

CERTIFICATE OF JUDGMENT

The State of Alabama }  
Baldwin County }

445  
Circuit Court, SPRING Term, 1939.

JOHNNIE D. CHESTER,

PLAINTIFF

Vs.

JOSEPH VACCARO & SON, a Partnership

composed of Jos. Vaccaro and Geo. Vaccaro,  
& JOS. VACCARO & GEO. VACCARO, individually,  
DEFENDANTS.

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County,

Alabama, do hereby certify that on the 10th day of May, 1939,

a Judgment was rendered by said Court in the above stated cause, wherein

JOHNNIE D. CHESTER,

was Plaintiff and JOSEPH VACCARO & SON, a Partnership composed of Jos. Vaccaro and Geo. Vaccaro, and JOS. VACCARO and GEO. VACCARO, individually, was Defendants in  
favor of the said Plaintiff and against the said Defendant for the sum of

THREE THOUSAND AND NO/100 (\$3,000.00)

DOLLARS,

and for the sum of FIFTEEN & 90/100 (\$15.90)

DOLLARS,

the costs in said suit and that ARMBRECHT, INGE, TWITTY & JACKSON,

are the Attorneys of record for the Plaintiff in said cause.

Witness my hand this 24th day of May, 1939.

Clerk, Circuit Court, Baldwin County, Alabama.

By:

Deputy Clerk.

Certificate Of Judgment

JOHNNIE D. CHESTER,

Plaintiff

Vs.

JOS. VACCARO & SON,

ET AL.,

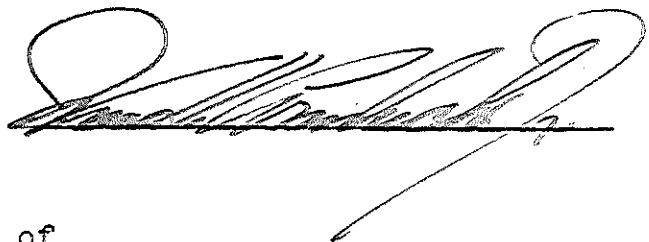
Defendant

STATE OF ALABAMA)

COUNTY OF MOBILE)

Wm. H. Armbrrecht, Jr.

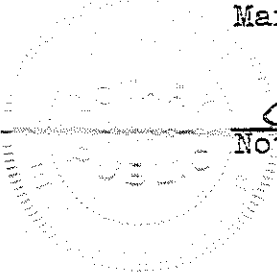
Personally appeared before me, the undersigned authority, on this, the 17th day of March, 1939, known to me and known by me to be one of the attorneys of record for the plaintiff in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, styled "Ora Chester Barber, Plaintiff, vs. Joseph Vaccaro and George Vaccaro, individually and doing business under the trade name and style of Joseph Vaccaro & Son, and C. J. Clark, Defendants", and having been first duly sworn doth depose and say that he is one of the attorneys of record for the plaintiff in said cause, that Ora Chester Barber now resides in the City of Denver, State of Colorado, that said Ora Chester Barber is a material witness in said cause and that her testimony as a witness in said cause on her own behalf will be material in said cause and that the plaintiff desires to take her testimony in the City of Denver, Colorado, on written interrogatories.



Subscribed and sworn to  
before me this 17th day of  
March, 1939.



Notary Public, Mobile County, Ala.



*Applicant*

*Filed March 17, 1939  
R. S. Bush, Register-Clark  
By: Arthur J. Thompson, Deputy*

THE STATE OF ALABAMA,  
Baldwin County.

No. \_\_\_\_\_

CIRCUIT COURT

RECEIVED

May 9 1938 1938

SECRETARY OF  
STATE

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon JOSEPH VACCARO and GEORGE VACCARO,

individually and doing business under the firm name and style

of Jos. Vaccaro & Son

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

them

Defendant by

ORA CHESTER BARBER,

Plaintiff

Witness my hand this 5th day of May 1938

*R. D. Clark* Clerk.

