

CECIL G. CHASON

Attorney at Law

P. DRAWER 458
216 LAUREL AVENUE
FOLI ALABAMA 36535
PHO 205 / 943-3171

December 2, 1968

Mr. Claude Johnson
Route 2, Box 134
Fairhope, Alabama 36532

Dear Mr. Johnson:

You are hereby notified that your two cases, one from Annette Shore, Case No. 7659, and the other from Charles J. Shore, Case No. 7660, are set for trial Tuesday, December 10, 1968, and that I am withdrawing my appearance in these cases. You should proceed immediately to obtain other counsel if you intend to defend.

Yours very truly,

C. G. Chason

CGC:jc

cc: Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama 36507

Mr. James R. Owen
Attorney at Law
Bay Minette, Alabama 36507

FILED

DEC 3 1968

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William A. Blazi and Claude Johnson 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 the same, then and there to answer the complaint of Annette Shore.

WITNESS my hand this 3rd day of August, 1967.

Olive D. Clark
Clerk

The defendant, William A. Blazi, resides at
108 Blakeney Street, Fairhope, Alabama.

The defendant, Claude Johnson, resides at
Route 1, Fairhope, Alabama.

* * * * *

ANNETTE SHORE,

Plaintiff,

VS.

WILLIAM A. BLAZI and
CLAUDE JOHNSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

7659

C O M P L A I N T

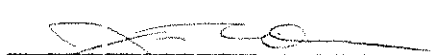
COUNT ONE

The plaintiff claims of the defendant, William A. Blazi, Twenty-five Hundred Dollars (\$2500.00) damages for that heretofore on to-wit, April 15, 1967, the plaintiff was a passenger in an automobile being driven on U. S. Highway 98 at a point which is .9 miles west of the limits of Daphne, Alabama, where U. S. Highway 98 intersects with Silver Bay Nursery Road and at a place where she had a right to be and at said time and place the said defendant so negligently operated an automobile so as to cause it to run into, upon or against an automobile being driven by Aaron Smiley at said time and place, so as to cause the said automobile being driven by Aaron Smiley to be pushed into the line of traffic of the automobile

in which the plaintiff was a passenger and as a proximate result of the negligence of the said defendant, William A. Blazi, the plaintiff was injured and damaged as follows: she suffered bruises and abrasions of her face, right hand and right knee; she was made sick, sore and nervous and was caused much expense in and about the treatment of her said injuries. Plaintiff avers that all of her injuries and damages were caused as a proximate result of the negligence of the said William A. Blazi at said time and place, hence this suit.

COUNT TWO

Plaintiff claims of the defendant, Claude Johnson, the sum of Twenty-five Hundred Dollars (\$2500.00) for that heretofore on to-wit, April 15, 1967, the plaintiff was a passenger in an automobile traveling on U. S. Highway 98 at a point approximately .9 miles West of the limits of Daphne at a point where U. S. Highway 98 intersects the Silver Bay Nursery road at a place where she had a right to be and at said time and place the defendant, William A. Blazi, who was then and there an agent, servant or employee of the defendant, Claude Johnson, acting within the line and scope of his authority as such agent, servant or employee so negligently operated a motor vehicle as to cause it to run into, upon or against an automobile being driven by Aaron Smiley and as a proximate result of the negligence of the said William A. Blazi at said time and place, the automobile of Aaron Smiley was pushed into the line of traffic in which the automobile in which plaintiff was a passenger was being operated, causing it to run into, upon or against the automobile of the said Aaron Smiley and as a proximate result thereof plaintiff was injured as follows: she suffered bruises and abrasions of her face, right hand and right knee; she was made sick, sore and nervous and was caused much expense in and about the treatment of her said injuries. Plaintiff avers that all of her injuries and damages were a proximate result of the negligence of the defendant, William A. Blazi, who was then and there an agent, servant or employee of the defendant, Claude Johnson, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

FILED

AUG 3 1967

ALICE J. DICK
CLERK
REGISTER

ANNETTE SHORE,

Plaintiff,

-vs-

WILLIAM A. BLAZI and
CLAUDE JOHNSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

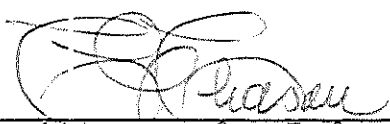
AT LAW

CASE NO. 7659

DEMURRER

Comes the Defendant, CLAUDE JOHNSON, and demurs to the Bill of Complaint heretofore filed therein and to each count thereof separately and severally, and as for grounds for demur, shows as follows:

1. The Complaint does not show a cause of action.
2. The Complaint is vague, indefinite and uncertain.



Attorney for Defendant, Claude
Johnson

Defendant respectfully demands
a trial by jury



FILED

SEP 11 1967

ALICE J. BUCK

CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

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WITNESS my hand this 3rd day of August, 1967.

