

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Guarantee Reserve Life Insurance Company of Hammond, Indiana, a corporation, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Lorene Neese.

Witness my hand, this the 24 day of October, 1962.

Oliver L. Luck
Clerk

LORENE NEESE,

Plaintiff,

Vs.

GUARANTEE RESERVE LIFE IN-
SURANCE COMPANY, of HAMMOND,
INDIANA, a corporation,

Defendant.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5343

1.

The Plaintiff claims of the Defendant \$142.85, which sum of money, with interest thereon, due on the policy of insurance for that the Defendant on, to-wit: the 27th day of April, 1959, agreed to indemnify the Plaintiff, against hospital, medical and surgical expenses resulting from the sicknesses or injuries of the Plaintiff and the husband of the Plaintiff, Leonard Neese, and that the Plaintiff's husband, Leonard Neese did on the 10th day of August 1962 to the 13th day of August, 1962, inclusive, and from the 27th day of August, 1962 to the 1st day of September, 1962, inclusive, enter and remain in the Sacred Heart Hospital in Pensacola, Florida, on advice of his physician, because of his physical health. That during this period, the said policy was in full force and effect and while the Plaintiff had made due and legal proof of her expenses to the Defendant, the said Defendant has failed and refused to pay said sum claimed.

WILTERS & BRANTLEY

BY: James J. Wilters

Attorney for the Plaintiff

I certify that the Defendant, GUARANTEE RESERVE LIFE INSURANCE COMPANY OF HAMMOND, INDIANA, a corporation, is, and was prior to the 1st day of September, 1962, and is as of this date, a non resident of the State of Alabama; that it did do business and enter into a contract of insurance with the Plaintiff, Lorene Neese, in Baldwin County, Alabama, and that as a result of this contract, the Plaintiff has a cause of action against the Defendant.

Petitioner further avers that according to the records of the Department of Insurance, State of Alabama, that Edwin Currie, P. O. Box 1307, Montgomery, Alabama, has been designated by the Defendant, GUARANTEE RESERVE LIFE INSURANCE COMPANY OF HAMMOND, INDIANA, a corporation, as its true and lawful Attorney or Agent upon whom process may be served, in any action accruing or injuries from its doing of business or as an incident thereto, by any such non resident, or its agent, servant, or employee.

WILTERS & BRANTLEY

BY: 

Harry J. Wilters, Jr.

Sworn to and subscribed before me this the 24th day of October, 1962.


Notary Public

FILED

OCT 24 1962

ALICE L. DICK, CLERK
REGISTER

8084

RECEIVED IN OFFICE

OCT 25 1932

M. S. BUTLER, Sheriff

70,5343

Lorene Neese

Guarantee Reserve
Life Ins. Co. of
Hannover Ind.

264-4185

FILED

OCT 24 1932

ALICE J. DUCK, CLERK
REGISTER



STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Witness my hand, this the 13 day of March, 1963.

Alice J. Duck
Clerk

LORENE NEESE,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
GUARANTEE RESERVE LIFE IN-	X	AT LAW
SURANCE COMPANY OF HAMMOND,	X	CASE NO. <u>5343</u>
INDIANA, a corporation,	X	
Defendant.	X	

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The Plaintiff claims of the Defendant \$142.85, which sum of money, with interest thereon, due on the policy of insurance for that the Defendant on, to-wit: the 27th day of April, 1959, agreed to indemnify the Plaintiff against hospital, medical and surgical expenses resulting from the sickness or injuries of the Plaintiff and the husband of the Plaintiff, Leonard Neese, and that the Plaintiff's husband, Leonard Neese, did on the 10th day of August, 1962, to the 13th day of August, 1962, inclusive, and from the 27th day of August, 1962, to the 1st day of September, 1962, inclusive, enter and remain in the Sacred Heart Hospital in Pensacola, Florida, on advice of his physician, because of his physical health. That during this period, the said policy was in full force and effect, and while the Plaintiff had made due and legal proof of her expenses to the Defendant, the said Defendant has failed and refused to pay said sum claimed.

