



NATIONAL SURETY COMPANY

L. A. PORTER, MANAGER
410 BELL BUILDING
MONTGOMERY, ALABAMA

BONDS

BANKER'S BLANKET
CONTRACT
COURT
DEPOSITORY
FIDELITY
FORGERY
FRAUD
MORTGAGE
PUBLIC OFFICIAL
SURETY
INSURANCE
BURGLARY
CREDIT
PLATE GLASS

March 30, 19 32.

Stapleton Insurance Agency,

Bay Minette, Alabama.

PLEASE RETURN THIS BILL WITH REMITTANCE and MAKE CHECK PAYABLE TO THE COMPANY

BOND OR POLICY NUMBER	EFFECTIVE DATE	TITLE	PREMIUM
7030159	9-23-31	N. P. Beasley	1.30
4011295	10-1-31	Benj. F. Patterson	21.00
7122709	10-1-31	Jesse M. Smith	510.00
2377051	10-5-31	John Coordes	7.50
3686606	11-13-31	Benj. F. Patterson	7.50
2269294	11-15-31	Jesse S. Kessler	10.00
7131049	12-11-31	Richard Bingham	5.00
2379565	1-14-32	Thomas W. Richerson	10.00
2379564	1-14-32	Thomas W. Richerson	10.00
2379563	1-14-32	Thomas W. Richerson	25.00
4026680	1-21-32	W. W. Nims & Marone McCurdy	32.00
4016733	11-18-31	Mary Elizabeth Puckett	28.00
7128033	11-11-31	Lilla A. Simmons	125.00
		Total Premiums	\$792.30
		20% Commission Credit	158.46
		Net Premiums Due	\$633.84
		Credits:	
		20% Commission on \$91.65 payment from Baldwin County:	
		Geo. W. Humphries #2379332	125.00
		G.W. Robertson #7084081	5.00
		Total Premiums	130.00
		Return Premium on	
		O. C. Hall #7091858	38.35
		Net Premium	91.65
		20% Com.	\$18.33
		Check from Chas. C. Hand & Son:	
		T.W. Richerson #2379563	25.00
		Do 2379564	10.00
		Do 2379565	10.00
		Total	45.00
		20% Comm.	9.00
		Net Check	36.00
		Check from Mary Elizabeth Puckett #4016733 (Gross)	28.00
		Total Credits	82.33
		Net Balance Due March 30, 1932	\$551.51
		(Affidavit on reverse side)	

NOTE—Should this Bill be found incorrect, you will confer a favor by reporting same at once to the Company direct.

State of Alabama :
Montgomery County:

I, Leslie W. Porter, Resident Vice President of National Surety Company, hereby certify that the within stated account is due, correct and unpaid.

Leslie W. Porter

Sworn to and subscribed before me this 30th day of March 1932.

Mary Frances Wilson
Notary Public, Montgomery
County, Alabama.

STATE OF ALABAMA
MONTGOMERY COUNTY

Before me, Mary Frances Wilson, a Notary Public in and for said State and County, personally appeared Leslie W. Porter, who being duly sworn says on oath that he is Resident Vice President of National Surety Company and authorized to make this affidavit and that the account stated on the reverse side of this sheet is a full true and correct statement of the indebtedness owing by Stapleton Insurance Agency of Bay Minette, Alabama, to said National Surety Company, to-wit, \$551.51 as of March 30, 1932, after allowing all just credits and set-offs.

Leslie W. Porter

Subscribed and sworn to before me this April ____, 1932.

Mary Frances Wilson
Notary Public, Montgomery County,
Alabama

State of Alabama :
Montgomery County:

I, Leslie W. Porter, Resident Vice President of National Surety Company; hereby certify that the within stated account is due, correct and unpaid.

Leslie W. Porter

Sworn to and subscribed before me this 30th day of March 1932.

Mary Frances Wilson
Notary Public, Montgomery
County, Alabama.

STATE OF ALABAMA
MONTGOMERY COUNTY

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Leslie W. Porter

Subscribed and sworn to before me this April ____, 1932.

Mary Frances Wilson
Notary Public, Montgomery County,
Alabama

The State of Alabama,
Baldwin
~~Montgomery~~ County

To any Sheriff of the State of Alabama—GREETING:

You are hereby Commanded to summon

W. D. STAPLETON and CHARLES C. HAND, formerly partners doing
business as STAPLETON INSURANCE AGENCY and W. D. STAPLETON
and CHARLES C. HAND

Baldwin
to appear before the Circuit Court of ~~Montgomery~~ County, in and for said County, at the place of
holding the same, within thirty days from the service of this summons and complaint, then and
there to demur or plead to the complaint of

NATIONAL SURETY COMPANY, a corporation

And you are hereby commanded to execute this process instanter and make return as required by
law.

Witness my hand this 5th day of April 193 2.

