

FOREMAN & BROWN
ATTORNEYS AT LAW

SUITE 210 VAN ANTWERP BUILDING

MOBILE, ALABAMA
36602

AREA CODE 205
432-2792

ALEXANDER FOREMAN, JR. (1914-1966)
ALTON R. BROWN, JR.
JAMES A. JOHNSTON
PETER V. SINTZ

December 5, 1967

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

Re: Joseph S. Southall Vs.
Standard Life & Accident Ins. Co., et al

Dear Mrs. Duck:

We are enclosing two complaints in the above styled
cause, and respectfully request that you file same.

Yours very truly,

FOREMAN & BROWN

By  James A. Johnston

JAJ/mh

Enclosures

JOSEPH S. SOUTHALL,

Plaintiff,

Vs.

STANDARD LIFE & ACCIDENT
INSURANCE COMPANY, a corpora-
tion, et al

Defendants

*

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*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY,

ALABAMA

AT LAW

CASE NO.

AMENDMENT

Comes now the Plaintiff in the above styled cause and
amends Count One (A) of his Complaint heretofore filed herein
by adding the following allegation at the end of said count:

1. Said policy is the property of the Plaintiff.

FOREMAN & BROWN
Attorneys for Plaintiff

BY James A. Johnston
James A. Johnston

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 30th
day of Jan, 1968 served a copy of the
foregoing pleading on counsel for all parties to this proceeding
by mailing the same by United States mail, properly addressed,
and first class postage prepaid.

James A. Johnston

FILED

JAN 30 1968

ALICE J. DUCK

CLERK
REGISTER

832

JOSEPH S. SOUTHALL	*	IN THE CIRCUIT COURT OF
Plaintiff,	*	BALDWIN COUNTY,
VS.	*	ALABAMA

STANDARD LIFE & ACCIDENT IN- *
 SURANCE COMPANY, a corporation, *
 & XYZ, the persons, firms or *
 corporations, who wrote the be- *
 low described policies to *
 Joseph Southall, or who re- *
 ceived premium payments on *
 the same, who are otherwise *
 unknown, but whose true name *
 and legal status will be add- *
 ed by amendment when ascer- *
 tained, jointly and severally,

Defendants * CASE NO. 7890

COUNT ONE

The Plaintiff claims of the Defendants, Nine Thousand (\$9,000.00) Dollars, plus interest and costs due on policy of insurance, said Policy No. being SS51091, whereby the Defendants on, to-wit; the 5th day of October, 1959, by virtue of a policy of accident insurance insured, Irma S. Southall, who died on, to-wit; the 18th day of May, 1967, as a result of injuries sustained in an automobile accident on, to-wit; the 19th day of April, 1967, of which the Defendants had notice. Said policy is the property of the Plaintiff.

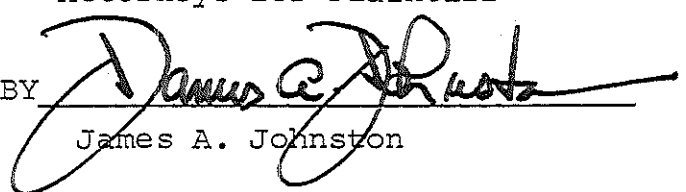
COUNT ONE (A)

Plaintiff claims of the Defendants the sum of Nine Thousand (\$9,000.00) Dollars, plus interest and costs due on a policy of accident insurance, Policy No. SS51091, for that on, to-wit; the 5th day of October, 1959, the Defendants entered into a written contract of insurance insuring Plaintiff's wife, Irma S. Southall, against death, hospital expense, and providing monthly accident benefits for injuries sustained as a result of accidental injury sustained while driving or riding within any automobile, truck, or bus, said death benefits becoming due if said accidental injury resulted in death within sixty (60) days from date of the accident. Plaintiff avers that on, to-wit; the 19th day of April, 1967, while this policy was in full force and effect, Plaintiff's wife, Irma S. Southall, was injured in an automobile accident which

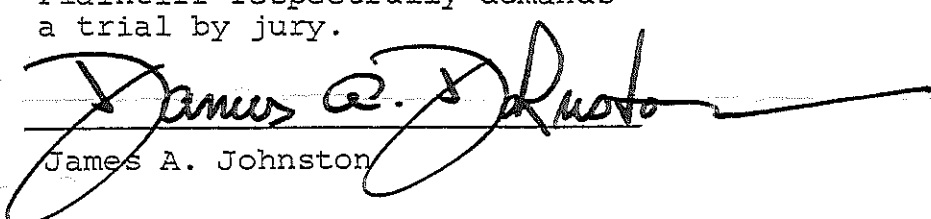
resulted in her death, on, to-wit; the 18th day of May, 1967,
of which Defendants had notice, that Plaintiff has made demand
in accordance with the provisions of said policy upon Defendants,
and that Defendants have refused to pay any and all sums due
under said contract, hence this suit.

FOREMAN & BROWN
Attorneys for Plaintiff

BY


James A. Johnston

Plaintiff respectfully demands
a trial by jury.


James A. Johnston

Service will be accepted by the firm Johnston, Johnston & Nettles
810 Van Antwerp Building
Mobile, Alabama

In accordance with instructions received from Standard Life and
Accident Insurance Company.

Service accepted this the 5th day of December, 1967.

*Robert D. Kendall
attorney for Defendant*

FILED

DEC 6 1967

ALICE J. DUCK CLERK
REGISTER

JOSEPH S. SOUTHALL,
Plaintiff,
VS.

STANDARD LIFE & ACCIDENT
INSURANCE COMPANY, a
corporation, et al,
Defendants.

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

A N S W E R

Come now the defendants in the above styled cause and for answer to the complaint and to each count thereof, separately and severally, assigns the following separate and several plea:

1. Not guilty.

JOHNSTON, JOHNSTON & NETTLES
Attorneys for the Defendants

BY

Robert G. Kendall
ROBERT G. KENDALL

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the defendants in the above styled cause with a copy of this plea and complaint by placing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

This 8 day of February, 1968

Robert G. Kendall
Attorney for Defendant

FILED

FEB 11 1968

ALICE J. DICK CLERK