

LUTHER BURT,

Plaintiff,

vs.

FAMILY RESERVE INSURANCE
COMPANY, a Corporation,

Defendant.

NO. 1381

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

DEMURRER

Comes now the Defendant and demurs to the Plaintiff's Complaint and to each count thereof separately and severally and assigns the following several grounds of demurrer:

1. For that it does not appear how or wherein Defendant is indebted to the Plaintiff.

2. For aught that appears the Defendant had not been notified of the death of Mack Burt, the alleged insured, prior to the commencement of this suit.

3. For aught that appears appropriate proof of the death of the alleged insured has not been delivered to the Defendant.

GRAHAM, BIBB, WINGO & FOSTER

By

Lepton D. Bibb
Attorneys for Defendant

1115 First National Building
Birmingham 3, Alabama

RECORDED
NO. 1381

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

LUTHER BURT,
Plaintiff,

vs.

FAMILY RESERVE INSURANCE
COMPANY, a Corporation,
Defendant.

DEMURRER

FILED
AUG 13 1949
ALICE J. DUCK, Clerk

LAW OFFICES
GRAHAM, BIBB, WINGO & FOSTER
FIRST NATIONAL BUILDING
BIRMINGHAM, ALABAMA

STATE OF ALABAMA §
BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon FAMILY RESERVE 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 LUTHER BURT.

WITNESS my hand this 27th day of July, 1949.

W. J. Duck
Clerk

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LUTHER BURT	§	IN THE CIRCUIT COURT OF
PLAINTIFF	§	BALDWIN COUNTY, ALABAMA
VS.	§	AT LAW
FAMILY RESERVE INSURANCE	§	
COMPANY, a corporation.	§	
DEFENDANT	§	

1.

The plaintiff claims of the Defendant FIVE HUNDRED (\$500.00) DOLLARS, due on a policy whereby the Defendant on the 27th day of March, 1948, insured the life of Mack Burt, who died on the 27th day of December, 1949, of which the Defendant has had notice. Said policy is the property of the Plaintiff.

Wm. J. Duck
Attorney for the Plaintiff

Received in Sheriff's Office
this 21 day of July, 1949
TAYLOR WILKINS, Sheriff

1949 JUL 29 AM 8:24

Executed this 29 day of July, 1949
on Family Reserve
Insurance
Company, a
corporation
by leaving a copy of within with
Bobby Ray
Agent &
of said company.

HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama

By Paul K. Givens D. S.

Baldwin P.
No 1381

RECORDED

summons and complaint

LUTHER BURT

PLAINTIFF

VS.

FAMILY RESERVE INSURANCE
COMPANY, a corporation.

DEFENDANT

Filed this day of July, 1949.

FILED

JUL 27 1949

ALICE J. DUCK, Clerk

HUBERT M. HALL
LAWYER
BAY MINETTE, ALABAMA