

5294

PETITION FOR HABEAS CORPUS

Ex Parte

Warren Kyle Brown

In the Circuit Court of
Baldwin County, Alabama

To the Hon. Hubert M. Hall, Judge of the Circuit Court of
Baldwin County, Alabama, in Equity:

Comes now your Petitioner, Vera Mae Brown and shows unto this
Court;

that Warren Kyle ~~xxxxx~~ Brown is unlawfully detained of his
liberty by Willard Brown.

that your Petitioner is the mother of Warren Kyle Brown, an
illegitimate child and that Willard Brown, her husband is not
the Baby's father, neither could he be.

that on to wit September 16, 1962, the said Willard Brown
left your Petitioner, stealing and abducting the said Warren
Kyle Brown.

Your Petitioner prays that Your Honor will cause a writ of
Habeas Corpus to issue, directed to the said Willard Brown,
commanding him to have the body of the said Warren Kyle Brown
before Your Honor, at such time as may be appointed by you,
together with the cause of his detention.

Vera Mae Brown
Petitioner

State of Alabama
County of Baldwin

Before me, Frank P. Probst, a Notary Public, in
and for said County, in said State, personally appeared Vera
Mae Brown, the above named Petitioner, who being by me first
duly sworn deposes and says; that the facts stated in said
petition are true.

Frank P. Probst

Subscribed and sworn to before me on the 24 day of
September, 1962.

Frank P. Probst

Notary Public, Baldwin County, Alabama

Hubert F. McFinley
Attorney for Petitioner

FILED

SEP 24 1962

ALICE I. DUCK, CLERK
REGISTER

10/3/62 Petition for Writ of Habeas Corpus
denied and dismissed
10/3/62 in 10th
JST

State of Alabama
County of Baldwin

To whom it may concern:

This is to certify that I, Vera Mae Brown am the mother of Warren Kyle Brown, an illegitimate child, born March 17, 1962. I married Willard Brown on to wit July 22, 1962. He is not the father of the child, Warren Kyle Brown, neither could he be.

On to wit September 16, 1962, Willard Brown left me, stealing and abducting the child, with whom he has no blood or other relationship whatsoever.

Dated this 24 day of September, 1962.

Vera Mae Brown

State of Alabama
County of Baldwin

Before me, Frank P. Probst, a Notary Public, in and for said County, in said State, personally appeared Vera Mae Brown, who first being duly sworn, deposes and says; that the allegations contained in the foregoing affidavit are true.

Frank P. Probst

Subscribed and sworn to before me on this 24 day of September, 1962.

Frank P. Probst

Notary Public, Baldwin County, Alabama

FILED

SEP 24 1962

ALICE J. DUCK, CLERK
REGISTER

WRIT OF HABEAS CORPUS

Ex Parte

Warren Kyle Brown

In the Circuit Court of
Baldwin County, Alabama

To: ~~Will~~ Willard Brown:

You are hereby commanded to have the body of Warren Kyle Brown alleged to be detained by you, by whatsoever name the said ~~Warren~~ Kyle Brown is known or called, together with the cause of such detention before me, John W. Isaac, Judge of the Circuit Court of Baldwin County, Alabama, on the 3 day of Oct 1962 at 10, A M, to do and receive what shall then and there be determined concerning the said Warren Kyle Brown.

Dated this 25 day of Sept, 1962.

John W. Isaac
Circuit Judge

FILED
SEP 25 1962
ALICE L. DUCK, CLERK
REGISTER

Executed this the 29th
day of September 1962
by serving a copy on
Willard Brown

Taylor Wilkins Sheriff
By W.O. Garner Chief Deputy

5294

Ex parte

Warren Kyle Brown

Warren Kyle Brown
County of ...
State of ...
I, Taylor Wilkins, Sheriff of the County of ... State of ... do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears from the records of the County of ... State of ...
Witness my hand and the seal of said County at ... this 29th day of September 1962.

Ex Parte)
WARREN KYLE BROWN) IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

RETURN OF PERSON TO WHOM WRIT DIRECTED

Now comes Willard Brown, to whom the writ of habeas corpus in this case was directed, and who has been duly served therewith, and for return to said writ shows to the Court that he detains and holds the said WARREN KYLE BROWN by virtue of being his father; by virtue of being the husband of the Petitioner Vera Mae Brown; by virtue of being the only one capable of properly caring and supporting the said child; and by virtue of having cared for and supported the said child since its birth. And he herewith produces or stands ready to produce the body of the said Warren Kyle Brown and submits him to the jurisdiction of the Hon Hubert M. Hall, Judge of the Circuit Court of Baldwin, County, Alabama, the judicial officer issuing the writ in this cause.

And comes now Willard Brown, and for further answer to the Petition for Habeas Corpus, denies each and every allegation in the Petition For Habeas Corpus which alleges that Warren Kyle Brown is unlawfully detained of his liberty by Willard Brown, and which also alleges that Willard Brown did steal and abduct the said Warren Kyle Brown.

Dated this 3rd day of October, 1962.

Willard Brown

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Kenneth Cooper, Notary Public, State at Large, State of Alabama, personally appeared Willard Brown, who is known to me, who, upon being duly and legally sworn, deposes and says that the allegations contained in the foregoing are true and correct.

Willard Brown

Subscribed and sworn to before me this 3rd day of October, 1962.

Kenneth Cooper
Notary Public, State at Large, State of Alabama