JOSEPH BORDENEY, A minor, by : his father and next friend, C. J. BORDENEY, :

IN THE CIRCUIT COURT OF

PLAINTIFF,

VS.

BALDWIN COUNTY, ALABAMA.

JOSEPH VACCARO & SOM,

DEFENDANT.

Plaintiff claims of the defendant, the sum of
Ten thousand and no/100 (\$10,000.00) Dollars, for that
on-to-wit the 20th day of April, 1958, a servant or agent
of the defendant, acting within the line and scope of his
employment, who was then operating a truck of the defendant
on the Mobile-Pensacola Highway, which is a public highway,
in Paldwin County, Alabama, negligently parked the truck
which he was then and there operating at night time on the
paved highway without any lights thereon and without putting
out any flares and as a proximate result of said negligence
caused the car in which the plaintiff was riding to collide
with another car which was then and there being operated
by Ora G. Barber and as a result thereof, the plaintiff was
caused to suffer great bodily pain and mental anguish, was
severely bruised and shaken up and his pelvis bone was broken.

Marine Aller

Plaintiff demands a trial of the above cause by

jury.

Tann Klack

STATE OF ALABAMA.

TO JOSEPH VACCARO AND GEORGE VACCARO, PARTNERS DOING BUSINESS UNDER THE NAME AND STYLE OF JOSEPH VACCARO & SON, 2226 NINTH AVENUE TAMPA, FLORIDA.

You will take notice that the Clerk of the Circuit of Baldwin County, Alabama, did on the 16th day of June, 1938, serve upon me, in my official capacity, summons and complaint attached, in a case entitled Joseph Bordenet, a minor, by his father and next friends, C. J. Bordenet vs. Joseph Vaccaro & Son, in the Circuit Court of Baldwin County, Alabama, a true copy of which summons and complaint is hereto attached.

Witness my hand and the Great Seal of the State of Alabama, this the 4th day of August, 1938.

Secretary of State of Alabama.

TO THE SHERIFF, DEPUTY SHERIFF, OR ANY OFFICER DULY QUALIFIED TO SERVE PROCESSES, IN THE NATURE OF SUMMONS, IN HILLSBOROUGH COUNTY, FLORIDA:

You are directed forthwith to serve the foregoint notice, with copy of summons and complaint thereto attached upon Joseph Vaccaro and George Vaccaro, individually, and as members of the partnership doinb business under the name and style of Joseph Vaccaro & Son, and to make return of the same immediately by filing in the office of the Clerk of the Circuit Court of Baldwin County, Bay Minette, Alabama.

Withess my hand and the Great Seal of the State of Alabama, this the 4th day of August, 1938.

Secretary of State of Alabama.

The State of Alabama, Baldwin County

	AS, <u>Earle Sm</u>	ith	
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ath complained	on oath to me, ROBERT	S. DUCK, Clerk of Circuit Court of Baldwin	County Ala
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at			
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the	said Joseph Vac	ecore and Son	
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the	said Joseph Vac	debt and costs, according to the complaint; and so	
the	said Joseph Vac	ecore and Son	thereon to be

WITNESS, my hand, this 21st day of April, 1938

ATTACHMENT KOORE PRINTING CO.,

Executed by attaching one Ford truck, 1936 Model Mtor Number 18-1980891 License number B-90-7 and Trailer, G.M.C. Model License numberG.K.-5-1056.
This Sard day of April 1938.

