

IN THE CHANCERY COURT OF _____ COUNTY, _____

_____, FORMERLY KNOWN AS

v.

THE ESTATES OF _____, _____
AND _____

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NO. _____

COMPLAINT FOR DECLARATORY JUDGMENT AND INTERPLEADER ACTION

COMES NOW the Plaintiff, _____, pursuant to Rules ___ and ___ of the _____ Rules of Civil Procedure, and files this, its Complaint for Declaratory Judgment and Interpleader Action against the Defendants, the Estate of _____, _____ and _____ (collectively referred to as the "_____") and in support hereof would show as follows:

1. _____ ("_____") is a _____ corporation, formerly known as _____ ("_____") whose principal office is located at _____, _____, _____ County, _____.
2. The _____ are residents of _____ County, _____ whose address is _____. Process may be served on these Defendants at such residence address.
3. Jurisdiction and venue are proper in _____ County pursuant to ___ Code Ann. Sec. ___ and ___ as the county of _____'s principal office and the county where the cause of action occurred or accrued.
4. On or about _____, _____, Mr. _____ purchased _____ industrial life insurance Policy No. _____ in the face value of \$00.00. Attached as Exhibit "A" is a copy of Mr. _____'s insurance policy application. Attached as Exhibit "B" is a copy of _____ insurance Policy No. _____. Attached as Exhibit "C" is a copy of _____ Plan 920 brochure. Attached as Exhibit "D" is a copy of funeral home merchandise and service letter dated _____. Attached as Exhibit "E" is a copy of Paid-Up Policy Certificate No. _____ showing that the premiums on Policy No. _____ were paid up in full on ___/___/___.
5. On or about _____, _____, wife of Defendant Mr. _____, purchased _____ industrial life insurance Policy No. _____ in the face value of \$00.00. Attached as Exhibit "F" is a copy of Mrs. _____'s insurance policy application. A copy of the life insurance policy, Plan 920 brochure, funeral home merchandise and service

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