

MOBILE INFIRMARY, a corporation,)

Plaintiff,)

vs.)

FRANK TOLEN,)

Defendant.)

IN THE CIRCUIT COURT OF

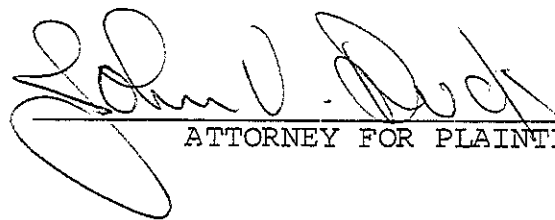
BALDWIN COUNTY, ALABAMA

AT LAW

6904

COUNT ONE

Plaintiff claims of the Defendant the sum of FOUR HUNDRED EIGHTY-THREE AND 50/100 (\$483.50) DOLLARS due from him by open account from, on to-wit: the 17th day of February, 1964 until on, to-wit: the 31st day of March, 1964, which sum of money with the interest thereon is still unpaid.



ATTORNEY FOR PLAINTIFF

NOTE: The account sued on is hereby evidenced by an itemized and verified statement of the account.

FILED
MAR 18 1968
ALICE I. DUCK, CLERK
REGISTER

COUNTY OF MOBILE
STATE OF ALABAMA

Be it remembered, that on this 2nd day of February
A. D., 1966, personally appeared before me, the undersigned authority,
T.J. Jones known to me
who being duly sworn, upon his oath stated that he is Collection Manager
of Mobile Infirmary
{ a corporation organized and doing business under the laws of the State of Alabama
{ and has been duly authorized by said corporation to make this affidavit
{ a partnership composed of _____
_____ a sole trader doing business as _____
and that as such he makes this affidavit; that he is familiar with the books and business of
said Mobile Infirmary; that the attached account against
Frank Tolen of Route #1, Box 40, Robertsdale, Ala.
is just and correct, within the knowledge of this affiant, that the items thereon stated and com-
posing the said account were sold and delivered to said Frank Tolen
at { its }
{ their } special instance and request, that credit has been duly given for all payments and
{ his }
just and lawful offsets to which said account is entitled as thereon stated, and that the balance
thereof, amounting to the sum of Four-hundred eighty three and 50/100 Dollars
(\$ 483.50) with interest from _____ 19____ is justly due and
remains unpaid.

T. J. Jones X
I hereby certify under my official seal that I am authorized as a Notary Public to
administer oaths under the laws of the State of Alabama
and that the foregoing was subscribed and sworn to before me on the day and year
first above stated.

James A. [Signature]
Notary Public

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6904

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonFRANK TOLEN.....

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.....

.....FRANK TOLEN....., Defendant.....

byMOBILE INFIRMARY, a corporation.....

....., Plaintiff.....

Witness my hand this.....18.....day of.....March.....19.66

.....Alice Duck.....Clerk

24:3-23-66

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No. 6904

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STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MOBILE INFIRMARY, a

corporation,

Plaintiffs

vs.

FRANK TOLEN

Defendants

SUMMONS AND COMPLAINT

Filed FILED 19.....

MAR 13 1966 Clerk

ALICE L. DUCK CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1, Box 40

Robertsdale, Alabama

RECEIVED
Received in Office

MAR 13 1966 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this March 26 1966

by leaving a copy with

Frank Tolen

3/26/66

50 500

on Court order of 500

H. F. Hall

..... Sheriff

H. F. Hall Deputy Sheriff

JOHN V. DUCK
~~DUCK & LACEY~~
Attorneys at Law
P. O. DRAWER A-J - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE March 16, 1966

Re: Mobile Infirmary vs. Frank Tolen

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed together with copy of same for
serving.

Sincerely,

John V. Duck
(initials)

DATE

6904

SIGNED

SIGNED

MOBILE INFIRMARY, a corporation I IN THE CIRCUIT COURT OF
PLAINTIFF I BALDWIN COUNTY, ALABAMA
VS I
FRANK TOLEN, I AT LAW
DEFENDANT I NO. 6904

Comes now the Defendant in the above styled cause and
for answer to the Bill of Complaint, says:

1.

The allegations in the Bill of Complaint are untrue.

WILTERS, BRANTLEY & NESBIT

By: Thylles S. Nesbit

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 11 day of April
1946, served a copy of the foregoing pleading on counsel
parties to this proceeding by mailing the same by United
Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By: Thylles S. Nesbit

FILED

APR 18 1946

ALICE I. DICK, CLERK
REGISTERED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

MOBILE INFIRMARY,
a corporation, Plaintiff

VS

FRANK TOLEN,
Defendant

ANSWER

John V. Duck
Fairhope, Alabama

Plaintiff's attorney

Wilters, Brantley & Nesbitt
Robertsdale, Alabama

Defendant's attorney

STATEMENT

10/30/64

MOBILE, ALA. _____ 19__

TO MOBILE INFIRMARY, DR.
P. O. BOX 4097
MOBILE, ALA.

Mr. Frank Tolen

Rt. 1 Box 40

Robertsdale, Ala.

SERVICES RENDERED

Mae Tolen

Hospitalization 2/17 to 2/24/64	\$412.20
Hospitalization 3/23 to 3/31/64	<u>121.30</u>
Total:	\$533.50
 Paid:	 50.00
Balance due:	\$483.50