

MARY VITOUS,

Plaintiff

vs

STERLING NATIONAL LIFE
INSURANCE COMPANY and
E. T. TETER,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SEPARATE ANSWER OF E. T.
TETER

Comes now the above named Defendant and for answer to
the Complaint and to each and every Count thereof, says
that the allegations of the Complaint are untrue.


Attorney for Defendant.

The Defendant demands a trial by jury.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Recorded

MARY VITOUS,

PLAINTIFF

VS

STERLING NATIONAL LIFE IN-
SURANCE COMPANY and E. T.
TETER,

DEFENDANTS

SEPARATE ANSWER OF
E. T. TETER

LLOYD A. MAGNEY,
Attorney for Defendants

Filed Apr 19th/1932
T. M. McInnis
clerk

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority in and for said County, in said State, personally appeared MARY VITOUS, who being duly sworn on oath says that Sterling National Life Insurance Company, a corporation, and E. T. Teter are justly indebted to her in the sum of Two Hundred Twenty and 30/100 Dollars (\$220.30) after allowing all just offsets and discounts, and that the said Sterling National Life Insurance Company, a corporation, and E. T. Teter are about to remove their property from the State of Alabama to the State of Florida, so that the plaintiff will probably lose her debt or have to sue for it in another State; that this attachment is not sued out by her for the purpose of vexing or harrassing the said Sterling National Life Insurance Company, a corporation, and E. T. Teter.

Mary Vitous

Sworn to and subscribed before
me, on this the 22 day of
March, 1932.

H. M. Sauer
Notary Public, Baldwin County,
Alabama.

RECORDED

Affidavit

Mary Peterson
vs

Mercury National
Life Insurance Co
and E. J. Peter

Filed March 22/1932
J. W. Peterson
Clerk.

MARY VITOUS,

Plaintiff

vs

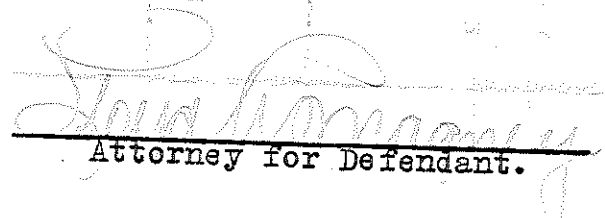
STERLING NATIONAL LIFE
INSURANCE COMPANY and
E. T. TETER,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SEPARATE ANSWER OF STERLING
NATIONAL LIFE INSURANCE
COMPANY

Comes now the above named Defendant and for answer to
the Complaint and to each and every Count thereof, says
that the allegations of the Complaint are untrue.


Attorney for Defendant.

The Defendant demands a trial by jury.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Recorded

MARY VITOUS,

PLAINTIFF

VS

STERLING NATIONAL LIFE IN-
SURANCE COMPANY and E. T.
TETER,

DEFENDANTS

SEPARATE ANSWER OF STERLING
NATIONAL LIFE INSURANCE
COMPANY.

LLOYD A. MAGNEY,
Attorney for Defendants

Filed Apr 19 1932
M. H. Williams
clerk

STATE OF ALABAMA.

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS, that we, MARY VITOUS, as Principal, and the undersigned as Sureties, are held and firmly bound unto the STERLING NATIONAL LIFE INSURANCE COMPANY, a corporation, and E. T. TETER, in the sum of FIVE HUNDRED DOLLARS (\$500.00) to be paid to the said Sterling National Life Insurance Company, a corporation, and E. T. Teter, their heirs or assigns, for which payment, well and truly to be made, we bind ourselves and each of us, our and each of our heirs, executors and administrators, jointly, severally and firmly by these presents.

Sealed with our seals and dated this the _____ day of March, 1932.

The condition of the above obligation is such, that, WHEREAS, the above bound Mary Vitous has on the day and date hereof prayed an attachment at the suit of Mary Vitous against the estate of the above named Sterling National Life Insurance Company, a corporation, and E. T. Teter, for the sum of Two Hundred Twenty and 30/100 Dollars (\$220.30) and hath obtained the same returnable to the Circuit Court of Baldwin County, Alabama, within thirty (30) days from the service of Writ of Attachment in said cause; NOW, if the said Mary Vitous shall prosecute the said attachment with effect and pay said defendants all such damages as they may sustain from the wrongful and vexatious suing out of said attachment, then this obligation to be void, otherwise to remain in full force and effect.

