


DOCTORS HOSPITAL OF MOBILE, a	:	IN THE CIRCUIT COURT OF
corporation,	:	BALDWIN COUNTY, ALABAMA
Plaintiff,	:	AT LAW
-VS-	:	
SADIE M. SARGEANT,	:	
Defendant.	:	CASE NUMBER 8760

MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause and moves the Court to enter a default judgment against the Defendant in the amount of ONE HUNDRED NINETY-THREE AND THIRTY-SIX/HUNDREDTHS DOLLARS (\$193.36), on an itemized verified statement of account attached to the bill of complaint, and assigns the following grounds:

1. Summons and complaint were personally served upon the Defendant June 21, 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.

  
 H. HAYDEN RECTOR  
 One of the Attorneys for the Plaintiff

Amount of account	\$172.60
Interest	\$ 20.76
Total judgment	\$193.36

DOCTORS HOSPITAL OF MOBILE,

a Corporation,

Complainant.

VS.

SADIE M. SARGEANT

Defendant.

IN THE CIRCUIT COURT

OF

BALDWIN

MOBILE COUNTY, ALABAMA.

NO. 8760

### NON-MILITARY AFFIDAVIT

STATE OF ALABAMA }

COUNTY OF MOBILE }

NOW comes, H. Hayden Rector

who being first duly sworn, deposes and says that the defendant herein, \_\_\_\_\_

Sadie M. Sargeant

was not at the time of the filing of this suit, and is not now in the Military or Naval Service of the United States.

The Defendant resides at Silverhill, Alabama

H. HAYDEN RECTOR

Sworn to and subscribed before me,

this 13th day of October

196 69

Janet Woodland

NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

STATE OF ALABAMA AT-LARGE

FILED

OCT 14 1969

ALICE J. DUCK REGISTER  
REGISTER

DOCTORS HOSPITAL OF MOBILE, : IN THE CIRCUIT COURT OF  
a corporation, :  
Plaintiff, : BALDWIN COUNTY, ALABAMA  
: AT LAW  
-vs- :  
SADIE M. SARGEANT, :  
Defendant. : CASE NUMBER 876D

Plaintiff claims of the Defendant ONE HUNDRED SEVENTY-  
TWO AND SIXTY/HUNDREDTHS DOLLARS (\$172.60) due from her by account  
on April 21, 1967, which sum of money with the interest thereon is  
still unpaid. An itemized statement of the account sued on, verified  
by the affidavit of a competent witness is attached hereto as  
"Exhibit A" and made a part hereof.

H. Hayden Rector  
H. HAYDEN RECTOR

Michael J. Salmon  
MICHAEL J. SALMON

Attorneys for the Plaintiff

Defendant may be served at:

Box 28  
Silverhill, Alabama

**FILED**

JUN 17 1969

ALICE J. F.

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned Notary Public, in and for said State and County, personally appeared DORIS M. DAVENPORT, known to me, who, being by me duly sworn, deposes and says that she is the Credit Manager of Doctors Hospital of Mobile, a corporation, and has knowledge of the account hereinbelow set out and that Sadie M. Sargeant is indebted to Doctors Hospital of Mobile, a corporation, by account for the following:

Services and Medicine	
April 21, 1967	\$172.60

for which no payment has been received and which account is still due and owing.

*Doris M. Davenport*  
DORIS M. DAVENPORT

Subscribed and sworn to  
before me this 13<sup>th</sup> day  
of June, 1969.

*Claude M. Land*  
NOTARY PUBLIC, STATE OF ALABAMA AT LARGE  
My Commission Expires Jan. 27, 1973

FILED

JUN 17 1969

ALICE J. DUCK CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8760

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ....Sadie M. Sargeant.....

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.....

SADIE M. SARGEANT

Defendant.....

by DOCTORS HOSPITAL OF MOBILE, A Corporation

Plaintiff.....

Witness my hand this 17th day of June 19 69.

*Alice J. Lee* Clerk

No. 8760

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DOCTORS HOSPITAL OF MOBILE

A Corporation

Plaintiffs

vs.

SADIE M. SARGEANT

Defendants

SUMMONS AND COMPLAINT

Filed June 17, 19.69

Alice J. Duck Clerk

H. Hayden Rector  
Michael J. Salmon

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Box 28  
Silverhill

Received In Office

JUN 17 1969

19

~~WILLIAMS~~

Sheriff

I have executed this summons

this June 21, 19.69

by leaving a copy with

Sadie M. Sargeant

Sheriff claims  
Ten Cents per mile  
JAYC  
by  
Deputy Sheriff  
50 miles at \$1.00  
\$5.00

Sheriff

Deputy Sheriff