

BURTON H. SILVERSTEIN, c/o/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF SOUTH BALDWIN
HOSPITAL

Plaintiff

VS.

JOHN L. STARLING

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9309

1.

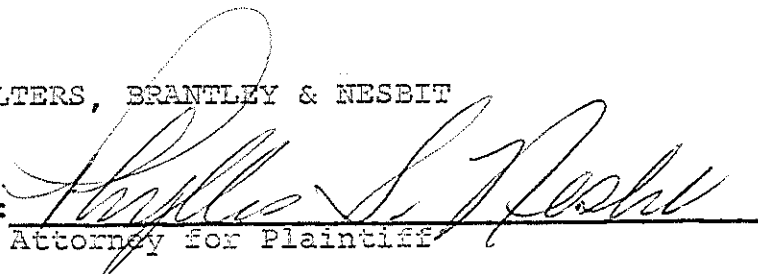
The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY FOUR AND 55/100 DOLLARS (\$164.55) due from him by account between South Baldwin Hospital and the Defendant on the 26th day of April, 1970, which sum of money, with interest thereon, is still unpaid and is the property of the Plaintiff by assignment made to him by the South Baldwin Hospital on April 26, 1969.

2.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED SIXTY FOUR and 55/100 DOLLARS (\$164.55) due from him by account between the South Baldwin Hospital and the Defendant on the 26th day of April, 1970, which sum of money, with interest thereon, is still unpaid and is the property of the Plaintiff by assignment made to him by the South Baldwin Hospital on April 26, 1969. A copy of the assignment and an itemized statement of the account sued on and assigned, verified by the affidavit of a competent witness, is attached hereto as Exhibits "A" and "B" and made a part hereof.

WILTERS, BRANTLEY & NESBIT

BY:


Attorney for Plaintiff

FILED

JUN 4 1970

ALICE J. DUCK CLERK
REGISTER

I, Marshall Crosby, Administrator of the
South Baldwin Hospital, do hereby transfer,
set over, assign, and convey to

B. H. Silverstein d/b/a AAA Assignment

Service the hereinattached account of

John L. Starling in the amount of
\$ 164.55, without recourse, this

26 day of April 19 69.

South Baldwin Hospital

Marshall Crosby
Marshall Crosby
Administrator

STATE OF Alabama
COUNTY OF Baldwin

Personally appeared before me, the undersigned authority, in and for said County and State, B. H. Silverstein, who after first being duly sworn deposes and says that he is the owner of the AAA Assignment Service and as such officer he has the supervision and custody of all the records of the said AAA Assignment Service including the accounts. Affiant further says that on the 26 day of April, 1969, that John L. Starling was indebted to said AAA Assignment Service in the amount of \$ 164.55. Further that this indebtedness is still due and unpaid.

[Signature]
Sworn to and subscribed before me this 31 day of March, 1970.

Mary W. Fulford
Notary Public, State at Large
My commission expires June 30, 1971

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 9309

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon John L. Starling

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.....

John L. Starling Defendant.....

by Burton H. Silverstein, d/b/a AAA Assignment Service.....

Plaintiff.....

Witness my hand this 7 day of June 1970

Alice J. Duck Clerk

No. 9309

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Burton H. Silverstein, d/b/a

AAA Assignment Service
Plaintiffs

vs.

John L. Starling

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUN 4 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt 1, Box 73H, Bay Minette,

Alabama

Received In Office

June 4

1970

Taylor Wilkins Sheriff

I have executed this summons

this June 5 1970

by leaving a copy with

John L. Starling

Sheriff claims 2 miles at

Ten Cents per mile Total \$.20
TAYLOR WILKINS, Sheriff

BY Taylor Wilkins
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Walters Deputy Sheriff

2 miles South of B14

BURTON H. SILVERSTEIN,
d/b/a AAA ASSIGNMENT,
as Assignee of SOUTH
BALDWIN HOSPITAL,

Plaintiff,

-vs-

JOHN L. STARLING,

Defendant.

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA

: AT LAW

: CASE NO.: _____

DEMURRER:

Comes the defendant in the above styled cause and
for demurrer to complaint filed in said cause says as
follows:

(1) That Count One of said complaint fails to state
a cause of action.

(2) That Count Two of said complaint fails to state
a cause of action.

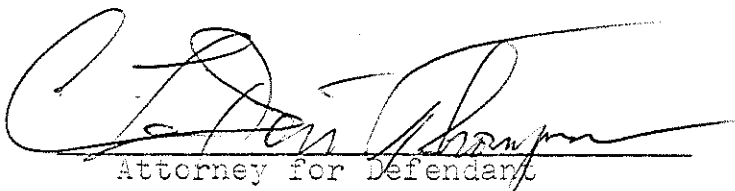
(3) That no assignment of said account was served
on defendant herein.

(4) That no certified copy of said account was served
on said defendant.

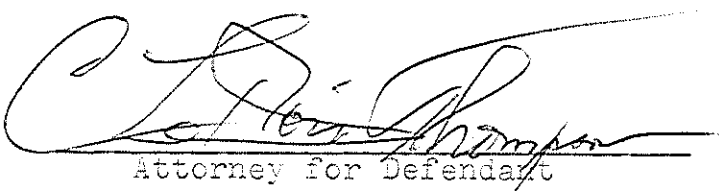
(5) That for aught alleged the account specified
in Count One has merged with a contract in said cause.

(6) That for aught alleged Count Two has been merged
with a contract.

(7) For aught alleged there is no allegation that any
service was rendered.


Attorney for Defendant

Defendant respectfully asks that he be granted a
trial by jury.


Attorney for Defendant

FILED

JUN 24 1970

ALICE J. DUCK
CLERK
REGISTER

Case 9309 ~~Jury~~

Burton H. Silverstein

vs

John L. Starling

OFFICE
937-3921

C. LeNOIR THOMPSON
ATTORNEY-AT-LAW
BAY MINETTE, ALABAMA 36507

HOME
937-7487

July 9, 1971

Circuit Court, Baldwin County
Bay Minette, Alabama

re: Burton H. Silverstein vs:
John L. Starling
Case Nr. 9309

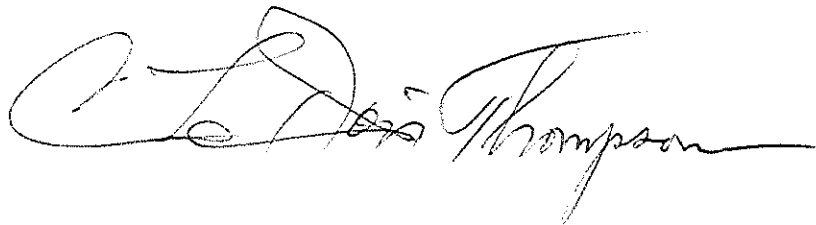
Attention: Mrs. Eunice Blackmon

Dear Mrs. Blackmon:

Please note for the record my withdrawal as attorney
for the defendant in the above case.

The defendant has been informed of this withdrawal
and has employed Honorable Kenneth Cooper, I am informed
by Mrs. Phylis Nesbitt.

Yours very truly,

A handwritten signature in cursive script, reading "C. LeNoir Thompson". The signature is written in dark ink and is positioned below the typed name "C. LeNoir Thompson".

CLT/lw