

CHRISTOPHER GASSER, a minor)
suing by and through his father)
and next friend, DR.)
RAYMOND F. GASSER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,

Plaintiff)

ALABAMA

VS.)

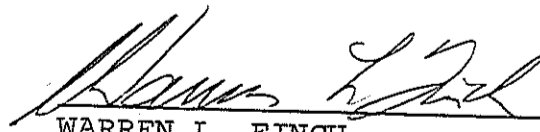
AT LAW

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 ascertain-)
ed

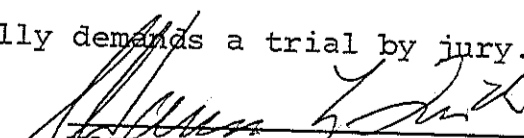
Defendants)

CASE NO. 10577

Comes now the Plaintiff, Christopher Gasser, a minor suing by and through his father and next friend, 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 to run into, upon or against the motor vehicle in which the Plaintiff was a passenger and as a direct and proximate consequence of said Defendant's negligence the Plaintiff was injured about the back, chest, body, neck, legs, shoulder and arms and Plaintiff has had to expend large sums of money for medical expenses. Plaintiff alleges that he has been 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 & Chason
Attorneys at Law
Bay Minette, Alabama

FILED

AUG 29 1972

EUNICE B. BLACKMON CIRCUIT
CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,577

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon 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

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 and Richard Roe, individuals, ABC, a co. XYZ a Corp. whose names are otherwise unknown but will be supplied by amendment when ascertained Defendant.

by Christopher Gasser, a minor suing by and through his father and next friend, Dr. Raymond F. Gasser

..... Plaintiff.....

witness my hand this 29th day of August 1972

Caroline B. Blackman, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Christopher Gasser, a minor suing by and through his father and next friend,
Dr. RAYMOND F. GASSER

Plaintiffs

VS.

Estate of KENNETH HAYES, dec'd; Heirs of Kenneth Hayes, John Doe & Richard Roe, Ind. ABC, a Co. XYZ a Corp. whose names are otherwise unknown but will be supplied by amendment when ascertained

Defendants

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

Plaintiff's Attorney

Warren L. Finch

Defendant's Attorney
Plaintiff's

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 Defts.

Sheriff claims _____ miles at

Ten Cents per mile Total \$ _____

TAYLOR WILKINS, Sheriff

BY _____

DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. A. Zeller Deputy Sheriff

CHRISTOPHER GASSER, a minor
suing by and through his father
and next friend, DR. RAYMOND
F. 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 ascertain-
ed

Defendants

X
X IN THE CIRCUIT COURT OF
X
X BALDWIN COUNTY, ALABAMA
X
X AT LAW CASE NO. 10,577
X
X
X
X
X
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 Honor-
able 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 cor-
porate.

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

BY: *John E. Chason*

FILED

SEP 6 1972

UNICE B. BLACKMON CIRCUIT CLERK