

LAW OFFICES
JAMES A. BRICE
FOLEY, ALABAMA

JAMES A. BRICE
RICHARD C. LACEY

P. O. Box 298
WHITEHALL 3-3601

October 6, 1959

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

Re: South Baldwin County Hospital
vs: Charlie Hadley
Case Number 3960

South Baldwin County Hospital
vs; Davis R. Whittington
Case Number 3945

Dear Mrs. Duck:

Please place the enclosed promissory notes on the
Judge's desk for judgment by default.

The amount of the judgment in the first case should
be as follows:

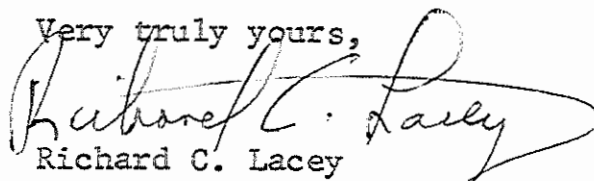
Principal:	\$100.60
Interest:	3.00
Attorneys' fee:	35.00
Total:	<u>\$138.60</u>

The amount of the judgment in the Whittington case
should be as follows:

Principal:	\$231.67
Interest:	5.23
Attorney's fee:	65.00
TOTAL:	<u>\$301.90</u>

Thank you.

Very truly yours,


Richard C. Lacey

RCL/vd

Enclosures

S U M M O N S

STATE OF ALABAMA)
COUNTY OF BALDWIN)

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

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

You are hereby commanded to summons Davis R. Whittington to appear before the Circuit Court of Baldwin County, Alabama, 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 South Baldwin County Hospital Corporation.

Witness my hand this 20 day of Aug., 1959.

Alice J. Sluck
CIRCUIT CLERK

Ex-93-59 -----

C O M P L A I N T

SOUTH BALDWIN COUNTY HOSPITAL
CORPORATION, a corporation,

Plaintiff,

VS.

DAVIS R. WHITTINGTON,

Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

I.

The Plaintiff claims of the defendant One Hundred Eighty and 72/100 (\$180.72) Dollars, due from him on account, to-wit: the 9th day of May, 1959, which sum of money, with interest thereon, is still unpaid.

II.

The Plaintiff claims of the Defendant One Hundred Five and 70/100 (\$105.70) Dollars, due by promissory note made by the Defendant on the 24th day of March, 1959, and payable on the 1st day of June, 1959, with interest from the 1st day of June, 1959, at the rate of six (6%) per cent per annum.

III.

The Plaintiff claims of the Defendant Forty Five and 25/100 (\$45.25) Dollars, due by promissory note made by the Defendant on

the 2nd day of March, 1959, and payable on the 1st day of May, 1959, with interest from the 1st day of May, 1959, at the rate of six (6%) per cent per annum.

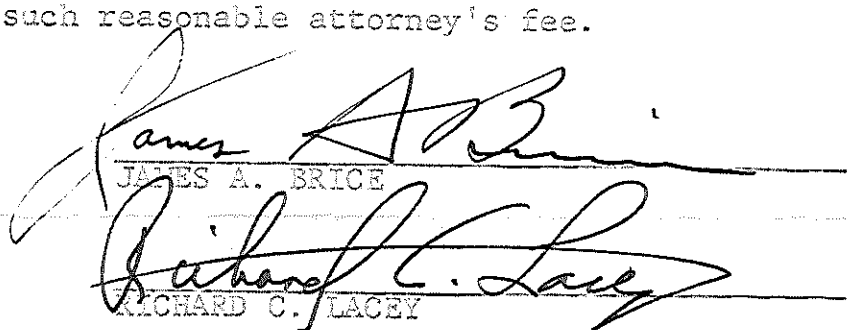
IV.

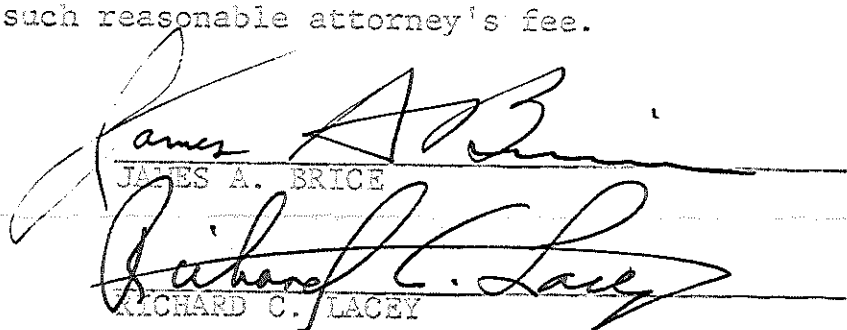
Plaintiff avers that in and by the terms of said notes, the Defendant waived all right to exemption under the Constitution and Laws of the State of Alabama, and of this waiver Plaintiff now claims benefit.

Plaintiff further avers that in and by the terms of said notes, the Defendant agreed to pay all costs of collecting or securing or attempting to collect or secure said notes, including a reasonable attorney's fee, and Plaintiff further claims of the Defendant the further and additional sum of Sixty Five and No/100 (\$65.00) Dollars, as such reasonable attorney's fee.

FILED
AUG 20 1959

ALICE J. DUCK, Clerk


JAMES A. BRICE


RICHARD C. LACEY

ATTORNEYS FOR PLAINTIFF

Received 20 day of Aug 1959
and on 3 day of Sept 1959
I served a copy of the within Rec
on Davis R. Whittington

By service on _____

TAYLOR WILKINS, Sheriff
By [Signature] D. S.

40/01

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY [Signature]
DEPUTY SHERIFF

3945

South Baldwin
County Hospital,
Corp. a corp

ds.

Davis R. Whittington

FILED
AUG 20 1959

ALICE J. DUCK, Clerk

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JAMES A. BRICE
RICHARD C. LACEY
FOLEY, ALABAMA