M. H. Wilkins, Sheriff,

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The State of Alabama, Baldwin County	Circuit Court,	Fall	Term, 19 <u></u> 3
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Towns Bandana			
Joseph Bordenet		- ·	
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	PLAINTIFF.		
	Vs.		
Joseph Vaccar & Son, a par	rtnership		
composed of Jos. Vaccaro and		-	,
	DEFENDANT.		
R. S. Duck	. Clerk of the	e Circuit Cou	rt of Baldwin County
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THE STATE OF ALABAMA	(•	No. 429	CIRCUI	r cc	UR:	Г.
BALDWIN COUNTY	(Judgment		TαT	~m 1	03 8
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DEAR SIRS: At the	<u> </u>	<u>e.c. 48</u>	9 Page 1997	<u></u>	<u> </u>	doubly C. G. Salatilan	وتيمس	-	
r the sum of	يسدور ينتمون	<u></u>	75.		The state of the s				
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spectfully request that you will, on receipt of t	nose a	in ite emit	mize the a	d sta .mou	tement of the c nt. If I do not he	osts which have accrued in ≥ar from you in a few days I	said will	cau: forw	se, and ard the
or and sweeting or your county for come	C'IOII.					R.S. Duck			
	especi		you						., Clerk.
CLERK'S FEES	@	Am	ount		S	HERIFF'S FEES	@	Am	nount
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words, per 100 words Entering Sheriff's return or copy thereof	15		40						20
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Entering Judgment, (each) Entering any other order of Court (each) Issuing Scire Facias, or notice in the	30		30		Taking and appr	roving bond	1.50		
nature thereof. (each)	75				Collecting mone	v under execution 5% first	3.00		
Issuing Execution or copy thereof; (each) Entering return, or copy thereof, for each 100				11	∃ 5200.00: 5% to	\$500.00; 3% all over \$500.00, attached, same for selling		4	75
words, 15 cents; but in no case less than Recording award of arbitrators, referees, audi-	20	ļ		1	i under executi	on,s fees,	ı		
tors, etc., for each 100 words, Issuing execution or attachment thereon, and	15			10	1				
entering return,	1.60					<u></u> .	l.y		
Taking bond for certiorari supersedeas, or appeal, or copy thereof and filing same,	75				***************************************				
Issuing Subpoenas for Witness, (each) Administering an oath, not relating to a trial	30								
pending and certifying the same, Issuing Attachment and taking bond, (ea.)	25 1.00	/	الردساويم			-(A) (1) (A) (A) (A) (A) (A) (A) (A) (A) (A) (A			
Issuingpapers in attachment, (each)	10 50								
Swearing and taking examination for Garni-									
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copy thereof. Certificate of Judgment,	50 50		40		Total She	riff's Fees,			
Recording each surveyor and surveyor's report or copy thereof, each 100 words 15 cts; but	50		<i>></i> ~						
not less than,	25	ļ			RECA	APITULATION			
not less than, Issuing Commission to take depositions, or copy thereof,	75			1	 Clerk's Feas			5	5-0 ,
commission.	50	į		• • • • • • • • • • • • • • • • • • • •	Kierice Rose	, , , , , , , , , , , , , , , , , , , ,		4)	* ***
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(each), Issuing writ of ad quod damnum or writ in the nature thereof,	75			8	Commissioner's	Justice of the Peace Court Fees, Residence,		İ	
Recording the return and inquest thereon	50			111	SCORSIDER'S WASS	1	.		
Or for each 100 words. Issuing Writ of certiorari, prohibition, mandamus, or writ in the nature therof,	15			$\frac{11}{12}$	Garnishee's Fees, Printer's Fees	5.55	- 11		
Finng the same and entering return	75 15					ees,		2	
Making a complete record of a cause or	15	اد	ا در د	~~					
[Making copy of any paper not herein provided]	15	7							
liviaking each certificate requiring the seal of	50							1	***
office, and affixing seal, Taking any bond not otherwise provided for,	75			ļ					
wise provided for, (each witness).	25			ļ		1000	•		*
For certifying abstract, in lieu of fees for transcript under section 2851 of the Code.	5.00			ĺ	13.44				
Record for Supreme Court, for each 100 words Each additional copy thereof, each 100 words	15 05			ĺ	· · · · · · · · · · · · · · · · · · ·		;		
Collecting money on judgments wherein said					Total Fee	s,	_ #	20	20-
judgment has not been paid within 30 days after rendition, one half the per cent allowed by the per cent allowed t	.			15	Judgment.		4.4		
ed sheriffs for same services for collecting money on executions,				16 17	Date, Interest.		-	. 0	
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Total Clerk's Fees,		1	30		Interest an	d Damages,			
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THE STATE OF ALABAMA, Baldwin County.	o	CIRCUIT C	
		May	193
To Any Sheriff of the State of Alabama:			: .
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You are hereby commanded to summon JC			rarene
composed of Joseph Vaccaro and	George Vaccard),	
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to appear and plead, answer or demur, within thirty day	from the service here	of, to the Com	plaint_file
the Circuit Court of Baldwin County, State of Alabama	at Bay Minette, Ala.,	against	
them Defendant by	TARTET DAT). 	
them Defendant by	OUDERA BUA	DENET a	Minor I
father and next friend, C. J.	Bordenet.	• 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	

	Plaintiff		
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witness my nand thisday of	April	193_ <mark>8</mark> _	
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COMPLA	INT	•	*
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JOSEPH BORDENET, a minor,	JOSEPH	VACCARO &	SON.
by his father and next friend,	Partner	ship,	
C. J. Bordenet.	The state of the s	A STATE OF THE STA	
Plaintiff versu	5		
The Plaintiff claims of the Defendant	:	4.	
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JOSEPH BORDEN A minor, by his father and next friend, C. J. BORDENT,

IN THE CIRCUIT COURT OF

PLAINTIFF,

BALDWIN COUNTY, ALABAMA.

