

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF DR. F. B. JONES

Plaintiff

VS.

JUANITA MORGAN

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 9341

1.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED AND NO/100 DOLLARS (\$300.00) due from her by account between the Defendant and Dr. F. B. Jones on the 28th day of September, 1967, which sum of money with interest thereon is till unpaid and is the property of the Plaintiff by assignment made to him by Dr. F. B. Jones on the 26th day of January, 1968.

2.

The Plaintiff claims of the Defendant the sum of THREE HUNDRED AND NO/100 DOLLARS (\$300.00) due from her by account between the Defendant and Dr. F. B. Jones on the 28th day of September, 1967, which sum of money with interest thereon is still unpaid and is the property of the Plaintiff by assignment made to him by Dr. F. B. Jones on the 26th day of January, 1968. 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 18 1970

ALICE J. DUCK

CLERK
REGISTER

I, Dr. F.B.Jones, do hereby transfer, set
over, assign, and convey to B.H.Silverstein
d/b/a/ AAA Assignment Service the herein
attached account of Mrs LARITA Morgan
in the amount of \$ 300.00, without
recourse, this 26 day of Jan 1968.

F. B. Jones

F. B. Jones, M.D.

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 January, 1968, that Lanita Morgan was indebted to said AAA Assignment Service in the amount of \$ 300.00. Further that this indebtedness is still due and unpaid.

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

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

[illegible]

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 9341

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JUANITA MORGAN

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.....

JUANITA MORGAN

... Defendant.....

by BURTON H. SILVERSTEIN, D/b/a AAA ASSIGNMENT SERVICE

..... Plaintiff.....

Witness my hand this 18th day of June 1970

Alice J. Luck Clerk

No. 9341

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Burton H. Silverstein, d/b/a

AAA Assignment Service

Plaintiffs

vs.

Juanita Morgan

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JUN 18 1970

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

June 18 1970

Taylor Wilkins Sheriff

I have executed this summons

this July 18 1970

by leaving a copy with

Juanita Morgan

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY [Signature] DEPUTY SHERIFF

[Signature] Sheriff

[Signature] Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

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