

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 RANDALL MANDERS 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 W.S. BEESLEY.

Witness my hand this 9th day of January, 1955.

Reece J. Much
CLERK

COMPLAINT

W.S. BEESLEY)
Plaintiff)
vs)
RANDALL MANDERS)
Defendant)

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

COUNT ONE:

The plaintiff claims of the defendant One Hundred Twenty Dollars (\$120.00), due from him by account on the 15th day of February, 1955, which sum of money, together with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant One Hundred Twenty Dollars (\$120.00), due from him for dental services done for the defendant on the 15th day of February, 1955, 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.

James A. Brice
JAMES A. BRICE
ATTORNEY FOR PLAINTIFF

Mr. Randall Manders, Defendant
is a resident of Fairhope, his
mailing address is P.O. Box 401,
Fairhope, Alabama

ITEMIZED STATEMENT OF ACCOUNT

STATE OF ALABAMA)
BALDWIN COUNTY)

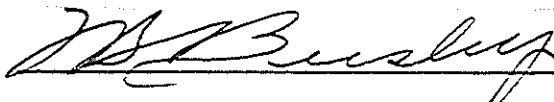
Before me, the undersigned Notary Public in and for said County and State, this day personally appeared W.S. BEESLEY, who being by me first duly sworn deposes and says on oath the following:

That his name is W.S. BEESLEY; that he is a licensed dentist practicing dentistry at Foley, Alabama; that he has personally performed dental services for the defendant, RANDALL MANDERS, at his request, as recorded on deponent's books of account, with which he is familiar, as follows:

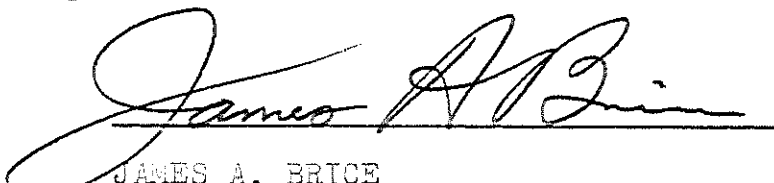
February 5, 1955 - 1X28 Acrylic, Clear Palate, Upper and Lower
Full Dentures.....\$120.00

BALANCE DUE.....\$120.00

And further, deponent W.S. BEESLEY says on oath that the above statement of account represents the sum due him from the defendant, RANDALL MANDERS, after due allowance for all credits.


W.S. BEESLEY

Sworn to and subscribed before me this 6th day of
January, 1956.


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

