

GENERAL EXCHANGE INSURANCE CORPORATION,
A Corporation,

PLAINTIFF,

VS.

M. N. HARRIS,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW.

No. 699.

And now comes the Defendant and supplements his answers to Interrogatories heretofore filed, in this cause, by the Plaintiff so that the same shall read as follows:

1. For answer to Interrogatory 1 he says:

That on or before the 24th day of November, 1939, he was the owner, subject to the rights of the General Motors Acceptance Corporation, of a Chevrolet $1\frac{1}{2}$ ton truck. He does not remember the Motor number or the Serial number of said truck.

2. For answer to Interrogatory 2 he says:

That the said truck was on or about the 24th day of November, 1939, involved in a collision with another automobile on the Bay Minette-Foley Highway in Baldwin County, Alabama. The owner and driver of the other automobile, so the defendant is advised, was Mr. Charles Styron of Bon Secour, Alabama. Mr. Styron was driving the car at the time of the accident.

3. For answer to Interrogatory 3 he says:

That no money was paid to him in settlement of any claim for damages that he had. The total amount paid by Mr. Styron, as he remembers, was Seven Hundred Fifty (\$750.00) Dollars, of which a part was paid to Dr. Hannan, a part to the Providence Infirmary and the balance to Guy H. Harris; that the entire balance over and above the doctor and hospital bill was paid to Guy H. Harris.

4. For answer to Interrogatory 4 he says:

The money was paid over to Dr. Hannan, the Providence Infirmary and Guy H. Harris, the party injured in the accident; that no amount was

paid to him in settlement of the damages to the said automobile truck.

M. N. Harris

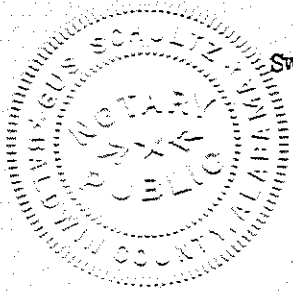
STATE OF ALABAMA

BALDWIN COUNTY

Before me, Gus Schutte a Notary Public, in and for said County, in said State, personally appeared M. N. Harris, who is known to me and who having been by me first duly sworn deposes and says that the foregoing answers to Interrogatories heretofore filed are correct.

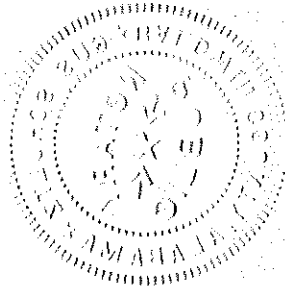
M. N. Harris

Sworn to and subscribed before me on this 26th day of February, 1943.



Gus Schutte
Notary Public, Baldwin County, Ala.

499



Filed

3-5-43

R.S. Luck

by Alice J. Luck
D.C.

General Exchange Insurance
Corporation, a corporation,

Plaintiff,

vs

M. N. Harris,

Defendant.

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

AT LAW.

NO. 699

INTERROGATORIES PROPOUNDED BY PLAINTIFF TO DEFENDANT

1. Is it not a fact that on or before the 24th day of November, 1939, you were the owner of a Chevrolet 1½ ton truck? Please state whether or not this truck was identified by Motor No. T-2715596, and by Serial No. 8-WD 09-12237.

2. Is it not a fact that on or about the 24th day of November, 1939, on the Bay Minette - Foley Highway in Baldwin County, Alabama, the said automobile truck was involved in a collision with another vehicle? Please state the name of the driver and the name of the owner of the other vehicle.

3. Is it not a fact that as a result of the said collision, there was paid to you a sum of money in settlement of your claim for damages received by the said automobile truck in the said collision? Please state the total amount paid to you for such damages.

4. If you state that a sum of money was paid to you, together with other parties, state the names of each of the parties who received such payment. State the total amount of the payment made to such parties and the amount actually received by you in settlement of the damages to the said automobile truck.

