

AUTO-OWNERS INSURANCE COMPANY,
A Corporation,

Plaintiff,

vs.

HUBERT W. TURNER, individually
and doing business as GUY
TURNER AGENCY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE. NO. 6962.

AMENDED COMPLAINT:

Comes the Plaintiff in the above styled cause, by its Attorneys, and amends the complaint heretofore filed in said cause, so that as amended, the same shall read as follows:

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND FIVE HUNDRED FORTY AND 01/100 DOLLARS (\$1,540.01) due from him by account on the 28th day of January, 1965, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND FIVE HUNDRED FORTY AND 01/100 DOLLARS (\$1,540.01) due from him on account stated between the Plaintiff and the Defendant on the 28th day of January, 1965, which sum of money, with the interest thereon, is still unpaid.

OWENS AND PATTON

By: Walt S. Patton
Attorneys for Plaintiff.

I, the undersigned, one of the attorneys of record for the Plaintiff in the within styled cause, do hereby certify that I have forwarded a copy of the foregoing amended complaint to E. G. Rickarby, the attorney of record for the defendant, by United States Mail, postage prepaid, properly addressed on this the 25th day of January, 1967.

FILED

JAN 26 1967

ALICE L. NUCK, CLERK
REGISTERED

AUTO-OWNERS INSURANCE COMPANY,)
A Corporation,)

Plaintiff,)

vs.)

HUBERT W. TURNER, individually)
and doing business as GUY)
TURNER AGENCY,)

Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND FIVE HUNDRED FORTY AND 01/100 DOLLARS (\$1,540.01) due from him by account on the 28th day of January, 1965, which sum of money, with the interest thereon, is still unpaid.

COUNT TWO:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND FIVE HUNDRED FORTY AND 01/100 DOLLARS (\$1,540.01) due from him by account on the 28th day of January, 1965, which sum of money, with the interest thereon, is still unpaid.

COUNT THREE:

The Plaintiff claims of the Defendant, the sum of ONE THOUSAND FIVE HUNDRED FORTY AND 01/100 DOLLARS (\$1,540.01) due from him by account on the 28th day of January, 1965, which sum of money, with the interest thereon, is still unpaid.

J. CONNOR OWENS, JR.,

By: Walter S. Patton
Walter S. Patton
Attorney for Plaintiff.

FILED
MAY 11 1966
ALICE L. HICK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon HUBERT W. TURNER
FAIRHOPE, ALABAMA

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.....

Hubert W. Turner

....., Defendant.....

by AUTO-OWNERS INSURANCE COMPANY, a corporation,

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

Witness my hand this.....13th.....day of.....May.....19.66

Asie J. Welch Clerk

No. 6967

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

AUTO-OWNERS INSURANCE

COMPANY, a corporation,

Plaintiffs

vs.

HUBERT W. TURNER

Defendants

SUMMONS AND COMPLAINT

Filed May 13 1966

Alfred J. Welch Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED

Received In Office

MAY 13 1966

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this 5-19 1966

by leaving a copy with

Hubert W. Turner
(F. H. Turner)

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY Roy Randall
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Roy Randall Deputy Sheriff

CODE 205
Telephone: 923-9836

LAW OFFICES

Mailing Address
P.O. BOX 471

E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

June 10, 1966

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Auto-Owners Insurance Company
Vs: Hubert W. Turner
File No. 66-152

Enclosed find Pleas for Defendant. Mailing a copy of
this Plea to Mr. J. Conner Owens, Jr., Attorney for the
Plaintiff.

Yours very truly,



EGR/jlb
Encl.
cc: Mr. Hubert W. Turner
6-24-66

AUTO-OWNERS INSURANCE COMPANY,
A Corporation,

Plaintiff,

VS.

HUBERT W. TURNER, Individually
and doing business as GUY
TURNER AGENCY,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

LAW SIDE.