J. M. Rice Clerk.

COMPLAINT

THE STATE OF ALABAMA
~~MONTGOMERY~~ COUNTY
BALDWIN

Baldwin
In the Circuit Court of ~~Montgomery~~ County
January Term 193 2

NATIONAL SURETY COMPANY, a
corporation

vs.

W. D. STAPLETON and CHARLES C.
HAND, formerly partners doing
business as STAPLETON INSURANCE
AGENCY and W. D. STAPLETON and
CHARLES C. HAND

Plaintiff

Defendants

1. The Plaintiff Claims of the Defendants Five Hundred Sixty-two and 30/100 (\$562.30) Dollars due from them by account on, to-wit, the 1st day of December, 1931, which sum of money with the interest thereon, is still unpaid.
2. The plaintiff claims of the defendants Five Hundred Sixty-two and 30/100 (\$562.30) Dollars for money during the year 1931 received by the defendants to the use of the plaintiff, which sum of money with interest thereon is still unpaid.
3. The plaintiff claims of the defendants the further sum of Two Hundred Eighty-five and no/100 (\$285.00) Dollars with interest thereon from, to-wit, December 1, 1931, for this that on, to-wit, February 8, 1926, the defendants entered into a written contract with the plaintiff in and by which the defendant agreed to act as agent of the plaintiff in procuring for it applications for bonds in and by which contract defendants agreed that the defendants would be personally liable for the payment to the plaintiff of all premiums on the business written by defendants whether collected or not and remit the same to the plaintiff and that the defendants acting under said contract wrote bonds for W. W. Nims & Marone McCurdy on which the due premium was \$32.00 and for Mary Elizabeth Puckett on which the due premium was \$28.00 and for Lilla A. Simmons on which the due premium was \$125.00, which premiums the defendants failed to collect but for which they are liable under the terms of said written contract and no part of which sum has been paid by the defendants to the plaintiff.

Baer & Baer
Attorneys for plaintiff

Plaintiff being a non-resident we acknowledge ourselves
security for the costs of this suit.

Baer & Baer

The State of Alabama, }
Baldwin
~~Montgomery~~ County

To any Sheriff of the State of Alabama—GREETING:

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W. D. STAPLETON and CHARLES C. HAND, formerly partners doing
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and CHARLES C. HAND

Baldwin

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holding the same, within thirty days from the service of this summons and complaint, then and
there to demur or plead to the complaint of

NATIONAL SURETY COMPANY, a corporation

And you are hereby commanded to execute this process instanter and make return as required by
law.

Witness my hand this

5th day of

March

1932.

Clerk.

COMPLAINT

Baldwin

THE STATE OF ALABAMA

In the Circuit Court of ~~Montgomery~~ County

~~MONTGOMERY~~ COUNTY

January

Term 1932

BALDWIN

NATIONAL SURETY COMPANY, a
corporation

vs.

W. D. STAPLETON and CHARLES C.
HAND, formerly partners doing
business as STAPLETON INSURANCE
AGENCY and W. D. STAPLETON and
CHARLES C. HAND

Plaintiff

Defendants

1. The Plaintiff Claims of the Defendant s Five Hundred Sixty-two and 30/100
(\$562.30) Dollars due from them by account on, to-wit, the 1st day of
December, 1931, which sum of money with the interest thereon, is still
unpaid.

2. The plaintiff claims of the defendants Five Hundred Sixty-two and
30/100 (\$562.30) Dollars for money during the year 1931 received by
the defendants to the use of the plaintiff, which sum of money with
interest thereon is still unpaid.

3. The plaintiff claims of the defendants the further sum of Two
Hundred Eighty-five and no/100 (\$285.00) Dollars with interest thereon
from, to-wit, December 1, 1931, for this that on, to-wit, February 8,
1926, the defendants entered into a written contract with the plaintiff
in and by which the defendant agreed to act as agent of the plaintiff
in procuring for it applications for bonds in and by which contract
defendants agreed that the defendants would be personally liable for the
payment to the plaintiff of all premiums on the business written by
defendants whether collected or not and remit the same to the plaintiff
and that the defendants acting under said contract wrote bonds for
W. W. Nims & Marone McCurdy on which the due premium was \$32.00 and
for Mary Elizabeth Puckett on which the due premium was \$28.00 and for
Lilla A. Simmons on which the due premium was \$125.00, which premiums
the defendants failed to collect but for which they are liable under
the terms of said written contract and no part of which sum has been

paid by the defendants to the plaintiff.

Bacon & Bacon
Attorneys for plaintiff

Plaintiff being a non-resident we acknowledge ourselves
security for the costs of this suit.

Bacon & Bacon

Received in office day of

193

Sheriff.

Executed by serving a copy

of the within Summons and Complaint on

Defendant this the 5th day of

April 1932

W. D. Stapleton and
Charles C. Hand

W. R. Stuart Sheriff.

By J. M. Armstrong
J. M. Armstrong

Original
Recorded
No.

