

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF IN THE STATE OF ALABAMA-----GREETINGS:

You are hereby commanded to summon BALDWIN MUTUAL INSURANCE COMPANY, a corporation, and ARTHUR HOLK, and GEORGE HOLK, 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 CHARLES DUDLEY GRICE.

WITNESS my hand, this the 20 day of September, 1958.

Charles D. Grice  
clerk.

9-27-58  
\*\*\*\*\*  
CHARLES DUDLEY GRICE \* IN THE CIRCUIT COURT OF  
PLAINTIFF \* BALDWIN COUNTY, ALABAMA.  
VS \*  
BALDWIN MUTUAL INSURANCE \* CASE NO. 3660  
COMPANY, a corporation, \*  
and ARTHUR HOLK, and \*  
GEORGE HOLK, \*  
DEFENDANTS \*

COUNT ONE

The Plaintiff claims of the Defendants, the Baldwin Mutual Insurance Company, a corporation, and Arthur Holk and George Holk, Seventy-five Thousand (\$75,000.00) Dollars, damages for maliciously and without probable cause therefor, causing the Plaintiff to be indicted by the Grand Jury of Baldwin County, Alabama, organized by and as a part of the Circuit Court of said County for the Fall Term 1957, of said Circuit Court on a charge in substance:

"The Grand Jury of said county charges that before finding this indictment, Charles Dudley Grice, alias Charles D. Grice, whose name is to the Grand Jury otherwise unknown, an agent, clerk, employee or servant of the Baldwin Mutual Insurance Company, Inc., an insurance Company, incorporated under the laws of the State of Alabama and doing business as the Baldwin Mutual Insurance Co., INC., embezzled, or fraudulently converted to his own use, or to the use of another, or fraudulently secreted with intent to convert to his own use, or the use of another, money and checks, or money or checks, to the

amount of about \$1,914.81, and of that value, which said money and checks, or money or checks, had come into his possession by virtue of his office, agency, or employment, against the peace and dignity of the State of Alabama." and to be arrested under a warrant or writ of arrest issued by Alice J. Duck, Clerk of said Court on September 18, 1957, an said indictment charging this plaintiff with embezzlement and which charge, before the commencement of this action, has been judicially investigated and said prosecution ended and this plaintiff discharged, and as a proximate consequence of the aforesaid malicious prosecution the plaintiff was caused to expend attorneys' fees for the defense of said malicious prosecution, to be deprived of his means of livelihood in that his license to sell insurance was unduly suspended, to lose his agency with insurance companies other than the defendant insurance company, and to be unable to secure employment elsewhere, and has suffered great mental pain and suffering and humiliation in the eyes of his family, clients, friends and the community in which he lives, all to the aforesaid damages to the plaintiff in the amount of Seventy-five Thousand (\$75,000.00) Dollars. The Plaintiff further claims punitive damages.

Charles Dudley Grice  
Charles Dudley Grice, Plaintiff.

Plaintiff demands a trial by jury in this cause.

Charles Dudley Grice  
Charles Dudley Grice, Plaintiff.

CHARLES DUDLEY GRICE,

Plaintiff,

VS.

BALDWIN MUTUAL INSURANCE  
COMPANY, a corporation,  
and ARTHUR HOLK and GEORGE  
HOLK,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 3660

DEMURRER

Now come the defendants, each separately and severally,  
and for demurrer to the complaint, say:

1. It does not state a cause of action.

*J. T. Blackburn*  
Attorney for defendants

LAW OFFICES OF  
DORTCH, ALLEN & MEIGHAN  
112 Court Street  
GADSDEN, ALABAMA

William B. Dortch  
James B. Allen  
J. Herbert Meighan, Jr.

January 15, 1959

Telephone Liberty 6-4616

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

Re: Grice v. Baldwin Mutual  
Insurance Company,  
Case No. 3660

Dear Mrs. Duck:

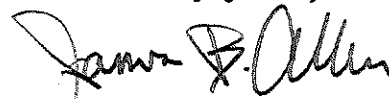
Please enter my appearance in the above case as  
Attorney of Record for the Plaintiff.

Also, I would appreciate it if you would advise me  
as to the status of the pleadings. Has a demurrer been filed?  
If so, please send me a copy of the same.

Also, please advise me as to when pleadings in the  
case are to be settled and when the case will probably be set down  
for trial.

Thanking you for furnishing me with this information  
and with best wishes, I am

Sincerely yours,

  
James B. Allen

JBA:c