

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF DRS. JOHN E. FOSTER
AND JULIUS MICHAELSON, d/b/a
MEDICAL ARTS CENTER

Plaintiff

VS.

WILLIE HORACE, JR.

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4385

1.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY SIX AND NO/100 DOLLARS (\$156.00) due from him by account between the Defenant and Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center on the 26th day of July, 1969, which sum of money with interest thereon is still unpaid and is the property of the Plaintiff by assignment made to him by the Medical Arts Center on May 9, 1970.

2.

The Plaintiff claims of the Defendant the sum of ONE HUNDRED FIFTY SIX AND NO/100 DOLLARS (\$156.00) due from him by account between the Defendant and Drs. John E. Foster and Julius Michaelson, d/b/a Medical Arts Center on the 26th day of July, 1969, which sum of money with interest thereon is still unpaid and is the property of the Plaintiff by assignment made to him by the Medical Arts Center on May 9, 1970. 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: Thyler J. Nesbit

Attorneys for Plaintiff

FILED

JUL 14 1970

ALICE J. DINK

CLERK
REGISTER

Mr. J. H. Knappe, and John B. Foster

of the Federal Reserve Bank of New York

located, on May 1, 1970, and convey

to the Federal Reserve Bank of New York

Service of the Department of the Treasury

WILLIE HORACE, JR. on the amount

of \$156.00 without recourse, this

9 day of May 1970.

J. Michaelson JR

STATE OF Alabama
COUNTY OF Baldwin

Personally appeared before me, the undersigned authority, in and for said County and State, Mary Fulford, who after first being duly sworn deposes and says that she is the OFFICE MANAGER of the Medical Arts Center and as such officer she has the supervision and custody of all the records of the said Medical Arts Center including the accounts. Affiant further says that on the 9 day of May, 1970, that Willie Grace, Jr was indebted to said Medical Arts Center in the amount of \$ 156.00. Further that this indebtedness is still due and unpaid.

Mary Fulford
Sworn to and subscribed before me this 9 day of May, 1970.

[Signature]
Notary Public, State at Large
My commission expires Aug. 5, 1972

See
Office #10
MAC - O (Chapman)
via garmachman
97-6217
35-1280

STATEMENT

MEDICAL ARTS CENTER

Box 910

FOLEY, ALABAMA

36535

FAMILY CODE:

- 1 Dorothy
- 2 Michael
- 3 _____
- 4 _____
- 5 _____
- 6 _____
- 7 _____
- 8 _____

Willie Horace Jr
P. O. Box 1154
Foley, Ala. 36535

LTBE - Hile T. J. - 10/22/72
5/21/70

NUMBER:

- 1 9596
- 2 31686
- 3 _____
- 4 _____
- 5 _____
- 6 _____
- 7 _____
- 8 _____

ACCOUNTS DUE AND PAYABLE WITHIN 30 DAYS

DATE	CODE			CHARGES	CREDITS	BALANCE
	Doctor	Family	Service			

BALANCE FORWARDED						
MAY 27'68	1,	1,	15	175.00		175.00 •
MAY 27'68					5.00	170.00 •
MAY 31'68					5.00	165.00 •
JUN 17'68					12.00	153.00 •
Delivered male infant				7-6-68		
APR 7'69	1,	2,	2	3.00		156.00 •
APR 8'69					3.00	153.00 •
JUL 26'69	1,	2,	14	3.00		156.00 •
AAA ASSIGNMENT SERVICE Medical Arts Center Bldg. 5/2/70 P. O. Box 987 Foley, Ala. 36535 PHONE 943-5687						

DOCTOR CODE	SERVICE RENDERED CODE	Pay Last Amount in this Column
1 Dr. J. Michaelson	6 Hospital Care	11 Orthopedic Care or Cast
2 Dr. John E. Foster	7 Surgery	12 Laboratory
	8 X-Ray	13 Sunday Call
PAYMENT CODE	9 EKG	14 Emergency Room Care
111 From Insurance	10 Physiotherapy	
		15 OB Fee

PP 45 per wk (3-31) *Wks Hale* #1 - 11/18/69 193/151
 CREDIT INFORMATION: #2 - 1-22-70 127/160
 #3 - 3-12-70

Credit Limit _____

Phone _____

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 30 day of June, 1970, that Willie Horace Jr was indebted to said AAA Assignment Service in the amount of \$ 156.00. Further that this indebtedness is still due and unpaid.

J. B. L. K.
Sworn to and subscribed before me this 30 day of June, 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.....

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLIE HORACE, JR.

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.....

WILLIE HORACE, JR. Defendant.....

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

....., Plaintiff.....

Witness my hand this 14 day of July 19 70

Burton H. Silverstein Clerk

7-14-70

No. 9385

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

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

Plaintiffs

vs.

Willie Horace, Jr.
Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... July 14, 1970 Clerk

ALICE J. BUCK
CLERK
REGISTER

WILTERS, BRANTLEY & NESBITT

BY:
Plaintiff's Attorney

.....
Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

July 14 1970

Taylor Wilkins Sheriff

I have executed this summons

this 1970
by leaving a copy with

Willie Horace, Jr.

Sherriff claims miles at

..... 920

TAYLOR WILKINS, Sheriff

DEPUTY SHERIFF

..... Sheriff

..... Deputy Sheriff

93

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19.....

