

**THE STATE OF ALABAMA** }  
**Baldwin County - Circuit Court** }

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

Whereas, at a Term of the Circuit Court of Baldwin County, held on the .....1st...day of December  
..... Monday in ..... 19<sup>71</sup>....., in a cer-  
tain cause in said Court wherein ..... Molly Umansky .....  
..... Plaintiff, and ..... Benjamin Umansky .....  
..... Defendant, a judgement was rendered against said  
..... Plaintiff .....  
to reverse which ..... Dismissal ..... the said ..... Plaintiff .....  
.....  
.....  
applied for and obtained from this office an APPEAL, returnable to the ..... next .....  
Court of Civil Appeals  
Term of our ..... Court of the State of Alabama, to be held at Montgomery, on the .....  
..... day of ..... 19..... next, and the necessary bond  
having been given by the said ..... Kenneth Cooper, Attorney for Plaintiff .....  
..... with ..... sureties,

Now, You Are Hereby Commanded, without delay, to cite the said ..... Benjamin Umansky .....  
..... or ..... C. LeNoir Thompson .....  
....., attorney, to appear at the ..... next ..... Term of our  
Court of Civil Appeals  
said ~~Supreme~~ Court, to defend against the said Appeal, if ..... they ..... think proper.

EUNICE B. BLACKMON  
Witness, ~~APPEAL~~ ~~CLERK~~, Clerk of the Circuit Court of said County, this ..... 25th .....  
day of ..... May ..... A. D., 19...71.

Attest:

*Eunice B. Blackmon* Clerk.

7/5

**CIRCUIT COURT**  
**Baldwin County, Alabama**

Molly Umarsky

Vs. { Citation in Appeal

Benjamin Umarsky

Issued \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Serve  
C. D. Thompson

Received 27 day of May 1974  
and on 27 day of May 1974  
I served a copy of the within Order  
on C. D. Thompson

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Zeller S.S.

MOLLY UMANSKY,

Plaintiff

-VS-

BENJAMIN UMANSKY,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7,451

NOTICE OF APPEAL

Comes now Molly Umansky, Plaintiff in above styled cause, by her attorney of record, Kenneth Cooper, and gives notice of appeal from the Order of Dismissal of the Circuit Court of Baldwin County, Alabama, At Law, rendered in this cause on the 1st day of December, 1970.

Dated this 19th day of May, 1971.

  
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Notice of Appeal to Honorable C. LeNoir Thompson by personally leaving a copy of same at his law office in Bay Minette, Alabama, on this 19th day of May, 1971.

  
ATTORNEY FOR PLAINTIFF

**FILED**

MAY 19 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

MOLLY UMANSKY,

Plaintiff

-VS-

BENJAMIN UMANSKY,

Defendant

§

§

§

§

§

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7,451

### NOTICE OF APPEAL

Comes now Molly Umansky, Plaintiff in above styled cause, by her attorney of record, Kenneth Cooper, and gives notice of appeal from the Order of Dismissal of the Circuit Court of Baldwin County, Alabama, At Law, rendered in this cause on the 1st day of December, 1970.

Dated this 19th day of May, 1971.

  
ATTORNEY FOR PLAINTIFF

### CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Notice of Appeal to Honorable C. LeNoir Thompson by personally leaving a copy of same at his law office in Bay Minette, Alabama, on this 19th day of May, 1971.

  
ATTORNEY FOR PLAINTIFF

**FILED**

MAY 19 1971

EUNICE B. BLACKMON CIRCUIT  
CLERK

MOLLY UMANSKY,

Plaintiff

-VS-

BENJAMIN UMANSKY,

Defendant

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7,451

SECURITY FOR COSTS

I, Kenneth Cooper, attorney for the above named Plaintiff,  
hereby acknowledge myself for all court costs involved in the  
appeal of this cause.

