

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bankers Fire and Marine Insurance Company, a corporation, 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 same, then and there to answer the complaint of N. S. Carter.

Witness my hand this 2 day of Aug, 1961.

Alice J. Duck
Clerk

Exp 8-3-61

N. S. CARTER,

Plaintiff,

VS.

BANKERS FIRE AND MARINE
INSURANCE COMPANY, A
Corporation,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

4798

COUNT ONE:

The Plaintiff claims of the Defendant One Thousand Five Hundred Dollars (\$1,500.00) for that on, heretofore, to-wit: the 15th day of October, 1957, the Defendant issued its policy of fire and lightning insurance no. 255594 insuring the Plaintiff against loss by fire and lightning in the amount of One Thousand Five Hundred Dollars (\$1,500.00) to a one story, frame, one family dwelling situated in Block 16 at Perdido Beach, Alabama for the term of three (3) years from October 15, 1957 to October 15, 1960; to which policy of insurance there was attached on January 25, 1960 an endorsement executed by the agent of the Defendant acting within the line and scope of its authority as such in and by the

terms of which endorsement the name of the insured was authorized to be changed from the Plaintiff to Alonzo Otto Ard and Evie M. Ard and in and by the terms of which said endorsement it was provided that "loss, if any, under this policy, shall be payable, to N. S. Carter, Box 190, Dyer, Arkansas". And the Plaintiff further alleges that on, to-wit: the 20th day of August, 1960, the building referred to in said policy of insurance was wholly destroyed by fire, of which destruction the Defendant has had notice, and that he was the owner of said property on said date. Wherefore the Plaintiff brings this suit and asks judgment against the Defendant in the amount of One Thousand Five Hundred Dollars (\$1,500.00) together with interest thereon from October 20, 1961.

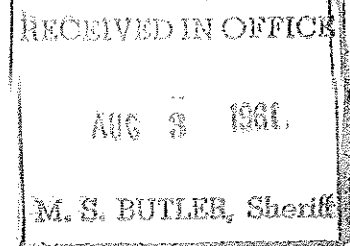
CHASON & STONE

FILED

AUG 23 1961

ALICE J. DUCK, CLERK
REGISTER

By: Melvin G. Stone, Jr.
Attorneys for Plaintiff



EXECUTED BY SERVING A
COPY OF THE WITHIN
William D. Page
Insurance Com.

This the *3* day of *Aug* 19*61*
M. S. BUTLER
Sheriff Montgomery County
By *Mitchell*
Deputy Sheriff

The Sheriff claims *2*
for at 10¢ per mile for a total
.20
M. S. Butler, Sheriff
Montgomery County, Ala.

8/2/61
NO. 4798

N. S. CARTER,
Plaintiff,
VS.

BANKERS FIRE AND MARINE INSURANCE
COMPANY, A Corporation,
Defendant.

* * * * *

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

* * * * *

SUMMONS AND BILL OF COMPLAINT

* * * * *

FILED

AUG 21 1961

ALICE J. DUCK, CLERK
REGISTER


CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

N. S. CARTER,)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY, ALABAMA
Vs.)	AT LAW
BANKERS FIRE AND MARINE)	4798
INSURANCE COMPANY, a)	
corporation,)	
Defendant)	

D E M U R R E R

Comes now the defendant, Bankers Fire and Marine Insurance Company, a corporation, separately and severally, and demurs to each count of the complaint filed herein, separately and severally, and for separate and several grounds of demurrer, sets down and assigns, separately and severally, the following:

1. That it does not state facts sufficient to constitute a cause of action against this defendant.


 Attorney for Defendant

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

FILED
 AUG 17 1961
 WIDE J. DUCK, CLERK
 REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE.

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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Witness my hand this 27 day of Aug, 1961.

Reece J. Luck
Clerk

N. S. CARTER,

Plaintiff,

vs.

BANKERS FIRE AND MARINE
INSURANCE COMPANY, A
Corporation,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

COUNT ONE:

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CHASON & STONE

By: M. J. Stone, Jr.
Attorneys for Plaintiff

FILED
AUG 21 1961
ALICE I. DUCK, CLERK
REGISTER

N. S. CARTER,

Plaintiff,

vs.

BANKERS FIRE AND MARINE INSURANCE
COMPANY, A Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

SUMMONS AND BILL OF COMPLAINT

THOMAS & SONS

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NOV 3 1901

RECEIVED

FILED NOV 3 1901

Robert G. Carter