

RAYMOND F. GASSER, JR., 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 ascertained

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW CASE NO. 10,578

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

FILED

SEP 6 1972

BY: 

EUNICE B. BLACKMON CIRCUIT
CLERK

RAYMOND F. GASSER, JR., a)	IN THE CIRCUIT COURT OF
minor suing by and through his)	
father and next friend, DR.)	BALDWIN COUNTY,
RAYMOND F. GASSER)	
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 ascertained)	
Defendants)	CASE NO. <u>10,578</u>

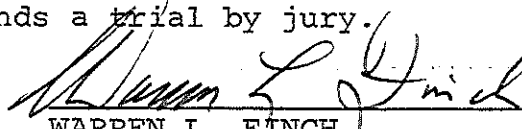
Comes now the Plaintiff, Raymond F. Gasser, Jr., a minor suing by and through his father and next friend, and claims of the Defendants the sum of TWO HUNDRED THOUSAND DOLLARS (\$200,000.00) for that heretofore on, to-wit: the 30th day of August, 1971, the Defendant, Kenneth Hayes, did negligently drive 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, shoulders and arms and suffered internal injuries 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.

FILED

AUG 31


 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 19..

EUNICE B. BLACKMON **CIRCUIT**
CLERK

SUMMONS AND COMPLAINT

MOORE PRINTING CO. BAY MINETTE ALA.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 10,578

.....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
.....
..... Plaintiff.....

witness my hand this 29th day of August 1972

Ernie B. Blackburn, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

RAYMOND F. GASSER, JR., 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 and Richard Roe, individuals
ABC, a company, XYZ, a corporation 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

Warren Finch

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

RECEIVED

AUG 30 1972

19.....

Sheriff

I have executed this summons

this Aug 30 1972

by leaving a copy with individuals

when ascertained

John Chason
Attorney for Depts.

per Court per rule Total \$

TAYLOR WILKINS Sheriff

DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Zallert Deputy Sheriff