

HAZEL LAMBERT RAYBORN,  
Complainant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

-vs-

WALTER JAMES RAYBORN,  
Defendant

COMPLAINT

To the

HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes HAZEL LAMBERT RAYBORN and by this her bill of complaint presented against WALTER JAMES RAYBORN, respectfully shows:

FIRST: That the Complainant and Defendant are both over the age of twenty-one years, both are now and have been for more than three years next preceeding the filing of this bill of complaint, bona fide residents of Baldwin County, Alabama.

SECOND: That the Complainant and Defendant were married August 6, 1946, at Bay Minette, Alabama.

THIRD: That the Defendant, Walter James Rayborn, has become after marriage, addicted to habitual drunkenness and that condition did not exist prior to their marriage.

FOURTH: That to this marriage there is born three children, namely: John Thomas Rayborn, a son now aged 4 years; Patricia Ann Rayborn, a daughter now aged 3 years; Walter James Rayborn, Jr., a son now aged one year; and that these children are now in the care and custody of their mother, this Complainant, and that it is to the best interest of said children to be in the care and custody of their mother.

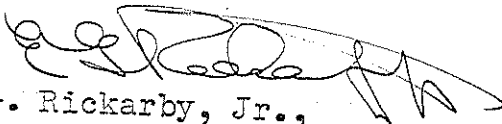
FIFTH: That the Defendant, Walter James Rayborn, is an able bodied man capable of earning good wages and the Complainant has no property or estate except her earnings as a waitress in a cafe in Fairhope, Alabama, and that it is necessary for her to have the financial assistance of her husband, the Defendant, for the support of these children.

WHEREFORE, Complainant prays that the Defendant be made a party to this cause by proper process requiring him to answer this bill within the time prescribed by law.

Complainant further prays that on a hearing of this cause a decree be rendered forever divorcing her from the said Walter James Rayborn and granting her the right to re-marry should she so desire and giving her the custody of said minor children and ascertain what would be a reasonable amount for the Defendant, Walter James Rayborn, to pay for the support of his children, and further ordering that the said Walter James Rayborn pay the expenses of this Complainant's attorney in prosecuting this action, and to have such other, further, or different relief as to equity may seem meet.

RICKARBY & RICKARBY

By:

  
E. G. Rickarby, Jr.,  
Attorney for Complainant

TO THE SHERIFF: Defendant's address is now Fairhope but he will probably be at Robertsdale with Mr. Tom Rayborn.

Hazel Lambert Rayborn,  
Complainant

-vs-

Walter James Rayborn,  
Defendant

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Bill of Complaint

FILED

JAN 15 1937

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
ALICE L. BUCK, CLERK

The State of Alabama, \_\_\_\_\_ County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon \_\_\_\_\_ Walter James Rabon

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State \_\_\_\_\_

\_\_\_\_\_ Hazel Lambert Tayborn

against \_\_\_\_\_

\_\_\_\_\_ Walter James Rayborn

Herein fail not. Due return make of this writ as the law directs.

Witness this 15th day of January, 19 54

\_\_\_\_\_ Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

No. 3182

Page

# The State of Alabama

Baldwin COUNTY.

## IN CIRCUIT COURT, IN EQUITY

HAZEL LAMBERT RAYBORN

vs.

WALTER JAMES RAYBORN

## SUMMONS

Returned by the Sheriff and filed in office, this

the day of , 19

, Register.

Received in office, this the 15 day of

Jan. 1954  
Taylor Watkins, Sheriff.

I have executed the within by leaving a copy

thereof with

Walter James  
Rayborn

defendant named herein, on this the 10

day of Feb. 1954

Taylor Watkins, Sheriff.

Filed 1-15-54  
A. J. [unclear]  
Ray

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY  
(DECEASED)

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

12 January 1954

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

Re: Hazel Lambert Rayborn  
Vs: Walter James Rayborn

Dear Mrs. Duck:

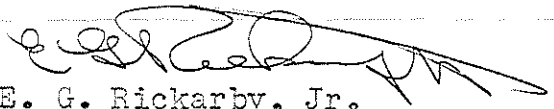
With this we are handing you a divorce petition of  
Mrs. W. J. Rayborn.

This is a case that I am handling principally because  
there are three children involved and Mrs. Rayborn is  
working as a waitress and wants this divorce petition  
to get some support.

She has made arrangements to pay some fees and out of  
the first money she pays I will split with you as to  
costs.

Please process this and oblige.

Yours very truly,

  
E. G. Rickarby, Jr.

R/i  
1855