COMPLAINT

ORA CHESTER BARBER,

JOSEPH VACCARO and GEORGE VACCARO,  
individually and doing business  
under the firm name and style  
of Jos. Vaccaro & Son, and

Plaintiff versus

C. J. CLARK, Defendants.

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

ALL INFORMATION CONTAINED  
HEREIN IS UNCLASSIFIED  
DATE 01-28-2001 BY 60322 UCBAW

By: Henderson F. Mynatt  
Henderson F. Mynatt, Deputy.

No. \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

\_\_\_\_\_  
PLAINTIFF

VS.

\_\_\_\_\_  
DEFENDANT

**Summons and Complaint**

Filed, \_\_\_\_\_ 193\_\_

\_\_\_\_\_, Clerk.

Defendant Lives at \_\_\_\_\_

\_\_\_\_\_  
Plaintiff's Attorney.

\_\_\_\_\_  
Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

THE STATE OF ALABAMA,  
Baldwin County.

No. \_\_\_\_\_

CIRCUIT COURT

RECEIVED

May 1938  
JUL 19 1938

To Any Sheriff of the State of Alabama :

SECRETARY OF  
STATE

You are hereby commanded to summon

JOSEPH VACCARO and GEORGE VACCARO, individually and doing business  
under the firm name and style of JOSEPH VACCARO & SON, and  
C. J. CLARK,

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against them

Defendant .. by

JOHNIE D. CHESTER,

Plaintiff

Witness my hand this 5th day of May 1938

*R. Duck*

Clerk:

COMPLAINT

JOHNIE D. CHESTER

JOS. VACCARO and GEO. VACCARO

AND C. J. CLARK.

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

Received this writ at Tampa, Fla. July 22nd, 1938 and executed the same at Tampa, Fla. on July 28th, 1938, as to the within named Joseph Vaccaro and George Vaccaro, individually and doing vusiness under the firm name and style of Joseph Vaccaro & Son, and C. J. Clark, by exhibiting this original writ and delivering a true copy hereof to Joseph Vaccaro, individually and doing business under the firm name and style of Joseph Vaccaro & Son, and C. J. Clark, and making known to him the contents thereof.

By: Henderson F. Mynatt  
Henderson F. Mynatt, Deputy.

[illegible]



THE STATE OF ALABAMA,  
Baldwin County.

No. \_\_\_\_\_

CIRCUIT COURT

May

193 8

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon JOSEPH VACCARO and GEORGE VACCARO,

individually and doing business under the firm name and style

of Joseph Vaccaro & Son, and C. J. CLARK,

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

them

Defendant by

JOHNIE D. CHESTER,

Plaintiff

Witness my hand this 5th day of May 193 8

Clerk.

COMPLAINT

JOHNIE D. CHESTER,

JOS. VACCARO and GEO. VACCARO,

individually and doing business

under the firm name and style of

Plaintiff versus Jos. Vaccaro & Son, and C. J. CLARK,  
Defendants.

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

JOHNIE D. CHESTER,

PLAINTIFF,

VERSUS

JOSEPH VACCARO and  
GEORGE VACCARO, individually  
and doing business under the  
trade name and style of  
JOSEPH VACCARO & SON,

and

C. J. CLARK,

DEFENDANTS

IN THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA

AT LAW NO.

COURT 1

Plaintiff claims of the defendants a sum of Ten Thousand Dollars (\$10,000) damages for that on to-wit: the 20th day of April, 1932, the defendant C. J. Clark who was then and there an agent or servant of the defendants, Joseph Vaccaro and George Vaccaro doing business as Joseph Vaccaro & Son, and while acting within the line and scope of his employment as such agent or servant, parked an automobile truck on Highway U. S. 90, in Baldwin County, Alabama, at or near the Alabama-Florida State line and so negligently allowed same to remain parked, that an automobile driven by one Marie Smith on said Highway and approaching said parked truck, then and there ran into and collided with an automobile being then and there driven by plaintiff on said highway, as a proximate result of said negligence of said defendant, C. J. Clark, plaintiff was painfully and permanently injured and sustained lacerations, contusions, and bruises in and about the face, head, body, and limbs, plaintiff's right knee was broken, and she was caused to incur and will incur considerable expense in and about the treatment of said injuries; WHEREFORE plaintiff prays.