*Kenneth Cooper*  
ATTORNEY FOR PLAINTIFF

*Taken & approved*  
*This — day of May 1971*  
*Ernie B. Blackmon,*  
*clerk*

THE STATE OF ALABAMA—JUDICIAL DEPARTMENT  
THE COURT OF CIVIL APPEALS OF ALABAMA

October Term 19 71-72

1 Div. No. 56-A

Molly Umansky

Appellant

v.

Benjamin Umansky

Appellee

On appeal from Baldwin Circuit Court

To the Clerk ~~Register~~ of the foregoing stated Court, Greeting:

Whereas, the record and proceedings of the Court below, in the above cause, were brought before the Court of Civil Appeals by appeal taken pursuant to law,

Now, it is hereby certified that upon consideration thereof the Court of Civil Appeals of Alabama, on the 26th day of April, 1972, dismissed said appeal on motion of appellant

and ordered that appellant Molly Umansky

and Kenneth Cooper

sureties for the costs of appeal, pay the costs of appeal in this Court and in the Court below, for which costs let execution issue.

~~-And it appearing that said parties have waived their rights of exemption under the laws of Alabama, it was ordered that execution issue accordingly.~~

Witness, J. O. Sentell, Clerk of the Court of Civil Appeals of Alabama, at the Judicial Department Building, this the 26th day of April, 1972.

J. O. Sentell  
Clerk of the Court of Civil Appeals of Alabama.

THE COURT OF CIVIL APPEALS  
OF ALABAMA

October Term, 1971-72

1 Div., No. 56-A

Molly Umansky

*Appellant,*

v.

Benjamin Umansky

*Appellee.*

From Baldwin Circuit Court.

No. 7451  
CERTIFICATE OF DISMISSAL

The State of Alabama,

Baldwin County. } Filed

this FILED day of APR, 1972

APR 27 1972

LUNICE B. BLACKMON CIRCUIT  
CLERK

STATE OF ALABAMA

BALDWIN COUNTY

MOLLY UMANSKY,

Plaintiff,

Vs.

BENJAMIN UMANSKY,

Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 7451

NON-RESIDENCY AFFIDAVIT

Before me, the undersigned authority, in and for said State and County, personally appeared Kenneth Cooper, who is known to me and who, by me being first duly and legally sworn, on oath deposes and says as follows:

That I am the attorney of record in the above-styled cause, and the Respondent named therein is either a non-resident of the State of Alabama or else conceals himself so that service of process of Court cannot be served upon the said Benjamin Umansky, the Defendant; that his whereabouts and residence in the State of Alabama is unknown; and cannot be ascertained after diligent effort, and Plaintiff states that such effort to find him has been made, without success; and that the Defendant is over 21 years of age.

That the giving or serving of notice, or subpoena by registered mail is authorized or required in this cause, and that such notice or subpoena may be given or served by certified mail in lieu of said registered mail; and that the person mailing such notice or subpoena shall stipulate delivery thereof shall be limited to addressee only, and shall demand a "return receipt", such certification being authorized under the provisions of Title 1, Section 17, Code of Alabama, Recompiled 1958.

Kenneth Cooper

Subscribed and sworn to before me this 5 day of April, 1967.

FILED

APR 5 1967

ALICE L. DUCK, CLERK  
REGISTER

Ernie B. Blackburn




MOLLY UMANSKY,	Y	IN THE CIRCUIT COURT OF
Plaintiff,	Y	BALDWIN COUNTY, ALABAMA
Vs.	Y	AT LAW
BENJAMIN UMANSKY,	Y	CASE NO. <u>7451</u>
Defendant.	Y	

AMENDED COMPLAINT

Comes now Plaintiff in above-styled cause, by her attorney of record, Kenneth Cooper, Esquire, and amends her complaint heretofore filed in this cause, by adding COUNT TWO thereto, to read as follows, to-wit:

