

HENRY CHAVEZ, :
PLAINTIFF, : IN THE CIRCUIT COURT OF
VS. : BALDWIN COUNTY, ALABAMA.
JOSEPH VACCARO, doing business :
under the name and style of : AT LAW, # _____
JOSEPH VACCARO AND SON, :
DEFENDANT. :

Plaintiff claims of the defendant, the sum of Ten Thousand and no/100 (\$10,000.00) Dollars, for that heretofore, 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 on and without putting out any flares and as a proximate result of said negligence, the car in which the plaintiff was riding, was caused to collide with another car which was then and there being operated by Ora C. Barber and as a proximate result thereof, plaintiff was caused to suffer great bodily pain and mental anguish, was severely bruised and shaken up and his back broken.

Marion R. Vicker
Attorney for Plaintiff.

Plaintiff demands trial of the above cause by jury.

Marion R. Vicker
Attorney for Plaintiff.

RECORDED

Filed April 4, 1939

R.S. Dusk, Clerk

By - Haudree Thompson, Deputy



JOHN BRANDON

Hon. Marion R. Vickers,
First National Annex,
Mobile, Ala.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
Baldwin County.

No. 511

CIRCUIT COURT

April

193 9

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon

JOSEPH VACCARO, doing business

under the name and style of Joseph 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 JOSEPH
VACCARO, ET AL., Defendant by HENRY CHAVEZ,

Witness my hand this 4th day of April 193 9
Plaintiff

R. S. DUCK
clerk - register Clerk.
Deputy

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant Dollars, due by

A TRUE COPY
J. R. McLEOD, Sheriff
Baldwin County, Ala.
D. S.

Plaintiff's Attorney.

HENRY CHAVEZ,

PLAINTIFF,

VS.

JOSEPH VACCARO, doing business :
under the name and style of :
JOSEPH VACCARO AND SON, :

: IN THE CIRCUIT COURT OF

: BALDWIN COUNTY, ALABAMA.

AT LAW, # _____

DEFENDANT.

Plaintiff claims of the defendant, the sum of Ten Thousand and no/100 (\$10,000.00) Dollars, for that heretofore, 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 on and without putting out any flares and as a proximate result of said negligence, the car in which the plaintiff was riding, was caused to collide with another car which was then and there being operated by Ora C. Barber and as a proximate result thereof, plaintiff was caused to suffer great bodily pain and mental anguish, was severely bruised and shaken up and his back broken.


Attorney for Plaintiff.

Plaintiff demands trial of the above cause by jury.


Attorney for Plaintiff.

*He the jury assess the damages
in this case at \$6000.⁰⁰*
9/14/39

DeVorey
Thomas

29

*Filed April 4, 1939
R. S. Burch, Clerk,
by - Pauline Thompson, Deputy*

RECEIVED
APR 22 1939
SECRETARY OF
STATE

ORIGINAL SUMMONS AND
COMPLAINT.

RECEIVED THE WITHIN WRIT on the 12th day of May, 1939, and executed the same in Hillsborough County, Florida, on the 26th day of May, 1939, by exhibiting this original Summons and Complaint and delivering a true copy of each to Joseph Vaccaro, doing business under the name and style of Joseph Vaccaro Son, the within named defendant.

Service 3.20
Mileage .75
3.95

J. R. McLeod, Sheriff,
Hillsborough County, Florida,
By *Leo Longalyn*

511

THE STATE OF ALABAMA, } No. 511 CIRCUIT COURT
Baldwin County. }

June Term, 1931

To Any Sheriff of the State of Alabama, Greeting :

You are hereby commanded, That of the goods and chattels, lands and tenements of
Henry Cherry Plaintiff in the suit,
you cause to be made the sum of \$15.80 Dollars,
costs of suit, created by said Plaintiff, for that, whereas, on the 14 day of
September 1931, the said Plaintiff recovered by the Judgment of the said Circuit Court
of said County, against

Defendant.
to the suit, the sum of Dollars,
besides Dollars, costs of suit;
upon which Judgment an Execution has been issued and returned by the Sheriff, "No property found."

AND HAVE YOU THAT MONEY ready to render to R. S. Dush
Clerk of said Court, and make return of this Writ and the Execution thereof, according to law.