*Amberst T. Jackson*  
Attorneys for Plaintiff

Plaintiff demands that said cause be tried by jury.

*Amberst T. Jackson*  
Attorneys for Plaintiff

Each of the defendants may be found at 2226 Ninth Avenue, Tampa, Florida. Please serve by registered mail under Code Section 9454 (1).

THE STATE OF ALABAMA,))  
BALDWIN COUNTY. ))

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

TO..... CLARA C. ALVEY, Cosmopolitan Hotel, Denver, Colorado:-

KNOW YE: That, we, having full faith in your prudence and competency, have appointed you commissioner, and by these presents do authorize you, or any one of more of you, at such time and place as you may appoint, to call before you and examine JOHNNIE D. CHESTER, witness in behalf of the plaintiff in a cause pending in our Circuit Court of Baldwin County, Alabama, wherein JOHNNIE D. CHESTER is Plaintiff, and JOSEPH VACCARO & SON, ET AL., Defendants, on oath to be by you administered, upon interrogatories annexed to this commission, to take and certify the deposition of the witness and return the same to our said Court, to be holden on the 10th day of April, next, under your hand and seal.

WITNESS this 29th day of March, 1939.

R. S. DUCK,  
Clerk of the Circuit  
Court of Baldwin County,  
Alabama.

By: *Handwritten Signature*  
Deputy Clerk.

JOHNNIE D. CHESTER,  
Plaintiff,

Vs.

JOS. VACCARO & SON,  
Defendants.

COMMISSION TO TAKE DEPOSITION  
ON INTERROGATORIES.

JOHNIE D. CHESTER,	)	
	:	
Plaintiff,	)	
	:	IN THE CIRCUIT COURT
vs.	)	
	:	OF BALDWIN COUNTY,
JOSEPH VACCARO and	)	
GEORGE VACCARO, individually	:	ALABAMA
and doing business under the	)	
trade name and style of	:	
JOSEPH VACCARO & SON,	)	AT LAW NO.
	:	
and	)	
	:	
C. J. CLARK,	)	
	:	
Defendants.	)	

TO JOSEPH VACCARO and  
 GEORGE VACCARO, individually  
 and doing business under the  
 trade name and style of  
 JOSEPH VACCARO & SON, and  
 C. J. CLARK,  
 GREETINGS:

You, and each of you, will please take notice that in  
 the foregoing stated cause, pending in our Circuit Court  
 of Baldwin County, Alabama, interrogatories to be pro-  
 pounded to Johnie D. Chester of 1670 Cherry Street,  
 Denver, Colorado, (a copy of which herewith issues) a  
 witness in her own behalf, have been this day filed in  
 my office, which said interrogatories will remain on  
 file as aforesaid ten days after the mailing of this  
 notice to you, during which time you can file cross-  
 interrogatories if you think proper.

Clara C. Alvey, whose address is Cosmopolitan Hotel,  
 Denver, Colorado, has been suggested as the Commissioner  
 to take said deposition.

Witness my hand as Clerk of said Court this 18<sup>th</sup> day of  
 March, A.D., 1939.

*R.S. Duck*  
 Clerk of Circuit Court, Baldwin  
 County, Alabama.  
*By - Maurice Thompson*  
 Deputy Clerk

STATE OF ALABAMA, )  
BALDWIN COUNTY. )

I, R. S. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that I have on this date, mailed a copy of the within Notice of Filing Interrogatories, together with copy of Interrogatories, to each of the defendants in the above styled case, at 2226 Ninth Avenue, Tampa, Florida.

