

CHASON, STONE & CHASON

ATTORNEYS AT LAW

P. O. BOX 120

BAY MINETTE, ALABAMA 36507

JOHN CHASON  
NORBORNE C. STONE, JR.  
JOHN EARLE CHASON  
EBERHARD E. BALL

TELEPHONE 937-2191

January 15, 1970

Mrs. Alice J. Duck, Clerk  
Circuit Court of Baldwin County, Alabama  
Bay Minette, Alabama 36507

Dear Mrs. Duck:

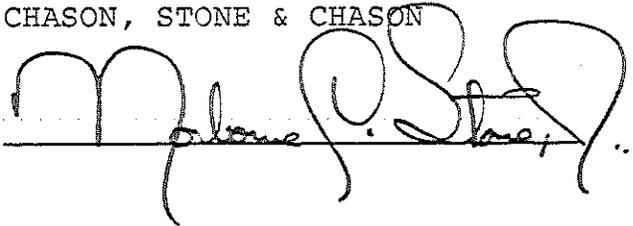
Re: Klasnich vs. Scott  
Case No. 8200

Would you please withdraw our appearance as attorneys for the defendant in the above case.

Thanking you for your attention to this request, we are

Sincerely,

CHASON, STONE & CHASON

By: 

NCS:dr

cc: Louis W. Scott  
653B Newborn Street  
Plateau, Alabama 36610

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

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 Louis Winfield Scott and Brady  
Rivers

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.....

Louis Winfield Scott and Brady Rivers....., Defendant.....

by George Klasnich and Frank Klasnich.....

....., Plaintiff.....

**FILED**

Witness my hand this.....

..... day of.....

19..68

JUL 1 1968

*George Klasnich*  
Clerk

**ALICE J. DUCK**

CLERK  
REGISTER

VOL

65 PAGE 99

*24*  
*7-6-68*

STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

*George Kearnick et al*

Plaintiffs

*137* vs.

*Louis Wanfield South et al*

Defendants

SUMMONS AND COMPLAINT

Filed 7-1 1968

*Deirdre J. ...* Clerk

RECORDS & CLERK DEPT.  
BALDWIN COUNTY, ALA.  
JUL 3 10 13 AM '68

BY \_\_\_\_\_ Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Jul 2 1968

Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_\_

by leaving a copy with

*Brady Rivers, 26-68*  
*By W. Estes D.S.*  
*Louis Wanfield South 7-15-68*  
*By R. Harlow D.S.*

TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA CLAIM \$1.50 EACH

FOR SERVING 3 PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ 200

PROCESS(ES) OR A TOTAL OF \$ 500

*Ray D. Bridges* Sheriff

*W. Estes* Deputy Sheriff

*R. Harlow - 20 mi*

GEORGE KLASNICH and  
FRANK KLASNICH  
  
Plaintiffs

vs

LOUIS WINFIELD SCOTT and  
BRADY RIVERS *et al*  
*Scott*  
Defendants

X  
X IN THE CIRCUIT COURT OF  
X BALDWIN COUNTY, ALABAMA  
X AT LAW NO. 8200  
X  
X

The plaintiffs claim of the defendants, Louis Winfield Scott and Brady Rivers the sum of Six Hundred (\$600.00) Dollars as damages for that heretofore on to-wit, March 4, 1968, at about 5:15 P.M. that plaintiffs' agent, servant or employee was operating an automobile pickup truck on a public highway, to-wit, U. S. Highway numbered 31 at a point about 6.3 miles North of Bay Minette in Baldwin County, Alabama, where she had a right to be and defendants, Louis Winfield Scott so negligently operated his pulpwood truck then and there as to cause the said pulpwood truck which he was operating to run over, upon or against the said pickup truck which plaintiffs' agent, servant or employee was then and there operating and plaintiffs aver that as a proximate consequence thereof, their said pickup truck was struck in the rear and the body and frame of said motor vehicle damaged so that the said motor vehicle was a total loss and plaintiffs aver that all of said damages were proximately caused by the said negligence of the said defedat, Louis Winfield Scott, the agent, servant or employee of Brady Rivers, in the negligent operation of said motor vehicle at the time and place and on the occasion aforesaid.

*[Handwritten Signature]*  
Attorney for plaintiffs.