COUNT TWO

Plaintiff claims of the Defendant the sum of Six Thousand Seven Hundred Fifty-Three (\$6,753.00) Dollars, with interest thereon at 6% per annum thereon since the 24<sup>th</sup> day of August, 1967, for that on January 3, 1966, Plaintiff recovered a pendente lite order against Defendant before Hon. George E. Schaaf, Judge of Circuit Court, Division 1, 21<sup>st</sup> Judicial Circuit, in and for St. Louis County, Missouri, in the sum of \$100.00 per month for child support, plus the additonal sum of \$250.00 per month for alimony, and further plus the additonal sum of \$56.00 as court costs, and that said sums now amount to Six Thousand Seven Hundred Fifty-Three (\$6,753.00) Dollars, which said sum, nor any part thereof, has been paid by the Defendant. Plaintiff avers that the said Judge of said Court, acting as the Circuit Judge of said Court, in and for St. Louis County, Missouri, was authorized by the laws of said State to make and enter said pendente lite order. And further avers that said pendente lite order remains in full force and effect, and it has not been reversed, satisfied or vacated.

  
 ATTORNEY FOR PLAINTIFF

FILED

SEP 13 1967

CLERK  
REGISTER

VOL 65 PAGE 12

I hereby certify that I delivered a copy of the foregoing  
AMENDED COMPLAINT to the office of C. Lenoir Thompson, Attorney  
for Defendant, in Bay Minette, Alabama, on this 16 day of  
Sept, 1967.

Kenneth Cooper  
ATTORNEY FOR PLAINTIFF

FILED  
SEP 18 1967  
CLERK  
REGISTER

SEP 18 1967

FILED  
SEP 18 1967  
CLERK  
REGISTER

MOLLY UMANSKY,	§	IN THE CIRCUIT COURT OF
Plaintiff,	§	BALDWIN COUNTY, ALABAMA
Vs.	§	AT LAW
BENJAMIN UMANSKY,	§	CASE NO. 7451
Defendant.	§	

AMENDED COMPLAINT

Comes now the Plaintiff in above-styled cause, by her Attorney of Record, Kenneth Cooper, Esquire, and amends her AMENDED COMPLAINT heretofore filed in this cause, by deleting COUNT TWO thereof, and substituting in lieu thereof the following AMENDED COUNT TWO, to-wit:

AMENDED COUNT TWO

Plaintiff claims of the Defendant the sum of Six Thousand Seven Hundred Fifty-Three (\$6,753.00) Dollars, together with interest thereon at 6% per annum thereon since the 24th day of August, 1967, for that on said date, Plaintiff recovered a judgment against the Defendant before Hon. Michael J. Carroll, in the Circuit Court, County of St. Louis, Missouri, in case styled Molly Umansky vs Benjamin Umansky, Case No. 267-268, which said sum, nor any part thereof, has been paid by the Defendant. Plaintiff avers that the Judge of said Court, acting as Judge of said Circuit Court in and for St. Louis County, Missouri, was authorized by the laws of said State to make and enter said judgment; and Plaintiff further avers that said judgment remains in full force and effect, and it has not been satisfied nor vacated.

*Kenneth Cooper*  
ATTORNEY FOR PLAINTIFF

I certify that I have mailed a copy of the foregoing to Hon. C. Lenoir Thompson, Attorney At Law, Bay Minette, Alabama, by depositing the same in United States Mail, postage prepaid, at Bay Minette, Alabama, on this 18 day of ~~February~~ <sup>November</sup>, 1968.

**FILED**

NOV 18 1968

*Kenneth Cooper*  
ATTORNEY FOR PLAINTIFF

**ALICE J. DUCK** CLERK  
REGISTER

VOL 65 PAGE 14

MOLLY UMANSKY

PLAINTIFF

VS

BENJAMIN UMANSKY

DEFENDANT

X

X

X

X

X

IN THE CIRCUIT COURT OF


BALDWIN COUNTY, ALABAMA

AT LAW NO. 7451

Comes Benjamin Umansky by C. LeNoir Thompson, his attorney of record and moves this Honorable Court to dismiss the above styled cause and as grounds for said motion shows unto this Honorable Court as follows:

1. The said action at law is moot in that the said defendant does not own any property in Baldwin County Alabama.

Wherefore, this motion.

