

3018

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 Clovis Hunter 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 30 day of August, 1956.

Dee J. Duck  
CLERK

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COMPLAINT

Blessed Martin de Porres )  
Hospital, a corporation )  
vs. ) Plaintiff )  
Clovis Hunter ) Defendant )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

COUNT ONE:

The plaintiff claims of the defendant Three Hundred One Dollars and Sixty-five Cents (\$301.65), due from him by account on the 7th day of May, 1956, which sum of money, together with interest thereon, is still unpaid.

COUNT TWO:

The plaintiff claims of the defendant Three Hundred One Dollars and Sixty-five Cents (\$301.65), due from him for hospital services done for the defendant on the 20th day of July, 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.

Mr. Clovis Hunter, Defendant,  
lives at or near Montrose,  
Alabama.

James A. Brice

JAMES A. BRICE  
ATTORNEY FOR PLAINTIFF

STATE OF ALABAMA

COUNTY OF MOBILE *Baldwin*

Before me, the undersigned Notary Public in and for said State and County, personally appeared Doyle Stewart, known to me and who by 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 Clovis Hunter for hospital services rendered to his father, Henry 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 off-sets to which said account is entitled as thereon stated and that the balance thereof amounting to the sum of Three Hundred One and 65/100ths DOLLARS (\$ 301.65 ) with interest from May 7, 1956 is justly due and remains unpaid.

*Doyle Stewart*

Subscribed and sworn to  
before me this 11th day  
of August, 1956.

*James A. Davis*  
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA  
*Baldwin*

no. 3018 Montrose

Received 30 day of Aug 19 56  
and on 19 day of Sept 19 56  
served a copy of the within S & C  
on Clovis Hunter

TAYLOR WILKINS, Sheriff  
By Edleigh Steadman

Montrose Ala

Sheriff claims 55 miles at  
Ten Cents per mile Total \$ 5.50  
TAYLOR WILKINS, Sheriff  
BY \_\_\_\_\_  
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

Blessed Martin de Porres  
Hospital, a corporation  
Plaintiff

Vs

Clovis Hunter  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE

FILED

AUG 30 1956

ALICE L. DUCK, Clerk  
JAMES A. BRICE

ATTORNEY AT LAW  
FOLEY, ALABAMA