



AlaFile E-Notice

01-CV-2008-901931.00

To: M STAN HERRING JR
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NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

LATONYA N HALL v. JAMES G. BROWN ET AL
01-CV-2008-901931.00

The following complaint was FILED on 6/19/2008 8:53:46 AM

Notice Date: 6/19/2008 8:53:46 AM

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
BIRMINGHAM, AL 35203

205-325-5355
anne-marie.adams@alacourt.gov

**COVER SHEET
CIRCUIT COURT - CIVIL CASE**

(Not For Domestic Relations Cases)

Case Number:
01-CV-200

Date of Filing:
06/19/2008



ELECTRONICALLY FILED
6/19/2008 8:53 AM
CV-2008-901931.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
ANNE-MARIE ADAMS, CLERK

GENERAL INFORMATION

**IN THE CIRCUIT OF JEFFERSON COUNTY, ALABAMA
LATONYA N HALL v. JAMES G. BROWN ET AL**

First Plaintiff: Business Individual
 Government Other

First Defendant: Business Individual
 Government Other

NATURE OF SUIT:

TORTS: PERSONAL INJURY

- WDEA - Wrongful Death
- TONG - Negligence: General
- TOMV - Negligence: Motor Vehicle
- TOWA - Wantonnes
- TOPL - Product Liability/AEMLD
- TOMM - Malpractice-Medical
- TOLM - Malpractice-Legal
- TOOM - Malpractice-Other
- TBFM - Fraud/Bad Faith/Misrepresentation
- TOXX - Other: _____

OTHER CIVIL FILINGS (cont'd)

- MSXX - Birth/Death Certificate Modification/Bond Forfeiture
Appeal/Enforcement of Agency Subpoena/Petition to Preserve
- CVRT - Civil Rights
- COND - Condemnation/Eminent Domain/Right-of-Way
- CTMP-Contempt of Court
- CONT-Contract/Ejectment/Writ of Seizure
- TOCN - Conversion
- EQND- Equity Non-Damages Actions/Declaratory
Judgment/Injunction Election Contest/Quiet Title/Sale For
Division
- CVUD-Eviction Appeal/Unlawful Detainer
- FORJ-Foreign Judgment
- FORF-Fruits of Crime Forfeiture
- MSHC-Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition
- PFAB-Protection From Abuse
- FELA-Railroad/Seaman (FELA)
- RPRO-Real Property
- WTEG-Will/Trust/Estate/Guardianship/Conservatorship
- COMP-Workers' Compensation
- CVXX-Miscellaneous Circuit Civil Case

TORTS: PERSONAL INJURY

- TOPE - Personal Property
- TORE - Real Property

OTHER CIVIL FILINGS

- ABAN - Abandoned Automobile
- ACCT - Account & Nonmortgage
- APAA - Administrative Agency Appeal
- ADPA - Administrative Procedure Act
- ANPS - Adults in Need of Protective Services

ORIGIN: F **INITIAL FILING**

A **APPEAL FROM
DISTRICT COURT**

O **OTHER**

R **REMANDED**

T **TRANSFERRED FROM
OTHER CIRCUIT COURT**

HAS JURY TRIAL BEEN DEMANDED? Yes No

RELIEF REQUESTED: **MONETARY AWARD REQUESTED** **NO MONETARY AWARD REQUESTED**

ATTORNEY CODE: HER037

6/19/2008 8:52:59 AM

/s M HERRING

MEDIATION REQUESTED: Yes No **Undecided**



IN THE CIRCUIT COURT OF JEFFERSON COUNTY

LATONYA N. HALL)

PLAINTIFFS,)

v.)

CASE NO:

JAMES G. BROWN; DAVIDSON)

TRUCKING; FICTITIOUS)

DEFENDANTS A,)

the correct legal designation of the named)

defendants; FICTITIOUS B, whether)

singular or plural, thereby intending to refer)

to an individual or entity who or that was)

the owner and/or collided with the)

automobile in which the plaintiff was)

riding on the occasion made the basis of)

this lawsuit; C, D, and E, whether singular)

or plural, thereby intending to refer to the)

legal entity, person, firm or corporation)

for whose benefit James G. brown was)

acting on the occasion made the basis of)

this lawsuit; F, G, and H, thereby intending)

to refer to the legal entity, person, firm or)

corporation responsible for the state of)

repair of the vehicles operated by or on)

behalf of defendants on the occasion made)

the basis of this lawsuit; FICTITIOUS)

DEFENDANTS I, J, and K, whether)

singular or plural, thereby intending to refer)

to the legal entity, person, firm or)

corporation who negligently or wantonly)

entrusted the drivers of the vehicles)

responsible for the wreck all of those names)

are unknown to the plaintiff at this time but)

will be added by amendment when)

ascertained)

DEFENDANTS.)

COMPLAINT

Comes now the plaintiff in the above styled cause, and for his complaint in this matter states as follows:

1. Plaintiff, Latonya N. Hall, is a resident of Jefferson County, Alabama and is over the age of nineteen (19) years.

2. Defendant, James G. Brown, is over the age of nineteen (19) years, and is a resident of Jefferson County, Alabama.

3. Defendant, Davidson Trucking, Inc., upon information and belief is a foreign corporation doing business in Walker County, Alabama.

4. The plaintiff is without sufficient information, knowledge or belief to aver the true and proper identities of fictitious defendants named in the style of this complaint (adopted herein), but will aver the same when ascertained.

5. On or about June 19, 2006, Plaintiff was traveling on Pinson St at Intersection of Bethel Ave and Old Pinson Hwy when she was struck from behind by Defendant.

6. Plaintiff avers that on the occasion of the accident defendant, James G. Brown, was incompetent to properly drive and operate the truck entrusted to him by his employer, Davidson Trucking, Inc., and fictitious defendants. Upon information and belief, defendant, Davidson Trucking, Inc., and fictitious defendants, were negligent and/or wanton in hiring, training, and/or supervision of James G. brown. Furthermore, plaintiff alleges that defendants, including fictitious defendants, were guilty of negligent entrustment of its truck to James G. brown, on the occasion of the accident made the basis of this suit. Said negligence and/or wantonness was the proximate cause of the injuries to the plaintiff.

7. As a direct and proximate consequence of the negligence and/or wantonness of the defendants, including fictitious defendants, the plaintiff, Latonya N. Hall, was caused to

suffer serious and substantial personal injuries. Her injuries are permanent in nature. Plaintiff has incurred medical expenses and will incur medical expenses in the future. Plaintiff is prevented from going about his daily pursuits and duties and has been caused to suffer great physical pain and suffering. The ability of the plaintiff, Latonya N. Hall, to earn income and make a living has been impaired and will be impaired in the future.

WHEREFORE, PREMISES CONSIDERED, plaintiff demands judgment against defendants for compensatory and punitive damages, the exact amount to be determined at a trial by a jury of their peers. Plaintiff also demands costs and all other relief to which he is entitled.

/s/ M. Stan Herring
M. Stan Herring (her037)
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SERVE DEFENDANT BY CERTIFIED MAIL

James G. Brown
245 Allcorn Dr. #450
Remlap, AL 35133

Davidson Trucking, Inc.
c/o Linda J. Davidson
2818 Sloss Lane
Fultondale, AL36068