

PUBLIC FINANCE CORPORATION
OF COLUMBUS, GA., a corpor-
ation,

Plaintiff,

-vs-

THEODORE SMITH & LUYETTE
SMITH, jointly and severally,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 4718

Plaintiff claims of the Defendants, jointly and severally,
FIVE HUNDRED EIGHT & 20/100 (\$508.20) DOLLARS, for that heretofore
on to-wit: 23d day of November, 1959, the Defendants executed a
written promissory note wherein the defendants agreed to pay
Public Finance Corporation of Columbus, Ga. the sum of SIX HUNDRED
TWENTY FIVE & 24/100 (\$625.24) DOLLARS, plus interest, in install-
ments of THIRTY SIX (\$36.00) DOLLARS per month for twenty-four (24)
months, of which Plaintiff claims due and payable \$508.20
Plaintiff avers that Defendants breached note by failure to pay and
under the terms of same Plaintiff declares all future payments
due and payable wherefore Plaintiff sues. Plaintiff is a licensee
under the "Georgia Industrial Loan Act."

WHEREFORE, Plaintiff claims of the Defendant FIVE HUNDRED
EIGHT & 20/100 (\$508.20) DOLLARS, as aforesaid.

Mayer W. Perloff
MAYER W. PERLOFF, Atty for Plaintiff

Defendants may be served:

THEODORE R. SMITH
c/o R. G. Smith, Loxley, Ala.

Emp: Ed Middleton Trucking
Loxley, Alabama

PUBLIC FINANCE CORPORATION
OF COLUMBUS, GA., a corpor-
ation,

Plaintiff,

-vs-

THEODORE SMITH & LUETTE
SMITH, jointly and severally,

Defendants.

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

NO. 4718

Plaintiff claims of the Defendants, jointly and severally,
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Plaintiff avers that Defendants breached note by failure to pay and
under the terms of same Plaintiff declares all future payments
due and payable wherefore Plaintiff sues. Plaintiff is a licensee
under the "Georgia Industrial Loan Act."

WHEREFORE, Plaintiff claims of the Defendant FIVE HUNDRED
EIGHT & 20/100 (\$508.20) DOLLARS, as aforesaid.


MAYER W. PERLOFF, Atty for Plaintiff

Defendants may be served:

THEODORE R. SMITH
c/o R. G. Smith, Loxley, Ala.

Emp: Ed Middleton Trucking
Loxley, Alabama

FILED
MAY 13 1961
ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 4718

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Theodore Smith & Lurette Smith, Jointly & Severally

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-----

Theodore Smith & Lurette Smith, Jointly & Severally-----, Defendant-----

by----- & Public Finance Corporation, of Columbus, Ga., a corp.-----

-----, Plaintiff-----

Witness my hand this 31 day of May 19-61

Exp-6-19-61

Alice J. Smith, Clerk

No. 4718 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

PUBLIC FINANCE CORPORATION

OF COLUMBUS, G.A., , A CORP.

Plaintiffs

vs.

THEODORE SMITH & LUETTE SMITH,

Jointly & Severally

Defendants

Summons and Complaint

Filed May 31, 19 61

Alice J. Duck Clerk

Mayer W. Perloff

Suite 605 Van Plaintiff's Attorney
Antwerp Bldg.

Mobile 12, Alabama

Defendant's Attorney

Defendant lives at

Received In Office

At June 1 19 *61*

Sheriff

I have executed this summons

this *6-19* 19 *61*

by leaving a copy with

Theodore Smith

Sheriff claims *40* miles at

Ten Cents per mile Total \$ *4.00*

TAYLOR WILKINS, Sheriff

BY *Steadham*
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Colleigh Steadham Deputy Sheriff

Lovley, Ala.

State of Alabama

BALDWIN COUNTY

TO THEODORE SMITH, Defendant

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of PUBLIC FINANCE CORPORATION OF COLUMBUS, GA. a corp, Plaintiff

versus THEODORE SMITH AND LURETTE SMITH, Defendant

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

MIDDLETON TRUCKING COMPANY OF LOXLEY, ALA

has been named as Garnishee

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 13th

day of October, 194

[Signature] Clerk of the Circuit Court.

Vertical text: THEODORE SMITH, ALABAMA, WINDOR, VIVIAN, CLERK OF CIRCUIT COURT, BALDWIN COUNTY, ALABAMA, M. O. R. I. C. H.

MAYER W. PERLOFF
ATTORNEY AT LAW
SUITE 605 VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
HEMLOCK 3-5412

MAYER W. PERLOFF

E. GRAHAM GIBBONS

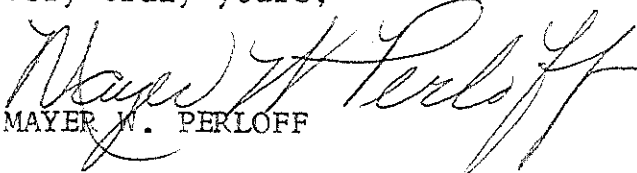
October
12,
1961

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

Dear Mrs. Duck:

I am enclosing herein two affidavits in support of garnishments for judgement I obtained in your court. I would appreciate your filing them and notifying me when the money has been paid into court so that it may be condemned.

