

STATE OF ALABAMA
BALDWIN COUNTY

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA

AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA: -

You are hereby commanded to summon Charlie Boothe to appear and plead, answer or demur, within thirty days from date of the service hereof, to a Bill of Complaint filed against him in Circuit Court, at Law, for said County and State by Jordan Clinic and Hospital, Inc., and at the same time and place to make return of your actions hereunder.

Given under my hand and seal this 24 day of March, 1960.

Alice J. Duck
CLERK OF COURT

JORDAN CLINIC AND HOSPITAL,
INC., a Corporation,

PLAINTIFF

- vs -

CHARLIE BOOTHE,

DEFENDANT

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 4220

COUNT ONE

The Plaintiff claims of the Defendant the sum of Two Hundred Eighty Seven and 80/100 (\$287.80) Dollars, due from him by account on the 30th day of July, 1957, which sum of money, with the interest thereon, is still unpaid.

FILED

MAR 24 1961

ALICE J. DUCK, CLERK
REGISTER

James B. Bailey
ATTORNEY FOR PLAINTIFF

23

MO. 42-2-1

JORDAN CLINIC AND HOSPITAL,
INC., a Corporation,

Plaintiff

- vs -

CHARLIE BOOTHE,

Defendant

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DEFENDANT'S ADDRESS:

RFD, FAIRHOPE, ALABAMA

Received 24 day of March 1960
and on 21 day of April 1960
I served a copy of the within etc
on Charlie Boathe

By service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Stedham D. S.

Sheriff claims 20 miles at
Ten Cents per mile Total \$ 2.00
TAYLOR WILKINS, Sheriff
BY Edleigh Stedham D. S.
DEPUTY SHERIFF

FILED
MAR 24 1961
ALICE L. DUCK, CLERK
REGISTER

DEFENDANT

NO. 4220

1.

That the matters alleged therein are untrue.

By:

Attorneys for the Defendant

The Defendant demands a trial by jury.

By:

Attorneys for the Defendant

FILED
4-25-60

42-20

Handwritten signature

JORDAN CLINIC AND HOSPITAL,
INC., A CORPORATION,

PLAINTIFF

VS

CHARLIE BOOTHE

DEFENDANT

ANSWER

FILED
APR 25 1960
ALICE J. DUCK, CLERK
REGISTER

JORDAN CLINIC AND HOSPITAL, INC.,
A CORPORATION,

PLAINTIFF

VS

CHARLIE BOOTHE,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

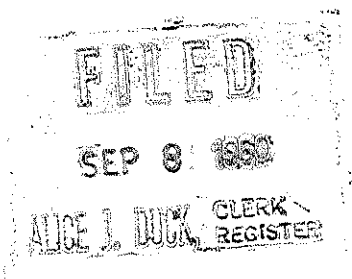
AT LAW

NO. 4220

Comes now the Defendant in the above styled cause and amends his
answer by adding the following answers and says:

2. That the debt sued on is barred by the Statute of limitations of
three years.
3. That the debt sued on is barred by the Statute of limitations of
six years.

WILTERS & BRANTLEY



By: 

Attorneys for the Defendant

4220

JORDAN CLINIC AND HOSPITAL, INC.
A CORPORATION,

PLAINTIFF

VS

CHARLIE BOOTH,

DEFENDANT

ANSWER

FILED

SEP 8 1960

ALICE I. DUCK, CLERK
REGISTER