

SUMMONS AND COMPLAINT

3019

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 Theophus Knight 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.

Alvin J. Duck
CLERK

COMPLAINT

Blessed Martin de Porres
Hospital, a corporation)
Plaintiff)
vs.)
Theophus Knight)
Defendant)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

COUNT ONE:

The plaintiff claims of the defendant One Hundred Eleven Dollars and Thirty Cents (\$111.30), 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 One Hundred Eleven Dollars and Thirty Cents (\$111.30), due from him for hospital services done for the defendant on the 21st day of December, 1953, 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. Theophus Knight, Defendant,
lives at Rt. 1, Daphne, 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 Theophus Knight for hospital services rendered to his son, Theophus Jr. 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 Eleven and 30/100ths DOLLARS (\$ 111.30) with interest from May 7, 1956 is justly due and remains unpaid.

Doyle Stewart

Subscribed and sworn to
before me this 10th day
of August, 1956.

James A. Zuercher
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA
Baldwin

No. 3019 Raphine

Served 30 day of Aug 1956

Served a copy of the within

service on

TAYLOR WILKINS, Sheriff

By D. S.

SUMMONS AND COMPLAINT

Blessed M artin de Porres
Hospital, a corporation
Plaintiff

Vs

Theophus Knight,
Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

Returned 22 day of Dec 1956

Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff

By Shelton
Deputy Sheriff

Returned 22 day of Dec 1956

NO PROPERTY FOUND OF

in Baldwin County, Alabama.

Taylor Wilkins, Sheriff

By Shelton
Deputy Sheriff

FILED

AUG 30 1956

ALICE J. BUCK, Clerk

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

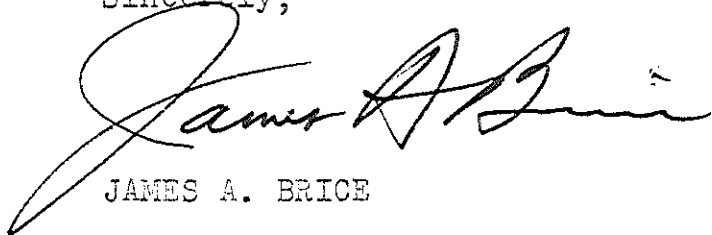
November 30, 1956

Mrs. Alice J. Duck, Clerk
Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Reference the two defendants whose cards are attached,
my information is that both are Negroes living at Belforrest.

Sincerely,



JAMES A. BRICE

JAB:ss

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