

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 James Winston 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 Blessed Martin de Porres Hospital, a corporation.

Witness my hand this 20th day of June, 1954.

CZERK

* * * * *

COMPLAINT

Blessed Martin de Porres Hospital,
a corporation,
Plaintiff

V.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

James Winston,
Defendant

COUNT ONE:

The plaintiff claims of the defendant One Hundred Fifty-four Dollars (\$154.00), due from him by account on the 23rd day of April, 1956, which sum of money, together with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant One Hundred Fifty-four Dollars (\$154.00), due from him for hospital services done for the defendant on the 23rd day of April, 1956, 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
ATTORNEY FOR PLAINTIFF

James Winston lives at or near Daphne, Alabama

STATE OF ALABAMA

COUNTY OF MOBILE

Before me, the undersigned Notary Public in and for said State and County, personally appeared Doyle Stewart, known to me and who by *me* being first duly sworn deposes and says that he is Business Manager of the Blessed Martin De Porres Hospital, a corporation organized and doing business under the laws of the State of Alabama; that as such he makes this affidavit; that he is familiar with the books and business of the Blessed Martin De Porres Hospital; that the attached account against James Winston for hospital services rendered to his wife, Lodie is just and correct within the knowledge of this affiant; that he has authority to make this affidavit and that he has personal knowledge of the matters contained herein; that the charges thereon stated and composing the said account were made at the special instance and request of the debtor and that credit has been duly given for all payments and just and lawful offsets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of One Hundred Fifty Four and No/100 DOLLARS (\$154.00) with interest from April 23, 1956 is justly due and remains unpaid.

Doyle Stewart

Subscribed and sworn to
before me this 7th day
of June, 1956.

W. Jack Edwards
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA *at large*

No. 2959

RECORDED

SUMMONS AND COMPLAINT

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

BLESSED MARTIN de PORRES
HOSPITAL, a corporation,
Plaintiff
V.

JAMES WINSTON,
Defendant

Received 25 day of June 1956
and on 25 day of June 1956
served a copy of the within 80 c
on James Winston

by service on _____

TAYLOR WILKINS, Sheriff
By Edlough Stedham D. S.

Fairhope Ala
Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Stedham
DEPUTY SHERIFF

FILED

JUN 25 1956

ALICE L. BUCK, CLERK

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA