

JOHN V. DUCK
Attorney at Law
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. kAlice J. Duck
Bay Minette, Ala.

DATE

DATE April 27, 1970

Re: Merchants Adjustment Service, Inc.,

Assignee of DRS. MUDD, MOSTELLAR & COPE,

and CHILDREN'S MEDICAL GROUP -vs-

MARY JOHNSON

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed, together with copy of same and
Summons to be served.

Sincerely,

SIGNED

SIGNED

MERCHANTS ADJUSTMENT SERVICE, INC.,)
Assignee of DRS. MUDD, MOSTELLAR &
COPE, and CHILDREN'S MEDICAL GROUP,)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Plaintiff,

) AT LAW

vs.

) No. 9232

MARY JOHNSON,

Defendant.

Plaintiff claims of the Defendant the sum of EIGHTY (\$80.00)
DOLLARS due by open account from on, to-wit: the 10th day of
April, 1970, 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

APR 29 1970

ALICE J. DUCK CLERK
REGISTER

STATEMENT OF ACCOUNT

Creditor Merchants Adjustment Service Inc. Assignee of Drs. Mudd, Mostellar and Cope
& Children's Medical Group
Debtor Mrs Mary Johnson Address Gen. Del. Fairhope, Ala
Employment Grand Hotel Address Fairhope, Ala.

Professional Services Rendered On Account \$ 80.00
Merchandise, Goods, Sold and Delivered On Account \$ _____
Date of Last Charge 10/69
Date of Last Payment None

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 Mama T. Jones

Affiant

Sworn and subscribed to before me this

10th day of April 19 70

B. E. Savage
Notary Public

STATE OF ALABAMA
COUNTY OF MOBILE

FOR A CONSIDERATION OF One and No/100 (\$1.00) Dollars and other valuable considerations to

Children's Medical Group

hereinafter called Vendor, paid by Merchants Adjustment Service, Inc. hereinafter called Vendee, the receipt of which is hereby acknowledged, and a further valuable consideration to be paid by Vendee to Vendor does hereby Sell, Assign, Transfer and set over to the Merchants Adjustment Service, Inc. of Mobile, Alabama, the following accounts:

Mrs Mary Johnson \$50.00

with full right and authority to demand, collect and receive payment thereof, and to execute any and all necessary receipts and releases thereof, with full right to enforce said claims by suit in the name of the Vendor or in the name of the said Vendee, but at the cost and expense of the Vendee. The Vendor warrants the said claims to be just, correct, due and owing and free from set-offs or counterclaims, and agrees to furnish on demand of the Vendee, all necessary statements, evidence and proof to support said claims.

Because of the uncertainty of the value of the said accounts, the exact consideration for this assignment is to be determined in accordance with an existing contract between Vendor and Vendee. However, it is expressly understood that Vendor hereby conveys to Vendee the absolute title to said accounts and the Vendor retains no title or interest, legal or equitable, in or to said accounts, or any proceeds that Vendee may obtain therefrom.

Executed on this the 16th day of April, 19 70.

Children's Medical Group

By: 

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 MARY JOHNSON

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.....

MARY JOHNSON

... Defendant.....

by MERCHANTS ADJUSTMENT SERVICE, INC., Assignee of DRS. MUDD,

MOSTELLAR & COPE, & CHILDREN'S MEDICAL GROUP

..... Plaintiff.....

Witness my hand this 29 day of

April 1970

Deice J. Duck Clerk

244-30-70

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

MERCHANTS ADJUSTMENT SERVICE, INC.,
Assignee of DRS. MUDD, MOSTELLAR &
COPE, and CHILDREN'S MEDICAL GROUP
Plaintiffs

vs.

MARY JOHNSON

Defendants

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

APR 29 1970 Clerk

ALICE J. DUCK CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
works at Grand Hotel,
Point Clear, Ala.

Recieved In Office

April 29 19 70

Taylor Wilkins Sheriff

I have executed this summons

this 30th April 19 70

by leaving a copy with

Mary Johnson

70 miles of
Sheriff claims
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
W. O. S. DEPUTY SHERIFF
BY W. O. S.

W. O. S. Sheriff
Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

70 miles Fee