Walter J. Pason
McConney, Husted, Turner & Rogers
Attorneys for Plaintiff

STATE OF ALABAMA

COUNTY OF MOBILE

BEFORE ME, Myrtle H. Jaulle, a Notary Public in and for the aforesaid State and County, personally appeared C. A. L. Johnstone, Jr., known to me, who, being by me first duly sworn, deposes and says:

That he is a member of the firm of McCorvey, McLeod, Turner & Rogers, attorneys for the plaintiff in the above styled cause; that as such, he is authorized to make this affidavit, and that the answers to the foregoing interrogatories, if well and truthfully made by the defendant, will be material evidence for the plaintiff in said cause.

C. A. L. Johnstone, Jr.

Subscribed and sworn to before me on
this 12th day of June, 1942.

Myrtle H. Jaulle
Notary Public, Mobile County, Alabama

Received in Sheriff's Office
this 5 day of Sept., 1942
W. R. STUART, Sheriff

9-14-42

INTERROGATORIES

GENERAL EXCHANGE INSURANCE
CORPORATION, a Corporation,

Plaintiff,

VS.

M. N. HARRIS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

FILED SEPTEMBER 2, 1942.

W. R. Stuart

W. R. Stuart
By John R. Davis Jr.

Executed 9-14-42
by handing a copy of
this writ to the
within named
defendant
M. N. Harris

W. R. Stuart Sheriff
By John R. Davis Jr.

GENERAL EXCHANGE INSURANCE CORPORATION,
a Corporation, Plaintiff,

VS.

M. W. HARRIS, Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW,
No. 699

And now comes the Defendant and for answer to the Plaintiff's complaint,
says:

That he pleads the general issue with the right to introduce such
testimony and papers as would be admissable, if specially pleaded.

Beebe & Hale

Attorneys for Defendant.

Defendant demands trial by jury.

Beebe & Hale

Attorneys for Defendant.

THE STATE OF ALABAMA, } No. 699. CIRCUIT COURT
 Baldwin County } Term, 1943

To Any Sheriff of the State of Alabama, Greeting:

You are hereby commanded, That of the goods and chattels, lands and tenements of
GENERAL EXCHANGE INSURANCE CORPORATION. Plaintiff in the suit,
 you cause to be made the sum of _____ Dollars,
 costs of suit, created by said Plaintiff, for that, whereas, on the 13th day of
April. 1943, the said Plaintiff ~~recovered by the Judgment of the said Circuit Court~~
Dismissed said suit of said County, against M N Harris. Defendant

to the suit, the sum of 000000 Dollars,
 besides ~~SEVEN~~ Fourteen and 80/100 Dollars, costs of suit;
 upon which Judgment an Execution has been issued and returned by the Sheriff, "No property found."
R S Duck.

AND HAVE YOU THAT MONEY ready to render to _____
 Clerk of said Court, and make return with this Writ and the Execution thereof, according to law.

Witness my hand this 25th day of May. 1943

R S Duck, Clerk

CLERK'S FEES	\$	Cts	SHERIFF'S FEES	\$	Cts
For every Summons and complaint.....	\$1.25	1	25	For Levying an Attachment.....	\$3.00
Each copy thereof.....	30		30	Entering and Returning Attachment.....	25
Entering a Sheriff's Return.....	20		25	Summoning Garnishee.....	1.50
Docketing.....	25		40	Serving Summons on Writ.....	1.50
Entering Apperance.....	20		50	Serving Notice Sci. Fa. Notice, etc.....	65
Filing.....	10		30	Serving..... Subpoenas.....	65
Every Order made in Court.....	30			Empanelling Jury.....	75
Copy thereof.....	25			Entering and Returning Execution.....	25
Every Trial with or without Jury.....	75			Collecting Costs Execution.....	1.50
Entering up Judgment or copy threof..	30		30	Executing a Writ of Pessionession.....	2.50
Issuing Execution.....	50		50	Taking and Approving Bonds.....	1.00
Docketing Execution.....	25			Commissions.....	
Entering Return on Execution.....	20		20	Sheriff's Commission for Property	
Issuing Subpoenas.....	30			Sold Under Attachment.....	
Administering Oath.....	25			Seizing Personal Property on Writ	
Issuing Each Attachment Taking Bond	1.00			of Detinue.....	3.00
Filing Attachment.....	10				
Each Summons for Garnishee.....	50			RECAPITULATION	
Each copy.....	50				
Notice to Deft. in Garnishee on Sum-				Clerk's Fees.....	7 30.
mons and Copy, per 100 words.....	20			Sheriff's Fees.....	4 50.
Commissions to take Depositions or				Justice's Fees.....	
copy.....	75			Witness Fees in Justice of Peace Court	
Order to Execute Writ of Inquiry.....	30			Constable's Fees.....	
Copy of Interrogators, 15c per hundred		1	00	Commissioner's Fees.....	
words or.....	50			Printer's Fees.....	
Filing each Deposition and endorsing				Witness Fees in Circuit Court.....	
same.....	20			Former Clerk's Fees.....	
Final Record, per hundred words.....	15	2	00	Stenographer's Fees.....	5.00
Every Certificate.....	50			Trial Tax.....	3.00
Taking Bond not otherwise provided					
for.....	75				
Witness Certificate.....	25				
Continuance.....	10		10		
Certificate of Judgment.....	50				
Order of Publication.....	1.00				
		7	30		14 80