  
Attorney for defendant.

I hereby certify that I have this 19 day of October, 1967, served a copy of the foregoing motion on Honorable Kenneth Cooper, attorney for plaintiff, by mailing copy of same to his office in Bay Minette, Alabama.

  
Attorney for defendant.

FILED

OCT 21 1967

ALICE J. DICK CLERK  
REGISTER

MOLLY UMANSKY

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

BENJAMIN UMANSKI

X

AT LAW

NO. 7451

Defendant

X

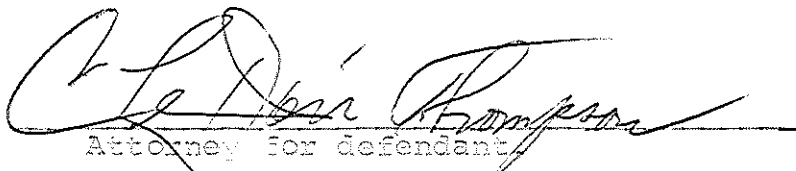
Comes the defendant in the above styled cause and for answer to the complaint filed therein shows unto this Honorable Court as follows:

1. Nul tiel judgment.

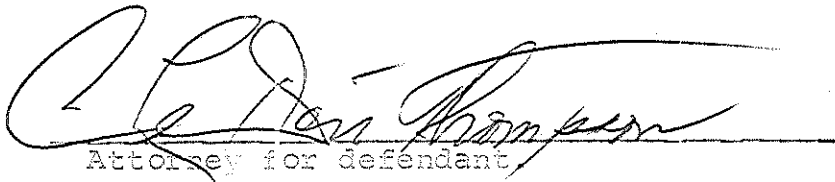
2. That the defendant was not a citizen of the State of Missouri nor was the defendant there in said State at any time pending the said suit from which the judgment, subject of this action was obtained and further that he was not properly served by process nor did he appear or defend the same.

3. That the said Court granting the judgment, subject of this suit did not have jurisdiction of the amount of said judgment.

4. That the said court granting the judgment subject of this suit did not have jurisdiction of the defendant.

  
Attorney for defendant

I hereby certify that I have this 11 day of August, 1967, served a copy of the foregoing answer on Honorable Kenneth Cooper, attorney for plaintiff, by depositing copy of same in the U. S. Mail, postage prepaid, properly addressed to his office in Bay Minette, Alabama.

  
Attorney for defendant

FILED

AUG 11 1967

ALICE J. DUCK

CLERK  
REGISTER

MOLLY UMANSKY	X	IN THE CIRCUIT COURT OF
Plaintiff	X	BALDWIN COUNTY, ALABAMA
VS	X	AT LAW
BENJAMIN UMANSKY	X	CASE NO. 7451
Defendant	X	

Comes the defendant in the above styled cause and moves this Honorable Court to dismiss the complaint filed in said cause or in the alternate to require the plaintiff to deposit sufficient costs in said cause to satisfy the clerk for all costs incurred inasmuch as said plaintiff is a non-resident of the State of Alabama.

  
ATTORNEY FOR DEFENDANT

I hereby certify that I have mailed a copy of the foregoing to Hon. Kenneth Cooper, Attorney at Law, Bay Minette, Alabama, by depositing the same in U. S. Mail, postage prepaid, at Bay Minette, Alabama, on this 21 day of July, 1967.

