

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - AT LAW

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 Marion Lazzari, a minor, suing by Angelo Lazzari as her Father and next friend.

Witness my hand this 20 day of May, 1963.

Deirdre L. Lazzari
Clerk

MARION 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

M. 5573

The Plaintiff claims of the Defendants the sum of Three Hundred Dollars (\$300.00) 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 Marion 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 laceration of her scalp and she received multiple contusions, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

Chas. Stone
Attorneys for Plaintiff

FILED
MAY 20 1963
ALICE L. DUCK, CLERK
REGISTER

7015573

MARION LAZZARI, A Minor,
suing by Angelo Lazzari, her
father and next friend,

Plaintiff,

vs

THOMAS P. SALVAGE, ET AL.,

Defendants

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

* * * * *

CHASON & STONE
ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

MARION 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

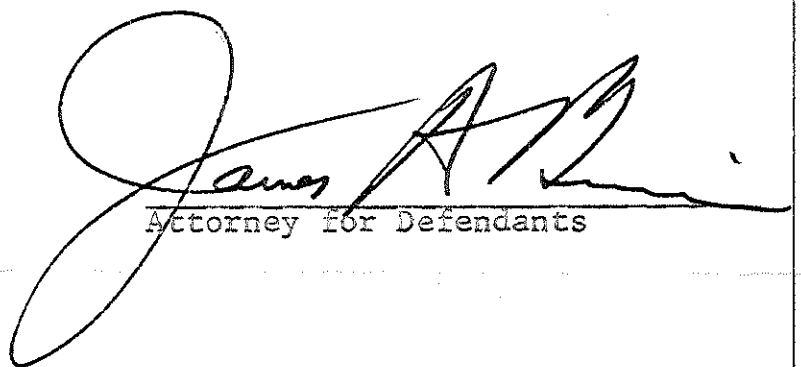
LAW SIDE

ANSWER

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

ONE

Not guilty.


Attorney for Defendants

FILED

MAY 20 1961

ALICE I. DUCK, CLERK
REGISTER

GULF AMERICAN FIRE and
CASUALTY COMPANY,
A Corporation,

Plaintiff

-VS-

L. C. FAISON

Defendant

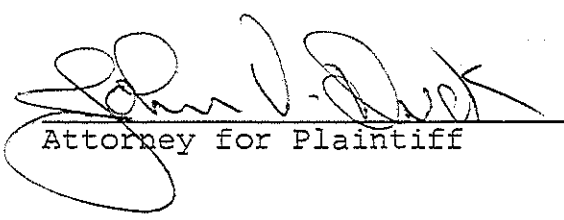
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA,
) AT LAW

) No: 5572
)
)
)

COUNT ONE:

Plaintiff claims of the Defendant, the sum of TWO HUNDRED and ELEVEN and 22/100 (\$211.22) DOLLARS, due by Promissory Note made by him on the 9th day of January, 1962, and payable on demand, with interest thereon.

That in and by the terms of said note, the Defendant promised that in the event of a default that he would pay all cost of collections, including a reasonable Attorneys fee, and the Plaintiff claims the further and additional sum of Fifty Dollars (\$50.00) as a reasonable Attorneys fee.


Attorney for Plaintiff

Defendant resides in
Bay Minette, Alabama.

FILED

MAY 20 1963

ALICE J. DUCK, CLERK
REGISTER