

1206

The State Of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

SADIE M. BRADFORD Complainant

VS

CLARENCE W. BRADFORD Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Confessio~~
~~on Answer and Waiver~~ and Testimony as noted by the Register, and upon
consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed
for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony here-
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,
and that the said SADIE M. BRADFORD
is forever divorced from the said

CLARENCE W. BRADFORD

for and on account of Abandonment.

It is further ordered, judged and decreed that Complainant re-
tain the care and custody of the seven children of the marriage
pending further orders of this Court.

It is further ordered, judged and decreed that Respondent pay
to Complainant for the support of their children, the sum of \$20.00
per week to be paid on Tuesday of each week and shall further
furnish Complainant with whatever clothing, school books and medic-
ine that maybe required for said children, and of which she will
inform Respondent in writing.

This Court retains custody of this cause for the purpose of mak-
ing such further orders and decrees as may seem proper.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry
except to each other until sixty days after the rendition of this decree, and that if appeal is taken
within sixty days, neither party shall again marry except to each other during the pendency of said
appeal.

It is further ordered that both parties
be, and are hereby permitted to again contract marriage upon the payment of the cost of
this suit.

It is further ordered that Clarence W. Bradford
the Respondent pay the cost herein to be taxed, for which execution may issue.

This 17th day of October 19 44

G. W. Hare
Judge Circuit Court, in Equity

I, ROBERT S. DUCK, Register of the Circuit
Court of Baldwin County, Alabama, do hereby certify that the
foregoing is a correct copy of the original decree rendered by the
Judge of the Circuit Court in the above stated cause, which said
decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day
of October, 19 44

Register of Circuit Court, in Equity.

Original

No. 1606 Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

SADIE M. BRADFORD

vs. Complainant.

CLARENCE W. BRADFORD

Respondent.

DIVORCE DECREE

2123

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Sadie M. Bradford, Complainant

vs.

Clarence W. Bradford, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Con-~~
~~fusion~~ Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said SADIE M. BRADFORD is forever divorced from the said CLARENCE W. BRADFORD for and on account of Abandonment.

It is further ordered, judged and decreed that Complainant retain the care and custody of the seven children of the marriage pending further orders of this Court.

It is further ordered, judged and dedreed that Respondent pay to Complainant for the support of their children, the sum of \$20.00 per week to be paid on Tuesday of each week and shall further furnish Complainant with whatever clothing, school books and medicine that maybe required for said children, and of which she will inform Respondent in writing.

This Court retains custody of this cause for the purpose of making such further orders and decrees as may seem proper.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Clarence W. Bradford the Respondent pay the cost herein to be taxed, for which execution may issue.

This 17th day of October, 1944

"F. W. Hare"

Judge Circuit Court, in Equity.

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the 2nd day of October, 1947

Alice J. Duck, Register of Circuit Court, in Equity.

No. Page

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

.....
Complainant.

Vs.

.....
Respondent.

DIVORCE DECREE

SADIE M. BRADFORD,
Petitioner,
vs.
CLARENCE W. BRADFORD,
Defendant.

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EQUITY NO. 1206
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

This cause coming on to be heard upon the prayer of the Petitioner that the Defendant, CLARENCE W. BRADFORD be adjudged in contempt of this Court for failure to make the payments ordered in the decree made October 17th, 1944, and it appearing from the sworn averments in the petition that the Defendant has disobeyed the order of this Court.

It is therefore ordered that the Register of this Court issue a summons to said Defendant, CLARENCE W. BRADFORD to appear before the Judge of this Court at Monroeville, Alabama on the 10th day of October, 1947, at 11:00 o'clock A. M. then and there to show cause why he shall not be held in contempt of this Court.

Done at Bay Minette, Alabama, this the 3rd day of October 1947.

J. H. Stare
Judge.

The above hearing is continued to Thursday afternoon, December 4, 1947, at 3:00 P. M., at the Court house at Bay Minette, Alabama.

