

Law Offices of
PERLOFF & REID
SUITE 205 - VAN ANTWERP BLDG.
MOBILE, ALABAMA 36602

MAYER W. PERLOFF
T. DWIGHT REID
DONALD M. BRISKMAN

AREA CODE 205
TELEPHONE 433-5412

July 3, 1968

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama

Re: Interstate Securities Co. vs. Rita Heathco and Clyde Heathco

Dear Mrs. Duck:

Please find an amendment attached adding Clyde Heathco as defendant in the above captioned matter. I would appreciate your filing this in your court and advising when service is obtained and the case is set for trial.

Very truly yours,

PERLOFF & REID


Mayer W. Perloff

/rms

Enc/3
Orig & 2 copies-amendment

LAW OFFICES OF
PERLOFF & REID
SUITE 205 - VAN ANTWERP BLDG.
MOBILE, ALABAMA 36602

MAYER W. PERLOFF
T. DWIGHT REID
DONALD M. BRISKMAN

June 26, 1968

AREA CODE 205
TELEPHONE 433-5412

Mrs. Alice Duck, Register
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: Interstate Securities Co. vs. Rita Heathco

Dear Mrs. Duck:

Please file the enclosed bill of complaint and notify me
as to when it will be set on the docket.

Very truly yours,

PERLOFF & REID


Donald M. Briskman

DMB/sjm

Enc.

FILED

JUN 27 1968

ALICE J. DUCK

INTERSTATE SECURITIES COMPANY
OF ALABAMA, a corporation,

Plaintiff,

vs.

RITA HEATHCO,

Defendant.

(IN THE CIRCUIT COURT OF
(BALDWIN COUNTY, ALABAMA,

(AT LAW

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CASE NO. 8193

Comes now the Plaintiff in the above styled cause and
amends its bill of complaint heretofore filed in this Honorable
Court by adding as defendant to said complaint, CLYDE HEATHCO,
and by amending the style of the said bill of complaint to
read as follows:

INTERSTATE SECURITIES COMPANY
OF ALABAMA, a corporation,

Plaintiff,

vs.

RITA HEATHCO, and CLYDE
HEATHCO, jointly and severally,

Defendants.

(IN THE CIRCUIT COURT OF
(BALDWIN COUNTY, ALABAMA,

(AT LAW

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CASE NO. 8193

PERLOFF & REID

BY: *Myron W. Reid*

Defendants may be served:
Route 2, Box 170, Fairhope, Alabama

FILED

JUL 5 1968

ALICE J. DUCK CLERK
REGISTER

PERLOFF & REID

ATTORNEYS AT LAW

205 VAN ANTWERP BLDG.

MOBILE, ALABAMA 36602

INTERSTATE SECURITIES COMPANY
OF ALABAMA, a corporation,

Plaintiff,

vs.

RITA HEATHCO,

Defendant.

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

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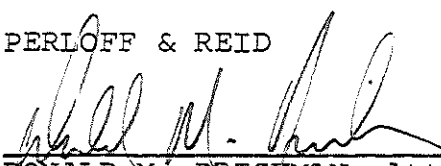
CASE NO. 819.3

Plaintiff claims of the defendant the sum of ONE THOUSAND FIVE HUNDRED SEVENTY NINE & 80/100 (\$1,579.80) DOLLARS for that heretofore on to-wit: the 23rd day of August, 1967, the defendant executed a promissory note wherein she agreed to pay plaintiff the sum of ONE THOUSAND FOUR HUNDRED SEVENTY SIX & no/100 (\$1,476.00) DOLLARS in installments of \$41.00 per month, including interest commencing on to-wit: the 5th day of October, 1967. Plaintiff avers that defendant defaulted in payment thereunder on to-wit: May 5, 1968, and pursuant to the terms of said promissory note the plaintiff has declared the entire balance due and owing.

Plaintiff avers that by the terms of said promissory note defendant waived all rights or claim of exemption under the Constitution and Laws of the State of Alabama and agreed to pay a reasonable attorneys fee in the event employment of an attorney was necessary for the collection which said attorney's fee plaintiff claims in the amount of \$263.30 which is 20% of \$1,316.50.

WHEREFORE, plaintiff claims of the defendant the sum of \$1,316.50, plus interest, plus attorney's fee as aforesaid.

PERLOFF & REID


DONALD M. BRISKMAN, Attorney for
Plaintiff

Defendant may be served:

Route 2, Box 170
Fairhope, Alabama

FILED

JUN 27 1968

ALICE J. DUCK

CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8193

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonRita Heathco.....

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.....

Rita Heathco
....., Defendant.....

byINTERSTATE SECURITIES COMPANY OF ALABAMA, a corp.....

....., Plaintiff.....

Witness my hand this.....27.....day of.....June..... 19.68..

.....*Archie Duck*..... Clerk

No.....8193.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

INTERSTATE SECURITIES COMPANY

OF ALABAMA, a corporation

Plaintiffs

vs.

RITA HEATHCO

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

JUN 27 1968

Clerk

ALICE J. DICK CLERK
REGISTER

PERLOFF & REID

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Rt 2 Box 170
Fairhope

Received In Office

JUN 27 1968

19.....

Sheriff

I have executed this summons

this June 29 1968

by leaving a copy with

Rita Heathco

Point Clear

Sherriff's claim 80 miles or

Ten Cents per mile Total \$ 8.00

TAYLOR WILKINS, Sheriff

BY Landell
DEPUTY SHERIFF

Taylor Wilkins, Sheriff
Ray Raynor, Deputy Sheriff

N.F.
LAW OFFICES OF

PERLOFF & REID

SUITE 205 - VAN ANTWERP BLDG.

MOBILE, ALABAMA 36602

MAYER W. PERLOFF
T. DWIGHT REID
DONALD M. BRISKMAN

February 6, 1969

AREA CODE 205
TELEPHONE 433-5412

Mrs. Alice J. Duck, Register
Circuit Court of Baldwin County
Baldwin County Courthouse
Bay Minette, Alabama

Re: #8193-Interstate Securities Co. vs. Rita Heathco

Dear Mrs. Duck:

Please enter a non-suit on motion of plaintiff in the above styled cause and sendus the bill of costs.

Thanking you, I am

Very truly yours,

PERLOFF & REID


Donald M. Briskman

/sjm