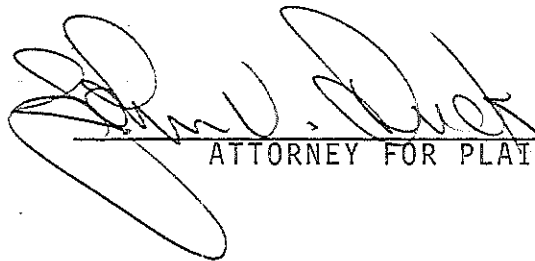


J. B. COOPER,)
Plaintiff,)
vs.)
ALLSTATE INSURANCE COMPANY,)
a corporation,)
Defendant.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
8843

Plaintiff claims of the Defendant TWENTY-TWO THOUSAND (\$22,000.00) DOLLARS, the value of one 1948 Chevrolet 1-1/2 ton Truck, Identification #1063722, with all well-drilling equipment, and one 1952 Chevrolet Truck, Identification #BL203G92, which the Defendant, on, to-wit: the 26th day of November, 1969 insured against loss or injury by fire and other perils in the Policy of Insurance mentioned, for the term one year, which personal property was wholly destroyed by fire on the 29th day of April, 1969, which the Defendant has had notice.


ATTORNEY FOR PLAINTIFF

FILED

AUG 14 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - 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 ALLSTATE INSURANCE 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.....

ALLSTATE INSURANCE COMPANY, a corporation Defendant.....

by J. B. COOPER

Plaintiff.....

Witness my hand this 14 day of August 1969

Alice J. Luck Clerk

Ex: 8-20-69

VOL

64 PAGE 109

Swanson

P- 6418

No. 8843

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

J. B. COOPER

Plaintiffs

vs.

ALLSTATE INSURANCE COMPANY,
a corporation,
Mr. Lass, mgr.

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

AUG 14 1969

Clerk

ALICE J. DUCK

CLERK
REGISTER

REC'D SHERIFF DEPT
MOBILE COUNTY ALA
AUG 15 8 41 AM

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
2573 Government Street
Mobile, Ala.

RECEIVED

AUG 14 1969

~~WILLIAM WILKINS~~ Sheriff

I have executed this summons

this *Aug 20* 19*69*
by leaving a copy with
Mr. Lass, as manager
of Allstate Ins. Co. of Ala.

Ray L. Bridges Sheriff

H. F. Swanson Deputy Sheriff

J. B. COOPER, * IN THE CIRCUIT COURT OF
Plaintiff, * BALDWIN COUNTY, ALABAMA
VS * AT LAW
ALLSTATE INSURANCE COMPANY, *
A Corporation, *
Defendant. CASE NO. 8843

D E M U R R E R

Comes now the Defendant, AllState Insurance Company, and demurs to the Plaintiff's Complaint and sets down and assigns the following grounds of demur, separately and severally, as follows:

1. That said policy of insurance is not sufficiently identified in said Complaint.
2. That the alleged contract of insurance is not set out in the Complaint.
3. For aught appearing therein no contract of insurance was in force and effect between this Defendant and the Plaintiff.
4. The allegations that a contract of insurance existed between this Defendant and the Plaintiff are mere conclusions of the pleader without any facts alleged in support thereof.
5. It is not alleged that the alleged contract of insurance between this Defendant and the Plaintiff was in force and effect on the date of the Plaintiff's alleged loss.
6. For aught appearing therein the alleged policy of insurance issued by this Defendant to the Plaintiff was not in force in effect on the date of the Plaintiff's alleged loss.
7. Said Count is vague and indefinite.
8. Said Count states no cause of action against this Defendant.

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 19th day of SEP, 1969, 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.

FOREMAN, BROWN & HUDGENS
Attorneys for the Defendant.

By Peter V. Sintz
Peter V. Sintz

FILED

SEP 19 1969

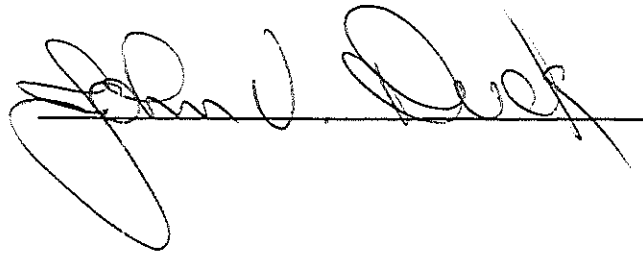
ALICE J. DUCK
CLERK
REGIS

J. B. COOPER,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW, CASE NO. 8843
ALLSTATE INSURANCE COMPANY,)	
a corporation,)	
Defendant.)	

AMENDED BILL OF COMPLAINT

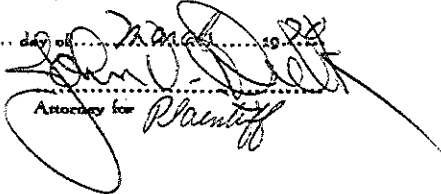
Comes now the Plaintiff in the above styled cause, and amends the Bill of Complaint heretofore filed to read as follows:

Plaintiff claims of the Defendant the sum of TWENTY-TWO THOUSAND (\$22,000.00) DOLLARS, the value of one 1948 Chevrolet 1-1/2 ton Truck, Identification #1063722, with all well-drilling equipment, and one 1952 Chevrolet Truck, Identification #BL203G92, which the Defendant on, to-wit: the 26th day of November, 1968 insured against loss or injury by fire and other perils in the Policy of Insurance mentioned, for the term of one year, which personal property was wholly destroyed by fire on, to-wit: the 29th day of April, 1969, which the Defendant has had notice.



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 a properly addressed envelope with adequate postage thereon.

This: 2nd day of March 1970

 Attorney for Plaintiff

FILED

MAR 4 1970

ALICE J. DUCK CLERK
REGISTER