

DRS. MUDD, MOSTELLAR & COPE,)
a Co-Partnership composed of)
ROBERT H. MUDD, HENRY C. MOS-)
TELLAR, JR. & W. FRANK COPE,)

Plaintiffs,)

vs.)

JAMES G. ENGLISH, SR. and)
LONIE ENGLISH,)

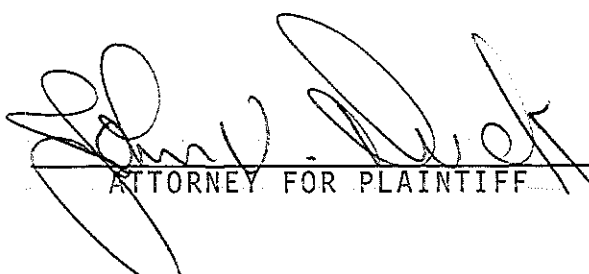
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

no. 9186

COUNT ONE

Plaintiff claims of the Defendants the sum of ONE HUNDRED FIFTY-FIVE (\$155.00) DOLLARS due by open account from on, to-wit: the 3rd day of September, 1967 until on, to-wit: the 11th day of March, 1968, 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 26 1970

ALICE J. GILL CLERK

STATEMENT OF ACCOUNT

Creditor Dr. Mudd, Mortimer & Coe
Debtor Mrs Loni English Address 52 Murphy Ave. Fairhope, Ala.
Employment Fairmont Nursing Address Fairhope, Ala.

Professional Services Rendered On Account \$ 155.00

Merchandise, Goods, Sold and Delivered On Account \$ _____

Date of Last Charge 10/17/67

Date of Last Payment 11/2/67

SWORN STATEMENT OF CLAIM

STATE OF ALABAMA

COUNTY OF MOBILE

I hereby certify that the above account is just and correct and that all proper credits have been given and that the balance as indicated above is due and payable.

X

Affiant

Sworn and subscribed to before me this

20th day of March 19 70.

Notary Public

66 2222

WM 13 10-11-54

Lonie-mother

~~Beasley's Rest Home~~

BC 1160340 *Los Front Nursing Home*

father-seamen

ins c seamens

Health & Welfare

Ad Dh 9-3-67

Dis 9-17-67

7-28-62

Be to Co

6. VENTRICULOGRAM
7. MYELOGRAM
8. NERVE BLOCK
9. SURGERY
10. HOSPITAL CARE

5:0 to 6:0

M. R. to J. W. Weldon

20
100
500
100

O.P DH 25

3-11-68
Father in Hosp.

Will pay on
the 20th.

9-652

10622

10-29-5

Will you

~~Planned~~

11-15-68

106503

7-2004

PAY LAST
AMOUNT IN
THIS COLUMN

PLEASE RETURN TOP HALF OF STATEMENT WITH PAYMENT

SUMMONS AND COMPLAINT

THE 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 JAMES G. ENGLISH, SR. and
LONIE ENGLISH

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.....

JAMES G. ENGLISH, SR. and LONIE ENGLISH ... Defendant.....

by DRS. MUDD, MOSTELLAR & COPE.....

..... Plaintiff.....

Witness my hand this 26 day of March 1970

Alvise J. Duck, Clerk

4-2-70

No. 9186

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

.....**DRS. MUDD, MOSTELLAR & COPE**.....

.....
Plaintiffs

vs.

.....**JAMES G. ENGLISH, SR. and**.....
.....**LONIE ENGLISH**.....
Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

MAR 26 1970

..... Clerk

ALICE J. DUCK

CLERK
REGISTER

.....**JOHN V. DUCK**.....

Plaintiff's Attorney

.....
Defendant's Attorney

Defendant lives at
52 Morphy Avenue, Fairhope,
Ala. (Mrs. Lonie English
works at Rosemont Nursing Home
Fairhope, Ala.)
Received in Office

March 26 1970

Taylor Wilkins Sheriff

I have executed this summons

this 2 - April 1970

by leaving a copy with

James G. English
Lonie English

Served a copy on
Bob R. Patton

Sheriff claims 140 miles at

Ten Cents per mile Total \$ 14.00

TAYLOR WILKINS, Sheriff

BY CROOK
DEPUTY SHERIFF

..... Sheriff

W. Crook Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

70 miles Fairhope

JOHN V. DUCK
ATTORNEY AT LAW
P. O. BOX Y
FAIRHOPE, ALABAMA 36532

July 22, 1970

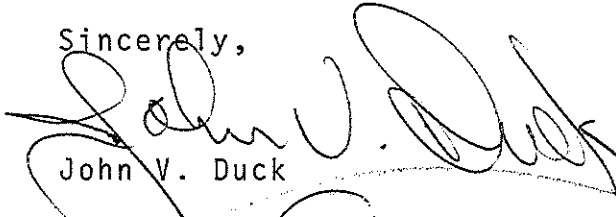
Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Ala.

Re: ~~Drs.~~ Mudd, Mosteller & Cope
vs. English. Civil #9186

Dear Mrs. Duck:

Would you please have the Judge issue a judgment
by default in captioned case.

Sincerely,


John V. Duck

JVD:lh

#

155.00