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RECORDED

GENERAL EXCHANGE INSURANCE CORPORATION,
a Corporation, Plaintiff,

VS.

M. N. HARRIS, Defendant.

ANSWER

Filed October 4, 1941
R. S. Dink, Clerk

BREDE & HALL, LAWYERS

No 699.

Page.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

GENERAL EXCHANGE INSURANCE
CORPORATION.

Plaintiff....

vs.

M N Harris.

Defendant....

Civil Execution for Costs
Against Plaintiff

Costs - - - - - \$ 14 80.

Civil Fee Book..... Page

Execution Docket..... Page

Filed May 25th....., 194 3.

Orvis M Brown Clerk.

Orvis M Brown,
Plaintiff's Attorney

Beebe & Hall,
Defendant's Attorney

COLLECTION COSTS FROM

Plaintiff.

The State of Alabama, }
BALDWIN COUNTY

I hereby certify that the within.....
and costs in this case are correct, and there
waswaiver of exemption as to personal
property under the Constitution and Laws of
Alabama.

This day of 194

Clerk.

Received in office

..... 194

Sheriff

Sheriff's Execution Docket, Page

Sheriff's Fee Book, Page

*Returned No property of the
plaintiff found in my
County. This 27th day of
July 1943
W R Stewart Sheriff
By M M. [Signature]*

Sheriff

THE STATE OF ALABAMA,
Baldwin County.

By virtue of the within execution, I have at

o'clock, M., this day of

194 levied

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
Baldwin County.

No. 699

CIRCUIT COURT

September, 1941. 193

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon M. N. HARRIS,

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

M. N. HARRIS

Defendant .. by

GENERAL EXCHANGE CORPORATION,

A Corporation

Plaintiff

Witness my hand this 4th day of September 1941

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

GENERAL EXCHANGE INSURANCE
CORPORATION, a Corporation,

Plaintiff,

vs

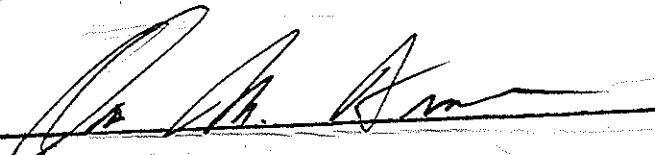
M. N. HARRIS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

The Plaintiff claims of the Defendant Two Hundred
Fifty and no/100 (\$250.00) Dollars, due from him for money
on to-wit the 29th day of November, 1939, received by the
Defendant to the use of the Plaintiff, which sum of money
with the interest thereon is still unpaid.


McCoy, McCord, Turner & Rogers
Attorneys for Plaintiff

Received in Sheriff's Office
this 4 day of Sept, 1941
W. R. STUART, Sheriff

Executed Sept 6-2 1941
by serving copy of within Summons and
Complaint on

M. N. Harris

W. R. Stuart Sheriff
By John R. Davis Deputy Sheriff

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RECORDED
GENERAL EXCHANGE CORPORATION,
A CORPORATION,

Plaintiff,

Vs.

M. N. HARRIS, Defendant

Summons & Complaint

Filed September 4 1941
R. S. Smith, Clerk
ORVIS M. BROWN
ATTORNEY AT LAW
Robertsdale, Alabama