  
ATTORNEY FOR DEFENDANT

**FILED**

AUG 1 1967

**ALICE J. DUCK** CLERK  
REGISTER

MOLLY UMANSKY

PLAINTIFF

VS

BENJAMIN UMANSKY

DEFENDANT

CASE NO. 7451

MOLLY UMANSKY

Plaintiff

vs

BENJAMIN UMANSKY

Defendant

X

X

X

X

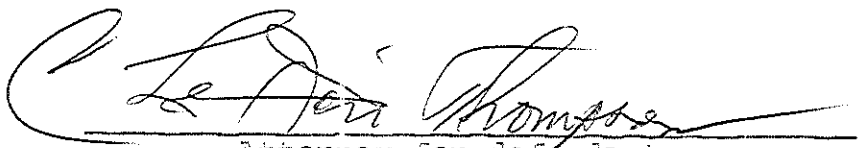
X

IN THE CIRCUIT COURT OF

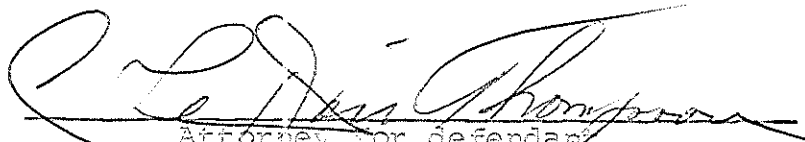
BALDWIN COUNTY, ALABAMA

AT LAW NO. 7451

Comes Benjamin Umansky defendant in the above styled cause by his attorney, C. LeNoir Thompson, and moves this Honorable Court to strike the amendment filed in said cause in that said amended complaint should be amended in one instrument and not by addition or deletion of words, letters or figures through a separate filing whereby the allegations originally prepared are varied.

  
Attorney for defendant.

I hereby certify that I have mailed a copy of the foregoing Motion to Strike to Hon. Kenneth Cooper, Attorney at Law, Bay Minette, Alabama, by depositing the same in U. S. Mail, postage prepaid, at Bay Minette, Alabama, on this 21 day of July, 1967.

  
Attorney for defendant.

**FILED**

JUL 21 1967

**ALICE J. DUCK** CLERK  
REGISTER



MOLLY UMANSKY,  
Plaintiff,  
Vs.  
BENJAMIN UMANSKY,  
Defendant.

§  
§  
§  
§  
§

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW  
CASE NO. 7451

AMENDED COMPLAINT

Comes now Molly Umansky, Plaintiff in above-styled cause, by her attorney of record, Kenneth Cooper, and amends her complaint heretofore filed in this cause, as follows, to-wit:

After the word "has", which is the last word on the 10th line of Count One, add the word "not"; in all other respects the complaint and Count One remains unchanged.

*Kenneth Cooper*  
ATTORNEY FOR PLAINTIFF

I hereby certify that I have mailed a copy of the foregoing AMENDED COMPLAINT to Hon. C. Lenoir Thompson, Attorney At Law, Bay Minette, Alabama, by depositing the same in United States Mail, postage prepaid, at Bay Minette, Alabama, on this 17 day of July, 1967.

*Kenneth Cooper*  
ATTORNEY FOR PLAINTIFF

**FILED**

JUL 17 1967

**ALICE J. DUCK** CLERK  
REGISTER

MOLLY UMANSKY

X

Plaintiff

X

IN THE CIRCUIT COURT OF

VS

X

BALDWIN COUNTY, ALABAMA

BENJAMIN UMANSKY

X

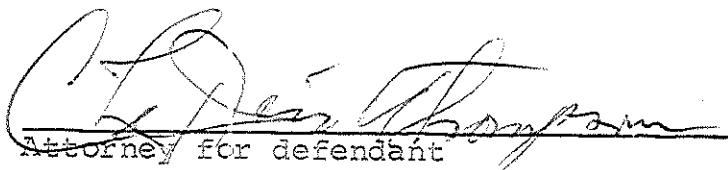
AT LAW

NO. 7451

Defendant

X

Comes the defendant in the above styled cause and demands  
a trial by jury.

  
Attorney for defendant

I hereby certify that I have this 3rd day of May, 1967,  
mailed a copy of the foregoing, postage prepaid to Honorable  
Kenneth Cooper, attorney for the plaintiff to his address in  
Bay Minette, Alabama.

  
Attorney for defendant.

