

DR. RAYMOND F. GASSER	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
	X	
vs.	X	BALDWIN COUNTY, ALABAMA
	X	
ESTATE OF KENNETH HAYES, Dec'd	X	AT LAW CASE NO. 10,580
HEIRS OF KENNETH HAYES, JOHN DOE		
and RICHARD ROE, individuals	X	
ABC, a company, XYZ, a corporation		
whose names are otherwise unknown	X	
but will be supplied by amendment		
when ascertained	X	
Defendants	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

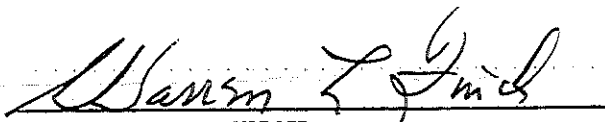
SEP 6 1972

EUNICE B. BLACKMON CIRCUIT CLERK

BY: John E. Chason

DR. RAYMOND F. GASSER)	IN THE CIRCUIT COURT OF
Plaintiff)	BALDWIN COUNTY,
VS.)	ALABAMA
ESTATE OF KENNETH HAYES, dec'd;)	AT LAW
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>10,580</u>

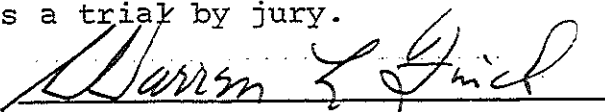
Comes now the Plaintiff, Dr. Raymond F. Gasser, and claims of the Defendants the sum of TWO HUNDRED THOUSAND DOLLARS (\$200,000.00) for that heretofore on, to-wit: the 30th day of August, 1971, the Defendant, Kenneth Hayes, did negligently drive an automobile on Alabama Highway 16 between Highway 66 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 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 his employment. Plaintiff alleges that he was permanently injured.


 WARREN L. FINCH
 Attorney for Plaintiff

Plaintiff respectfully demands a trial by jury.

Defendant May Be Served:

Mr. John Chason
 Chason, Stone and Chason
 Attorneys at Law
 Bay Minette, Alabama


 WARREN L. FINCH
 Attorney for Plaintiff

FILED

AUG 29, 1972

EUNICE B. BLACKMON CIRCUIT CLERK

SUMMONS AND COMPLAINT

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10,580

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon
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 Dr. Raymond F. Gasser Plaintiff.....

witness my hand this 29th day of August 19..72..

Ernest B. Blackman Clerk

STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

DR. RAYMOND F. GASSER

Plaintiffs

VS.

ESTATE OF KENNETH HAYES, dec'd; Heirs of
Kenneth Hayes, John Doe & Richard Roe, Ind.
ABC, a company, XYZ, A CORP. WHOSE names
are otherwise unknown but will be supplied by
amendment when ascertained

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

AUG 30 1972 19.....

TAYLOR WILKINS Sheriff

I have executed this summons

this Aug 30 1972

by leaving a copy with

John Chason
Attorney for Defts.

St. aff. claims..... miles at

Ten Cents per mile Total \$

TAYLOR WILKINS, Sheriff

BY DEPUTY SHERIFF

Taylor Wilkins Sheriff
W. A. Elliott Deputy Sheriff