Emmett F. Hadwick
Judge Presiding

EQUITY NO. 1206

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

SADIE M. BRADFORD,

Petitioner,

VS.

CLARENCE W. BRADFORD,

Defendant.

ORDER.

SADIE M. BRADFORD,
Petitioner,
vs.
CLARENCE W. BRADFORD,
Defendant.

EQUITY NO. 1206
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

This cause coming on to be heard upon the prayer of the Petitioner that the Defendant, CLARENCE W. BRADFORD be adjudged in contempt of this Court for failure to make the payments ordered in the decree made October 17th, 1944, and it appearing from the sworn averments in the petition that the Defendant has disobeyed the order of this Court.

It is therefore ordered that the Register of this Court issue a summons to said Defendant, CLARENCE W. BRADFORD to appear before the Judge of this Court at Monroeville, Alabama on the 10th day of October, 1947, at 11:00 o'clock A. M. then and there to show cause why he shall not be held in contempt of this Court.

Done at Bay Minette, Alabama, this the 3rd day of October 1947.

"F. W. HARE"

Judge.

The above hearing is continued to Thursday afternoon, December 4, 1947, at 3:00 P. M., at the Court house at Bay Minette, Alabama.

Emmett F. H. Hare
Judge Presiding

COPY.

EQUITY NO. 1206.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

SADDIE M. BRADFORD, Petitioner,
 vs.
 CLARENCE W. BRADFORD, Respondent.

It is therefore ordered that the Registrar of this Court issue a summons to said Defendant, CLARENCE W. BRADFORD to appear before the Judge of this Court at Monroeville, Alabama on the 10th day of October, 1947, at 11:00 o'clock A. M. then and there to show cause why he shall not be held in contempt of this Court.

Defendant has disobeyed the order of this Court. It is therefore ordered that the Registrar of this Court issue a summons to said Defendant, CLARENCE W. BRADFORD to appear before the Judge of this Court at Monroeville, Alabama on the 10th day of October, 1947, at 11:00 o'clock A. M. then and there to show cause why he shall not be held in contempt of this Court.

Defendant has disobeyed the order of this Court. It is therefore ordered that the Registrar of this Court issue a summons to said Defendant, CLARENCE W. BRADFORD to appear before the Judge of this Court at Monroeville, Alabama on the 10th day of October, 1947, at 11:00 o'clock A. M. then and there to show cause why he shall not be held in contempt of this Court.

EQUITY NO. 1206
 IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA
 IN EQUITY.

SADDIE M. BRADFORD,
 Petitioner,
 vs.
 CLARENCE W. BRADFORD,
 Defendant.

This cause coming on to be heard upon the prayer of the Petitioner that the Defendant, CLARENCE W. BRADFORD be adjudged in contempt of this Court for failure to make the payment ordered in the above captioned case, and it appearing from the sworn statements in the petition that the Defendant has disobeyed the order of this Court.

FILED
 OCT 3 1947
 ALICE J. BUCK, REGISTRAR

Done at Bay Minette Alabama, this the 3rd day of October 1947.

"F. W. HARRIS"
 Judge.

The above hearing is continued to Thursday afternoon, December 4, 1947, at 3:00 P. M., at the Court house at Bay Minette, Alabama.

[Handwritten signature]
 Judge Presiding

Sadie M Bradford.

THE STATE OF ALABAMA,
BALDWIN COUNTY

VS.

Clarence W Bradford.

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____

and ⁺ testimony of Complainant and Sim Andrews.

and in behalf of Defendant upon Answer and Waiver.

Produce Register.

No. 1606

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Bradford

VS.

Bradford

NOTE OF TESTIMONY

Filed in Open Court this 16

day of Oct 1944

Rodney

Register.

SADIE M. BRADFORD
Complainant

No. 1206

vs

CLARENCE W. BRADFORD
Respondent.

E Q U I T Y

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

DEPOSITIONS OF SADIE M. BRADFORD and SIM. T. ANDREWS.

