

THE DETROIT EDISON COMPANY,
a Corporation,

Plaintiff,

-VS-

Ernest Maddock,


Defendant.

)
) IN THE CIRCUIT COURT OF BALDWIN
)
) COUNTY, ALABAMA. AT LAW.
)
)
)
)
)
)

CASE NO. _____

COUNT ONE.

Plaintiff claims of the defendant the sum of \$229.06 due by the defendant to the plaintiff on account by and between plaintiff and defendant on and between to-wit: November 15, 1952 and January 16, 1953, as shown by itemized statement of account verified by affidavit hereto annexed, which said sum, with the interest thereon is still unpaid.


A. S. WHITING, ATTORNEY FOR PLAINTIFF.
708-9 Annex, First National Bank Bldg.,
Mobile, Ala.

Note: The defendant is said to manage and conduct a place known as the Maddock Foundation situated between Fairhope and Point Clear, Ala.

ALMUR S. WHITING

ATTORNEY AT LAW

—
TELEPHONES:

OFFICE: 2-3604

RESIDENCE: 6-6226

—
FORREST E. SHORT

ASSOCIATE COUNSEL

ANNEX, FIRST NATIONAL BANK BUILDING

SUITE 708-9

MOBILE 6, ALABAMA

P. O. BOX 988

Sept. 18, 1953

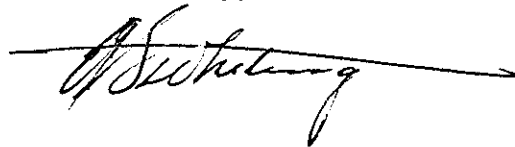
Mrs Alice J. Duck,
Clerk of the Circuit Court,
Bay Minette, Ala.

Dear Mrs Duck:

Enclosed herewith please find suit^{papers} in the case of Detroit Edison Co.,
a Michigan Corporation against Ernest Maddock, Individually and d/b/a Ernest Maddock
Foundation. Would you please let process issue to the Sheriff and advise me when
service has been had, so that I may know when to ask the court for a default
judgment in the event the defendant should not appear and defend the suit.

Thanking you for your courtesy in the premises.

Yours truly,



ASW/e
Enc.1

2091

STATE OF Michigan

COUNTY OF Wayne

Before me, the undersigned authority, personally appeared

David Robertson known to me, who

being duly sworn, upon his oath states that he is Supervisor of

the Collection Department of The Detroit Edison Company

a corporation organized and doing business under the laws of New York

~~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 The Detroit Edison Company

that the attached account against Ernest Maddock,

is just and correct, and within the personal knowledge of this affiant;

that the items thereon stated and composing the said account were sold

and delivered to said Ernest Maddock

at the special instance and request of said debtor, and that credit has

been duly given for all payments and just and lawful offsets to which

said account is entitled as thereon stated, and that the balance thereof,

amounting to the sum of Two hundred twenty-nine and 6/100 - Dollars

(\$ 229.06) with interest from _____, 19____, is

justly due and remains unpaid.

David Robertson

David Robertson, Supervisor
Collection Department

Under My official seal

Sworn to and subscribed before me on

this the 2nd day of September,

1953.

Harry B. Kester

Notary Public.

My commission expires: January 2, 1954

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2091

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ernest Maddock

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

Ernest Maddock

, Defendant

by The Detroit Edison Company

, Plaintiff

Witness my hand this 19th day of September 1953

W. J. Smith, Clerk

RECORDED

No. 2091

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

THE DETROIT EDISON COMPANY

Plaintiffs

vs.

ERNEST MADDOCK

Defendants

SUMMONS and COMPLAINT

Filed 9-19-53, 19

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Nov. 3, 1953

Taylor W. Perkins, Sheriff

I have executed this summons

this Nov. 6, 1953
by leaving a copy with

Ernest Maddock

Taylor W. Perkins, Sheriff

J. D. Stone, Deputy Sheriff

THE DETROIT EDISON COMPANY

2000 SECOND AVENUE

WOODWARD 2-2100

EXTENSION 631

RETURN THIS STUB WHEN PAYING BY MAIL TO
THE DETROIT EDISON COMPANY
2000 SECOND AVE. DETROIT 26, MICH.

DE FORM CN 7 9-52

OVERDUE ACCOUNT

DISREGARD IF PAID WITHIN PAST FEW DAYS

PAYABLE AT ANY OF THE COMPANY'S OFFICES
OFFICE HOURS 8:30 A.M. TO 5 P.M.

Ernest Maddock
4701 W. Delhi Road, Ann Arbor, Mich.
c/o Fairhope, Alabama

Ernest Maddock
4701 W. Delhi Road
Ann Arbor, Mich.

LEDGER 86 8/52 U

FOLIO NUMBER	PERIOD COVERED FROM TO	DUE DATE	GROSS BILL
5580	Nov. 15 Jan. 16	Feb. 8/53	228.16

LEDGER 86 8/52 U

FOLIO	DUE DATE	GROSS BILL
5580	Feb. 8/53	228.16

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OFFICE HOURS 8:30 A.M. TO 5 P.M.

Ernest Maddock
5495 Webster Church Rd., Ann Arbor
c/o Fairhope, Alabama

Ernest Maddock
5495 Webster Church Rd.
Ann Arbor District

LEDGER 85 8/52 U

FOLIO NUMBER	PERIOD COVERED FROM TO	DUE DATE	GROSS BILL
1000	Dec. 14 Jan. 11	Feb. 20/53	.90

LEDGER 85 8/52 U

FOLIO	DUE DATE	GROSS BILL
1000	Feb. 20/53	.90