

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

MAYER W. PERLOFF

E. GRAHAM GIBBONS

November  
28,  
1961

The Honorable Hubert M. Hall,  
Judge of the Circuit Court,  
Baldwin County,  
Bay Minette, Alabama.

Re: Household Finance Corporation -v- Hubert L. Smith - Case #4774

My dear Judge Hall:

On November 21, 1961, you dismissed the above captioned case out of your court. In this case I represent the Plaintiff and LeNoir Thompson represents the Defendant. We had agreed among ourselves that he would consent to a judgement for the Plaintiff in this matter.

Under the circumstances I would appreciate your reinstating this case on your docket and I shall ask Mr. Thompson to promptly take a judgement in this matter.

Very truly yours,

  
MAYER W. PERLOFF

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W  
P  
/  
S

*Judgment  
By Workheld*

*488.62  
15  
24340  
58868  
70.302*

HOUSEHOLD FINANCE CORPORATION,\*  
a corporation,

Plaintiff,

-v-

HUBERT L. SMITH and EVELYN  
SMITH, jointly and severally, \*

Defendants.

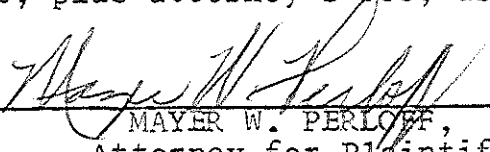
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

NO. 4774

Plaintiff claims of Defendants, jointly and severally,  
SIX HUNDRED FIFTY ONE & 57/100 (\$651.57) DOLLARS, forthat heretofore  
on to-wit: March 4, 1958, the Defendants executed a written promissory  
note wherein the Defendants agreed to pay HOUSEHOLD FINANCE CORPOR-  
ATION, a corporation, FIVE HUNDRED & 51/100 (\$500.51) DOLLARS,  
in<sup>24</sup> installments at \$29.00 per month, commencing on to-wit:  
April 4, 1958, including interest. Plaintiff avers that Defendant  
defaulted in payment thereunder on, to-wit: January 23, 1959, and  
pursuant to the terms of said promissory note, the Plaintiff herein  
has declared the entire balance due and owing.

Plaintiff avers that by the terms of said promissory note, the  
Defendants waived all right to exemption under the Constitution  
and Laws of State of Florida, and agreed to pay areasonable attorney's  
fee in the event employment of an attorney was necessary for the  
collection, which said attorney's fee plaintiff claims in the amount  
of ONE HUNDRED SIXTY TWO & 89/100 (\$162.89) DOLLARS, one-third  
of FOUR HUNDRED EIGHTY EIGHT & 68/100 (\$488.68) DOLLARS.

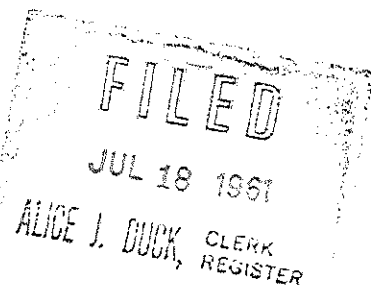
WHEREFORE, Plaintiff claims of the Defendants, jointly and  
severally, \$488.68, plus interest, plus attorney's fee, as aforesaid.

  
MAYER W. PERLOFF,  
Attorney for Plaintiff

Defendants may be served:

Home: Route 1, Perdido, Ala.  
c/o Dave Gettings

His emp: Quinley's Motor Supply Co.  
Bay Minette, Alabama



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4774

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Hubert L. Smith and Evelyn Smith

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 Hubert L. Smith  
and Evelyn Smith, jointly and severally, Defendant

by Household Finance Corporation, A Corporation

Plaintiff

Witness my hand this 18 day of July 1961

Alice J. Huck, Clerk

No. 4774

Page \_\_\_\_\_

**The State of Alabama**

Baldwin County

**CIRCUIT COURT**

**HOUSEHOLD FINANCE CORPORATION,**

**A Corporation**

Plaintiffs

vs.

**HUBERT L. SMITH & EVELYN SMITH,**

**Jointly and severally**

Defendants

**Summons and Complaint**

Filed July 18, 1961

Alice J. Duck

Clerk

**Mayer W. Perloff**

**Van Antwerp Bldg** Plaintiff's Attorney  
**Mobile, Ala.**

Defendant's Attorney

Defendant lives at \_\_\_\_\_

Received In Office

July 18 1961

\_\_\_\_\_, Sheriff

I have executed this summons

this July 21 1961

by leaving a copy with

Hubert L. Smith  
Evelyn Smith

Hubert L. Smith Sheriff

W. C. Zeller Deputy Sheriff

O. J. Duck

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

MAYER W. PERLOFF  
E. GRAHAM GIBBONS

July 17, 1961

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

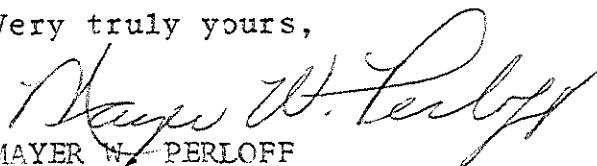
Re: Household Finance Corp -v- SMITH, Hubert & Evelyn

Dear Mrs. Duck:

Will you please file the above Bill of Complaint in your  
Circuit Court and advise me when service has been had.

Thank you for your attention.

Very truly yours,

  
MAYER W. PERLOFF

M

W

P

/rms

Enc/orig.-2 copies  
Bill of Complaint