

LAW OFFICES OF
LANGE, SIMPSON, ROBINSON & SOMERVILLE

EXCHANGE SECURITY BANK BUILDING
BIRMINGHAM 3, ALABAMA

FAIRFAX 3-8941

15 February 1962

RAY L. LANGE
JAMES A. SIMPSON
MEMORY L. ROBINSON
ORMOND SOMERVILLE
REID B. BARNES
JAMES O. HALEY
WHITE E. GIBSON, JR.
ROBERT MCD. SMITH
CHARLES B. ROBINSON
ROY W. SCHOLL, JR.
ALLEN D. RUSHTON
JAMES E. SIMPSON
JAMES L. CLARK
HENRY E. SIMPSON

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
At Law
Bay Minette, Alabama

Re: Lounette T. Ingram v. Blue Cross-Blue Shield
Case No. 5003

Dear Mrs. Duck:

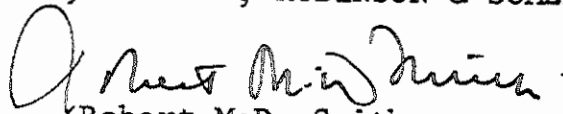
We are enclosing a demurrer in the above case. We should appreciate your entering our name as counsel for defendant and giving us notice of all settings of this case.

We should appreciate if you would let us know whether it is the practice in your court to have cases set in advance of trial date for settlement of the pleadings and also give us some idea of when the case will be called on either a pretrial or trial docket.

We shall greatly appreciate your cooperation.

Very truly yours,

LANGE, SIMPSON, ROBINSON & SOMERVILLE


Robert McD. Smith

RMS:jdn

Enclosure

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

JOHN CHASON
NORBORNE C. STONE, JR.
JOHN EARLE CHASON

PHONE 937-2191

March 20, 1962

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

Dear Mrs. Duck:

Re: Ingram vs. Blue Cross-Blue Shield
Circuit Court of Baldwin County
Case Number 5003

Would you please enter the appearance of this firm as
one of the attorneys for the Defendant in the above cause.

Thanking you for your attention to this matter, we are

Yours very truly,

CHASON & STONE

By: 

NCS:bw

CC: Hon. Robert McD. Smith
Exchange-Security Bank Building
Birmingham 3, Alabama

Walters, Brantley & Nesbit
Attorneys at Law
Robertsdale, Alabama



STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Blue Cross-Blue Shield of Alabama, a Corporation, to appear and plead, answer or demur within thirty days from the service hereto to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, by Lounette T. Ingram.

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

Alice J. Duck
Alice J. Duck, Clerk

LOUNETTE T. INGRAM

Plaintiff

VS

BLUE CROSS-BLUE SHIELD
OF ALABAMA, A Corporation

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5003

1.

The Plaintiff claims of the Defendant THREE HUNDRED TWO and 45/100 DOLLARS (\$302.45), with interest due on a policy of insurance whereby the Defendant, on to-wit: the 15th day of October, 1957, agreed to indemnify the Plaintiff against hospital, medical and surgical expenses resulting from the sickness or injuries of the Plaintiff, and the Plaintiff avers that on the 27th day of October, 1961, she entered the Mobile Infirmary, Mobile, Alabama, for the purpose of having a large maxillary cyst located at the mid-line of the upper maxillary area running from the canine fossa of the right side to the canine fossa of the left side, involving the floor of the nose and the right and left maxillary sinuses removed by surgery and that the same was removed by a duly qualified and licensed oral surgeon, and that she was discharged from said hospital on the 29th day of October, 1961. That during this period the said policy was in full force and effect and while the Plaintiff has made due and legal proof of her expenses to the Defendant, the said Defendant has failed and refused to pay said sum claimed.

FILED

JAN 24 1962

ALICE J. DUCK, CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

James Wilters
Attorneys for the Plaintiff

30

FEB 6 1962

*Blue Cross Blue
Shield of Ala.
a Corp.*

Mr. Venter

*Holt A. McDowell, Sheriff
Jefferson County, Alabama*

Holt A. McDowell, Sheriff of
Jefferson County, Alabama,
claims \$1.50 each for serving
process(es) and \$1.00
travel expense on each of
process(es) or a total of
\$2.50.
W. H. A. Deputy Sheriff,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5003

LUNETTE T. INGRAM

Plaintiff

VS

BLUE CROSS-BLUE SHIELD
OF ALABAMA, A Corporation

Defendant

FILED

JAN 24 1962

ALICE J. DUCK, CLERK
REGISTER

Winters, Brantley & Nesbit
Box 555
Robertsdale, Alabama

ad

JAN 25 AM 9:48

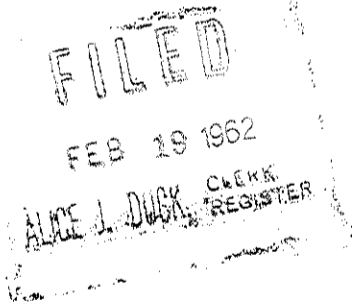
LOUNETTE T. INGRAM,)	IN THE CIRCUIT COURT OF
Plaintiff,	(BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
BLUE CROSS-BLUE SHIELD OF	(
ALABAMA, a corporation,)	CASE NO. 5003
Defendant.	(

D E M U R R E R

Comes the defendant, Blue Cross-Blue Shield of Alabama, a corporation, and demurs to the complaint heretofore filed and assigns as grounds of said demurrer, separately and severally, the following:

1. For that the averments thereof are mere conclusions of the pleader unsupported by sufficient averments of fact.
2. For that it does not appear in what manner the defendant has breached any duty owed to the plaintiff.
3. For that the averment that the "same was removed by a duly qualified and licensed oral surgeon" is a conclusion of the pleader.
4. For aught appearing the defendant did not agree to pay on behalf of the plaintiff for services of the type described in the complaint.

Lange, Simpson, Robinson & Somerville
 LANGE, SIMPSON, ROBINSON & SOMERVILLE
 Attorneys for Defendant



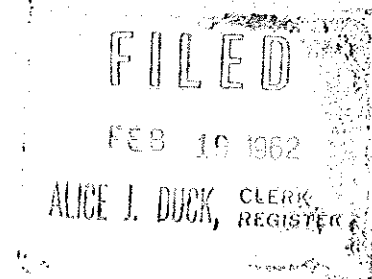
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

LOUNETTE T. INGRAM,
Plaintiff,

vs.

BLUE CROSS-BLUE SHIELD
OF ALABAMA,
Defendant.

DEMURRER



LAW OFFICES OF
LANGE, SIMPSON, ROBINSON & SOMERVILLE
EXCHANGE SECURITY BANK BUILDING
BIRMINGHAM, ALA.

LOUNETTE T. INGRAM,

Plaintiff,

vs.

BLUE CROSS-BLUE SHIELD
OF ALABAMA, A Corporation,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5003

PLEA:

Comes now the Defendant in the above styled cause, by its attorneys, and for answer to the Complaint heretofore filed against it, pleads as follows:

1. The allegations of the Complaint are untrue.

Respectfully submitted,

LANGE, SIMPSON, ROBINSON & SOMERVILLE

and

CHASON & STONE

By:


Attorneys for Defendant

*Filed 7/9/63
Hester
gr*