FILED

MAY 8 1967

ALICE J. DICK, CLERK  
REGISTER

MOLLY UMANSKY	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
BENJAMIN UMANSKY	X	AT LAW NO. 7451
Defendant	X	

Comes the defendant in the above-entitled cause, appearing specially and only for the purpose of filing this plea, and says that the said Molly Umansky, plaintiff in this cause, ought not to have and maintain her said action for the defendant says separately and severally, as follows, to-wit:

FIRST

That the said defendant is a resident of St. Louis County, St. Louis, Missouri, and is not a resident of Baldwin County, Alabama.

SECOND

That the said defendant's permanent address is St. Louis County, St. Louis, Missouri, where he presently resides and said defendant resided at this address when the alleged judgment was obtained and has continued to reside at said address until the present date.

WHEREFORE, defendant says that the Circuit Court of Baldwin County, Alabama, is without jurisdiction to try and determine this cause, and that this said action should be abated, and prays the judgment of this Honorable Court whether the plaintiff should be allowed to further maintain this suit.

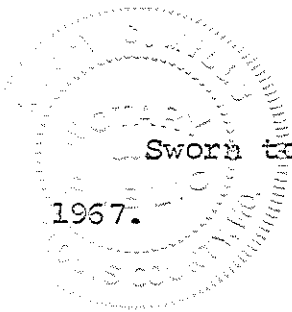
*Benjamin Umansky*  
 Defendant  
*C. LeNoir Thompson*  
 C. LeNoir Thompson  
 Attorney for defendant

STATE OF MISSOURI

COUNTY OF St. Louis

Before me, Nancy C. Miller, a Notary Public,  
in and for said County, in said State, personally appeared  
Benjamin Umansky, who, being known to me, and by me first duly  
sworn, deposes and says on oath:

That he is the defendant in the above entitled cause and  
has personal knowledge of the facts stated in the foregoing pleas  
and that the said statements of fact therein contained are true.



Nancy C. Miller

Sworn to and subscribed before me, this the 3rd day of May,  
1967.

Nancy C. Miller  
Notary Public

*Commission Expires:  
Jan. 31, 1969*

I hereby certify that I have served a copy of the foregoing  
plea to the venue in the above styled cause on Honorable Kenneth  
Cooper, attorney for the plaintiff, by depositing same in the  
U. S. Mail, postage prepaid, to his address in Bay Minette,  
Alabama, this 8 day of May, 1967.

C. LeDes Thompson  
Attorney for defendant.

FILED  
MAY 8 1967  
ALICE J. BUCK, CLERK  
REGISTER

KENNETH COOPER  
ATTORNEY AT LAW  
109 EAST 1ST STREET  
BAY MINETTE, ALABAMA 36507  
TELEPHONE 937-7412

April 25, 1972

C  
Mr. J. O. Sentell, Clerk  
The Court of Civil Appeals  
Post Office Box 1206  
Montgomery, Alabama 36101

Re: 1st Division, 56 and 56-A  
Molly Umansky vs. Benjamin Umansky  
Circuit Court No. 7450 and 7451

O  
Dear Mr. Sentell:

Your letter of March 21, to Mrs. Eunice B. Blackmon,  
Clerk of Circuit Court of Baldwin County, has been referred  
to me for reply.

P  
Please find enclosed a motion to dismiss said appeal.

Sincerely yours,

  
Kenneth Cooper

Y KC/mmmb

✓ cc: Mrs. Eunice B. Blackmon  
Clerk of Circuit Court

Enclosure

IN THE COURT OF CIVIL APPEALS

1st DIVISION No. 56

\*\*\*\*\*

MOLLY UMANSKY,

Appellant

-VS-

BENJAMIN UMANSKY,

Appellee

\*\*\*\*\*

Appealed from the

Circuit Court of Baldwin County

At Law, Case No. 7,450

Comes now Kenneth Cooper, attorney for appellant in above-styled cause and dismisses the appeal in above-styled case and requests that he be taxed with the court costs in said appeal.

