

ANGELIA DELORES ZAHN	I	IN THE CIRCUIT COURT OF
Plaintiff,	I	BALDWIN COUNTY,
Vs	I	ALABAMA
SUPER STORES, INC., a	I	CIVIL DIVISION
corporation; XYZ		
Corporation; JOHN DOE	I	AT LAW
and RICHARD ROE, d/b/a		
SUPER 5 & 10 STORE;	I	
Defendants.	I	CASE NO. <u>8831</u>

Plaintiff claims of the Defendant the sum of FIFTEEN THOUSAND (\$15,000.00) DOLLARS as damages for that heretofore and on, to-wit, the 10th day of October, 1968, the Defendants were the owners or proprietors having charge of the maintenance or condition of the Super 5 & 10 Store in the Plaza Shopping Center, Atmore, Alabama. Plaintiff avers that on said occasion she was upon said premises by invitation of the Defendants, being a business invitee in that she was on said premises for the purpose of purchasing merchandise from the Defendants, and that at said time and place she was traversing one of the isles or passageways provided for customers and persons traversing said building and in so walking she was caused to fall and thereby sustained severe, painful and permanent injury to her person; Plaintiff was contused and bruised in and about the various portions of her body, and she sustained shock and her nervous system was shocked and impaired, and Plaintiff was at the time of said accident, pregnant with child and as a result of the fall she was caused to have a miscarriage, and Plaintiff has been put to great medical, doctor and hospital expense for treatment of her injuries, and Plaintiff has been prevented from going about her daily duties and pursuits, all to her damage which she claims.

Plaintiff avers that on said occasion the Defendants negligently caused or negligently allowed a color crayon to be and remain on the floor of the isle or the passageway in question and Plaintiff was caused to slip and fall on the aforesaid crayon, and as a direct

and proximate result of the aforesaid negligence of the Defendants, Plaintiff was, as aforesaid, caused to fall and sustained the injuries and damages herein claimed all as a direct and proximate result of the negligence of the Defendants as aforesaid.

M. A. MARSAL and JAMES E. ATCHISON
Attorneys for Plaintiff

by: James E. Atchison
JAMES E. ATCHISON

Plaintiff demands a trial
by jury.

by: James E. Atchison
JAMES E. ATCHISON

Defendants may be served:
Super 5 & 10 Store
Plaza Shopping Center
Atmore, Alabama

FILED

AUG 5 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8831

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon SUPER STORES, INC., A CORP., XYZ CORPORATION:

JOHN DOE AND RICHARD ROE, d/b/a SUPER 5 & 10 Store

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 SUPER STORES, INC., A
SUPER 5 & 10 STORE
Corporation; XYZ Corporation; JOHN DOE and RICHARD ROE, d/b/a Defendant.

by ANGELIA DELORES ZAHN

Plaintiff.

Witness my hand this 5th day of August 1969

Alice D. Luck, Clerk

Ex-8-7-69

No. 8831

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

ANGELIA DELCRES ZAHN

Plaintiffs

vs.

SUPER STORES, INC., A Corporation,
XYZ CORP., JOHN DOE & RICHARD
ROE, d/b/a SUPER 5 & 10 STORE

Defendants

SUMMONS AND COMPLAINT

Filed August 5, 1969

Alice J. Duck

Clerk

M. A. MARSAL & JAMES E. ATCHISON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

August 5, 1969

Taylor Wilkins Sheriff

I have executed this summons

this 7- Day Aug 1969
by leaving a copy with

Manager Bob Kobes
Super 5 & 10 Store

Gr Bynes Sheriff

Alton Keenes Deputy Sheriff

64 miles

SEALE, MARSAL, SEALE & DUKE

LAWYERS

2410 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS
POST OFFICE BOX 1746
432-6686

HARRY SEALE
M. A. MARSAL
A. J. SEALE
LEON G. DUKE

August 14, 1969

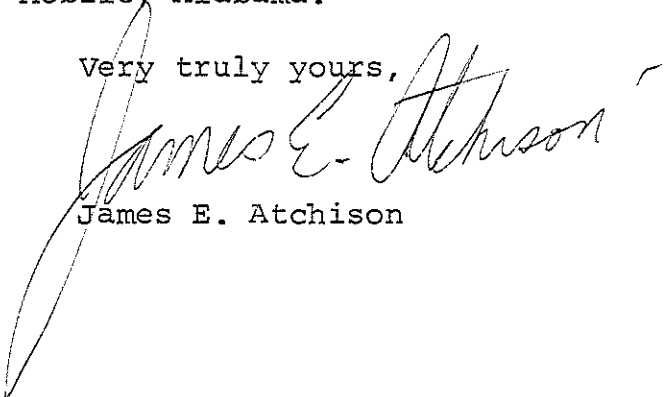
Mrs. Alice Duck
Clerk of Circuit Court
Baldwin County
Bay Minette, Alabama

