

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Guarantee Trust Life Insurance Company 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 Joseph Randolph Reichler, suing by and through his guardian, Catherine Walker.

WITNESS my hand this 23 day of August, 1965.

Basie French
Clerk

The defendant may be served by serving a copy of the summons and complaint on the Superintendent of Insurance for the State of Alabama, Montgomery, Alabama.

* * * * *

JOSEPH RANDOLPH REICHLER, a
minor suing by and through
Catherine Walker, as his guardian,

Plaintiff,

VS.

GUARANTEE TRUST LIFE INSURANCE
COMPANY,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

70-6652

COMPLAINT

COUNT ONE

The plaintiff claims of the defendant Twenty-five Hundred Dollars (\$2500.00) due on a policy, whereby the defendant on the 15th day of October, 1964, insured Hazel Reichler against the loss of her life resulting directly and independently of all other causes from accidental bodily injuries. The plaintiff avers that the said Hazel Reichler lost her life solely from bodily injuries effected directly and independently of all other causes through accidental means, which death occurred on the 23rd day of October, 1964, of which the defendant has had notice. The plaintiff avers that he is the owner of said policy and is the beneficiary named therein and claims the proceeds thereof, together with interest at the rate of six percent per annum.

EX-8-25-65

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X. R. O.
Attorney for Plaintiff

FILED
AUG 23 1965
CLERK

JOSEPH RANDOLPH REICHLER, a
minor suing by and through
Catherine Walker, as his guardian,

Plaintiff,

VS.

GUARANTEE TRUST LIFE INSURANCE
COMPANY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

INTERROGATORIES PROPOUNDED TO DEFENDANT

Now comes the plaintiff in the above styled cause and
propounds the following interrogatories to the defendant in this
cause:

1. On October 15, 1964, did you issue policy number
1-D-184620 to Hazel Reichler?

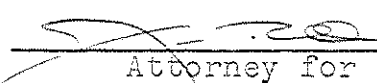
2. If your answer to interrogatory number one is yes,
do you have the original policy in your possession?

3. If your answer to interrogatory number two is yes,
please attach a copy of the said insurance policy to your answers
to these interrogatories.

4. Have you received due proof that the said Hazel
Reichler, referred to in interrogatory number one, to whom your
said insurance policy was issued, died accidentally during the
month of October, 1964?

5. Have you had notice that the said Hazel Reichler,
who was insured under your policy number 1-D-184620 died accidentally
during the month of October, 1964?

6. Have you paid the proceeds of the said policy referred
to in interrogatory number one to the beneficiary of the said policy,
Joseph Reichler?


Attorney for Plaintiff

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared
James R. Owen, who first being duly and legally sworn, deposes and
says: That he is the attorney for the plaintiff in the above styled
cause; that the answers to the foregoing interrogatories will be

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CLERK

material testimony for the plaintiff in the trial of the said cause.

Sworn to and subscribed before me on
this the 23rd day of August, 1965.

Ernestine R. Sims
Notary Public, Baldwin County, Alabama

EX-8-25-65

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710 665-2

RECEIVED IN OFFICE
RECEIVED
AUG 25 1965
AUG 24 1965
M. S. BUTLER, Sheriff
TAYLOR WILKINS
SHERIFF

Joseph Randolph Pecklee
attorney

vs.

Guarantee Trust Life
Insurance Co.

Executed by serving 3 copies of
the within on Walter S.
Hornum Superintendent
of Insurance, State of Alabama
This The 25 day of Aug 1965

Sheriff of Montgomery County
M. S. Butler
By J. H. Harned D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$ 20
M. S. Butler, Sheriff
Montgomery County, Ala.

FILED

AUG 23 1965

ALICE J. DICK, CLERK
REGISTER

Joe R. Owens, sal 7W
comp

STATE OF ALABAMA

DEPARTMENT OF INSURANCE

I, the undersigned as Superintendent of Insurance for the State of Alabama,
hereby certify that on the 25th day of August, 1965, I sent
by registered mail in an envelope as follows:

Guarantee Trust Life Insurance Company
2537 West Montrose
Chicago 18, Illinois

REGISTERED MAIL
RETURN RECEIPT REQUESTED

and Interrogatories
bearing sufficient prepaid postage, a copy of a summons and complaints/served upon
me by the Sheriff of Montgomery County, Alabama, in a cause styled as follows:

Joseph Randolph Reichler, a minor suing by and through
Catherine Walker, as his guardian _____, Plaintiff

in the Circuit Court of Baldwin County

VERSUS

(Name of Court)
Guarantee Trust Life Insurance Company, Defendant

And that on the 30th day of August, 1965, I received
the return card showing receipt by the designated addressee of said envelope on
the 25th day of August, 1965.

Witness my hand and official seal this the 30th day of August,
1965.

Walter S. Houseal
SUPERINTENDENT OF INSURANCE

TELEPHONE
787-4659
P. O. BOX 8332

LAW OFFICES OF
S. PALMER KEITH, JR.

812-815 UNITED SECURITY BUILDING, ENSLEY
BIRMINGHAM, ALABAMA 35218

January 10, 1966

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

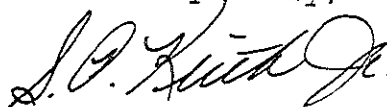
Re: Reichler vs. Guarantee Trust
Life Insurance Company
No. 6652 and 6653

Dear Mrs. Duck:

Attached please find check in the amount of \$3,053.40 representing payment in full of the judgments and court costs in the above styled causes.

Also attached are the two cost bills recently forwarded to me by your office. It would be appreciated if you would mark these two cost bills paid in full and return them, together with a receipt for \$3,053.40, to me at the above address at your earliest convenience.

Yours very truly,



S. PALMER KEITH, JR.

SPKjr:jmc

cc: Mr. James R. Owen
Attorney at Law
Bay Minette, Alabama