  
ATTORNEY FOR APPELLANT

IN THE COURT OF CIVIL APPEALS

STATE OF ALABAMA

1st DIVISION

No. 56-A

\*\*\*\*\*

MOLLY UMANSKY,

Appellant

-VS-

BENJAMIN UMANSKY,

Appellee

\*\*\*\*\*

Appealed from the

Circuit Court of Baldwin County

At Law, Case No. 7,451

Comes now Kenneth Cooper, attorney for appellant in above-styled cause and dismisses the appeal in above-styled case and requests that he be taxed with the court costs of said appeal.

  
ATTORNEY FOR APPELLANT

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

CERTIFICATE OF APPEAL. (Civil Cases,)

No. 7451

Baldwin County, Circuit Court.

MOLLY UMANSKY

Plaintiff.  
vs.

BENJAMIN UMANSKY

Defendant.

I, Eunice B. Blackmon Clerk of Circuit Court,  
of Baldwin County, Alabama, hereby certify that in the  
cause of MOLLY UMANSKY plaintiff  
vs.

BENJAMIN UMANSKY defendant,

which was ~~tried and determined~~ <sup>DISMISSED</sup> in this Court on the 1st day of  
December 19 71, in which there was a judgment for

~~Dollars, in favor of the plaintiff, (or judgment~~  
~~for defendant,)~~ the 19th Plaintiff on the 19th day of  
May 1971, took an appeal to the Court of Civil Appeals  
Court  
of Alabama to be holden of and for said State.

I further certify that Kenneth Cooper, Attorney for Plaintiff  
filed security for cost of appeal, to the Court of Civil Appeals Court, on  
the 19th day of May 19 71, and that Kenneth Cooper,  
is  
~~are~~ sureties on the appeal bond.

I further certify that notice of the said appeal was on the 27  
day of May 19 71, served on Hon. C. Lenoir Thompson  
as attorney of record for said appellee, and that the amount sued for  
was Six Thousand Seven Hundred Fifty-three <sup>plus interest</sup> Dollars. (Or certain lands)  
(Or personal property.)

Witness my hand and the seal of this Court, this the 27  
day of May 1971.

Eunice B. Blackmon  
Clerk of the Circuit Court of  
Baldwin County, Alabama.



SUMMONS AND COMPLAINT

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

NO. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Benjamin Umansky, Bay Minette, Alabama, or wherever he may be found, to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, Against Benjamin Umansky by Molly Umansky, Plaintiff.

Witness my hand this 5 day of April, 1967.

Alice J. Duck, CLERK.

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MOLLY UMANSKY,

ℓ

IN THE CIRCUIT COURT OF

Plaintiff,

ℓ

BALDWIN COUNTY, ALABAMA

Vs.

ℓ

AT LAW

BENJAMIN UMANSKY,

ℓ

CASE NO. 7451

Defendant.

ℓ

COUNT ONE

Plaintiff claims of the Defendant the sum of Four Thousand Three Hundred Three and no/100 (\$4,303.00) Dollars, with interest thereon at 6% per annum thereon from the 25th day of January, 1967, for that on 3 January, 1966, Plaintiff recovered a pendente lite order against Defendant before Hon. George E. Schaaf, Judge of Circuit Court, Division 1, 21st Judicial Circuit, in and for St. Louis County, Missouri, in the sum of \$100.00 per month for child support, the sum of \$250.00 per month for alimony, plus the sum of \$56.00 as court costs, and that said sums amounted to above said \$4,303.00 as of 25 January, 1967, which said sum, nor any part thereof, has been paid by the Defendant. Plaintiff further avers that the said Judge of said Court, acting as the Circuit Judge thereof, in and for St. Louis County, Missouri, was authorized by the laws of said State to make and enter said pendente lite order. And further

avers that said pendente lite order remains in full force and effect, and it has not been reversed, satisfied or vacated.

*Kenneth Coopers*  
ATTORNEY FOR PLAINTIFF

FILED  
MAY 5, 1967  
ALICE L. BROWN, CLERK