

ROSEMONT NURSING HOME, INC.,  
a corporation,

Plaintiff

vs

PEARL BROWN,

Defendant

\* IN THE CIRCUIT COURT OF

\* BALDWIN COUNTY, ALABAMA

\* AT LAW


\*

\* Case No. 9707

COUNT I.

The plaintiff claims of the defendant TWO THOUSAND ONE HUNDRED NINETY-SEVEN & 21/100 DOLLARS (\$2,197.21) due for work, labor and nursing services done for the defendant by the plaintiff between to wit: the 4th day of October, 1969, and the 23rd day of September, 1970, which sum of money with the interest thereon is still unpaid. The plaintiff avers that this work, labor and nursing service was performed under a contract, a copy of which is attached hereto as if fully set out herein.

The plaintiff in addition to the principal amount sued for further claims benefit of waiver of exemption as provided under the contract and a reasonable attorney's fee as provided under said contract.

  
FRED F. SMITH, JR., Attorney for  
Plaintiff  
P.O.Box 487  
Fairhope, Alabama 36532

SERVE DEFENDANT:  
Route 3  
Enterprise, Alabama

**FILED**

FEB 22 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

State of Alabama  
Baldwin County

For and in consideration of care and treatment heretofore rendered and hereinafter to be rendered to the patient named by Rosemont Nursing Home, Inc. I/we hereby guarantee payment to the said Rosemont Nursing Home, Inc. of all of their charges for such care and treatment heretofore or hereafter rendered to the said patient. I/we hereby waive all requirements of law prerequisite to my/our obligation to pay these charges, and waive all right of exemption under the constitution and laws of the State of Alabama and any other state and of the United States, and agree to pay all costs of collection of these charges, including a reasonable attorney's fee.

Signed and Sealed this 25<sup>th</sup> day of JANUARY 1970.

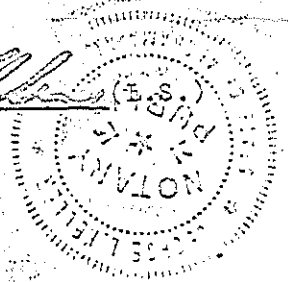
Patients Name

Peopl Brown (L.S.)

Mrs. Pearl Brown

ATTEST:

Ray L. Feller (L.S.)



RECORDED  
STATE OF ALABAMA  
I HEREBY FILED  
WAS FILED ON

SEP 3 9 35 AM '70

RECORDED  
STATE OF ALABAMA  
I HEREBY FILED  
WAS FILED ON



THE STATE OF ALABAMA

Baldwin County

\* CIRCUIT COURT, BALDWIN COUNTY

\*

\* No. \_\_\_\_\_

\* \_\_\_\_\_ Term 1971

TO ANY SHERIFF OF THE STATE OF ALABAMA:

Your are hereby commanded to summon PEARL BROWN, Route 3, Enterprise, Alabama, 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 PEARL BROWN, Defendant, by ROSEMONT NURSING HOME, INC., a corporation, Plaintiff.

WITNESS my hand this 22 day of Feb, 1971.

Ernie B. Blackman  
Clerk

Received in office this 26 day Feb, 1971.

R. M. Sparks  
Sheriff

by \_\_\_\_\_  
D.S.

9707  
Original

THE STATE OF ALABAMA

Baldwin County

Circuit Court

~~XXXX~~ ROSEMONT NURSING HOME, INC.  
a corporation,

Plaintiff

vs

PEARL BROWN,

Defendant

SUMMONS AND COMPLAINT

Filed \_\_\_\_\_ 1971

Clerk

Fred F. Smith, Jr.  
P.O. Box 487-Fairhope, Alabama

Plaintiff's Attorney

EEB 22 1971

TAYLOR WILKINS  
SHERIFF

Not Bond in Date County after \_\_\_\_\_  
This 2 day of MAY 1971  
W. Walker  
Sheriff of Date County, Ala.

MAY 17 1971

TAYLOR WILKINS  
SHERIFF

Executed this 21 day of  
May 1971  
by handing a copy of the within  
Summons and Complaint to  
PEARL BROWN  
Defendant.  
W. Walker  
BY: C. E. Shipp Sheriff.

THE SHERIFF CLAIMS 30 MILES  
AT 10c PER MILE FOR A TOTAL OF  
3.00

W. Walker  
WILLIAM WALKER, Sheriff

By \_\_\_\_\_  
Deputy Sheriff

FRED F. SMITH, JR.  
ATTORNEY AT LAW  
P. O. BOX 487  
FAIRHOPE, ALABAMA 36532

August 31, 1971

FRED F. SMITH, JR.  
JOHNNY MACK LANE

302 DELAMARE ST.  
FAIRHOPE, ALABAMA  
928-9276

Mrs. Eunice Blackmon  
Clerk - Circuit Court  
Baldwin County Court House  
Bay Minette, Alabama 36507

RE: Rosemont Nursing Home, Inc. vs Pearl Brown  
No. 9707

Dear Mrs. Blackmon:

Please issue an execution in the above styled cause directed to the Sheriff of Mobile County, Alabama, directing him to levy upon the following described real property of the defendant:

West 50 feet of Lot 9, Block 14 of Whistler and commencing at the North side of Wasson Street, 150 feet from the North corner of Wasson and Carr Streets, run North 110 feet then East 46 feet, then South 110 feet, then West along Wasson Street 46 feet to the beginning, being a part of Lot 6, Block 14 of Whistler.

Very truly yours,

  
Fred F. Smith, Jr.

FFS/s