Joseph Vaccaro

VS.

JOSEPH VACCARRO & SON,

DEFENDANT.

and George Vaccaro ()
Plaintiff claims of the defendant, the sum of

Ten Thousand and no/100 (\$10,000.00) Dollars, for that on-to-wit the 20th day of April, 1938, a servant or agent of the defendant, acting within the line and scope of his employment, who was then operating a truck of the defendant on the Mobile-Pensacola Highway, which is a public highway, in Baldwin County, Alabama, negligently parked the truck which he was then and there operating at night time on the paved highway without any lights thereon and without putting out any flares and as a proximate result of said negligence caused the car in which the plaintiff was riding to collide with another car which was then and there being operated by Ora C. Barber and as a result thereof, the plaintiff was caused to suffer great bodily pain and mental anguish, was severely bruised and shaken up and his pelvis bone was broken.

Harm A // selv-Attorney for Plaintiff.

Plaintiff demands a trial of the above cause by

jury.

Harm K. J. seld.

JOSEPH BORDENET, a minor, by his father and next friend, C. J. Bordenet, Plaintiff,

JOSEPH VACCARO & BON, a Partner-ship composed of Joseph Vaccaro and George Vaccaro, Defendants. Laserving copy of within Summons and Kxecuted.. Complaint on

Filed April 21st, 1938,

m C Ocerio Deputy Sheriff

_Sheriff

STATE OF ALABAMA,

COUNTY OF MOBILE.

Personally appeared before me, the undersigned Notary Public, Earl Smith, who being duly sworn deposes and says that he was the driver of the car in which Joseph Bordens was riding at the time he was injured as the result of the negligent operation of a truck of Joseph Vaccarro & Son; that Joseph Bordens is very seriously injured, having received a broken pelvis bone and a punctured bladder. He is at present confined in Providence Infirmary in Mobile, Alabama, and according to doctors, is in considerable danger.

Edule Smith

Subscribed and sworn to before me, this the 21st day of April, 1938.

Marin & Fresh

Notary Public, Mobile County, Ala

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april 2/2

1938

My forhole



STATE OF ALABAMA OFFICE OF SECRETARY OF STATE MONTGOMERY



August 4, 1938

Mr. R. S. Duck, Clerk Circuit Court -Baldwin County Bay Minette, Ala.

Dear Sir:

In Re: Earl Smith vs. Joseph Vaccaro & Son Henry Chavez vs. Joseph Vaccaro & Son Joseph Bordenet, a minor, etc., vs. Joseph Vaccaro & Son

I am enclosing herewith copies of notices, together with copy of letter written to the Sheriff at Tampa, Florida, requesting that he serve summonses and complaints on the defendants Joseph Vaccaro & Son. You will note that he is to make his return direct to you.

This service is made at the request of Mr. Marion R. Vickers, Attorney. We shall appreciate your notifying Mr. Vickers when service has been completed.

With best wishes, I am

Yours very truly,

Howell Turner Secretary of State.

HT:M
Copy to:
Mr. Marion R. Vickers,
First National Annex
Mobile, Ala.

			<u></u>	MOOKE PRINTING CO	DAY MINETTE, ALA.
THE STATE O		MA, No.	429	CIRCUIT C	OURT
Baldwin	County.				
					193
o Any Sheriff of th	e State of Ala	bama:			
	***			TE	1
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friend, C. J.	JOSEPH 1 Bordenet, this 15th	BORDENET, a Plain day of COMPLAIN	Minor by h	is father	and - next
friend, C. J. Witness my hand	JOSEPH J Bordenet, this 15th	BORDENET, a Plain day of	Minor by h	is father	and - next

Plaintiff versu

The Plaintiff claims of the Defendant

Dollars, due by

RECEIVED THE WITHIN WRIT August 5, 1938, and executed same August 8, 1938, in Hillsborough County, Florida, by exhibiting the original and delivering a true copy thereof together with a copy of Notice of Hearing upon George Vaccaro, in person, son of Joseph Vaccaro and a member of Joseph Vaccaro & Son, the within named defendant; FURTHER executed the within Writ August 12, 1938, in Hillsborough County, Florida, by exhibiting the original and delivering a true copy thereof together with a copy of Notice of Hearing upon Joseph Vaccaro, in person, of Joseph Vaccaro & Son, the within named defendant.

Bervices	a.00
Copies	.70
Returns	.50
Mileage	.75
	3.98

J. R. McLeod, Sheriff, Hillsborough County, Florida,

Well of Jorgaly, D. S.