This, the 18th day of March, 1939.

R. S. DUCK, Clerk,

By: *Heath H. Hays*  
Deputy Clerk.

to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

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to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

to each of the defendants.

*Notice of Filing Interrogatories*

July 21, 1938

Messrs. Armbrecht, Twitty & Jackson,  
630 First National Bank Building  
Mobile, Ala.

Dear Sirs:

Attention: Mr. T. K. Jackson, Jr

In Re: Ora Chester Barber vs. Joseph  
Vaccaro & George Vaccaro and  
C. J. Clark

Johnie D. Chester vs. Joseph  
Vaccaro and George Vaccaro and  
C. J. Clark

---

Your letter of July 20th received.

I have today forwarded summonses and complaints  
to the U. S. Marshal at Tampa, Florida, to be served on the  
defendant Joseph Vaccaro. I am enclosing herewith copy of  
letter together with notice sent.

Trusting that we will be able to obtain service  
through the marshal, I am

Yours sincerely,



Howell Turner  
Secretary of State.

HT:m

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

Enclosures:

July 21, 1938

To the United States Marshal,  
Tampa, Florida.

Dear Sir:

Re: Ora Chester Barber vs.  
Joseph Vaccaro & George Vaccaro and  
C. J. Clark

Johnie D. Chester vs. Joseph Vaccaro  
& George Vaccaro and C. J. Clark

---

Will you please serve the enclosed notices and  
summons and complaints on the defendant JOSEPH VACCARO  
at 2226 NINTH AVENUE, TAMPA, FLORIDA.

Please make your return on each copy of the summons  
and complaint herewith enclosed and forward to Hon. R. S. Duck,  
Clerk Circuit Court, Baldwin County, Bay Minette, Alabama.

For your information, a copy of Act No. 32, H.B. 84,  
approved February 8, 1935, is enclosed, Page #2, of which I  
call to your attention.

I am enclosing herewith \$2.00 in each suit as your  
fee for these services.

It is our desire to have these papers served on  
the defendant at once.

Please acknowledge receipt of this letter to me  
and also as soon as you mail the returns to the Clerk at  
Bay Minette, Alabama, advise me.

Yours truly,



Howell Turner  
Secretary of State of Alab

HTLM

Enclosures:



S T A T E   O F   A L A B A M A .

TO JOSEPH VACCARO,  
2226 NINTH AVENUE  
TAMPA, FLORIDA.

You will take notice that the Clerk of the Circuit Court of Baldwin County, Alabama, did on the 19th day of July, 1938, serve upon me, in my official capacity, summons, with complaint attached, in the case entitled Johnie D. Chester vs. Joseph Vaccaro and George Vaccaro, individually and doing business under the trade name and style of Joseph Vaccaro & Son, and C. J. Clark, Circuit Court, 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 July 21, 1938.

Secretary of State of Alabama.

TO THE UNITED STATES MARSHAL, OR DEPUTY UNITED STATES MARSHAL,  
WHO IS <sup>A</sup> DULY CONSTITUTED OFFICER QUALIFIED TO SERVE PROCESSES, IN  
THE NATURE OF SUMMONS, IN HILLSBOROUGH COUNTY, FLORIDA:

You are directed forthwith to serve the foregoing notice, with copy of summons and complaint thereto attached upon <sup>individually and</sup> Joseph Vaccaro, as a member of the partnership of Joseph Vaccaro and George Vaccaro, invididually and doing business under the trade 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.

Witness my hand and the Great Seal of the State of Alabama, this July 21, 1938.

Hawell Turner  
Secretary of State of Alabama.

STATE OF ALABAMA.

TO JOSEPH VACCARO,  
2226 NINTH AVENUE  
TAMPA, FLORIDA.