NATIONAL SURETY COMPANY, a
corporation

vs.

W. D. STAPLETON and CHARLES C.
HAND, formerly partners doing
business as STAPLETON INSURANCE
AGENCY and W. D. STAPLETON and
CHARLES C. HAND

Baldwin
Circuit Court of Montgomery County

Term, 1932

SUMMONS AND COMPLAINT

Filed in office this 14th day of

April A. D., 1932

D. M. McInnis Clerk.

Ball & Ball Plaintiff's Attorney.

BROWN PRINTING CO., MONTGOMERY, 1932

WITNESS my hand this

day of

A. D., 1932

The Plaintiff having given bond and made affidavit as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the Defendant give bond, payable to the Plaintiff, with security in double value of the property, conditioned that if the Defendant is cast in the suit he will, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

To the Sheriff of Said County—GREETING.

The State of Alabama,
Baldwin
Montgomery County

Clerk Circuit Court Montgomery County.

THE STATE OF ALABAMA,
Baldwin County.

No. 9044

CIRCUIT COURT

Term, 1933

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING :

You are hereby commanded, That of the goods and chattels, lands and tenements of
National Surety Co. & Co. Plaintiff in the suit,
you cause to be made the sum of Dollars,

costs of suit, created by said Plaintiff, for that, whereas, on the 3rd day of
January 1933, the said Plaintiff lost and recovered recovered by the Judgment of the said Circuit Court
of said County, against

M. D. Stapleton and Charles H. Hand et al Defendant
to the suit, the sum of Dollars,

besides Dollars, cost of suit;
upon which Judgment an Execution has been issued and returned by the Sheriff, 'No Property Found.'

AND HAVE YOU THAT MONEY ready to render to
Clerk of said Court, and make return of this Writ and the execution thereof, according to law.

Witness my hand, this day of 1933

Clerk.

CLERK'S FEES	Dollars	Cts.	SHERIFF'S FEES	Dollars	Cts.
For every Summons and Complaint	\$1	25	For Levying an Attachment	\$3	00
Each copy thereof	30	00	Entering and Returning Attachment	25	
Entering a Sheriff's Return	20	00	Summoning Garnishee	1	50
Docketing	25	00	Serving Summons on Writ	1	50
Entering Appearance	20	00	Serving Notice Sci. Fa. Notice, etc.	65	
Filing	10	00	Serving Subpoenas	65	
Every Order made in Court	30	00	Empanelling Jury	75	
Copy thereof	25	00	Entering and Returning Execution	25	
Every Trial with or without Jury	75	00	Collecting costs Execution	1	50
Entering up Judgment or copy thereof	30	00	Executing a Writ of Possession	2	50
Issuing Execution	50	00	Taking and Approving Bonds	1	00
Docketing Execution	25	00	Commissions		
Entering Return on Execution	20	00	Sheriff's Commission for Property Sold		
Issuing Subpoenas	30	00	Under Attachment		
Administering Oath	25	00	Seizing Personal Property on Writ of		
Issuing Each Attachment Taking Bond	\$1	00	Detinue	3	00
Filing Attachment	10	00			
Each Summons for Garnishee	50	00			
Each copy	50	00			
Notice to Deft. in Garnishee on Summons					
and copy, per hundred words	20	00			
Commissions to take Depositions or copy	75	00			
Order to Execute Writ of Inquiry	30	00			
Copy of Interrogators, 15c per hundred					
words, or	50	00			
Filing each Deposition and Endorsing					
same	20	00			
Final Record, per hundred words	15	00			
Every Certificate	50	00			
Taking Bond not Otherwise Provided for	75	00			
Witness Certificates	25	00			
Continuance	10	00			
Certificate of Judgment	50	00			
Order of Publication	1	00			

RECAPITULATION

Clerk's Fees	<u>8.40</u>
Sheriff's Fees	<u>8.90</u>
Justice's Fees	<u>3.00</u>
Witness Fees in Justice of Peace Court	<u>3.00</u>
Constable's Fees	
Commissioner's Fees	
Printer's Fees	
Witness Fees in Circuit Court	
Former Clerk's Fee	
Stenographer's Fees	5 00
Trial Tax	3 00

See Book H Page 256

3/6/36
Paid

600
1470

145
5.95

1470

NATIONAL SURETY COMPANY, a
Corporation,

Plaintiff,

VS.

W. D. STAPLETON AND CHARLES
C. HAND, formerly partners
doing business as STAPLETON
INSURANCE AGENCY, and W. D.
STAPLETON AND CHARLES C.
HAND,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. _____.

DEMURRERS.

Come the Defendants in the above entitled cause
and demurs to the Complaint and each and every count thereof upon
the following separate and several grounds to-wit:

First: The Complaint does not state a cause
of action.

John Hart, Heard & Chason
J. B. Starkman

Attorneys for Defendants.