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular..... Term, 19..... of the Circuit Court of Baldwin County, to-wit: On the 22nd day of October, 1970, being a regular day of said term, Burton H. Silverstein, d/b/a AAA Assignment Service

recovered judgment against Willie Horace, Jr.

for the sum of ONE HUNDRED SIXTY SIX AND NO/100----- Dollars, and cost of suit, and affidavit having been made by Phyllis S. Nesbit, attorney for Plaintiff that process of garnishment is believed to be necessary to obtain satisfaction of such Judgment, and that the following named persons or corporations, vis:

Hale Manufacturing Company

Foley, Alabama

has or is believed to have in its possession, or under its control money or effects belonging to said defendant Horace or that it is, or is believed to be indebted to said defendant or to be liable to them, or to one of them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

You Are Therefore Hereby Commanded to Summon

Hale Manufacturing Company

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court Within 30 days service of this writ

House thereof, ~~in the city of Bay Minette, on the..... Monday in..... A. D. 19.....~~
~~when and there within the three first days of the..... Monday in..... A. D. 19.....~~

the service of the garnishment, or at the making..... its answer, or at any time intervening the time of serving the garnishment, and making the answer..... it was indebted to said defendant Horace and whether it will not be indebted in future to said defendant Horace by a contract then existing, and whether by a contract then existing it is, or are, liable to said defendants for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether it has not in its possession or under its control money or effects belonging to the defendant Willie Horace, Jr.

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 5 day of Nov., A. D., 1970

Issued 5 day of Nov. A. D., 1970

ATTEST:

Alice J. Duck, Clerk.

CIRCUIT COURT, BALDWIN COUNTY

No. 9385 1/2

Burton H. Silverstein

VS. }

GARNISHMENT ON JUDGMENT

Willie Hecace, Jr.

Issued _____ day of _____ 19__

Returnable _____ day of _____ 19__

P. Nesbit

Attorney

Moore Printing Co. - Bay Minette, Alabama

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 7 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ 14.20
PROCESS(ES) OR A TOTAL OF \$ 17.40

Received 5 day of Nov 19 70
and on 9 day of Nov 19 70
I served a copy of the within Writ
on Willie Hecace, Jr.
By James Stephens Officer
By James Stephens Officer

TAYLOR WILKINS, Sheriff
By James Stephens

STATE OF ALABAMA

Baldwin County

TO WILLIE HORACE, JR. Defendant.....

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of..

AAA Assignment Service Plaintiff.....

versus Willie Horace, Jr. Defendant.....

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

Hale Manufacturing Company

has been named as Garnishee.....

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the

5 day of Nov. 1970

Alice J. Hester
Clerk of the Circuit Court.

9385 1/2

NOTICE
TO DEFENDANT OF GARNISHMENT
BY
CLERK OF CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

~~TO~~

Burton A. Libenstein

Plaintiff....

VS.

Willie Horace Jr.

Defendant....

P. Nesbit

Received 5 day of Nov. 1970
and on 7 day of Nov. 1971
I served a copy of the within Notice
on Willie Horace, Jr.
By service on _____

TAYLOR WILKINS, Sheriff
By *Richard L. Spencer*

THE HALE MANUFACTURING COMPANY

P. O. DRAWER 729

FOLEY, ALABAMA
36535

AREA CODE 810
TELETYPE 743-2851

November 11, 1970

AREA CODE 205
TELEPHONE 943-8611

FILED

NOV 14 1970

Mrs. Alice J. Duck, Clerk
CIRCUIT COURT OF BALDWIN COUNTY
Bay Minette, Ala. 36507

ALICE J. DUCK CLERK
REGISTER

Re: AAA Assignment Service
vs.
Willie Horace, Jr. 9385 1/2

Dear Mrs. Duck:

We as Garnishee in the above case wish to inform you that Willie Horace, Jr. is employed by us and that we are indebted to him. As of week ending November 15, 1970, we will deduct 25% out of his wages after taxes, sui and social security have been deducted.

We will withhold the total amount of \$166.00. If this amount does not agree with your figures, please advise.

If we can be of further help in the above matter, please let us know.

Very truly yours,

THE HALE MANUFACTURING COMPANY

June Taylor
(Mrs.) June Taylor
Office Manager

jt

9385 1/2

THE STATE OF ALABAMA,
BALDWIN COUNTY

} CIRCUIT COURT

Personally appeared before me, Alice J. Duck, Clerk of the Circuit Court in and for Baldwin County and State aforesaid----- Phyllis S. Nesbit, Attorney for AAA Assignment Service who being duly sworn, on oath says, that a regular----- Term of the Circuit Court of Baldwin County, to-wit: on the----- day of----- October 19----- 70, ----- Burton H. Silverstein, d/b/a AAA Assignment Service recovered a judgment against ----- Willie Horace, Jr.

----- for the sum of ONE HUNDRED SIXTY SIX AND NO/100----- Dollars besides costs of suit; that said judgment remains wholly unsatisfied and in full force and effect: that Hale Manufacturing Company Foley, Alabama

supposed to be indebted to or have effects of the said----- Willie Horace, Jr. in----- its----- possession, or under----- its----- control, and that he believes process of Garnishment against said----- Hale Manufacturing Company is necessary to obtain satisfaction of said judgment.

Sworn to and subscribed this----- 5----- day of----- Nov----- A. D. 19----- 70
----- Alice J. Duck----- Clerk.

Phyllis S. Nesbit

NO. _____

CIRCUIT COURT

vs.

AFFIDAVIT Garnishment on Judgment

Filed this _____ day of _____, 19____

Clerk.

MOORE PRINTING CO., BAY MINETTE, ALA.