Very truly yours,


MAYER W. PERLOFF

M
W
P
/
S

Enc/2

PUBLIC FINANCE CORPORATION
OF COLUMBUS, GA., a corpor-
ation,

Plaintiff,

-v-

THEODORE SMITH and LUETTE
SMITH, jointly and severally,

Defendants.

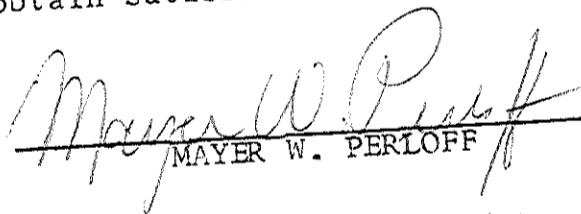
IN THE CIRCUIT COURT OF
BALDWIN COUNTY,

ALABAMA

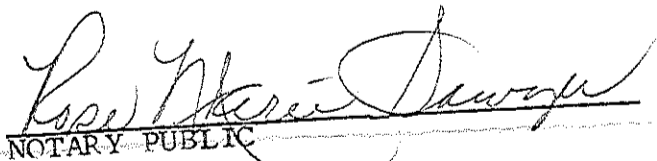
AT LAW

CASE NO. 4718

Personally appeared before me, the undersigned authority,
MAYER W. PERLOFF, who being duly sworn, on oath says, that on the
12th day of October, 1961, of the Circuit Court of Baldwin County,
PUBLIC FINANCE CORPORATION OF COLUMBUS, GA., a corporation,
recovered a judgement against THEODORE SMITH and LUETTE SMITH,
for the sum of FIVE HUNDRED EIGHT & 20/100 (\$508.20) DOLLARS,
besides costs of suit; that said judgement remains wholly unsatisfied
and in full force and effect; that Ed Middleton Trucking Co. of
Loxley, Alabama, is supposed to be indebted to or have effects of
the said THEODORE SMITH, in its possession or under its control,
and that he believes process of Garnishment against said Ed Middleton
Trucking Co. is necessary to obtain satisfaction of said Judgement.


MAYER W. PERLOFF

Sworn to and subscribed this
12th day of October, 1961.


NOTARY PUBLIC

FILED

OCT 12 1961

CLERK
REGISTER

State of Alabama

BALDWIN COUNTY

TO THEODORE SMITH, Defendant:

YOU ARE HEREBY NOTIFIED that a Writ of Garnishment has been issued in the case of PUBLIC FINANCE CORPORATION OF COLUMBUS, GA. a corp., Plaintiff,

versus THEODORE SMITH AND LURETTE SMITH, Defendant,

now pending in the Circuit Court of Baldwin County, Alabama, Law Side, in which

ED MIDDLETON TRUCKING COMPANY OF LOXLEY, ALA

has been named as Garnishee.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal on this the 13th

day of October, 194

[Signature] Clerk of the Circuit Court.

NOTICE
 TO DEFENDANT OF GARNISHMENT
 BY
 CLERK OF CIRCUIT COURT
 BALDWIN COUNTY, ALABAMA
 TO
 PUBLIC FINANCE CORPORATION OF
 COLUMBUS, GA a corp.

Plaintiff.....

VS.

THEODORE SMITH

Defendant.....

20 he served 1960
 Theodore Smith
 Loxley, Ala

Returned 7 day of Oct 1961
 Not found in my county after diligent search and in-
 quiry. Taylor Wilkins, Sheriff

By W. D. Powell
 Deputy Sheriff

Received 13 day of Oct 1961
 and on _____ day of _____ 1961
 I served a copy of the within _____
 on Theodore Smith
 By service on _____
 _____ 1961

TAYLOR WILKINS, Sheriff
 By _____
 D. S.

Garnishment on Judgment.

The State of Alabama,
Baldwin County

CIRCUIT COURT, BALDWIN COUNTY

TERM, 19--

To any Sheriff of the State of Alabama, Greeting:

WHEREAS, at a regular October Term, 1961, of the Circuit Court of Baldwin County, to-wit: On the 12th day of October, 1961, being a regular day of said term, PUBLIC FINANCE CORPORATION OF COLUMBUS, GA, a corp

recovered judgment against THEODORE SMITH and LUETTE SMITH

for the sum of Five hundred eight and 20/100 Dollars, and cost of suit, and affidavit having been made by Mayer Perloff

that process of garnishment is believed to be necessary to obtain satisfaction of such judgment, and that the following named persons or corporations, viz:

ED MIDDLETON TRUCKING COMPANY OF LOXLEY, ALABAMA

has or is believed to have in their possession, or under their control money or effects belonging to said defendant Theodore Smith or that they are ~~is~~ or is believed to be indebted to said defendant Theodore Smith or to be liable to them, or to one of them on a contract for the delivery of personal property, or on a contract for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property.

