

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Hertis Doyle Baggett and Legal Mutual Insurance Company, a Corporation, formerly known as Lawyers Mutual Insurance Company, to appear and plead, answer or demur, within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, In Equity, by Annie Louise Davis, as Complainant, against Hertis Doyle Baggett and Legal Mutual Insurance Company, a Corporation, formerly known as Lawyers Mutual Insurance Company, as Respondents.

Witness my hand this 11 day of May, 1956.

Annie Louise Davis
Register.

ANNIE LOUISE DAVIS,)
Complainant,)
vs.)
HERTIS DOYLE BAGGETT and)
LEGAL MUTUAL INSURANCE)
COMPANY, a Corporation,)
formerly known as Lawyers)
Mutual Insurance Company,)
Respondents.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Annie Louise Davis, respectfully shows unto your Honor and unto this Court as follows:

1. That your Complainant is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama. That the Respondent, Hertis Doyle Baggett, is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama. That the Respondent, Legal Mutual Insurance Company, a Corporation, who was formerly known as Lawyers Mutual Insurance Company, is a Corporation organized under the laws of the State of Alabama and doing business within the state of Alabama.

2. The Complainant recovered a final judgment against Hertis Doyle Baggett in the Circuit Court of Baldwin County, Alabama, on March 15, 1956, in the sum of Three Thousand Five Hundred Dollars (\$3,500.00) debt and Thirty-four Dollars and Fifty-five Cents (\$34.55) costs in said suit for bodily injury sustained by the Complainant and caused by the negligence of the Respondent, Hertis Doyle Baggett, in the negligent manner in which he operated his automobile upon a public highway in Baldwin County, Alabama, on to-wit: April 16, 1955, at which time, the said Hertis Doyle Baggett negligently drove an automobile into and against an automobile in which the Complainant was riding as a passenger.

3. That the Respondent, Hertis Doyle Baggett, was insured against such loss and damage at the time when the right of action arose on a policy which was issued to him by the Lawyers Mutual Insurance Company, a Corporation. That since the date such cause of action arose, the Lawyers Mutual Insurance Company has amended its charter and the name of such company has been changed to Legal Mutual Insurance Company, who is one of the Respondents in this cause. The Complainant as such judgment creditor is entitled to have the insurance money provided for in the contract of insurance between the Respondent insurance company and Hertis Doyle Baggett applied to the satisfaction of the judgment which the Complainant recovered against Hertis Doyle Baggett on March 15, 1956. More than thirty days have expired since the date such judgment was rendered and such judgment has not been satisfied and the Complainant has received no payment thereon from either of the Respondents.

PRAYER FOR PROCESS


The premises considered, your Complainant prays that your Honor will cause the usual writ of process to issue to Hertis Doyle Baggett and the Legal Mutual Insurance Company, a Corporation, formerly known as Lawyers Mutual Insurance Company, requiring them to appear and plead, answer or demur within the time required by law.

PRAYER FOR RELIEF

Your Complainant further prays that upon a final hearing of this cause that your Honor will order and decree that the in-

insurance money provided for in the contract of insurance between the Lawyers Mutual Insurance Company, now known as Legal Mutual Insurance Company, and Hertis Doyle Baggett, to the extent of the amount of the judgment recovered by your Complainant, with interest thereon, and with the costs of Court, be paid to the Register of this Court for the purpose of satisfying the judgment rendered in favor of the Complainant and against Hertis Doyle Baggett as herein set out, and that the Respondents be taxed with the costs of this proceeding. Complainant prays for such other and further relief to which she may be entitled.

CHASON & STONE

By:  _____
Solicitors for Complainant.

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ANNIE LOUISE DAVIS
Complainant

VS

HERTIS DOYLE BAGGETT
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: 3784

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DEMURRER

Comes now the Complainant in the above styled cause and demurrers to the Complainant's complaint and to every aspect thereof and sound as grounds as follows:

1. There is no equity in the bill.

Wil Hay
Solicitor for Respondent

ANNIE LOUISE DAVIS
Complainant

VS

HERTIS DOYLE BAGGETT
Respondent

IN EQUITY

NUMBER: 3784

DECURRER

FILED

JUN 21 1956

ALICE J. DUCK, Register