You will take notice that the Clerk of the Circuit Court of Baldwin County, Alabama, did on the 19th day of July, 1938, serve upon me, in my official capacity, summons, with complaint attached, in a case entitled Ora Chester Barber, vs. Joseph Vaccaro and George Vaccaro, individually and doing business under the trade name and style of Joseph Vaccaro & Son, and C. J. Clark, Circuit Court, 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 July 21, 1938.

---

Secretary of State of Alabama.

TO THE UNITED STATES MARSHAL, OR DEPUTY UNITED STATES MARSHAL,  
WHO IS A DULY CONSTITUTED OFFICER QUALIFIED TO SERVE PROCESSES,  
IN THE NATURE OF SUMMONS, IN HILLSBOROUGH COUNTY, FLORIDA:

You are directed forthwith to serve the foregoing notice, with copy of summons and complaint thereto attached upon Joseph Vaccaro, individually and as a member of the partnership of Joseph Vaccaro and George Vaccaro, individually and doing business under the trade 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.

Witness my hand and the Great Seal of the State of Alabama, this July 21, 1938.

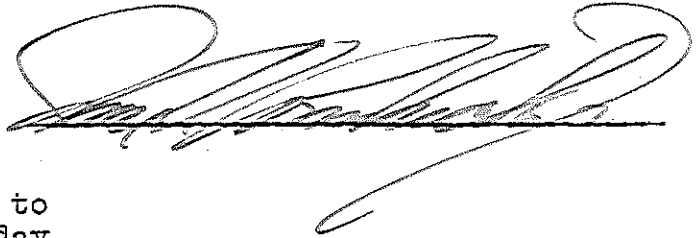
  
Secretary of State of Alabama.

STATE OF ALABAMA)

COUNTY OF MOBILE)


Wm. H. Armbrrecht, Jr.,

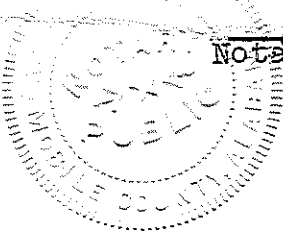
Personally appeared before me, the undersigned authority, on this, the 17th day of March, 1939, known to me and known by me to be one of the attorneys of record for the plaintiff in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, styled "Johnie D. Chester, Plaintiff, vs. Joseph Vaccaro and George Vaccaro, individually and doing business under the trade name and style of Joseph Vaccaro & Son, and C. J. Clark, Defendants." and having been first duly sworn doth depose and say that he is one of the attorneys of record for the plaintiff in said cause, that Johnie D. Chester now resides in the City of Denver, State of Colorado, that said Johnie D. Chester is a material witness in said cause and that her testimony as a witness in said cause on her own behalf will be material in said cause and that the plaintiff desires to take her testimony in the City of Denver, Colorado, on written interrogatories.

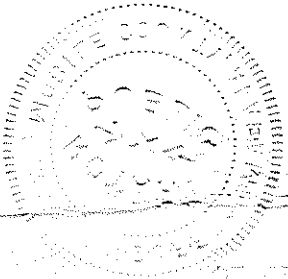


Subscribed and sworn to  
before me this 17th day

of March, 1939.

  
Notary Public, Mobile County, Alabama





*Opponent*

*Filed March 18, 1939*

*R. S. Dyer, Clerk  
By - Nathaniel Thompson, Deputy*

THE STATE OF ALABAMA,  
Baldwin County.

No. \_\_\_\_\_ CIRCUIT COURT

May 1938

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon \_\_\_\_\_

JOSEPH VACCARO and GEORGE VACCARO, individually and doing  
business under the firm name and style of JOS. VACCARO & SON,  
and C. J. CLARK,

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against them

Defendant by \_\_\_\_\_

JOHNNIE D. CHESTER,

Plaintiff \_\_\_\_\_

Witness my hand this 5th day of May 1938

*[Signature]* Clerk.

