

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

SIXTH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASGEY BEDSOLE
THOMAS G. GREAVES, JR.
WM. BREVARD HAND
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON, JR.
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
W. C. BOONE, JR.
DONALD F. PIERCE

MAILING ADDRESS:
P. O. BOX 123

CABLE ADDRESS:
HAB

TELEPHONE:
HEMLOCK 2-5514

August 2, 1961

47711

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

Re: D. D. Dryer v. United States Fire
Insurance Company, a corporation

Dear Mrs. Duck:

I enclose herewith an amended answer which I would appreciate your filing with the court on the behalf of the defendant. If you would be kind enough to acknowledge receipt on the enclosed copy of this letter I would sincerely appreciate it.

Yours very truly,

W. C. Boone

For the Firm

WCBjr.meb
Enclosure

FILED
AUG 13 1961
ALICE J. DUCK, CLERK
REGISTER

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July 28, 1961

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

Re: D. D. Dryer vs. United States Fire
Insurance Company, a corporation

Dear Mrs. Duck:

I am enclosing herewith Answer which I would appreciate your filing with the Court on behalf of the defendant, re above, acknowledging receipt of same on the enclosed copy of this letter.

Yours very truly,

WB Hand

For the Firm

WBH:dn

Enclosure

*copy of letter
mailed 7/31/61*

D. D. DRYER,)	IN THE CIRCUIT COURT OF
Plaintiff)	
vs.)	BALDWIN COUNTY, ALABAMA
UNITED STATE FIRE)	AT LAW
INSURANCE COMPANY,)	
a corporation,)	CASE NO. <u>4771</u>
Defendant)	

AMENDED ANSWER

Comes now the defendant in the above styled cause and amends the answer previously filed to the complaint and each count thereof, separately and severally, by adding thereto the following separate and several plea:

TWO

The material allegations thereof are untrue.

W. C. Brough
Attorney for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED
JUL 2 1961
ALICE J. DUCK, CLERK
REGISTER

D. D. DRYER, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
VS. :
UNITED STATES FIRE : AT LAW
INSURANCE COMPANY, a :
Corporation, :
Defendant. :

A N S W E R

Comes now the defendant and for answer to the
plaintiff's complaint, assigns the following plea:

1. Not guilty.

W B Hand
Attorney for Defendant
622 First National Bank Bldg.
Mobile, Alabama

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED

JUL 31 1961

ALICE L. DUCK, CLERK
REGISTER

D. D. DRYER

Plaintiff

-VS-

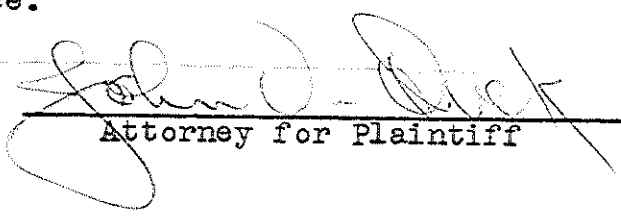
UNITED STATES FIRE INSURANCE COMPANY,
A CORPORATION.

Defendant

I
IN THE CIRCUIT COURT OF
I
BALDWIN COUNTY, ALABAMA
I
AT LAW
I
I

COUNT ONE:

Plaintiff claims of the Defendant the sum of TWO THOUSAND SIX HUNDRED (\$2,600.00) DOLLARS, the value of one 1959 Chrysler Automobile, serial Number: 5-H-11111111, which the Defendant, on the 4th day of November, 1960 insured against loss or injury by collision, fire and other perils in the policy of insurance mentioned, for the term of one year, which automobile was wholly destroyed by collision on the 26th day of March, 1961, of which the Defendant has had notice.


Attorney for Plaintiff

Defendant may be served at:

Huffman, Slye Insurance Agency,
Fairhope, Alabama

FILED

JUL 14 1961

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon UNITED STATES FIRE INSURANCE COMPANY, a

Corporation

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 UNITED STATES FIRE

INSURANCE COMPANY, a Corporation, Defendant.

by D. D. DRYER

Plaintiff.

Witness my hand this 14 day of July 1961

Adrian J. Smith, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

D. D. DRYER

vs. Plaintiffs

UNITED STATES FIRE INSURANCE
COMPANY, a Corporation

Defendants

SUMMONS and COMPLAINT

Filed

FILED

, 19

JUL 14 1961

, Clerk

ALICE J. DUCK, CLERK
REGISTER

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Huffman Slye Insurance Agency
Fairhope, Alabama

RECEIVED IN OFFICE

July 14, 19 *61*

, Sheriff

I have executed this summons

this *July 20*, 19 *61*

by leaving a copy with

John A. Huffman Mg
United States Fire Ins Co

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 200
TAYLOR WILKINS, Sheriff

BY *EA*
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Edlidge Steadman Deputy Sheriff

Fairhope, Ala