

474

PETER J. STEIGERNWALD,

Plaintiff,

VS.

VIRGINIA FIRE & MARINE  
INSURANCE CO., a Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

TO VIRGINIA FIRE & MARINE INSURANCE COMPANY, DEFENDANT:

You are hereby notified to produce for trial of the above entitled cause the proof of loss, or loss report mailed to you on or about March 12, 1938, and if you fail to do so, secondary evidence of the contents will be given.

Baldwin County  
Attorneys for Plaintiff.

RECORDED Duck  
8-28/

NOTICE TO PRODUCE PROOF OF LOSS  
OR LOSS REPORT.

PETER J. SMITHGOLD,

Plaintiff,

VS.

VIRGINIA FIRE & MARINE INSURANCE  
COMPANY, a Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Filed October 13, 1938

R. S. DUCK

clerk, registrar

By Charles Thompson Deputy

Executed this 14th  
day of Oct. 1938 by  
Serving a copy of  
within summons  
on W.E. Conroy  
Local agent for  
within named  
Insurance Co.

Wm. A. Williams  
Sheriff  
D.S.

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon VIRGINIA FIRE & MARINE INSURANCE COMPANY, a Corporation, to appear within thirty days from the service of this writ, in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of PETER J. STEIGERWALD.

WITNESS my hand this 13<sup>th</sup> day of October, 1938.

R. E. Duchs  
Clerk.

By: Handwritten Signature,  
Deputy Clerk

PETER J. STEIGERWALD,  
Plaintiff,

VS.

VIRGINIA FIRE & MARINE  
INSURANCE CO., a Corporation,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

The Plaintiff claims of the Defendant THREE HUNDRED and EIGHTY-EIGHT (\$388.00) DOLLARS, the value of the dwelling house and pressing club, which the Defendant, on the 5th day of March, 1938, insured against loss or injury by fire and other perils, in the policy of insurance mentioned, for the term of one year, which house and pressing club was damaged by fire on the 12th day of March, 1938, of which the Defendant has had notice.

Becher & Co. Becher  
Attorneys for Plaintiff.

Served *2/17* *Duck*  
RECORDED 8-381

*W. P. Cooney*  
SUMMONS AND COMPLAINT

PETER J. STUTIGERWALD,  
Plaintiff,

VS.  
VIRGINIA FIRE & MARINE  
INSURANCE COMPANY, a  
Corporation,  
Defendant.

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

*Served on W.E. Cooney*  
*Filed Oct. 13, 1938*  
**R. S. DUCK**  
clerk, "register  
By *Handwritten Signature* Deputy

*By B.G. Shuea*  
*Sherry*  
*Sherry*

*Executed this 14th*  
*day of Oct 1938*  
*By serving a copy*  
*of within business*  
*on W.E. Cooney*  
*local agent for within*  
*insurance co. named*

PETER J. STEIGERWALD,  
PLAINTIFF,

VS.

VIRGINIA FIRE & MARINE  
INSURANCE COMPANY, a  
Corporation,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALEWIN COUNTY, ALABAMA,

IT LAW.

INTERROGATORIES PROPOUNDED BY THE PLAINTIFF TO THE DEFENDANT:

1. Please state the name and also the name of the general agents for the State of Alabama for the Southern part of Alabama.
2. Please state whether or not you had a local representative at Foley, in Baldwin County, Alabama, on March 5th, 1938, and if so, his name.
3. Please state whether or not, on March 5th, 1938, you issued policy insuring the dwelling house and pressing shop of Peter J. Steigerwald, located at 410 on the East side of Alston Street, in Block 10, Foley, Alabama.
4. Please state whether or not the policy was in force and effect on March 12th, 1938.
5. Please state whether or not a loss report was filed by the Plaintiff soon after the fire and damage to his property, on March 12th, 1938; If so, please attach a copy of the report to your answer.
6. Please state whether or not you sent an adjuster to Foley to view the property and appraise the loss, on to-wit, March 18th, 1938, and if so, please state his name.
7. Please state whether or not it is a fact that an agreement was entered into between the Plaintiff and the adjuster representing you, placing the value of the loss and damage to the property of the Plaintiff at Three Hundred and Eighty-eight (\$388.00) Dollars.
8. Please state whether or not you have made any payments to cover the loss and damage to the property of the Plaintiff covered under policy issued by you to him.
9. Please state whether or not the policy issued by you to the Plaintiff, on March 5th, 1938, is numbered 302789.
10. Please state whether or not W. E. Cooney was the agent representing the company at Foley, in Baldwin County, Alabama, on March 5th, 1938.

Berles & Cooney  
Attorneys for Plaintiff.

STATE OF ALABAMA, )

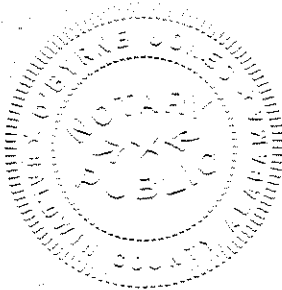
BALDWIN COUNTY. )

Before me, the undersigned authority, in and for said County, in said State, personally appeared HUBERT M. HALL, who is known to me and who having been by me first duly sworn, deposes and says, that he is one of the attorneys of record for the Plaintiff, in the above styled cause; that true answers to the above and foregoing interrogatories will be material in the prosecution of the above case pending in the Circuit Court of Baldwin County, Alabama.

Hubert M. Hall

Sworn to and subscribed before  
me this 10th day of October,  
1938.

W. Byrnes Jones  
Notary Public, Baldwin County,  
Alabama.



INTERROGATORIES:

PETER J. SPIDERNALD,

Plaintiff,

VS.

VIRGINIA FIRM & MARINE  
INSURANCE COMPANY, a  
Corporation,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

AT LAW.

*Served on Mr. J. Spidernald  
and Oct. 13/1938 7:00 a.m.*  
**R. S. DUCK**  
clerk - register.

By *Handwritten Signature*  
Deputy

*Executed this 14th  
day of Oct. 1938  
by serving a copy  
of within summons  
on M. E. Cooney  
Local agent for  
within named  
Insurance Co.*

*M. E. Cooney  
Shrout*

*By R. S. Duck  
S.S.*

