

EILEEN GASSER

Plaintiff

VS.

ESTATE OF KENNETH HAYES,
dec'd; HEIRS OF KENNETH
HAYES, JOHN DOE And RICHARD)
ROE, individuals, ABC, a)
company; XYZ a corporation;)
whose names are otherwise)
unknown but will be supplied)
by amendment when ascertained)

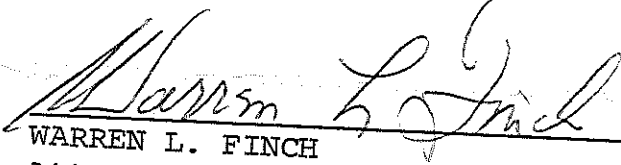
Defendants

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY,
) ALABAMA

) AT LAW

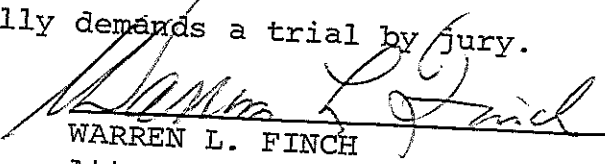
) CASE NO. 10,575

Comes now the Plaintiff, Eileen Gasser, and claims of the Defendants the sum of FIFTY THOUSAND DOLLARS (\$50,000.00) for that heretofore on, to-wit: the 30th day of August, 1971, the Defendant, Kenneth Hayes, did negligently drive an automobile on Alabama Highway 16 between Highway 66 and Jenkins Road, both of which are public roads in the County of Baldwin, State of Alabama, in that the said Defendant did negligently cause, allow or permit the said motor vehicle he was driving on said Alabama Highway 16 at said time and place to run into, upon or against the motor vehicle driven by the Plaintiff and as a direct and proximate consequence of said Defendant's negligence, the Plaintiff was injured about the back, chest, body, neck, shoulder, arms and suffered internal injuries and Plaintiff has had to expend large sums of money for medical expenses and Plaintiff was caused to lose a considerable amount of time from her employment. Plaintiff alleges that she was permanently injured.


WARREN L. FINCH

Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury.


WARREN L. FINCH

Attorney for Plaintiff

Defendant May Be Served:
Mr. John Chason
Chason, Stone and Chason
Attorneys at Law
Bay Minette, Alabama

FILED

AUG 29 1971

EUNICE B. BLACKMON CIRCUIT CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County
No. 10,575

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ESTATE OF KENNETH HAYES, dec'd; Heirs of Kenneth Hayes,
John Doe & Richard Roe, individuals, ABC, a company; XYZ a corporation; whose names
are otherwise unknown but will be supplied by amendment when ascertained

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 Estate of Kenneth Hayes;
dec'd; Heirs of Kenneth Hayes, John Doe & Richard Roe, individuals, ABC, a company; XYZ
a corporation; whose names are otherwise unknown but will be supplied by amendment when
ascertained Defendant

by EILEEN GASSER

Plaintiff.....

witness my hand this 29th day of August 1972

Eileen Gasser Clerk

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

EILEEN GASSER

Plaintiffs

VS.

ESTATE OF KENNETH HAYES, dec'd; Heirs of
Kenneth Hayes, John Doe & Richard Roe, individuals,
ABC, a company; XYZ a corporation; whose
names are otherwise unknown but will be supplied

by amendment when ascertained

SUMMONS AND COMPLAINT

Filed August 29, 1972

Eunice B. Blackmon Clerk

Defendant May Be Served:

Mr. John Chason
Chason, Stone & Chason
Attorneys At Law
Bay Minette, Alabama

Warren Finch

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

AUG 30 1972

19.....

TAYLOR WILKINS

Sheriff

I have executed this summons

this Aug 30 1972

by leaving a copy with

Mr. John Chason
Attorney for Defs.

Shirley Hobbs

Ten Cents per mile Total \$

TAYLOR WILKINS Sheriff

DEPUTY SHERIFF

Taylor Wilkins Sheriff

W A Zeller Deputy Sheriff

WARREN L. FINCH

LAW OFFICE
OF

963 OLD SHELL ROAD
MOBILE, ALABAMA 36604
TELEPHONE 438-1621

WARREN L. FINCH

December 6, 1972

Mrs. Eunice B. Blackmon
Clerk of Circuit Court
Baldwin County Courthouse Building
Bay Minette, Alabama

RE: Eileen Gasser Vs. Est. of Kenneth Hayes
Case No. 10,575

Dr. Raymond F. Gasser Vs. Est. of Kenneth Hayes
Case No. 10,576

Christopher Gasser Vs. Est. of Kenneth Hayes
Case No. 10,577

Raymond F. Gasser, Jr. Vs. Est. of Kenneth Hayes
Case No. 10,578

Dr. Raymond F. Gasser Vs. Est. of Kenneth Hayes
Case No. 10,579

Dr. Raymond F. Gasser Vs. Est. of Kenneth Hayes
Case No. 10,580

Dear Mrs. Blackmon:

Please dismiss the cases as referenced above and mail
us the Court Cost bill.

Sincerely,



Warren L. Finch

WLF/cs

cc: Mr. John E. Chason

EILEEN GASSER	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
ESTATE OF KENNETH HAYES,	X	AT LAW CASE NO. 10,575
Dec'd; HEIRS OF KENNETH		
HAYES, JOHN DOE And RICHARD	X	
ROE, individuals, ABC, a		
company; XYZ a corporation;	X	
whose names are otherwise		
unknown but will be supplied	X	
by amendment when ascertained		
	X	

MOTION TO QUASH SERVICE

Come now the Defendants in the above styled cause, appearing specially by and through their attorney of record, and for no other object or purpose, to move to quash the service of the above styled cause, heretofore attempted on them, and as grounds therefor would show unto Your Honor and unto this Honorable Court as follows:

1. Service of process was attempted by serving John Earle Chason of the firm of Chason, Stone & Chason, Attorneys at Law, Bay Minette, Alabama, who is not a Defendant nor is he agent, servant or employee for any Defendant, either individual or corporate.

2. The service attempted herein is of a suit which is not a pending suit and is not sufficient under Title 7, Section 198, Code of Alabama Recompiled 1958.

CHASON, STONE & CHASON

FILED

SEP 6 1972

BY: John E. Chason