

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon St. Paul Fire and 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 same, then and there to answer the complaint of William E. Barnes, Jr.

Witness my hand, this 30 day of December, 1969.

Alice J. Duck
CLERK

WILLIAM E. BARNES, JR.
PLAINTIFF

VS

ST. PAUL FIRE AND
MARINE INSURANCE COMPANY,
A Corporation

DEFENDANT

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)

) AT LAW
)

) NUMBER: 9055
)
)
)
)

Plaintiff claims of the Defendant TEN-THOUSAND and NO/100 (\$10,000.00) DOLLARS, the value of damages from the owner or operator of an uninsured automobile for bodily injury suffered by Plaintiff which the Defendant, on the 14th day of July, 1969, insured against such damages from the owner or operator of an insured automobile because of bodily injury for the period of one year, which injuries the Plaintiff suffered in an accident occurring on the 18th day of December 1968 at the intersection of Conception Street and Canal Street in Mobile, Alabama, with Emma Dreding O'Shea, the operator of an insured automobile to-wit a 1965, Comet four door sedan, 1969 Alabama License Plate #2-6530, of which the Defendant has had notice;

And Plaintiff does further allege that the said Policy, to-wit Policy Number 201AM9243 provided that determination of the entitlement for such damages and the amount thereof shall be made by agreement between the Defendant and its insured, namely the Plaintiff herein, or, if they fail to agree, by arbitration

and that Defendant has wholly failed or refused to make such agreement for such damages and has failed and refused to submit the said matter to arbitration, hence this suit.

HAYES & BOGGS

BY:

W. H. Hayes
Attorneys for Plaintiff

FILED

DEC 30 1969

ALICE J. DUCK CLERK
REGISTER

9055

William E. Barnes, Jr.

vs.

St. Paul Fire & Marine
Insurance Co.

FILED

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ALICE J. DUCK

CLERK
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W. Hayes

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CLERK

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| PLAINTIFF |) | BALDWIN COUNTY, ALABAMA |
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| VS |) | AT LAW |
| |) | |
| ST. PAUL FIRE AND |) | NUMBER: <u>9055</u> |
| MARINE INSURANCE COMPANY, |) | |
| A Corporation |) | |
| |) | |
| DEFENDANT |) | |

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HAYES & BOGGS

BY:

W. H. Hayes
Attorneys for Plaintiff

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ALICE J. DUCK CLERK
REGISTER

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HAYES & BOGGS

BY: 

Attorneys for Plaintiff

FILED

DEC 30 1909

WILLIAM J. DUCK
REGISTER
CLERK

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