FILED

MAR 13 1963

ALICE J. DUCK, CLERK
REGISTER

WILTERS & BRANTLEY

527

BY:

Gary H. Wilters
Attorney for the Plaintiff

I certify that the Defendant, GUARANTEE RESERVE LIFE INSURANCE COMPANY OF HAMMOND, INDIANA, a corporation, is, and was prior to the 1st day of September, 1962, and is as of this date, a non resident of the State of Alabama; that it did do business and enter into a contract of insurance with the Plaintiff, Lorene Neese, in Baldwin County, Alabama, and that as a result of this contract, the Plaintiff has a cause of action against the Defendant.

Petitioner further avers that according to the records of the Department of Insurance, State of Alabama, that Mr. Edwin Currie, 2071 Union Avenue, Suite 205, Montgomery, Alabama, has been designated by the Defendant, GUARANTEE RESERVE LIFE INSURANCE COMPANY OF HAMMOND, INDIANA, a corporation, as its true and lawful Attorney or Agent upon whom process may be served, in any action accruing or injuries from its doing of business or as an incident thereto, by any such non resident, or its agent, servant, or employee.

WILTERS & BRANTLEY

BY: *Harry J. Wilters, Jr.*
Harry J. Wilters, Jr.

Sworn to and subscribed before me this the 12 day of March, 1963.

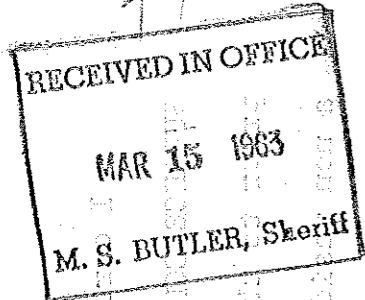
June B. Halcy
Notary Public

FILED

MAR 13 1963

ALICE L. DUCK, CLERK
REGISTER

64-3-18-63



Returned 18 day of Nov 1963

Not found in my County
after diligent search and
inquiry.

M. S. Butler, Sheriff

[Signature]

5343

Leone Nease
Pltz

DS

Guarantee Reserve
Life Insurance Co
lyt.

Amended Complaint



STATE OF ALABAMA
BALDWIN COUNTY

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Alice J. Duck
Clerk

LORENE NEESE,

Plaintiff,

Vs.

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SURANCE COMPANY OF HAMMOND,
INDIANA, a corporation,

Defendant.

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WILTERS & BRANTLEY

BY: Lang Wilters

Attorney for the Plaintiff

FILED

MAR 13 1963

ALICE J. DUCK, CLERK
REGISTERED

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WILTERS & BRANTLEY

BY:


Harry J. Wilters, Jr.

Sworn to and subscribed before me this the 12th day of March, 1963.


Notary Public

 FILED

MAR 13 1963

ANNE L. DUCK, CLERK
REGISTER

Montgomery, Ala., _____ October 29, 1962 _____ 19 _____

To the Sheriff _____ Baldwin _____ County,
_____ Bay Minette, _____ Alabama.

I enclose herewith. Dear Sheriff: There is no Edwin Currie listed in any of our directories. The postoffice box number you gave us belongs to The United Press. We contacted them and they say they never heard of Edwin Currie. If you can give us a better address, we will be glad to try again. Tell the Attorneys that if they will give us two copies, and the address of the Insurance Company, we can get it served through the State Superintendent of Insurance, if they want to.

Thank you,

Please serve and return as early as possible.

M. S. Butler

Sheriff of Montgomery County, Alabama

By: Carl Linzey - Clerk

(If not found in your county please advise promptly giving information as to present location, if possible.)

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BALDWIN COUNTY

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Alvin L. Duck
Clerk

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Plaintiff,

Vs.

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FILED

OCT 24 1962

ALVIN L. DUCK,

CLERK
REGISTER

WILTERS & BRANTLEY

BY:

Walter J. Wilters
Attorney for the Plaintiff

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WILTERS & BRANTLEY

BY:

Harry J. Wilters, Jr.

Sworn to and subscribed before me this the 24th day of October, 1962.

June B. Luder
Notary Public