plaintiffs

vs.

Lillie Rigby Pickens

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

MAY 29 1961

Clerk

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

301-4th Avenue, Foley, Alabama

RECEIVED
Received in Office

MAY 29 1961

19.....

~~TAYLOR WILKINS~~

~~Deputy Sheriff~~

Sheriff

I have executed this summons

this

by leaving a copy with

Lillie Rigby Pickens

Sheriff claims 72 miles at

Ten Cents per (to Town) 7.20

TAYLOR WILKINS, Sheriff

BY

Ch. Dress
DEPUTY SHERIFF

Sheriff

Deputy Sheriff

Free, 72

BRICE

NAME

ADDRESS

Billie Rigsby

Gen. Del.

CITY

Foley, Ala.

MR unclaimed

FAMILY

1. Billie	NO. 7488	5.	NO.
2. Jimmie	NO. 13164	6.	NO.
3. Kathy	NO. 14206	7.	NO.
4. Leon Picken	NO. 7175	8.	NO.

DATE	CODE			CHARGES	V	CREDITS	V	BALANCE
	DOCTOR	FAMILY	SERVICE					
BALANCE FORWARDED						JUN 9'62		178.00
OCT 25'63	4,	4,	1	7.00				185.00 •
OCT 25'63						6.00		179.00 •
NOV '68			210,300			10.00		169.00 •
DEC '68			210,300			15.00		154.00 •
JAN '69			210,300			5.00		149.00 •
FEB '69			210,300			5.00		144.00 •
MAR '69			2,210,300			10.00		134.00 •

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BRICE

Willie Riggsby
 Gen. Del.
 Foley, Ala.

MR. retained

FAMILY

1. Willie	NO. 7488	5.	NO.
2. Jimmie	NO. 13164	6.	NO.
3. Kathy	NO. 14206	7.	NO.
4. Leon Picken	NO. 7175	8.	NO.

DATE		CODE			CHARGES	Y	CREDITS		Y	BALANCE
		DOCTOR	FAMILY	SERVICE						
BALANCE FORWARDED							JUN 9'62			178.00
OCT 25'63		4,	4,	1	7.00					185.00*
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FEB '69				210,300			5.00			144.00*
MAR '69				2,210,300			10.00			134.00*

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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 1 day of April, 1967, Lillie Mae Pickens was indebted to said Medical Arts Center in the amount of \$ 179.00. Further that this indebtedness is still due and unpaid.

Daniela L. Blackwell
Sworn to and subscribed before me this 8 day of October, 1968.

Hubert H. Hild
Notary Public, State at Large
My commission expires Aug. 5, 1972

BURTON SILVERSTEIN)
)
Plaintiff)
)
VS.)
)
LILLIE RIGSBY PICKENS)
)
Respondent)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
Case # 8731

Comes the defendant in the above entitled cause and for answer to the complaint makes the following pleas:

PLEA ONE

There was no consideration to the defendant for the note.

PLEA TWO

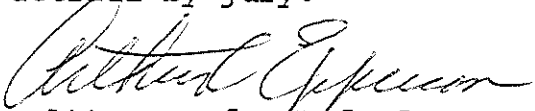
The defendant was coerced into signing the note by the plaintiff by the use of threats and intimidation.

PLEA THREE

The defendant's signature was obtained by fraud on the part of the plaintiff.


Attorney for the Defendant

The defendant demands
atttrial by jury:


Attorney for Defendant

FILED

JUL 7 1969

ALICE J. DUCK CLERK
REGISTER

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA
36535

AREA CODE 810
TELETYPE 743-2851

March 22, 1971

AREA CODE 205
TELEPHONE 943-8611

Mrs. Eunice Blackmon, Clerk
CIRCUIT COURT OF BALDWIN COUNTY
Bay Minette, Ala. 36507

Re: Burton H. Silverstein
vs.
Lillie Rigsby Pickens
Case #8731½

Dear Mrs. Blackmon:

Enclosed find our check #8093, in the amount of
\$181.10 to cover our employee, Lillie Pickens'
garnishment.

If we can be of further help in the above matter,
please let us know.

Very truly yours,

THE HALE MANUFACTURING COMPANY

June Taylor
(Mrs.) June Taylor
Office Manager

jt

enclosure