Witness my hand this 25 day of June 1931

R. S. Dush Clerk

CLERK'S FEES		Dollars	Cts	SHERIFF'S FEES		Dollars	Cts
every Summons and Complaint	\$1 25	1	25	For Levying an Attachment	\$3 00		
a copy thereof	30		30	Entering and Returning Attachment	25		
ering a Sheriff's Return	20		20	Summoning Carnishee	1 50		
cketing	25		25	Serving Summons on Writ	1 50		
ering Appearance	20			Serving Notice Sci. Fa. Notice, etc.	65		
g	10		10	Serving Subpoenas	65		
ry Order made in Court	30			Empanelling Jury	75		
y thereof	25			Entering and Returning Execution	25		
ry Trial with or without Jury	75		75	Collecting Costs Execution	1 50	1	50
ering up Judgment or copy thereof	30		30	Executing a Writ of Possession	2 50		
ing Execution	50		50	Taking and Approving Bonds	1 00		
cketing Execution	25		25	Commissions			
ering Return on Execution	20			Sheriff's Commission for Property Sold			
ing Subpoenas	30			Under Attachment			
ministering Oath	25			Seizing Personal Property on Writ of			
ing Each Attachment Taking Bond	1 00			Detinue	3 00	1	50
ng Attachment	10						
h Summons for Garnishee	50			RECAPITULATION			
h copy	50			Clerk's Fees		7	35
ice to Deft. in Garnishee on Sum-				Sheriff's Fees		1	50
mons and Copy, per 100 words	20					3	92
mmissions to take Depositions or copy	75			Justice's Fees			
er to Execute Writ of Inquiry	30			Witness Fees in Justice of Peace Court			
y of Interrogators, 15c per hundred				Constable's Fees			
words or	50			Commissioner's Fees			
ng each Deposition and endorsing				Printer's Fees			
same	20			Witness Fees in Circuit Court			
al Record, per hundred words	15		3 50	Former Clerk's Fee			
ry Certificate	50			Stenographers's Fees	5 00		
ing Bond not otherwise provided for	75			Trial Tax	3 00	3	00
Witness Certificates	25						
Continuance	10						
tificate of Judgment	50						
er of Publication	1 00						
		7	35			9	15 80

JUN 25 1940

No. 511 Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY
CIRCUIT COURT

Henry Clancy
vs.
Joe Vaccaro & Son,

Plaintiff--

Defendant--

Civil Execution for Costs
Against Plaintiff

Costs - - - - - \$ 15.00

Civil Fee Book Enail Page 511

Execution Docket - - - - - " Page - - - - - "

Filed - June 25 - - - - - , 1940

R.S. Dorch Clerk.

Morton K. Vickers
Plaintiff's Attorney

Defendant's Attorney

JUN 25 1940

COLLECTION COSTS FROM

The State of Alabama, {
BALDWIN COUNTY

I hereby certify that the within
and costs in this case are correct, and there was
waiver of exemption as to personal prop-
erty under the Constitution and Laws of Ala-
bama.

This - - - - - day of - - - - - 193- - - - -

Received in office June 25 1940

W.B. Stuart
Sheriff

Sheriff's Execution Docket, Page - - - - -

Sheriff's Fee Book, - - - - - Page - - - - -

Returned August 24, 1940
no property of the
plaintiff found in Baldwin Co
W.B. Stuart Sheriff
By Mrs. Hannah R. D.

THE STATE OF ALABAMA, {
Baldwin County. { By virtue of the within execution, I have at - - - - -
o'clock, - - - - - M., this - - - - - day of - - - - - 193- - - - - levied

Sheriff

The State of Alabama,

CIRCUIT COURT

Baldwin County.

No. 511

December Term, 1939

ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

YOU ARE HEREBY COMMANDED, That of the goods and chattels, lands and tenements of Joseph Vaccaro

Defendant,

cause to be made the sum of Six Thousand (\$6,000.00) Dollars DOLLARS,

Plaintiff,

entered of Joseph Vaccaroon the 14 day of September, 1939, by the Judgment of our Circuit Court held for the County ofBaldwin, besides the sum of \$ 14.30 DOLLARS,of suit, and have the same to render to the said Joseph Vaccaro, and make return of this Writ and

execution thereof, according to law.

Interest from 1939, to 1939, to 1939.Witness, my hand this 11 day of December, 1939.R.S. Duck, Clerk.

