

SEA RANCH PROPERTIES, INC., X
A Corporation, X

Plaintiff, X

vs. X

CHEROKEE INSURANCE COMPANY, X
A Corporation, X

Defendant. X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 9287

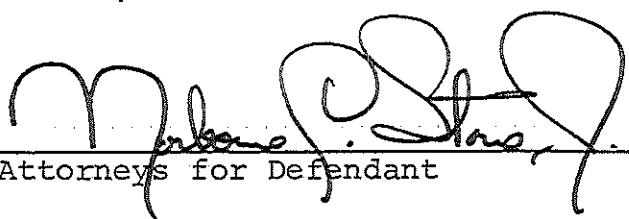
DEMURRER:

Comes now the Defendant, by its attorneys, and demurs to the Complaint filed against it in the above styled cause and assigns the following separate and several grounds in support thereof:

1. That said Complaint does not state a cause of action.
2. Sufficient facts are not alleged to entitle the

Plaintiff to the relief prayed for.

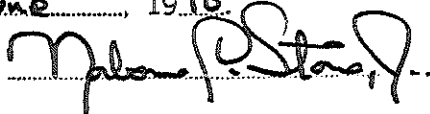
CHASON, STONE & CHASON

By: 
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 19 day

of June, 1970.



FILED

JUN 19 1970

ALICE J. DUCK CLERK
REGISTER

9287

SEA RANCH PROPERTIES, INC.,
A Corporation,

Plaintiff,

VS.

CHEROKEE INSURANCE COMPANY,
a corporation,

Defendant.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO:9287

* * * * *

DEMURRER

FILED

* * * * *

JUN 19 1970

ALICE J. DUCK CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

WILSON HAYES

LAWYER

P. O. BOX 300

BAY MINETTE, ALABAMA

36507

TELEPHONE 937-5506

May 29, 1970

Mrs. Alice J. Duck
Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama 36507

9287

Dear Mrs. Duck:

Please file the enclosed suit, Sea Ranch
Properties, Inc. vs Cherokee Insurance Company.

With kind regards, I am

Yours very truly,

Wil Hayes
Wilson Hayes

WH/ms
Enc.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Cherokee 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 Sea Ranch Properties, Inc., a Corporation.

Witness my hand this the 29 day of May, 1970.

Alice J. Duck
Clerk

SEA RANCH PROPERTIES, INC.	X	IN THE CIRCUIT COURT
A Corporation,	X	
	X	BALDWIN COUNTY, ALABAMA
PLAINTIFF	X	
	X	AT LAW
VS	X	
	X	NUMBER: <u>9287</u>
CHEROKEE INSURANCE COMPANY,	X	
A Corporation,	X	
DEFENDANT	X	

I

The Plaintiff claims of the Defendant \$10,000.00, the value of the contents of a resturant building, which the Defendant, on the 20th day of July, 1968 insured against loss or injury by windstorm in the policy of insurance mentioned, Policy Number 23 06 25 for the term of three years which property was damaged by windstorm on the 17th day of August, 1969, of which the Defendant has had notice.

HAYES & BOGGS
Attorneys for Plaintiff

By: Wilson Hayes
Wilson Hayes

Plaintiff demands trial by Jury

Wilson Hayes

FILED

MAY 29 1970

ALICE J. DUCK CLERK
REGISTER

2914

NUMBER: 9287

Executed by serving 2 copies of
the within on Frank W. Perry
Superintendent
of Insurance, State of Alabama
This The 3 day of June 1970
Sheriff of Montgomery County
M. S. Butler,
By W. L. Mason D. S.

SEA RANCH PROPERTIES, INC.
A Corporation,

PLAINTIFF

VS

CHEROKEE INSURANCE COMPANY,
A Corporation,

DEFENDANT

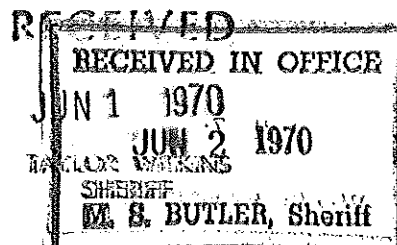
M. S. Butler, Sheriff of Montgomery
County, Alabama, Claim \$1.50 each for
serving 1 process(es) and \$1.00
travel expense on each of 1
process(es) or a total of \$2.50

IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

MAY 29 1970

ALICE J. DUCK CLERK
REGISTER



STATE OF ALABAMA
DEPARTMENT OF INSURANCE

I, the undersigned as Superintendent of Insurance for the State of Alabama,
hereby certify that on the 3rd day of June, 1970, I
sent by registered mail in an envelope as follows:

Cherokee Insurance Company
4108 Hillsboro Road
Nashville, Tennessee 37215

REGISTERED MAIL
RETURN RECEIPT REQUESTED

bearing sufficient prepaid postage, a copy of a summons and complaint served upon
me by the Sheriff of Montgomery County, Alabama, in a cause styled as follows:

Sea Ranch Properties, Inc., Plaintiff

in the Circuit Court of Baldwin County

VERSUS

(Name of Court)

Cherokee Insurance Company, Defendant

And that on the 9th day of June, 1970, I received
the return card showing receipt by the designated addressee of said envelope on
the 8th day of June, 1970.

Witness my hand and official seal this the 9th day of June,
1970.

R. Frank Ussery

SUPERINTENDENT OF INSURANCE

FILED

JUN 10 1970

ALICE J. DUCK

CLERK
REGISTER