**FILED**

JUL 1 1968

**ALICE J. DUCK** CLERK REGISTER

THE COURT REPORTER  
AND THE JURY  
THE COURT REPORTER  
AND THE JURY

We the Jury find Plaintiff and set  
his damages at 600<sup>00</sup> Six Hundred  
Dollars -

Charles B. [Signature]

Plaintiff's name, defendant's name, and the date of the accident. (00.0000) Defendant's name and the date of the accident. The court found that the defendant was negligent and liable for the plaintiff's injuries. The court awarded the plaintiff damages of \$600.00. The court also found that the defendant was negligent and liable for the plaintiff's injuries. The court awarded the plaintiff damages of \$600.00.

GEORGE KLASNICH et. al.,	X	IN THE CIRCUIT COURT OF
Plaintiffs,	X	BALDWIN COUNTY, ALABAMA
vs.	X	AT LAW
LOUIS W. SCOTT et. al.,	X	NO. 8200
Defendants.	X	

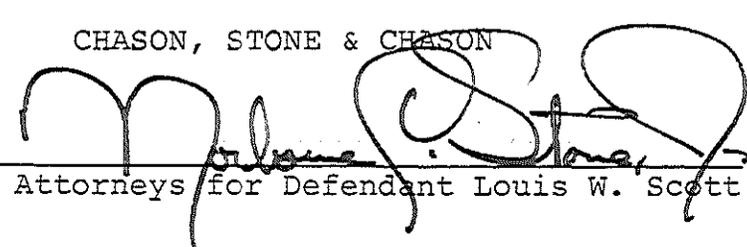
DEMURRER:

Comes now the Defendant Louis W. Scott, by his attorneys, and demurs to the Complaint heretofore filed against him and assigns, separately and severally, the following grounds in support thereof:

1. The Complaint fails to state a cause of action.
2. The Complaint fails to allege that the Defendant Louis W. Scott owed a duty to the Plaintiffs and that he breached said duty proximately causing damages to the Plaintiffs.
3. The allegations of the Complaint are vague, indefinite and uncertain.
4. The Complaint fails to allege that the Defendant Louis W. Scott was guilty of any negligence which proximately resulted in the damages allegedly sustained by the Plaintiffs.
5. The Complaint fails to allege that the Plaintiffs owned the truck allegedly damaged.
6. For aught that appears from the allegations of the Complaint the Plaintiffs were not the owners or bailees of the motor vehicle allegedly damaged.
7. The Complaint fails to allege facts which constitute negligence as a matter of law.

Respectfully submitted,

CHASON, STONE & CHASON

By:   
Attorneys for Defendant Louis W. Scott

FILED

AUG 15 1968

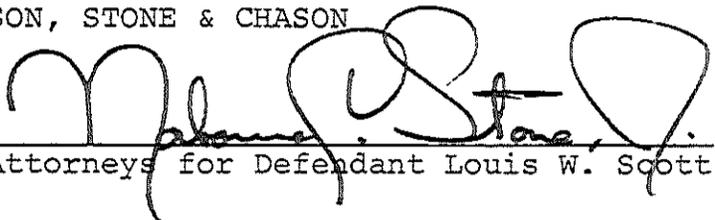
ALICE J. DUCK

CHECK REGISTER

VOL 65 PAGE 100

The Plaintiff respectfully demands  
a trial of this cause by a jury.

CHASON, STONE & CHASON

By:   
Attorneys for Defendant Louis W. Scott

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing  
pleading has been served upon counsel  
for all parties to this proceeding, by  
mailing the same to each by First Class  
United States Mail, properly addressed  
and postage prepaid on this.....day  
of....., 19.....

.....

GEORGE KLASNICH et. al.

Plaintiffs,

vs.

LOUIS W. SCOTT et al,

Defendants.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 8200

\* \* \* \* \*

DEMURRER

\* \* \* \* \*

**CHASON, STONE & CHASON**  
ATTORNEYS AT LAW  
P. O. BOX 120  
BAY MINETTE, ALABAMA



ROBERTS & SON, INCORPORATED

P. O. Box 1382 — Birmingham, Alabama 35216

Phone (205) 822-3122

BILL HACKBARTH

REPRESENTATIVE

Carlisle, the attorney  
checked on this company  
it is a Corp. formed  
in this county and  
can be served on a  
one in the office  
at place of business



R & S  
ROBERTS & SON, INCORPORATED

Phone (302) 673-3133

REPRESENTATIVE  
BILL HACKBARTH

This party in Wisconsin  
 his people in St. Louis  
 weren't the Corp.

[Handwritten signatures and scribbles follow, including names like "Carl" and "John"]