

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 6714

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Bankers Life and Casualty Company, a corporation

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed  
in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....  
Bankers Life and Casualty Company, a corporation....., Defendant.....

by John T. Evans....., Plaintiff.....

Witness my hand this 30th day of September 1965

Alice J. Clark Clerk

JOHN T. EVANS,

PLAINTIFF,

VS

BANKERS LIFE AND CASUALTY  
COMPANY, a Corporation

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 6714


The Plaintiff claims of the Defendant benefits under that certain policy of insurance issued by the Defendant to John T. Evans, Policy No. 560,195,924, and the Plaintiff avers that he has paid a valuable consideration to the Defendant and for such consideration paid by the Plaintiff to the Defendant, the Defendant agrees to insure the Plaintiff against loss of life, limb, sight, or time by accidental bodily injury or loss of time by sickness.

II

Plaintiff avers that on, to-wit, July 3, 1964 through January 5, 1965, he was ill and was totally disabled and that under the aforesaid policy, he was entitled to \$100.00 per month or \$606.66, and that he has made a report to the Defendant of the said loss under the said policy contract and the Defendant has denied payment to him.

WHEREFOR, PLAINTIFF PRAYS:

- a. That process issue requiring the Defendant to be and appear in this Court at the time and in the manner required by law, to answer this complaint.
- b. That Plaintiff be awarded a judgement herein in the sum of \$606.66, plus Court costs, expenses, and reasonable attorney fees.
- c. That Plaintiff have such other and further relief that he may be entitled to receive.

  
William P. Boggs, Attorney for  
Plaintiff, Daphne, Alabama

FILED

SEP 30 1965

ALICE L. DUCK, CLERK  
REGISTER

JOHN T. EVANS,

PLAINTIFF,

VS

BANKERS LIFE AND CASUALTY  
COMPANY, a Corporation

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William P. Boggs, Attorney for  
Plaintiff, Daphne, Alabama

**FILED**

SEP 30 1965

Alice J. Duck, CLERK  
REGISTER

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PLAINTIFF,  
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COMPANY, a Corporation  
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IN THE CIRCUIT COURT OF  
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AT LAW

CASE NO. \_\_\_\_\_

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FILED

SEP 30 1965

ALICE J. DUCK, CLERK  
REGISTER

William P. Boggs, Attorney  
Plaintiff, Baldwin, Alabama

STATE OF ALABAMA

DEPARTMENT OF INSURANCE

I, the undersigned as Superintendent of Insurance for the State of Alabama, hereby certify that on the 27th day of December, 1965, I sent by registered mail in an envelope as follows:

Bankers Life & Casualty Company  
4444 West Lawrence Avenue  
Chicago, Illinois 60630

REGISTERED MAIL  
RETURN RECEIPT REQUESTED

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

John T. Evans, Plaintiff

in the Circuit Court of Baldwin County

VERSUS

Bankers Life and Casualty Company, a corp., Defendant  
(Name of Court)

And that on the 3rd day of January, 1966, I received the return card showing receipt by the designated addressee of said envelope on the 29th day of December, 1965.

Witness my hand and official seal this the 4th day of January, 1966.

FILED  
JAN 5 66

CLERK  
REGISTER

Walter S. McNeal  
SUPERINTENDENT OF INSURANCE

JOHN T. EVANS,

PLAINTIFF

VS

BANKERS LIFE AND CASUALTY  
COMPANY, a corporation

DEFENDANT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NO.

6714

.....

Before me, Ruth K. Howell, a Notary Public in and for said State and County, personally appeared Wilson Hayes, One of the Attorneys for the Plaintiff and, being sworn, says:

That Defendant, Bankers Life and Casualty Company, a Corporation, is a foreign corporation whose address is 4444 W. Lawrence Avenue, Chicago, Illinois, 60630.

Wilson Hayes

Sworn to and subscribed before me this the 3<sup>rd</sup> day of

December, 1965.

Ruth K. Howell  
Notary Public, Baldwin Co., Ala.

Filed 12-3-65  
Beirfrench

JOHN T. EVANS,  
PLAINTIFF,  
VS  
BANKERS LIFE AND CASUALTY  
COMPANY, a Corporation  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 6714

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William P. Boggs, Attorney for  
Plaintiff, Daphne, Alabama

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MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

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....., Plaintiff.....

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64-12-27-65

Alice J. Duck Clerk



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Page.....

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

JOHN T. EVANS

Plaintiffs

vs.

BANKERS LIFE AND CASUALTY COMPANY  
a Corporation Defendants

SUMMONS AND COMPLAINT

Filed September 30, 19 65

Alice J. Duck Clerk

William P. Boggs

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

4444 W. Lawrence Ave  
Chicago, Illinois - 60630

Received In Office  
RECEIVED IN OFFICE

19.....

DEC 27 1965

Sheriff

M. S. Butler Sheriff

this 19.....

by leaving a copy with

Executed by serving 2 copies of

the within on Walter S.

Flanagan Superintendent

of Insurance, State of Alabama

This The 27 day of Dec 19 65

Sheriff of Montgomery County

M. S. Butler

By J. B. ... D. S.

The Sheriff's Office  
fills at 10¢ per page for a total  
of \$ 20

M. S. Butler Sheriff  
Montgomery County, Ala.

Sheriff

Deputy Sheriff