

ELLA A. HENDERSON,

Plaintiff,

vs.

CHEROKEE CREDIT LIFE
INSURANCE COMPANY,

Defendant.

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 6806

DEMURRER

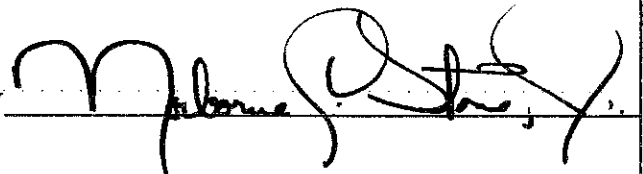
Comes now the Defendant in the above styled cause, by its attorneys, and demurs to the Complaint heretofore filed against it and as grounds therefor assigns, separately and severally, the following:

1. The Complaint fails to state a cause of action.
2. It affirmatively appears from the allegations of the Complaint that the Plaintiff is not the owner of the policy sued on.
3. It affirmatively appears from the allegations of the Complaint that the Plaintiff is not the real party in interest.
4. The Complaint fails to allege sufficient facts to entitle the Plaintiff to the relief therein sought.

Respectfully submitted,

CHASON, STONE & CHASON

By

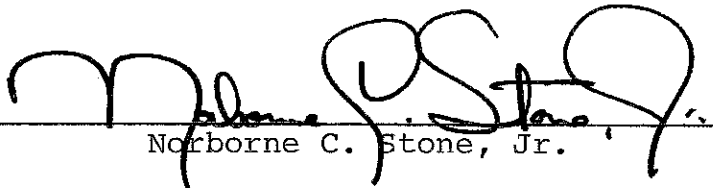


FILED
APR 1966
ALICE L. DICK, CLERK
REGISTER

CERTIFICATE OF SERVICE

I, Norborne C. Stone, Jr., one of the Solicitors for the Defendant, do hereby certify that I have this day mailed a copy of the foregoing Demurrer to Honorable Kenneth Cooper, Attorney for the Plaintiff, by United States Mail, postage prepaid, properly addressed to his office in Bay Minette, Alabama.

Done this 1st day of April, 1966.


Norborne C. Stone, Jr.

ELLA A. HENDERSON,

Plaintiff,

VS.

CHEROKEE CREDIT LIFE
INSURANCE COMPANY,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW CASE NO. 6806

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DEMURRER

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FILED

APR - 1936

ALICE L. DICK, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. BOX 120
BAY MINETTE, ALABAMA

SUMMONS AND COMPLAINT

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to Summon Cherokee Credit Life Insurance Company 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 Cherokee Credit Life Insurance Company, Defendant, by Ella A. Henderson, Plaintiff.

Witness my hand this 4th day of January, 1966.

Alice J. Luck
Clerk

+++++

ELLA A. HENDERSON,
Plaintiff,
Vs.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

CHEROKEE CREDIT LIFE
INSURANCE COMPANY,
Defendant.

CASE NO. 6806

COUNT ONE:

The Plaintiff claims of the Defendant TWELVE HUNDRED EIGHT and 64/100 (\$1208.64) DOLLARS, due on a policy, whereby the Defendant, on the 4th day of August, 1964, insured the life of George A. Henderson, who died on the 22nd day of June, 1965, of which the Defendant has had notice. Said policy is the property of the Plaintiff, and it is due to Baldwin National Bank of Robertsdale, Alabama, as successor to Central Baldwin Bank of Robertsdale, Alabama.

Kenneth Cooper
Attorney For Plaintiff

FILED

JAN 11 1966

ALICE J. LUCK CLERK
REGISTER

Received by Sheriff's Office
MAR 1 1966
100 Cents per mile Total \$0.00
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF
Received by day of 1966
served a copy of the within
day of 1966
By service on Robert L. Sullivan
TAYLOR WILKINS, Sheriff
By M. S. Butler
Returned 4 day of June 1966
Not found in my County
Inquiry.
M. S. Butler, Sheriff
By Thompson

RECEIVED IN OFFICE
JAN 6 1966
M. S. BUTLER, Sheriff

CASE NO. 1886

HELA M. HENDERSON

Defendant

CHESAPEAKE CREDIT LIFE
INSURANCE COMPANY

Defendant

IN THE CIRCUIT COURT OF

FLORIDA COUNTY, ALABAMA

sende MR. K. Norman Gordon
MONTGOMERY, ALA.

FILED

JAN 4 1966

ALICE T. DUCK, CLERK
REGISTER

KENNETH COOPER
ATTORNEY AT LAW

100 E. 5TH STREET
BAY MINETTE, ALABAMA