P L E A S

Comes the Defendant, HUBERT W. TURNER, and offers the following Pleas to the Plaintiff's Complaint:

Defendant avers that the allegations of the Complaint are untrue. The Defendant, for Answer to said Complaint, says that he has paid the debt for the recovery of which this suit was brought before the action was commenced.


Attorney for Defendant.

FILED

JUN 12 1964

ALICE J. DUCK, CLERK
RECEIVED

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by depositing in the United States Mail a copy of same in an envelope with adequate postage prepaid the same and proper addressed.
This 5th day of June, 1964

E. G. RICHARDS


Attorney for Plaintiff
P. O. Box 471, Fairhope, Ala. 36525

AUTO-OWNERS INSURANCE COMPANY,)	IN THE CIRCUIT COURT OF
A Corporation,)	
)	BALDWIN COUNTY, ALABAMA
Plaintiff,)	
vs.)	LAW SIDE. NO. 6962.
HUBERT W. TURNER, individually)	
and d/b/a GUY TURNER AGENCY,)	
Defendant.)	

Now comes the Plaintiff in the above styled cause, by and through its Attorneys of Record, and shows unto this Court that on February 27, 1967, a judgment by consent in favor of the Plaintiff in this cause and against the Defendant in this cause was entered in the amount of \$1200.00 plus costs; that it was also entered on the docket sheet of the Circuit Court of Baldwin County, Alabama, that said judgment was to be paid at the rate of \$50.00 per month, with interest at the rate of six percent per annum.

Plaintiff further alleges that the Defendant did, on the 27th day of February, 1967, make a payment of \$50.00; that another payment in the amount of \$50.00 was due and payable on or before the 27th day of March, 1967, which payment has not, to the date hereof been made;

WHEREFORE, Plaintiff respectfully prays that this Court will make and enter an order setting a date for the hearing of this Petition for the Defendant to show cause why your Honor should not order execution to be issued against the Defendant in this cause; Plaintiff further prays that your Honor will, upon a hearing of this matter, enter an order allowing a Certificate of Judgment to be issued and recorded in the Offices of the Probate Judge of Baldwin County, Alabama, and Mobile County, Alabama; Plaintiff prays for such other, further and different relief in the premises to which it might be entitled.

OWENS AND PATTON

FILED

APR 13 1967

MADE L. BUCK, CLERK
REGISTER

By: Walter J. Patton
Attorneys for Plaintiff.

AUTO-OWNERS INSURANCE COMPANY,)	
a Corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA
vs.)	
HUBERT W. TURNER, individually)	LAW SIDE. NO. 6962
and d/b/a GUY TURNER AGENCY,)	
Defendant.)	

ORDER:

This day came Auto-Owners Insurance Company, the Plaintiff in the above styled cause, by and through its Attorneys of Record, and filed its petition praying that the Defendant Hubert W. Turner, be required to appear and show cause why this Court should not order execution to be issued against the Defendant under that certain consent judgment entered in favor of the Plaintiff and against the Defendant in this cause on February 27, 1967, which judgment is in the amount of \$1200.00 plus costs and interest at 6% per annum, and which amount was to be payable at \$50.00 per month; and further praying that a Certificate of Judgment be issued in the matter to be recorded in the Offices of the Probate Judge of Baldwin County, Alabama, and Mobile County, Alabama; upon consideration of all of which, it is, therefore,

ORDERED, ADJUDGED AND DECREED by the Court that the said Hubert W. Turner, individually and d/b/a Guy Turner Agency, be and appear before this Court at 11:20 o'clock A M., on the 25th day of April, 1967, in the Court Room of the Circuit Court of Baldwin County, Alabama, Bay Minette, Alabama, and show cause why execution under said judgment should not be issued and why said Certificate of Judgment should not be issued and recorded.

Let a copy of said petition and of this order be served forthwith, personally upon the said Hubert W. Turner at Fairhope, Alabama, by the Sheriff of Baldwin County, Alabama.

DONE this 13th day of April, 1967.

FILED

APR 18 1967

ALICE J. DUCK, CLERK
REGISTER

Julian J. Madaleno
Circuit Judge.

