

E. M. BRICE DARBY
PLAINTIFF
VS
BALDWIN MUTUAL
INSURANCE COMPANY
DEFENDANT

1117
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.
NO. 1117

Now comes George Holk and for answer to interrogatories heretofore filed by the Plaintiff says:

1.

That for answer to interrogatory one he says: His name is George Holk. He is Secretary-Treasurer of the Baldwin Mutual Insurance Company, Inc., a corporation.

2.

For answer to interrogatory two he says: Yes.

3.

For answer to interrogatory three he says: Yes.

4.

For answer to Interrogatory four he says: yes.

5.

For answer to interrogatory five he says: September 1, 1947.

6.

For answer to interrogatory six he says: Yes.

7.

For answer to interrogatory seven he says: Yes.

8.

For answer to interrogatory eight he says: No. April 29, 1947.

9.

For answer to interrogatory nine he says: Yes.

10.

For answer to interrogatory ten he says: Following or same morning.

11.

For answer to interrogatory eleven he says: Yes.

12.

For answer to interrogatory 12 he says: Paul Kaiser, Preisent, Frank Walker General Agent, George Holk, Secretary-Treasurer.

13.

For answer to interrogatory 13 he says: I think so.

George Holk

STATE OF ALABAMA

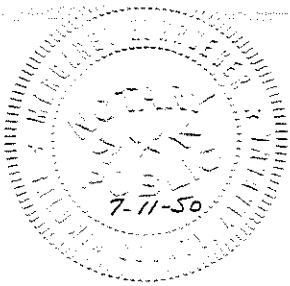
BALDWIN COUNTY

Personally appeared before me, the undersigned authority, George Holk, who is known to me and who having been by me first duly sworn says that the foregoing answer to interrogatories heretofore filed by him are true and correct.

George Holk

Sworn to and subscribed before me on this the 21st day of December, 1947.

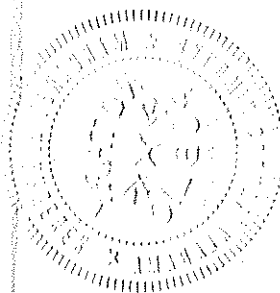
Margaret M. Whieger
Notary Public, Baldwin County, Ala.



RECORDED

RECORDED

1117



Interrogatories

Filed

1-22-48

*Reice J. Duck
clerk.*

E. M. BRICE DARBY
PLAINTIFF
VS
BALDWIN MUTUAL
INSURANCE COMPANY
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.
NO. 1117

Now comes Paul Kaiser, and in answer to Interrogatories heretofore filed by the Plaintiff says:

1.

That for answer to interrogatory one he says: his name is Paul Kaiser. He is president of the Baldwin Mutual Insurance Company, Inc., a corporation.

2.

For answer to interrogatory two he says: yes.

3.

For answer to interrogatory three he says: Yes.

4.

For answer to interrogatory four he says: Yes.

5.

For answer to interrogatory five he says: September 1, 1947.

6.

For answer to interrogatory six he says: yes.

7.

For answer to interrogatory seven he says: yes.

8.

For answer to interrogatory eight he says: no. April 29, 1947.

9.

For answer to interrogatory 9 he says: yes.

10.

For answer to interrogatory ten he says: Following or same morning.

11.

For answer to interrogatory eleven he says: Yes.

12.

For answer to interrogatory 12 he says: Paul Kaiser, President Frank Walker General Agent, George Holk Secretary-Treasurer.

13.

For answer to interrogatory 13 he says: I think so.

Paul Kaiser

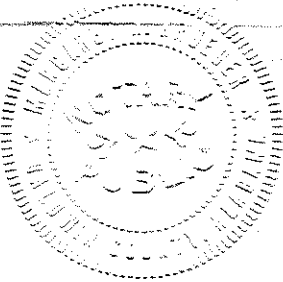
STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me, the undersigned authority, Paul Kaiser, who is known to me and who having been by me first duly sworn that the foregoing answer to interrogatories heretofore filed by him are true and correct.

Paul Kaiser

Sworn to and subscribed before me on this the 21st day of December, 1947.

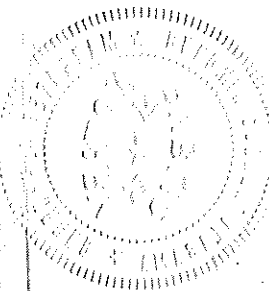


Margaret St. Augustine
Notary Public, Baldwin County, Ala.

