

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.

Alice J. Duck
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

COMPLAINT
COUNT ONE

The plaintiff claims of the defendant One Thousand Dollars (\$1,000.00) due on a policy, whereby the defendant on the 15th day of October, 1964, insured the life of Hazel Reichler, who died on October 23, 1964, of which the defendant had notice. Said policy is the property of the plaintiff.

64-8-25-65

X
Attorney for plaintiff

FILED
AUG 25 1965
ALICE J. DUCK, CLERK
COURT 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?

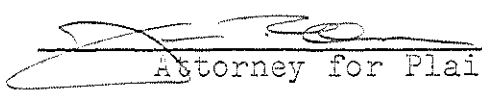
2. If your answer to interrogatory number one is yes,
do you have the original policy in your possession?

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

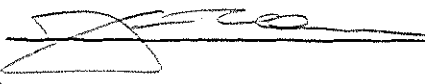
STATE OF ALABAMA)

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

FILED
OCT 29 1964
CLERK
REGISTER

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

JOSEPH RANDOLPH REICHLER, ETC.

Plaintiff

-vs-

GUARANTEE TRUST LIFE
INSURANCE COMPANY

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6653

ANSWERS TO INTERROGATORIES

Now comes the Defendant and for answer to interrogatories heretofore propounded to it by the Plaintiff says as follows:

1. Yes.

2. Yes.

3. See attached.

4. We received proof that Hazel Reichler died during the month of October, 1964.

5. We have had notice that Hazel Reichler died during the month of October, 1964.

6. No.

GUARANTEE TRUST LIFE INSURANCE COMPANY

BY:

Thomas B. Dunkin
THOMAS B. DUNKIN, VICE PRESIDENT

STATE OF ILLINOIS

COOK COUNTY

Before me, the undersigned authority in and for said County and State, personally appeared THOMAS B. DUNKIN, who being by me first duly sworn, deposes and says that he has authority to make this affidavit and that the foregoing Answers to Interrogatories are true and correct to the best of his knowledge, information and belief.

Thomas B. Dunkin
THOMAS B. DUNKIN

Sworn to and subscribed before me

this 15th day of October, 1965.

Notary Public
NOTARY PUBLIC

FILED

OCT 27 1965

ALICE L. DICK, CLERK
REGISTER

6653

*Joseph Randolph Tucker
a minor*

05-

*Guarantee Trust Life
Insurance Co*

RECEIVED IN OFFICE

AUG 25 1965

JAYLOR WILKINS
M. S. BUTLER, Sheriff

Executed by serving 3 copies of
the within on Walter S.

W. S. Butler Superintendent
of Insurance, State of Alabama

This The 25 day of Aug 1965

Sheriff of Montgomery County

M. S. Butler,

By J. W. Butler S.

The Sheriff claims 2

miles at 10c per mile for a total
of \$ 20

M. S. Butler, Sheriff
Montgomery County, Ala.

FILED

AUG 25 1965

MADE I. TUCKER, CLERK
REGISTER

NO. 6653

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

JOSEPH RANDOLPH REICHLER, ETC.

Plaintiff

-VS-

GUARANTEE TRUST LIFE INSURANCE
COMPANY

Defendant

ANSWERS TO INTERROGATORIES

S. P. KEITH, JR.
ATTORNEY FOR DEFENDANT

JOSEPH RANDOLPH REICHLER, A
MINOR, ETC.

Plaintiff

-vs-

GUARANTEE TRUST LIFE
INSURANCE COMPANY

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW


NO. 6653

P L E A


Now comes the Defendant, GUARANTEE TRUST LIFE INSURANCE COMPANY, by its attorney, S. P. KEITH, JR., and for answer to the Complaint heretoforefiled in this cause, says as follows:

1. Defendant for answer to the Complaint says that the allegations contained therein are untrue.

2. Defendant for answer to the Complaint says that it is not guilty of the matters alleged therein.


ATTORNEY FOR DEFENDANT

I hereby certify that a copy of the foregoing Plea has been mailed by U. S. Mail, postage prepaid, to JAMES R. OWEN, Attorney for the Plaintiff, on this the 3rd day of September, 1965.


ATTORNEY FOR DEFENDANT

*Filed 9-7-65
Avery J. Smith*

NO. 6653

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JOSEPH RANDOLPH REICHLER, A
MINOR, ETC.

Plaintiff

-vs-

GUARANTEE TRUST LIFE INSURANCE
COMPANY

Defendant

P L E A

S. P. KEITH, JR.
ATTORNEY FOR DEFENDANT

JOSEPH RANDOLPH REICHLER, A
MINOR, ETC.

Plaintiff

-vs-

GUARANTEE TRUST LIFE
INSURANCE COMPANY

Defendant

X
:
X
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X
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X
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X
:
X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. _____

DEMURRERS

Now comes the Defendant, GUARANTEE TRUST LIFE INSURANCE COMPANY, by its attorney, S. P. KEITH, JR., and demurs to the Complaint heretofore filed in this cause, and as grounds therefor sets out and assigns the following, separately and severally:

1. For that the Complaint fails to state a cause of action.
2. For that the allegations of the Complaint are mere conclusions of the pleader.
3. For that the allegations of the complaint are too indefinite, uncertain and ambiguous.
4. For that the allegation "Hazel Reichler lost her life solely from bodily injuries effected directly and independently of all other causes through accidental means" is a mere conclusion of the pleader.



ATTORNEY FOR DEFENDANT

I hereby certify that a copy of the foregoing Demurrers has been mailed by U. S. Mail, postage prepaid, to JAMES R. OWEN, Attorney for the Plaintiff, on this the 3rd day of September, 1965.



ATTORNEY FOR DEFENDANT

NO. _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

JOSEPH RANDOLPH REICHLER, A
MINOR, ETC.

Plaintiff

-vs-

GUARANTEE TRUST LIFE INSURANCE
COMPANY

Defendant

4653

D E M U R R E R S

S. P. KEITH, JR.
ATTORNEY FOR DEFENDANT