Mary Vitous (SEAL)
Voltaire Vitous (SEAL)
H. J. Moore (SEAL)

Taken and approved this the
22 day of March, 1932.

W. R. Pearson
Clerk.

STATE OF ALABAMA.

BALDWIN COUNTY.

KNOW ALL MEN BY THESE PRESENTS, that we, H. H. MONTGOMERY, as Superintendent of Banks of the State of Alabama, liquidating the Consolidated State Bank, ^{3/15/32} H E Marker and

Chas Norman, are held and firmly bound unto MARY WITOUS, in the sum of \$450.00, FOUR HUNDRED AND FIFTY DOLLARS, for the payment of which, well and truly to be made, we jointly and severally bind ourselves, our heirs, executors and administrators.

Sealed with our seals and dated the 15th day of November 1932.

The condition of the above obligation is such, that whereas and attachment issued from the Circuit Court of Baldwin County, Alabama, on the 22nd day of March 1932 in favor of the said MARY WITOUS against STERLING NATIONAL LIFE INSURANCE COMPANY and E. T. TETER, for the sum of \$220.50, TWO HUNDRED DOLLARS AND TWENTY CENTS, has been attached by W. R. Stuart of said county upon the following described property to-wit;

Three desk, three chairs, two type writers, one adding machine and stand, two tables, one steel filing cabinet and one small steel cabinet, one stationary cabinet, one small oak cabinet, one heater, one lineolium,

and whereas W. J. Osborne as liquidating Agent of the Consolidated State bank has made affidavit that the Consolidated State Bank has a just claim to said property and upon entering into this bond with sufficient surety, as required by law, has obtained possession of said property;

Now, if the said H. H. Montgomery, as Superintendent of Banks of the State of Alabama, liquidating the Consolidated State Bank, shall have the said described property forthcoming, if which be found liable thereafter and pay such costs and damages as may be recovered for interposing the said claim and delay, then this obligation to be void, otherwise to remain in full force and effect.

H. E. MONTGOMERY, as Superintendent of Banks of the State of Alabama, liquidating the Consolidated State Bank.

By W. J. [Signature] (Seal)
Liquidating Agent

H. E. [Signature] (Seal)

Chas. Norman (Seal)

Taken and approved this
2 day of November,
1932.

W. R. [Signature]
Sheriff.

The State of Alabama, }
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, Mary Vitous,

hath complained on oath to me, T. W. RICHESON, Clerk of Circuit Court of Baldwin County,
Ala., that Sterling
National Life Insurance Company, a corporation,
and E.T. Teter,

is justly indebted to the Plaintiff Mary Vitous,

in the sum of Two hundred twenty and 30/100 Dollars, and

Mary Vitous

having made affidavit and given bond

as required by law, in such cases, you are hereby commanded to attach so much of the estate of
Sterling,
National Life Insurance Company, a corporation

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such
estate, so attached unless replevied, so to secure, that the same may be liable to further pro-
ceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be
held at the Court House of said County, on 2nd Monday of April
19 32 next; when and where you must make known to said Court how
you have executed this Writ,

WITNESS, my hand, this 22nd day of March, A. D. 1932

T. W. Richeson Clerk.

RECORDED

No.

ATTACHMENT

Mary Vitous

Vs. Attachment

Sterling National Life Insurance Co.

Issued March 22nd, 1932, 192

Moore Printing Co. Bay Minette, Ala.

Given July

- 3 Office desk
- 4 Office chairs
- 2 Typewriters
- 1 adding machine stand
- 2 tables
- 1 large heavy cabinet
- 1 small " "
- 1 stationary cabinet
- 1 small file cabinet
- 1 heater
- 1 Ring (umbrella)

Executed March 22nd 1932 by
~~Serving~~ Attaching & Taking into
my possession the following property
to wit: (3) Desk's (3) Chairs (2) Typewriters
(1) adding machine & Stand 2 Tables
one steel filing Cabinet one small
steel Cabinet (1) Stationary Cabinet
one small oak Cabinet (1) one
Heater and (1) Umbrella Ring
as the property of the Sterling
National Life Insurance Co.