COMPLAINT

JOHNNIE D. CHESTER,

JOS. VACCARO and GEO. VACCARO ,  
individually and doing business  
under firm name and style of  
Jos. Vaccaro & Son, and C. J. CLARK,  
Defendants.

Plaintiff versus

The Plaintiff claims of the Defendant \_\_\_\_\_

\_\_\_\_\_ Dollars, due by

Plaintiff's Attorney.

JOHNIE D. CHESTER,

PLAINTIFF,

versus

JOSEPH VACCARO and  
GEORGE VACCARO, individually  
and doing business under the  
trade name and style of  
JOSEPH VACCARO & SON,

and

C. J. CLARK,

DEFENDANTS

IN THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA

AT LAW NO.

COUNT I

Plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000) damages for that on to-wit the 20th day of April, 1938, the defendant C. J. Clark who was then and there an agent or servant of the defendants, Joseph Vaccaro and George Vaccaro doing business as Joseph Vaccaro & Son, and while acting within the line and scope of his employment as such agent or servant, parked an automobile truck on Highway U. S. 90, in Baldwin County, Alabama, at or near the Alabama-Florida State Line and so negligently allowed same to remain parked, that an automobile driven by one Earle Smith on said Highway and approaching said parked truck, then and there ran into and collided with an automobile being then and there driven by plaintiff on said highway, as a proximate result of said negligence of said defendant, C. J. Clark, plaintiff was painfully and permanently injured and sustained lacerations, contusions, and bruises in and about the face, head, body, and limbs, plaintiff's right knee was broken, and she was caused to incur and will incur considerable expense in and about the treatment of said injuries; WHEREFORE PLAINTIFF SUES.

*Amberst Twitty Jackson*  
Attorneys for Plaintiff

Plaintiff demands that said cause be tried by jury.

*Amberst Twitty Jackson*  
Attorneys for Plaintiff

Each of the defendants may be found at 2226 Ninth Avenue, Tampa, Florida. Please serve by registered mail under Code Section 9454 (1).

RECORDED  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

*Quil*  
8-237

AT LAW NO.

JOHNIE D. CHESTER,  
PLAINTIFF,

versus

JOSEPH VACCARO AND GEORGE  
VACCARO, individually and  
doing business under the  
trade name and style of  
JOSEPH VACCARO & SON

and  
C. J. CLARK,

DEFENDANTS

COMPLAINT

Executed *May 5<sup>th</sup>* 1938  
by serving copy of within Subpoena  
Complaint on

*George Vaccaro*  
*and*  
*C. J. Clark*  
*Ambrecht, Twitty & Jackson* Sh  
By *John R. Davis* Deputy Shie.

Filed this *5<sup>th</sup>* day of *May* 1938.  
Clerk-Receiv. Secy.

*We, the jury assess*  
*Plaintiff's damages at*  
*\$ 3000.00*  
*J. Ambrecht*  
Ambrecht, Twitty & Jackson  
Attorneys for Plaintiff

Each of the defendants may be found at 2226 Ninth Avenue,  
Tampa, Florida. Please serve by registered mail under Code Section  
9454 (1).



0727 (1)

Received this writ at Tampa, Fla. July 22nd, 1938 and executed the same at Tampa, Fla. on July 28th, 1938, as to the within named Moseph Vaccaro and George Vaccaro, individually and doing business under the firm name and style of Joseph Vaccaro & Son, and C. J. Clark, by exhibiting this original writ and delivering a true copy hereof to Joseph Vaccaro, individually and doing business under the firm name and style of Joseph Vaccaro & Son, and C. J. Clark, and making known to him the contents thereof.

Fee ----- \$ 2.00

Mileage ----- .12

----- \$ 2.12

Chester S. Dishong, U. S. Marshal.