152-12

6962

Auto-Owners Insurance
Co. a corp.

Pltf.

vs.

Hubert W. Turner ind.,
+ Alta-Guy Turner
Agency, Def.

Petition + Order

FILED
APR 12 1967
ALICE J. BUCK, CLERK
REGISTERED

Walter S. Patton

Filed 13 day of April 1967

at day of 19

and a copy of the within

Hubert W. Turner

service on

TAYLOR WILKINS, Sheriff

By

Returned 14 day of April 1967
Not found to be correct after diligent search and in-
quiry
Taylor Wilkins Sheriff
Ray Randall Deputy Sheriff

AUTO-OWNERS INSURANCE COMPANY,)
A Corporation,)

Plaintiff,)

vs.)

HUBERT W. TURNER, individually)
and d/b/a GUY TURNER AGENCY,)

Defendant.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE. NO. 6962.

Now comes the Plaintiff in the above styled cause, by and through its Attorneys of Record, and shows unto this Court that on February 27, 1967, a judgment by consent in favor of the Plaintiff in this cause and against the Defendant in this cause was entered in the amount of \$1200.00 plus costs; that it was also entered on the docket sheet of the Circuit Court of Baldwin County, Alabama, that said judgment was to be paid at the rate of \$50.00 per month, with interest at the rate of six percent per annum.

Plaintiff further alleges that the Defendant did, on the 27th day of February, 1967, make a payment of \$50.00; that another payment in the amount of \$50.00 was due and payable on or before the 27th day of March, 1967, which payment has not, to the date hereof been made;

WHEREFORE, Plaintiff respectfully prays that this Court will make and enter an order setting a date for the hearing of this Petition for the Defendant to show cause why your Honor should not order execution to be issued against the Defendant in this cause; Plaintiff further prays that your Honor will, upon a hearing of this matter, enter an order allowing a Certificate of Judgment to be issued and recorded in the Offices of the Probate Judge of Baldwin County, Alabama, and Mobile County, Alabama; Plaintiff prays for such other, further and different relief in the premises to which it might be entitled.

OWENS AND PATTON

By: Walter S. Patton
Attorneys for Plaintiff.

FILED

APR 18 1968

ALICE L. BUCK, CLERK
REGISTER

AUTO-OWNERS INSURANCE COMPANY,)	
a Corporation,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
vs.)	BALDWIN COUNTY, ALABAMA
)	
HUBERT W. TURNER, individually)	
and d/b/a GUY TURNER AGENCY,)	LAW SIDE. NO. 6962
Defendant.)	

ORDER:

This day came Auto-Owners Insurance Company, the Plaintiff in the above styled cause, by and through its Attorneys of Record, and filed its petition praying that the Defendant Hubert W. Turner, be required to appear and show cause why this Court should not order execution to be issued against the Defendant under that certain consent judgment entered in favor of the Plaintiff and against the Defendant in this cause on February 27, 1967, which judgment is in the amount of \$1200.00 plus costs and interest at 6% per annum, and which amount was to be payable at \$50.00 per month; and further praying that a Certificate of Judgment be issued in the matter to be recorded in the Offices of the Probate Judge of Baldwin County, Alabama, and Mobile County, Alabama; upon consideration of all of which, it is, therefore,

ORDERED, ADJUDGED AND DECREED by the Court that the said Hubert W. Turner, individually and d/b/a Guy Turner Agency, be and appear before this Court at 11:00 o'clock A. M., on the 25th day of April, 1967, in the Court Room of the Circuit Court of Baldwin County, Alabama, Bay Minette, Alabama, and show cause why execution under said judgment should not be issued and why said Certificate of Judgment should not be issued and recorded.

Let a copy of said petition and of this order be served forthwith, personally upon the said Hubert W. Turner at Fairhope, Alabama, by the Sheriff of Baldwin County, Alabama.

DONE this 13th day of April, 1967.

Telfair J. Mashburn

Circuit Judge.

FILED

APR 19 1967

ALICE J. HUCK, CLERK
REGISTER