Re; Delores Zahn VS Super 5 & 10
Case No. 8831

Dear Mrs. Duck:

Please dismiss the above styled cause and forward the cost bill to the attorney for the defendant in care of Larry U. Sims, First National Bank Bldg., Mobile Alabama.

Very truly yours,


James E. Atchison

JEA:mam

THE STATE OF ALABAMA

ESCAMBIA COUNTY

No

59

Cirine DIV. 8831
Case No.

IN THE Circuit COURT OF
ESCAMBIA COUNTY, ALABAMA

Angelica Deborah Zahn

Baldwin

VS.
Super Stores Inc. Super 5 & 10 store - Bob Kobos mgr.

Before me J. F. Vickery Clerk of the Circuit Court of
Escambia County, Alabama, personally appeared G. S. Byrne, who being duly sworn deposes
and says, I am the Sheriff of Escambia County, Alabama, in the case of

Same VS. Same
in the above mentioned court, in the execution of the Summons & Complaint

in the above mentioned case, I or one of my duly authorized deputies traveled 64 miles
by the most direct route from Brewton to Atmore
and return and am entitled to mileage at ten cents per mile, to be taxed as cost in the case.

Sworn and subscribed to before me this 7th day of Aug, 1969, Sheriff.
G. S. Byrne
Clerk of the Court

Disp. of Case. After considering the affidavit made by the sheriff in the above mentioned Case, I as trial judge of
said court do hereby approve the claim for mileage in the sum of

SEALE, MARSAL, SEALE & DUKE

LAWYERS

2410 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

HARRY SEALE

M. A. MARSAL

A. J. SEALE

LEON G. DUKE

MAILING ADDRESS

POST OFFICE BOX 1746

432-6686

August 4, 1969

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

Re: Angelia Delores Zahn V Super Stores,
Inc., et al

Dear Mrs. Duck:

Enclosed herewith please find a complaint which I would like
for you to file in our behalf.

Thanking you for your continued co-operation, I am

Very truly yours,


James E. Atchison

JEA:mam

8831

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON
LAWYERS

30TH FLOOR FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

36601

MAILING ADDRESS:
P. O. DRAWER C
OR P. O. BOX 123

CABLE ADDRESS:
HAB
TELEPHONE
432-5511
AREA CODE 205

CHAS. C. HAND
C. B. ARENDALL, JR.
T. MASSEY BEDSOLE
THOMAS G. GREAVES, JR.
VIVIAN G. JOHNSTON, JR.
PAUL W. BROCK
ALEX F. LANKFORD, III
EDMUND R. CANNON
LYMAN F. HOLLAND, JR.
J. THOMAS HINES, JR.
DONALD F. PIERCE
LOUIS E. BRASWELL
HAROLD D. PARKMAN
G. PORTER BROCK, JR.
HARWELL E. COALE, JR.
STEPHEN G. CRAWFORD
JERRY A. McDOWELL
W. RAMSEY MCKINNEY, JR.
LARRY U. SIMS
A. CLAY RANKIN, III
EDWARD A. HYNDMAN, JR.
MICHAEL D. KNIGHT
G. HAMP UZZELLE, III

November 29, 1971

Clerk, Circuit Court
Baldwin County Courthouse
Bay Minette, Alabama

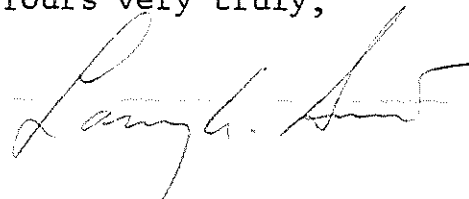
RE: Angelia D. Zahn v. Super Stores, Inc.
court costs

Dear Sir:

Please advise if the costs in the above-referenced matter has been paid. If not, please advise with a copy of your cost bill and we will clear up the matter.

Thanking you for your cooperation in this matter,
we are,

Yours very truly,



For the Firm

LUS:jkn