By: *Henderson F. Mynatt*  
Henderson F. Mynatt, Deputy.

copy

Filed this 5 day May 1938  
U. S. District  
Clerk-Register

RECEIVED  
U. S. DISTRICT COURT  
TAMPA, FLA.  
MAY 19 1938  
CLERK-REGISTER

CLERK-REGISTER  
U. S. DISTRICT COURT  
TAMPA, FLA.

ORA CRISTEN BALDWIN,

PLAINTIFF,

versus

JOSEPH VACCARO and  
GEORGE VACCARO, individually  
and doing business under the  
trade name and style of  
VACCARO VACCARO & SON,

and

C. J. CLARK,

DEFENDANTS

IN THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA

AT LAW No.

COUNT I

Plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000) damages for that on, to-wit, the 20th day of April, 1936, the defendant C. J. Clark who was then and there an agent or servant of the defendants, Joseph Vaccaro and George Vaccaro, doing business as Joseph Vaccaro & Son, and while acting within the line and scope of his employment as such agent or servant, parked an automobile truck on Highway U. S. 90 in Baldwin County, Alabama, at or near the Alabama-Florida State line, and so negligently allowed same to remain parked that an automobile driven by one Marie Smith on said Highway and approaching said parked truck ran into and collided with an automobile in which the plaintiff was then and there riding on said Highway, and as a proximate result of said negligence of said defendant, C. J. Clark, plaintiff was then and there painfully and permanently injured and sustained lacerations, contusions, and bruises in and about the face, head, body, and limbs, and was caused to incur and will incur considerable expense in and about the treatment of said injuries; WHEREFORE Plaintiff asks.

COUNT II

Plaintiff claims of the defendants the sum of One Thousand Dollars (\$1,000) damages for that on, to-wit, the 20th day of April, 1936, the defendant C. J. Clark who was then and there an agent or servant of the defendants, Joseph Vaccaro and George

Vaccaro, doing business as Joseph Vaccaro & Son, while acting within the line and scope of his employment as such agent or servant, parked an automobile truck on Highway U. S. 90 in Baldwin County, Alabama, at or near the Alabama-Florida State Line, and so negligently allowed same to remain parked that an automobile driven by one Marie Smith on said Highway and approaching said parked truck ran into and collided with an automobile in which the plaintiff was then and there riding, and plaintiff avers that as a proximate result of the said negligence of said C. J. Clark, said automobile, which was and is the property of the plaintiff was broken and badly bent; the wheels, axle, engine, body, radiator, frame, grill, bumper, front fenders, windshield, and steering wheel thereof were bent, torn, and damaged, and said car was depreciated in value by reason thereof and was otherwise damaged.

*Ambecht, Twitty & Jackson*  
Attorneys for Plaintiff

Plaintiff demands that said cause be tried by jury.

Attorneys for Plaintiff

Each of the defendants may be found at 2226 Ninth Avenue, Tampa, Florida. Please serve by registered mail under Code Section 9454 (1).

Plaintiff ----- \$ 5.15  
Fee ----- \$ 5.00

BA: *Henderson E. Mather, Debtor*  
Clerk of Court  
Clerk of Court

C. J. Clark, and herein known to him the contents thereof. and doing business under the firm name and style of Joseph Vaccaro & Son, and otherwise with and dealing with a firm name and style of Joseph Vaccaro & Son, and C. J. Clark, by executing this Vaccaro and George Vaccaro, individually and doing business under the firm name of Lamb's, Inc. on July 28th, 1938, as to the matters named Joseph Vaccaro and George Vaccaro, individually and doing business under the firm name of Lamb's, Inc. on July 28th, 1938 and executed the

Fee -----	\$ 2.00
Mileage ----	.12
	<hr/>
	\$ 2.12

By: Henderson F. Mynatt  
Henderson F. Mynatt, Deputy.

Each of the defendants will be found at 3332 Wilson Avenue,

**THE UNIVERSITY OF CHICAGO PRESS**

**THE UNIVERSITY OF CHICAGO**

*[Handwritten signature]*

100-443887-1000