You Are Therefore Hereby Commanded to Summon ED MIDDLETON TRUCKING COMPANY OF LOXLEY, ALABAMA

to be and appear before the honorable Judge of the Circuit Court for Baldwin County, at the Court House thereof, in the city of Bay Minette, on the Within 30 days ~~Monday~~ in Monday A. D. 1961, then and there within the three first days of the term, to answer on oath, whether at the time of the service of the garnishment, or at the time making their answer, or at any time intervening the time of serving the garnishment, and making the answer they ~~were~~ indebted to said defendant Theodore Smith and whether they will not be indebted in future to said defendant

they by a contract then existing, and whether by a contract then existing they is, or are, liable to said defendants for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property, or which is payable in personal property, and whether they has not in their possession or under their control money or effects belonging to the defendant Theodore Smith

Herein fail not, and have you then and there this Writ.

Witness, ALICE J. DUCK, Clerk of said Court, this 13th day of Oct, A. D., 1961

Issued 13th day of Oct A. D., 1961

ATTEST

Alice J. Duck, Clerk.

45557
45592

Circuit Court, Baldwin County

No. 4718 1/2

PUBLIC FINANCE CORPORATION, OF COLUMBUS
GEORGIA, a corp.

VS. } Garnishment On Judgment

THEODORE SMITH and LURETTE SMITH

ED MIDDLETON TRUCKING CO. of
LOXLEY, ALA, Garnishee

Issued _____ day of _____ 19____

Returnable _____ day of _____ 19____

to be served on
Ed Middleton Trucking Co.
Loxley, Ala

Attorney

Sheriff claims 40 miles at
Ten Cents per mile Total 4.00
TAYLOR WILKINS Sheriff
BY W. O. Garner
DEPUTY SHERIFF

Received 13 day of Oct 1961
and on 21 day of Oct 1961
I served a copy of the within Warrant
on Ed Middleton Trucking
By service on Ed Middleton

TAYLOR WILKINS, Sheriff
By W. O. Garner D.S.
Satley

PUBLIC FINANCE CORPORATION
OF COLUMBUS, GEORGIA, a
Corporation,

Plaintiff,

Vs.

THEODORE SMITH and
LUETTE SMITH,

Defendants.

X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

CAS E NO. 4718 1/2

Personally appeared before me, the undersigned authority,
E. D. Middleton, who is personally known to me, who being by
me first duly sworn, on oath says, that he is the owner of
E. D. Middleton Produce Company of Loxley, Alabama, a corpora-
tion, and that as such officer has authority to make answer
for the garnishee in the above states case. In answering the
garnishment therein, he says that the garnishee is not now in-
debted to the defendant in any sum whatever, and was not in-
debted to him at the time of the service of this garnishment,
nor at any time intervening between the time of the service of
the garnishment and the making of this answer.; and it will
not be indebted in the future to the said defendant by any
contract then or now existing, and that it will not be liable
to the defendant for the delivery of personal property by any
contract then or now existing, for the delivery of personal
property, nor for the payment of money which may be discharged
by the delivery of personal property, or which is payable in
personal property, and that it has not in its possession or
under its control money or effects belonging to the defendant.

E. D. Middleton
E. D. Middleton Produce Company,
a Corporation, by E. D. Middleton,
its President

Sworn to and subscribed before me this the 27 day of October,

1961.
FILED
OCT 30 1961
ALICE J. DUCK, CLERK
REGISTER

Wade B. ...
Notary Public
Baedwa Co Ala
2344 Comm expires 6/1/65

MAYER W. PERLOFF
ATTORNEY AT LAW
SUITE 605 VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
HEMLOCK 3-5412

May 30, 1961

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

Re: Public Finance Corp. -v- SMITH, Theodore, et al

Dear Mrs. Duck:

Please find attached bill of complaint in the above captioned matter which I would appreciate your filing in your Court.

I would appreciate your advising me when service has been had in the matter.

Very truly yours,

MAYER W. PERLOFF

MWP:rms

Enc/

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4718

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~Theodore Smith & Luetta Smith, Jointly & Severally~~

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-----

~~Theodore Smith & Luetta Smith, Jointly & Severally~~-----, Defendant-----

by----- g. Public Finance Corporation, of Columbus, Ga., a corp.-----

-----, Plaintiff-----

Witness my hand this 31 day of May 1961

Alicia J. Smith, Clerk