RECORDED

1119

RECORDED



Interrogation's

Filed
1-22-48
A. J. M. M.
clerk

E. M. BRICE DARBY

PLAINTIFF

VS

BALDWIN MUTUAL
INSURANCE COMPANY

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

INTERROGATORIES PROPOUNDED BY THE PLAINTIFF TO THE
DEFENDANT, AND TO THE PRESIDENT AND SECRETARY, RES-
PECTIVELY OF THE DEFENDANT.

1.

Please state your name, and the office you hold with the
Baldwin Mutual Insurance Company, Inc., a corporation.

2.

Please state whether or not you were such officer on April
27th, 1947.

3.

Please state whether or not the Baldwin Mutual Insurance
Company on the 25th day of March, 1946, issued its standard
policy to E. M. Brice, now E. M. Brice Darby of Summerdale,
Alabama, covering a frame hotel building, situated opposite
Kennedy's Platform in Summerdale, Alabama, and other property.

4.

Please state whether or not the said policy was numbered
4510.

5.

Please state whether or not the policy was extended and if
so to what date.

6.

Please state whether or not the policy was extended to
September 1, 1947.

7.

Please state whether or not the said policy was in full
force and effect on April 27, 1947.

8.

Please state whether or not the property, the frame hotel building, situated opposite Kennedy's Platform, Summerdale, Alabama, was on to-wit April 27, 1947, wholly destroyed by fire.

9:

Please advise whether or not you have had notice of said fire.

10.

Please state when you received notice of said fire.

11.

Please state whether or not the officers or agents went to Summerdale on the night of the fire or early next morning to investigate the fire.

12.

Please state what officers or agents of the company went to Summerdale on the night of the fire or the next morning.

13.

Please state whether or not E. M. Brice, and E. M. Brice Darby is one and the same person.

John S. Lee
Attorney for the Plaintiff

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said County in said State, personally appeared H. M. Hall, who being by me first duly sworn, deposes and says that he is Attorney for E. M. Brice Darby, the Plaintiff, in the suit against Baldwin Mutual Insurance Company, Inc., a corporation; that true answer to the foregoing interrogatories will be material evidence on behalf of the Plaintiff.

John S. Lee

Sworn to and subscribed before me on this the 12 day of November, 1947.

James M. Hall
Notary Public, Baldwin County,
Alabama



1117 RECORDED

Received in Sheriff's Office
this 12 day of Nov, 1947
TAYLOR WILKINS, Sheriff

Excluded By sending a
copy of this written within
on George Holk and
Paul Kaiser. This the
28th day Nov. 1947
Taylor Wilkins Sheriff
Zollie B. Guffin D.S.

E. M. BRICE DARBY

PLAINTIFF

VS

BALDWIN MUTUAL INSURANCE COMPANY

DEFENDANT

INTERROGATORIES

FILED
NOV 12 1947
ALICE J. DUCK, Clerk



STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are commanded to summons BALDWIN MUTUAL INSURANCE COMPANY, INC., 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 E. M. Brice Darby.

WITNESS my hand this the 12 day of November, 1947.

Alvin J. Smith
Clerk

E. M. BRICE DARBY

PLAINTIFF

VS

BALDWIN MUTUAL
INSURANCE COMPANY

DEFENDANT

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

1.

The Plaintiff claims of the Defendant THIRTY FIVE HUNDRED (\$3500.00) DOLLARS the value of a frame hotel building which the Defendant on the 25th day of March, 1946, insured against loss or injury by fire and other perils in the policy of insurance mentioned, for the term beginning March 25, 1946, and ending July 3, 1946, and which was duly extended, and which policy was in full force and effect at the time of loss, which said frame hotel building was wholly destroyed by fire on the 27th day of April, 1947, of which the Defendant has had notice.

Wm. Lee
Attorney for the Plaintiff

Received in Sheriff's Office
this 12 day of Nov, 1947
TAYLOR WILKINS, Sheriff

Executed By serving a
Copy of the written within
to George Holk this
28th day Nov. 1947
Taylor Wilkins Sheriff
Zellie B. Griffin S.S.

RECORDED

George Holk
1117
~~2008~~

E. M. BRICE DARBY

PLAINTIFF

VS

BALDWIN MUTUAL INSURANCE
COMPANY

DEFENDANT

RECORDED

SUMMONS AND COMPLAINT

FILED

NOV 12 1947

ALICE J. DUCK, Clerk