

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.....LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:

You are hereby commanded to summons Paul Younce to appear before the Circuit Court, to be held for said County at the place of holding same, within thirty (30) days from service of this process, then and there to answer the complaint of Julius Michaelson.

Witness my hand this 8th day of Dec, 1953.


CLERK

COMPLAINT

JULIUS MICHAELSON

Plaintiff)

vs.)

PAUL YOUNCE

Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

COUNT ONE:

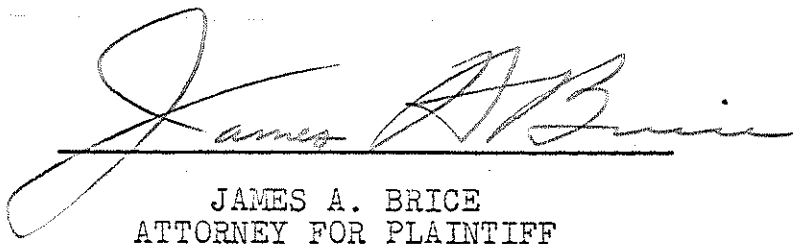
The plaintiff claims of the defendant One Hundred Sixty-Five Dollars (\$165.00), due from him by account on the 10th day of December, 1952, which sum of money, together with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant One Hundred Sixty-Five Dollars (\$165.00), due from him for medical services done for the defendant on the 10th day of December, 1952, at his request, which sum of money with the interest thereon, is still unpaid.

An itemized statement of account, verified by affidavit of plaintiff, is attached hereto.

Mr. Paul Younce, Defendant,
lives on a farm southeast
of Foley, Alabama.


JAMES A. BRICE
ATTORNEY FOR PLAINTIFF

ITEMIZED STATEMENT OF ACCOUNT

STATE OF ALABAMA)
BALDWIN COUNTY)

JULIUS MICHAELSON)
Plaintiff)
vs.)
PAUL YOUNCE)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

Before me, the undersigned Notary Public in and for said County and State, this day personally appeared Julius Michaelson, who being by me first duly sworn deposes and says on oath the following:

That his name is Julius Michaelson; that he is a licensed physician practicing medicine at Foley, Alabama; that he has personally performed medical services for the defendant, Paul Younce, at his request, and for various members of his family, by his personal knowledge, as recorded on deponent's books of account as follows:

<u>Date</u>	<u>Nature</u>	<u>Charge</u>	<u>Credit</u>
4-15-50	Mrs. Younce	\$20.00	
4-18-50	"	16.00	
4-20-50	"	6.00	
4-21-50	"	6.00	
4-22-50	"	6.00	\$48.00
4-23-50	"	6.00	
4-24-50	"	16.00	
4-25-50	"	10.00	
4-16-50	"	6.00	
4-17-50	"	6.00	
4-19-50	"	6.00	
4-26-50	"	6.00	
4-27-50	"	6.00	
4-28-50	"	6.00	
4-29-50	"	16.00	68.00
4-30-50	"	6.00	
5-1-50	"	6.00	
5-2-50	"	6.00	
5-3-50	"	6.00	
5-4-50	"	6.00	
5-5-50	"	16.00	
5-6-50	"	6.00	
5-7-50	"	6.00	
5-8-50	"	6.00	
5-9-50	"	6.00	
5-10-50	"	6.00	
5-11-50	"	6.00	
5-12-50	"	16.00	
5-13-50	"	6.00	
5-14-50	"	3.00	
5-15-50	"	3.00	
5-16-50	"	3.00	
5-17-50	"	3.00	
5-18-50	"	3.00	
5-19-50	"	5.00	
5-20-50	"	3.00	
5-21-50	"	16.00	
5-22-50	House call, penicillin	6.00	
5-23-50	"	6.00	
5-24-50	"	6.00	
5-25-50	"	6.00	
5-26-50	"	6.00	

<u>Date</u>	<u>Nature</u>	<u>Charge</u>	<u>Credit</u>
5-27-50	House call, penicillin	\$16.00	\$100.00
5-30-50	Check--Church of Christ		50.00
6-6-50	House call	10.00	
6-6-50	"	10.00	
6-17-50	Credit check		50.00
6-21-50	House call	10.00	
6-28-50	"	10.00	
7-5-50	"	10.00	
7-14-50	"	10.00	
7-20-50	"	10.00	
8-5-50	"	10.00	
8-18-50	"	10.00	
8-28-50	"	8.00	
9-14-50	"	6.00	
9-22-50	"	5.00	
10-4-50	Penicillin--Mr. Younce	6.00	
10-30-50	Edna	6.00	
2-17-51	Mrs. Younce	3.00	
6-9-51	"	3.00	
6-11-51	Lab work	10.00	
6-23-51	"	2.00	
7-7-51	"	3.00	
7-15-51	Professional services	5.00	
7-16-51	Penicillin	6.00	
7-17-51	"	3.00	
10-27-52	Kathleen	21.00	
10-30-52	"	3.00	
10-31-52	"	3.00	
11-4-52	"	3.00	
11-13-52	Insurance		30.00
TOTAL		\$513.00	\$346.00
BALANCE DUE		\$167.00	

And further, deponent Julius Michaelson says on oath that the above statement of account represents the sum due him from the defendant, Paul Younce, after due allowance for all credits.

Julius Michaelson, M.D.
JULIUS MICHAELSON

Sworn to and subscribed before me this 6 day of December, 1955.

James A. Brice
JAMES A. BRICE
Notary Public in and for said County and State

