

STATE OF ALABAMA

IN THE CIRCUIT COURT - AT LAW

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Thomas P. Salvage and Madonna P. Salvage to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Edith Lazzari, a minor, suing by Angelo Lazzari as her Father and next friend.

Witness my hand this 20 day of May, 1963.

Angelo Lazzari
Clerk

EDITH LAZZARI, A Minor,
suing by Angelo Lazzari
as her Father and next
friend,

Plaintiff,

vs.

THOMAS P. SALVAGE and
MADONNA P. SALVAGE,

Defendants.

IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW

Ms. 5571

The Plaintiff claims of the Defendants the sum of Eight Thousand Five Hundred Dollars (\$8,500.00) as damages for that on, to-wit: January 27, 1963, on Baldwin County Highway #64 at its intersection with Baldwin County Highway #27, a public highway in Baldwin County, Alabama, the Defendant Madonna P. Salvage, who was then and there the agent, servant or employee of the Defendant Thomas P. Salvage, and acting within the line and scope of her employment as such agent, servant or employee, negligently drove an automobile into or against an automobile in which the said Edith Lazzari was riding as a passenger and as a proximate result

of the negligence of such Defendants the Plaintiff was injured in this: she received a fractured skull, and the fragments of such skull were driven into the cranial cavity thereby depressing the brain; her right eye is sunken; there are cosmetic changes in her face which involves a slight crook in her nose; there is a large scar about her hairline and she was permanently injured, all to the damages of the Plaintiff in the sum above mentioned, hence this suit.


Attorneys for Plaintiff

FILED

MAY 20 1963

ALICE J. DUCK, CLERK
REGISTER

720 5571

EDITH LAZZARI, A Minor,
suing by Angelo Lazzari
as her Father and next
friend,

Plaintiff,

VS

THOMAS P. SALVAGE ET AL.,

Defendants

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

* * * * *

FILED
MAY 20 1964
ALICE J. DUCK, CLERK
REGISTER

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

EDITH LAZZARI, a Minor, suing by
ANGELO LAZZARI, as her Father and
next Friend,

PLAINTIFF

VS

THOMAS P. SALVAGE and MADONNA P.
SALVAGE,

DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

LAW SIDE

5571

ANSWER

Come now the defendants in the above styled cause, by their
attorney, and for answer to the complaint heretofore filed inter-
pose the following separate and several plea thereto:

ONE

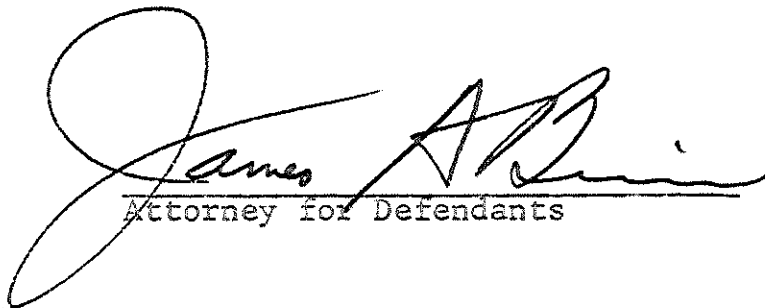
Not guilty.

FILED

MAY 20 1963

ALICE J. DUCK,

CLERK
REGISTER


Attorney for Defendants

TRISTON LAZZARI, a Minor, suing by
ANGELO LAZZARI, as his Father and
Next Friend,

PLAINTIFF

VS

THOMAS P. SALVAGE AND MADONNA P.
SALVAGE,

DEFENDANTS

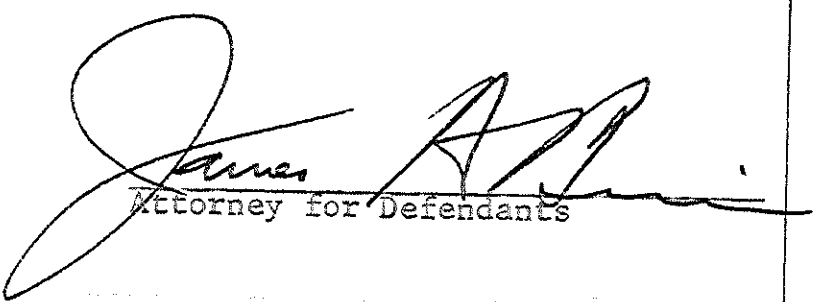
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE

ANSWER

Come now the defendants in the above styled cause, by their
attorney, and for answer to the complaint heretofore filed inter-
poses the following separate and several plea thereto.

ONE

Not guilty.


Attorney for Defendants

FILED

MAY 20 1963

ALICE J. DUCK, CLERK
REGISTERED