

SEA RANCH PROPERTIES, INC.	:	IN THE CIRCUIT COURT OF
a corporation,	:	
	:	BALDWIN COUNTY, ALABAMA
Plaintiff	:	
	:	AT LAW
v.	:	
	:	
AMERICAN MOTORISTS	:	
INSURANCE COMPANY, a	:	
corporation,	:	
	:	
Defendant.	:	CASE NO. 9295

ANSWER OF DEFENDANT

Comes now the defendant in the above captioned cause and in answer to the complaint of the plaintiff in said cause files the following pleas, separately and severally, that is to say:

1. This defendant is not guilty.

2. This defendant denies each and every one of the material allegations therein contained.

INGE, TWITTY, DUFFY & PRINCE


 JAMES J. DUFFY, JR.
 Attorney 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 29th day of June, 19 70.


 Attorney for Defendant

FILED

JUN 30 1970

ALICE J. DICK CLERK
REGISTER

INGE, TWITTY, DUFFY & PRINCE

LAWYERS

FRANCIS H. INGE (1902-1959)
THOS. E. TWITTY
RICHARD H. INGE
THOS. E. TWITTY, JR.
JAMES J. DUFFY, JR.
SYDNEY R. PRINCE, III
JOHN N. LEACH, JR.

MERCHANTS NATIONAL BANK BUILDING
MOBILE, ALABAMA
36602

MAILING ADDRESS:
P. O. BOX 1109
MOBILE, ALA.
36601

CABLE ADDRESS:
TWINING
TELEPHONE
433-5441

June 29, 1970

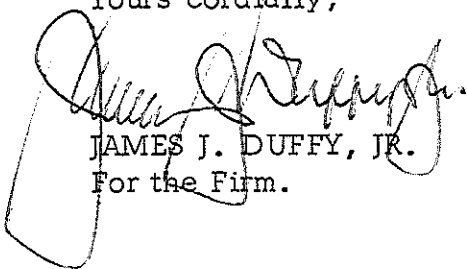
Mrs. Alice J. Duck
Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Sea Ranch Properties, Inc. v.
American Motorists Insurance Company
Case No. 9295

Dear Mrs. Duck:

Enclosed herewith please find my answer in the above captioned case which I would appreciate your placing on file.

Yours cordially,



JAMES J. DUFFY, JR.
For the Firm.

JDjr/cm
Enclosure

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:

American Motorists Insurance Company
4750 Sheridan Road
Chicago, Illinois 60640

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)

American Motorists Insurance Company, Defendant

And that on the 8th day of June, 1970, I received
the return card showing receipt by the designated addressee of said envelope on
the 5th day of June, 1970.

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

R. Frank Unry

SUPERINTENDENT OF INSURANCE

FILED

JUN 10 1970

ALICE J. DUCK

CLERK
REGISTER

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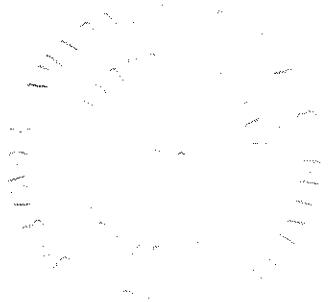
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9295

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STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon American Motorists 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.

Clerk

SEA RANCH PROPERTIES, INC.
A Corporation,

PLAINTIFF

VS

AMERICAN MOTORISTS
INSURANCE COMPANY, A
Corporation,

DEFENDANT

X
X
X
X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

AT LAW

NUMBER: 9295

I

The Plaintiff claims of the Defendant \$5,000.00, the value of a resturant building, which the Defendant, on the 9th day of September, 1967 insured against loss or injury by windstorm in the policy of insurance mentioned, Policy Number TM 657 384 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, Attorney's for Plaintiff

BY: W. H. Hayes

Plaintiff demands trial by Jury

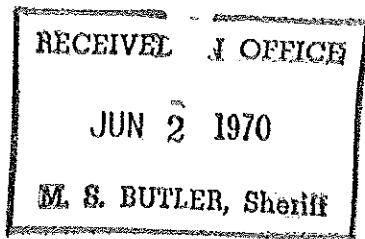
W. H. Hayes

FILED

MAY 29 1970

ALICE J. BOCK CLERK
REGISTER

2922



Executed by serving 2 copies of
the within on Frank Koury
Superintendent
of Insurance, State of Alabama

This The 2 day of June 1970

Sheriff of Montgomery County

M. S. Butler,

By W. E. Mason D. S.

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

process(es) for a total of 2.50

W. E. Mason
JUN 1 1970

Deputy Sheriff

TAYLOR WILKINS
SHERIFF

NUMBER:

9295

SEA RANCH PROPERTIES, INC.
A Corporation,

PLAINTIFF

VS

AMERICAN MOTORISTS
INSURANCE COMPANY, a
Corporation,

DEFENDANT

IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
AT LAW

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

9295

Dear Mrs. Duck:

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

With kind regards, I am

Yours very truly,

Wilson Hayes
Wilson Hayes

WH/ms
Enc.