W. W. Stewart
Sheriff

By J. B. Wilson
D.S.

RECORDED

UNDERWOOD TYPEWRITER COMPANY

UNDERWOOD, ELLIOTT-FISHER, SUNOSTRAND - SPEED THE WORLD'S BUSINESS

62 ST. FRANCIS STREET

MOBILE, ALA.

10-22-32

Mr. T.W. Richerson,
Chancery Clerk,
Bay Minette, Ala.

Dear Mr. Richerson:

I am very anxious to learn just who filed an attachment against the furniture and office equipment of the Sterling National Life Ins. Co. of Silver Hill, Ala. I hold title to an Underwood Typewriter 3-11/3854533 which is tied up by this attachment but which I feel certain I can get released as soon as I learn just who attached it.

I wrote to Sheriff Stuart the 13th. a letter asking for this information but have not an answer up to today.

I am enclosing a stamped envelope for your reply and if there is a fee of any sort for this information, let me know. In the meantime, you may know that I will be further indebted to you if you will let me have this information at once.

With my warm personal regards, I am

Very truly yours,



Sub-branch Manager.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, E. Frank Saunders, a Notary Public in and for said State and County, this day personally appeared W. J. OSBORNE, who being first duly sworn, deposes and says, that he is Liquidating Agent for the Consolidated State Bank; that the following described personal property, to-wit:

Three office desks; four office chairs; two type-writers; one adding machine and stand; two tables; one large steel filing cabinet; one small steel filing cabinet; one stationery cabinet; one small oak cabinet; one heatrola; one linoleum rug;

upon which an attachment from the Circuit Court of Baldwin County, Alabama, issued the 22nd day of March, 1932, in favor of Mary Vitous against the Sterling National Life Insurance Company, a corporation, and E. T. Teter for the sum of Two Hundred Twenty and 30/100 Dollars (\$220.30), has been levied by W. R. Stuart, Sheriff of Baldwin County, Alabama, is not the property of said Sterling National Life Insurance Company and E. T. Teter, but is the property of the said Consolidated State Bank, as successor to the State Bank of Silverhill under and by virtue of two notes executed on the 4th day of February, 1931, in the sum of Two Hundred Forty Dollars (\$240.00) and Three Hundred Sixty Dollars (\$360.00) respectively, which notes were executed to cover rent of the said Sterling National Life Insurance Company owing to the said State Bank of Silverhill, and that the said Consolidated State Bank has a just claim to the said property levied on, in that the Sterling National Life Insurance Company and E. T. Teter owe the said Consolidated State Bank the sum of Six Hundred & n0/100 Dollars as unpaid rent.

Sworn to and subscribed
before me on this the
25 day of November, 1932

W. J. Osborne
Liquidating Agent.

E. Frank Saunders
Notary Public, Baldwin County,
Alabama.

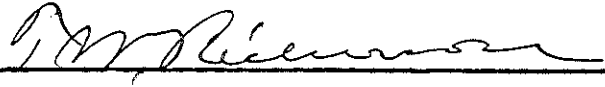
STATE OF ALABAMA.

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon STERLING NATIONAL LIFE INSURANCE COMPANY, a corporation, and E. T. TETER to appear within thirty (30) 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 MARY VITOUS.

WITNESS my hand this the 22nd day of March, 1932.



MARY VITOUS,

Plaintiff,

vs.

STERLING NATIONAL LIFE
INSURANCE COMPANY, a
corporation, and E. T.
TETER,
Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

1. The plaintiff claims of the defendants Two Hundred twenty and 30/100 Dollars (\$220.30) due from them by account on the first day of March, 1932.

2. Plaintiff claims of the defendants Two Hundred twenty and 30/100 Dollars (\$220.30) on account stated between the plaintiff and the defendants on the first day of March, 1932.

3. Plaintiff claims of the defendants Two Hundred twenty and 30/100 Dollars (\$220.30) for work and labor done for the defendants by the plaintiff during the year 1931-1932 at their request.

Which sums of money, with the interest thereon, are still due and unpaid.


Attorneys for Plaintiff.