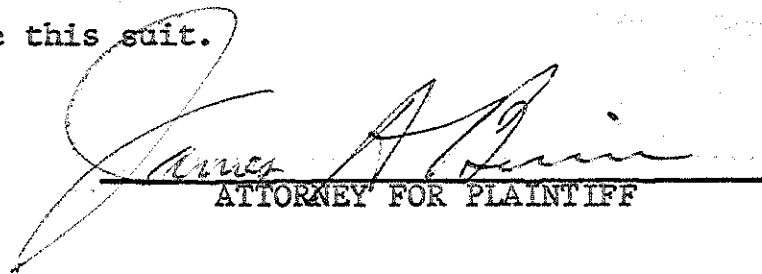


4136

ERMA F. HOFFMAN,) IN THE CIRCUIT COURT OF
PLAINTIFF,) BALDWIN COUNTY, ALABAMA
VS.) AT LAW.
PHYSICIANS' NATIONAL LIFE)
INSURANCE COMPANY,)
DEFENDANT.)

C O M P L A I N T

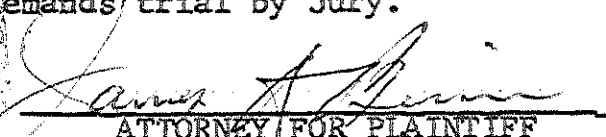
The plaintiff claims of the defendant the sum of One Thousand Five Hundred and No/100 (\$1,500.00) Dollars damages for breach of an agreement entered into by it on, to-wit: the 27th day of January, 1959, in substance as follows: Defendant, for and in consideration of the sum of Four and 35/100 (\$4.35) Dollars per month, agreed to and did insure plaintiff against illness requiring hospitalization and surgical treatment and to pay plaintiff therefor during confinement in a hospital the sum of Eight and No/100 (\$8.00) Dollars per day and to pay certain other hospital and surgical benefits. Plaintiff avers that on, to-wit: the 20th day of August, 1959, she contracted an illness under the terms of said contract requiring hospitalization and surgery. And the plaintiff says that although she has complied with all the provisions thereof the defendant has failed to pay the plaintiff for any of her hospital and surgical expenses. Plaintiff avers that at the time of hospitalization and surgery, said premiums on said policy had been paid to and accepted by the defendant and said policy was in full force and effect. Plaintiff avers that said policy is the property of herself. For all of this plaintiff has suffered damages to the extent of One Thousand Five Hundred and No/100 (\$1,500.00) Dollars, hence this suit.


ATTORNEY FOR PLAINTIFF

DEMAND FOR TRIAL BY JURY:

Plaintiff demands trial by Jury.

FILED
JAN 15 1960


ATTORNEY FOR PLAINTIFF

ALICE L. DUCK, CLERK
REGISTER

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

January 13, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Erma F. Hoffman
vs: Physicians' National Life
Insurance Company

Dear Mrs. Duck:

I enclose pleadings on behalf of the above plaintiff.
Please obtain service of process upon the Superintendant of
Insurance for the State of Alabama.

Thank you.

Very truly yours,


James A. Brice

JAB/vd

Enclosures

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4036

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon PHYSICIANS' NATIONAL LIFE INSURANCE COMPANY

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against-----

PHYSICIANS' NATIONAL LIFE INSURANCE COMPANY-----, Defendant---

by ERMA F. HOFFMAN-----

-----, Plaintiff---

Witness my hand this 15----- day of January----- 1960.

Ex 1-20-60 Alvin J. Duck-----, Clerk

No. 4136

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

ERMA F. HOFFMAN

Plaintiffs

vs.

PHYSICIANS' NATIONAL LIFE

INSURANCE COMPANY

Defendants

Summons and Complaint

Filed January 15, 1960

Alice J. Duck Clerk

To serve on
Superintendent of Insurance for the
State of Alabama

Plaintiff's Attorney

Defendant's Attorney

92
RECEIVED IN OFFICE

Defendant lives at
JAN 18 1960

M. S. BUTLER, Sheriff
Received in Office

19

2
Sheriff

I have executed this summons

this 19

by leaving a copy with

Executed by serving 2 copies of
the within on Edmon L. Rinehart

Superintendent
of Insurance, State of Alabama

This The 20 day of Jan 19 60

Sheriff of Montgomery County

M. S. Butler,

By Ramsey D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$ 2.00

M. S. Butler, Sheriff
Montgomery County, Ala.

Sheriff

Deputy Sheriff

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

April 13, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Re: Erna Hoffman
vs: Physicians National Life Ins. Co.

Dear Mrs. Duck:

4136

The defendant in the above case has made full settlement. Therefore, I ask that the case be dismissed and that you send the cost bill to Mr. T. S. Henderson, Physicians National Life Insurance Company, 1211 South 28th Street, Birmingham, Alabama.

Thank you.

Very truly yours,


James A. Brice

JAB/vd

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

March 16, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

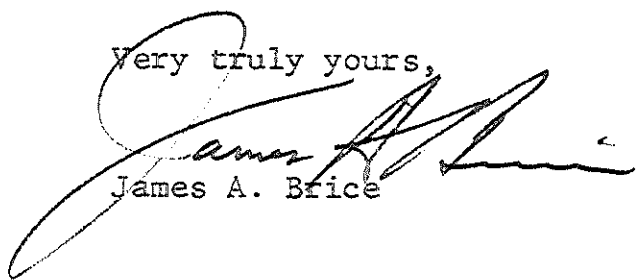
4756
Re: Erma A. Hoffman
vs: Physicians National Life Ins. Company

Dear Mrs. Duck:

Please enter a judgment by default for plaintiff and against defendant. I should like a writ of inquiry issued for the earliest available date for hearing testimony.

Thank you.

Very truly yours,


James A. Brice

JAB/vd

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 4036

TERM, 1960

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

PHYSICIANS' NATIONAL LIFE INSURANCE COMPANY, Defendant

by ERMA F. HOFTMAN

, Plaintiff

Witness my hand this 15 day of January 1960

Alice J. Luck, Clerk

No. 4136

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

ERMA F. HOFFMAN

Plaintiffs

vs.

PHYSICIANS' NATIONAL LIFE

INSURANCE COMPANY

Defendants

Summons and Complaint

Filed January 15, 1950

Alice J. Duck Clerk

to serve on
Superintendent of Insurance for the
State of Alabama

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

ERMA F. HOFFMAN,)	IN THE CIRCUIT COURT OF
PLAINTIFF,)	BALDWIN COUNTY, ALABAMA
VS.)	AT LAW.
PHYSICIANS' NATIONAL LIFE)	
INSURANCE COMPANY,)	
DEFENDANT.)	

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ATTORNEY FOR PLAINTIFF

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Plaintiff demands trial by Jury.


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