## First Supplement to Memorandum 78-35

Subject: Study D-39.200 - Enforcement of Judgments (Comprehensive Statute--Retroactive Application of Exemptions)

Attached hereto is a reprint of Comment, <u>The Contract Clause and</u> <u>the Constitutionality of Retroactive Application of Exemption Statutes:</u> <u>A Reconsideration</u>, 9 Pac. L.J. 889 (1978). This Comment provides additional background material for the Commission's consideration of Memorandum 78-35 (sent 5/19/78). The reprint is being sent only to Commissioners.

Respectfully submitted,

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