

2673

EDWARD SIDNEY BRUEGGEMANN,) IN THE
Complainant,) CIRCUIT COURT
VS.) OF
SECILIA GUARISCO BRUEGGEMANN,) BALDWIN COUNTY, ALABAMA
Respondent.) IN EQUITY NO. _____

ONE

Complainant avers that he and Respondent are each over the age of twenty-one years, that both Complainant and Respondent are of sound mind, and that the Respondent is the lawful wife of the Complainant, they having been lawfully married to each other on the 12th day of January, 1948 at Daphne, in the County of Baldwin, Alabama. Complainant avers that both he and the Respondent are bona-fide resident citizens of the State of Alabama, and of the County of Baldwin, and that both Complainant and Respondent have been such bona-fide resident citizens for more than one year next immediately preceding the filing of this Bill of Complaint.

TWO

Complainant avers that two children have been born of the marriage of Complainant and Respondent, namely, Edward Charles Brueggemann, aged two years and six months, and Frederic Anthony Brueggemann, aged eight months; that both of said children are currently in the custody of the Respondent at the home of her parents in Daphne, Alabama; and that at the present time the Respondent, because of the tender age of said children, is the proper person to have custody and control of said children.

THREE

Complainant avers that on the 14th day of March, 1950, the Respondent did voluntarily abandon the bed and

board of the Complainant at St. Louis, Missouri, without his consent, without any cause or fault on his part, and without any intention to return; that said abandonment occurred more than one year next immediately preceding the filing of this Bill of Complaint in this case, and has been continuous and uninterrupted since the 14th day of March, 1950; and that since said date the Complainant and the Respondent have not lived together as man and wife, nor in any way regarded each other as man and wife.

PRAYER FOR PROCESS

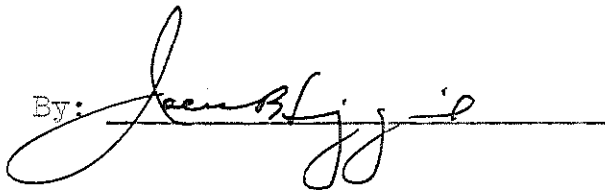
Wherefore, the premises considered, Complainant prays that Your Honor will take jurisdiction of the case made by this Bill of Complaint, and will cause process to be issued against the Respondent, Secilia Guarisco Brueggemann, requiring her to answer, plead, or demur within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that upon a final hearing of this case your Honors will make an order or decree dissolving the bonds of matrimony now existing between the Complainant and Respondent, and grant to the Complainant an absolute decree of divorce and to Complainant and Respondent the right to marry again within the time required by law, if they so desire; that Your Honor will enter an order designating the Respondent as the person to have the custody and control of the minor children of the Complainant and the Respondent, subject to the rights of the Complainant to visit said children at all

reasonable times and to take said children into his custody at intervals and during vacation; that Your Honor will fix the amount which the Complainant shall pay to the Respondent for support and maintenance of said minor children; and that Your Honor will grant to the Complainant and to the Respondent, such other, further and different relief as unto Your Honor may seem just and proper.

HIGGINS & HIGGINS
Solicitors for Complainant

By: 

Address of Respondent:

c/o Augustino Guarisco
Daphne, Alabama

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2673

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Secelia Guarisco Brueggeman

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

Secelia Guarisco Brueggeman

, Defendant

by Edward Sidney Brueggeman

, Plaintiff

Witness my hand this 22nd day of June 19 51

Arice J. Leach, Clerk

No. 2673 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

EDWARD SIDNEY BRUEGGEMAN

Plaintiffs

vs.

SECELIA GUARISCO BRUEGGEMAN

Defendants

SUMMONS and COMPLAINT

Filed 6-22-51, 19.....

W. J. French, Clerk

RECORDED

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19.....

, Sheriff

I have executed this summons

this 23rd June, 1951

by leaving a copy with

Person named within

Taylor Wilkins

Sheriff

A. P. VanDusen Deputy Sheriff

5 $\frac{14}{2}$ 601

EDWARD SIDNEY BRUEGGEMANN,
Complainant,

vs.

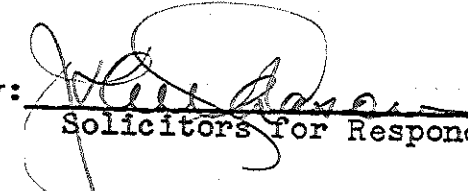
SECILIA GUARISCO BRUEGGEMANN,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof separately and severally, says:

1. That she admits the allegations of paragraph 1 of the Bill of Complaint.
2. That she admits the allegations of the second paragraph of the Bill of Complaint.
3. That she denies the allegations of the third paragraph of the Bill of Complaint and demands strict proof thereof.

CHASON & STONE

By: 
Solicitors for Respondent

ANSWER

EDWARD SIDNEY BRUEGGEMANN,

Complainant,

vs.

SECILIA GUARISCO BRUEGGEMANN,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Filed: July 3rd, 1951.

Alfred. H. H. H.
Register.

RECORDED

HIGGINS & HIGGINS

ATTORNEYS AT LAW

421-425 GREYSTONE BUILDING

104 ST. JOSEPH STREET

MOBILE, ALABAMA

JOHN R. HIGGINS
LEE E. HIGGINS

June 21st, 1951

Mrs. Alice J. Duck, Register
Circuit Court in Equity
Bay Minette, Alabama

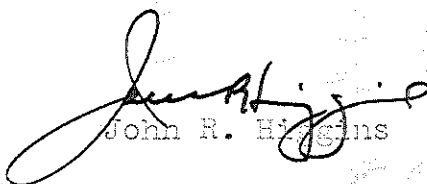
Re: Edward Sidney Brueggemann
Vs: Secilia Guarisco Brueggemann

Dear Mrs. Duck:

I enclose herewith for filing Bill of
Complaint in the above matter.

The respondent, Mrs. Brueggemann may be
served, c/o Augustino Guarisco, Daphne, Alabama.

Very truly yours,


John R. Higgins

JRH/ek

W 26 73

Edward Sidney
Brueggeman

vs.
Secilia Guarisco Brueggeman

2673

Divorce

Filed 6-22-51

in sum & Comp
deb to sheriff

Higgins & Higgins