Alice J. Clark
Clerk

The defendant, William A. Blazi, resides at
108 Blakeney Street, Fairhope, Alabama.

The defendant, Claude Johnson, resides at
Route 1, Fairhope, Alabama.

* * * * *

ANNETTE SHORE,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
WILLIAM A. BLAZI and)	AT LAW
CLAUDE JOHNSON,)	7659
)	
Defendants.)	

C O M P L A I N T


COUNT ONE

The plaintiff claims of the defendant, William A. Blazi, Twenty-five Hundred Dollars (\$2500.00) damages for that heretofore on to-wit, April 15, 1967, the plaintiff was a passenger in an automobile being driven on U. S. Highway 98 at a point which is .9 miles west of the limits of Daphne, Alabama, where U. S. Highway 98 intersects with Silver Bay Nursery Road and at a place where she had a right to be and at said time and place the said defendant so negligently operated an automobile so as to cause it to run into, upon or against an automobile being driven by Aaron Smiley at said time and place, so as to cause the said automobile being driven by Aaron Smiley to be pushed into the line of traffic of the automobile

in which the plaintiff was a passenger and as a proximate result of the negligence of the said defendant, William A. Blazi, the plaintiff was injured and damaged as follows: she suffered bruises and abrasions of her face, right hand and right knee; she was made sick, sore and nervous and was caused much expense in and about the treatment of her said injuries. Plaintiff avers that all of her injuries and damages were caused as a proximate result of the negligence of the said William A. Blazi at said time and place, hence this suit.

COUNT TWO

Plaintiff claims of the defendant, Claude Johnson, the sum of Twenty-five Hundred Dollars (\$2500.00) for that heretofore on to-wit, April 15, 1967, the plaintiff was a passenger in an automobile traveling on U. S. Highway 98 at a point approximately .9 miles West of the limits of Daphne at a point where U. S. Highway 98 intersects the Silver Bay Nursery road at a place where she had a right to be and at said time and place the defendant, William A. Blazi, who was then and there an agent, servant or employee of the defendant, Claude Johnson, acting within the line and scope of his authority as such agent, servant or employee so negligently operated a motor vehicle as to cause it to run into, upon or against an automobile being driven by Aaron Smiley and as a proximate result of the negligence of the said William A. Blazi at said time and place the automobile of Aaron Smiley was pushed into the line of traffic in which the automobile in which plaintiff was a passenger was being operated, causing it to run into, upon or against the automobile of the said Aaron Smiley and as a proximate result thereof plaintiff was injured as follows: she suffered bruises and abrasions of her face, right hand and right knee; she was made sick, sore and nervous and was caused much expense in and about the treatment of her said injuries. Plaintiff avers that all of her injuries and damages were a proximate result of the negligence of the defendant, William A. Blazi, who was then and there an agent, servant or employee of the defendant, Claude Johnson, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

Fairhope

CASE NO. 7659

Received 3 day of Aug 1967
and on 11 day of August 1967
I served a copy of the within etc
on William A. Blazi &
Claude Johnson
By service on Claude Johnson

TAYLOR WILKINS, Sheriff

By J. M. Eastman
Barnwell, Ala.

ANNETTE SHORE,

PLAINTIFF,

VS:

WILLIAM A. BLAZI &
CLAUDE JOHNSON,

DEFENDANTS

*108 Blakeney St.
Fhope*

Rt. 1 Fairhope

SUMMONS & COMPLAINT

FILED

AUG 3 1967

ALICE J. DUCK

CLERK
REGISTER

JAMES R. OWEN, ATTY.

*William A. Blazi
not found 8-11-67
in Hospital Biloxi*

Sheriff's fee 10.00 miles at
100 cents per mile Total \$ 10.00
TAYLOR WILKINS, Sheriff
By J. M. Eastman
DEPUTY SHERIFF