

Law Offices of
PERLOFF, REID & BRISKMAN
257 ST. ANTHONY STREET
MOBILE, ALABAMA 36603

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

November 17, 1970

AREA CODE 205
TELEPHONE 433-5412

Mrs. Alice J. Duck, Clerk
Circuit Court of Baldwin County
Bay Minette, Alabama, 36507

Re: Dixie Acceptance Corp. vs. MILTON, Geneva #9508

Dear Mrs. Duck:

You have informed us that personal service was obtained on the defendant in the above captioned cause on October 17, 1970. More than 30 days have now elapsed since service was obtained and no answer has been filed on her behalf.

Under the circumstances, we would appreciate you asking Judge Mashburn to enter a default judgment in favor of the plaintiff in this cause.

When this has been done I would appreciate you so advising us so that we may then proceed to obtain possession of the property.

Very truly yours,


MAYER W. PERLOFF
MWP/rms

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MOBILE, ALABAMA 36603

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

October 9, 1970

**AREA CODE 205
TELEPHONE 433-5412**

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

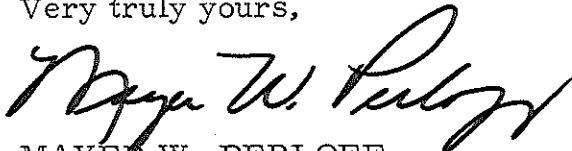
Re: Dixie Acceptance Corporation vs. MILTON, Geneva

9508

Dear Mrs. Duck:

Please file the attached complaint in your court and advise when service has been obtained on the defendant.

Very truly yours,


MAYER W. PERLOFF

/rms

Enc/

DIXIE ACCEPTANCE CORPORATION, (IN THE CIRCUIT COURT OF
a corporation, (BALDWIN COUNTY, ALABAMA,
Plaintiff, (AT LAW
vs. (
GENEVA MILTON, (
Defendant. (CASE NO. 9508

The plaintiff sues to recover the possession of the following
tract of land:

Lot 3, Block 2, Loxley Heights, according to plat
thereof recorded in the office of Judge of Probate,
of Baldwin County, Alabama, in Map Book 3, page
17.

of which it has the legal title thereto, and upon which, pending such
possession, and before the commencement of this suit, the defendant
entered and unlawfully withholds, together with ONE HUNDRED DOLLARS
(\$100.00) for the detention thereof.

PERLOFF, REID & BRISKMAN

BY: 
Attorneys for Plaintiff

Defendant may be served:

519 South 52nd Street
Loxley, Alabama

or

Route 1, Box 39-E
Loxley, Alabama

FILED

OCT 10 1970

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

} No. 9508

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Geneva Milton

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.....

Geneva Milton .., Defendant.....

by Dixie Acceptance Corporation, a corp.

..... Plaintiff.....

Witness my hand this 10th day of October 1970

Alice J. Duck, Clerk

No. 9508

Page.....

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

DIXIE ACCEPTANCE CORPORATION

A Corp.

Plaintiffs

vs.

GENEVA MILTON

Defendants

SUMMONS AND COMPLAINT

Filed October 10, 1970

Alice J. Duck Clerk

Perloff, Reid & Briskman

257 St. Anthony St.
Mobile, Ala. Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Oct 10 1970

Sheriff

I have executed this summons

this 17 Oct 1970

by leaving a copy with

Geneva Milton

BV

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY Brown

Deputy Sheriff

Taylor Wilkins, Sheriff

HJB Brown, Deputy Sheriff

Moore Printing Co. - Bay Minette, Ala.

40 miles R.T.
copy

The employee has been paid 14 weeks temporary total disability at the rate of \$44.00 per week or a total of \$616.00. This is a lump sum settlement based on 25 % permanent partial disability to the left shoulder which amounts to 208 additional weeks at \$10.92 a week or a total of \$2,038.90, which includes 4% discount rate for sum lump settlement.