

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.

.....TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon GLEND A SWITZER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against GLEND A SWITZER

....., Defendant.....

by SOUTH BALDWIN COUNTY HOSPITAL CORPORATION

....., Plaintiff.....

Witness my hand this 2 day of March 1960

Quincy J. Newkirk, Clerk

No. 4197

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STATE of ALABAMA

Baldwin County

CIRCUIT COURT

SOUTH BALDWIN COUNTY HOSPITAL

CORPORATION

Plaintiffs

vs.

GLEND A SWITZER

Defendants

Summons and Complaint

Filed

FILED

19

MAR 2 1960

ALICE J. DUCK

**CLERK
REGISTER**

Clerk

JAMES A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

3-2, 1960

Sheriff.

I have executed this summons

this March 3, 1960

by leaving a copy with

Glenn A Switzer

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Taylor Wilkins
DEPUTY SHERIFF

Taylor Wilkins
Sheriff.

Walter H. H. H.
Deputy Sheriff.

Specy

OFFICE: PHONE WH 3-4951

ARTHUR C. EPPERSON
ATTORNEY AT LAW
10 So. MCKENZIE ST.—P. O. Box 706
FOLEY, ALABAMA

RES.: PHONE WH 3-6381

September 14, 1960

4197

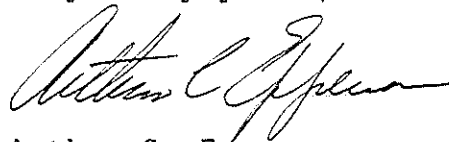
Mrs. Alice J. Duck
Clerk, Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

In reference to Case No. 4197, South Baldwin Hospital vs. Glenda Switzer, set for trial Thursday, September 15, Mr. James Brice, Attorney for South Baldwin Hospital, and I have agreed to take the case out of the call of this jury term, and I will withdraw my demand for a jury trial.

I will appreciate it very much if you will take care of this for us.

Very truly yours,



Arthur C. Epperson

ACE/at

cc: James A. Brice
Foley,
Alabama

SOUTH BALDWIN HOSPITAL)
CORPORATION,)
PLAINTIFF)
VS:)
GLEND A SWITZER,)
DEFENDANT)

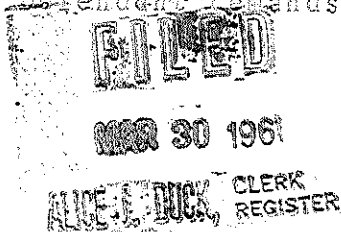
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Comes the Defendant in the above entitled cause and demurs to the Complaint, and separately and severally to each count thereof, and for grounds of demurrer, assigns, separately and severally the following:

1. From aught that appears there was no consideration for said promissory note.
2. From aught that appears there was no demand made upon the Defendant for payment.
3. From aught that appears the Defendant did not refuse to make payment of any amount due.

Arthur L. Epperson
ATTORNEY FOR DEFENDANT

The Defendant demands a trial by Jury.



Arthur L. Epperson
Attorney for Defendant