CLERK'S FEES		AMOUNT	SHERIFF'S FEES		AMOUNT
ng.....	Summons and Complaint.....	\$1.25	1.25	Serving and Returning.....	Summons..... \$1.50
ng.....	copies of same.....	.30	30	Serving and Returning.....	Writs..... 1.30
ng.....	Branch Summons and Complaint.....	1.25		Serving and Returning.....	Subpoenas for ... Wit. .65
ng.....	copies of same.....	.30		Levying.....	Attachment..... 3.00
ring.....	Sheriff's Return or copy of above.....	.20	20	Entering and Returning.....	Attachment..... .25
cketing Cause.....		.25	25	Summoning and Returning.....	Garnishee..... 1.50
ring.....	Appearances.....	.20		Serving and Returning.....	Sci. Fas. Notices 1.50
g.....	1. Pleas..... Demurrers.....	.10	10	Impaneling Jury.....	.75
.....	Affidavits, Certified.....	.25		Collecting Cost, Execution.....	1.50
.....	Commissions to take Depositions.....	.75		Taking and Approving.....	Replevin Bonds..... 1.00
.....	copies of Interrogatories.....				Claim Bonds..... 1.00
.....	Notices of Filing Interrogatories.....	.50			Garnishment Bonds..... .75
g.....	Packages of Depositions.....	.10			Forthcoming Bonds..... 1.00
osing.....	Packages of Depositions.....	.10			Bail Bonds..... 1.00
.....	Orders in Court.....	.30			Detinue Bond..... 1.00
.....	Continuances.....	.10		Writ of Possession.....	5.00
ing.....	Subpoenas for..... Witnesses.....	.30		Making Deed.....	5.00
l and Incidents.....		.75	75	Collecting Money on Execution.....	
ring.....	Judgment.....	.30	30	Writ of Restitution.....	2.00
ing.....	Execution.....	.50	50	Sheriff's Commissions.....	
ring.....	Sheriff's Return of Execution.....	.20	20	Sheriff's Deed.....	
ing.....	Certiorari..... Sci. Fas.....	.75		Seizing Personal Property in Detinue.....	3.00
ng.....	Certiorari, etc.....	.15			
ing.....	Notices.....	.75		Former Sheriff's Fees.....	
ing.....	copies of same.....	.50		TOTAL SHERIFF'S FEES.....	
ing.....	Bonds.....	.75		WAIVER..... NO WAIVER.....	
ng.....	Bonds.....	.10		RECAPITULATION.....	
ing.....	Attachment Writ..... and taking Bond.....	1.00		Judgment for <u>plaintiff</u> for.....	<u>6,000.00</u>
ng.....	Attachments.....	.10		Interest from.....	
.....	Summons of Garnishee.....	.50		Damages.....	
earing and Ent.....	Answer of Garnishee.....			Clerk's Fees.....	<u>7.35</u>
.....	Complete Record, 15c per 100 words.....		<u>3 50</u>	Sheriff's Fees <u>Shirley Sec of State</u>	<u>3.95</u>
.....	Manuscript to Supreme Court.....			Justice of Peace Fees.....	
.....	Certificate of Appeal to Supreme Court.....	.75		Witness Fees in Justice of Peace Court.....	
.....	Notices of Appeal.....	.75		Constable's Fees.....	
.....	Appeal Bond.....	.75		Commissioner's Fees.....	
.....	Certificate of Judgment.....	.50		Commissioner's Residence.....	
.....	Witness Certificates.....	.25		Printer's Fees.....	
.....				Garnishee's Fees.....	
.....				Witness Fees in Circuit Court.....	
.....				Former Clerk's Fees.....	
.....				Trial Tax.....	<u>3 00</u>
TOTAL CLERK'S FEES.....		<u>13.5</u>		TOTAL FEES.....	<u>6,014.20</u>

Baldassare COUNTY.

The State of Alabama,

COUNTY:

Plaintiff.

vs.

Defendant

AGAINST DEFENDANT.

Interest from -----, 19-----

19

Damages-----

S. 14.30

560/4.30

Page-511

Page 11

1939

Clerk

Plaintiff's Attorney

Defendant's Attorney

The State of Alabama,

COUNTY:

This day

19.

Clerk.

Received in Office

1039

Sheriff.

Sheriff's Execution Docket, page-

Sheriff's Fee Book, page.

Returned February 11-1940
no property of the
defendant found in
Baldwin County

W. R. Stuart Sheriff

By W. B. Hamilton D.S.

ALL RIGHTS RESERVED

COUNTY.

The State of Alabama,

revised.

PLAINTIFF'S WITNESSES

DEFENDANT'S WITNESSES:

Total.