WITNESSES FOR COMPLAINANT

The said witnesses appearing before me at the time and place hereafter stated, being first duly sworn upon examination by the solicitor for the Complainant, testified as follows:

SADIE M. BRADFORD

I am the Complainant in this cause. I am over the age of twenty-one years and reside east of Fairhope in Baldwin County, Alabama, where I was born. Clarence Bradford is also over the age of twenty-one years and lived in this County up to October of last year. We were married in Pensacola, June 12, 1930 and have seven children all of whom live with me. Their names and ages are:

Estelle	13 years
Vivian	11 years
Coleman	9 years
Betty	7 years
Alice	6 years
Earle	4 years
Lilly	2 years

For the last two years I have known that my husband was untrue to me. He became infatuated with the wife of a neighbor, one Lola Allday. After my husband started going with her she left her husband and four children and moved to her parents residence much nearer to Fairhope. She obviously did this in order to be closer to Clarence, as I am reliably informed he was with her at all hours of the evening and night, as he was away from home a great deal. He and she worked at the same place in Mobile and came home in the same car together with other riders. His people tried to make him give this other woman up but it did no good and finally he left me entirely and took up with her. First in Mobile for a short while after she had been run out her parents home, and later in Tampa, Florida, where I was told they lived together, and on his two trips home she came with him. While my husband has abandoned me since October of last year he has been sending fifteen dollars a week home for the children and has been giving them clothes. He writes that he loves his children and will continue to care for them. They are staying with me and I am supporting them, as I also work in Mobile, coming home each night.

I do not know of my own knowledge, when and where my husband has been guilty of infidelity with this woman, but I have been reliably informed of his intimacy with her by people whom I believe and, therefore, charge him with adultery committed with her at various times and places in the past two years. I also found before he went away, a picture of the pair together in

which she was holding his arm in an affectionate way. I have this picture now.

Sadie M. Bradford

SIM T. ANDREWS

I have been a resident of Baldwin County since 1910 and have known Mr. and Mrs. Bradford since 1934. They live in a half mile of me. They are both over twenty-one years of age and live in Baldwin County.

For the past two years Clarence Bradford has been going with a Mrs. Lola Allday who lives across the street from me. She did live about two and a half miles from me, but she left her husband and four children on account of Bradford and went to live with her parents who live across from me, apparently so she could see Bradford whenever she wanted. I know that she is committing adultery with Bradford, not that I have ever seen them in the act but I have seen enough to know that no woman would act with a man as she does if she was not intimate with him. I have seen her driving with him alone late at night going into or coming out of lonely spots, sitting with him in his car in front of her father's place hugging and kissing many times, often late at night. Sometimes he would be lying with his head in her lap or with her head on his shoulder and looking as if they did not care who saw them. They worked at the same place in Mobile and came home in the same car. Last October he left home and, I am told, went to Tampa, Florida and shortly after she left Baldwin County and I hear went to live with him. He has been back twice and each time she came with him and went back with him. Their carrying on was common talk in the neighborhood.

Just before the pair left Alabama, they went off together in his car on a Saturday afternoon and did not come back until Sunday night. When she came back and went to her room, her father followed her with a cowhide and beat her severely. The next day Bradford came for her and took her and her clothes to Mobile where she got a room. Bradford left his home too and got a room in Mobile and a little later they both left for Florida.

Bradford has a wife and seven children, Lola a husband and four children.

Simon T. Andrews

CERTIFICATE

I, Patricia F. Lord, acting as commissioner by agreement of parties hereby certify that in the case of SADIE M. BRADFORD and CLARENCE W. BRADFORD, pending on the Equity side of the Circuit Court of Baldwin County, I caused SADIE M. BRADFORD and SIM T. ANDREWS, witness for Complainant, to appear before me at my office in the Bank Building, Fairhope, Alabama, where, after being duly sworn, upon examination by the solicitor for the Complainant, she testified as is above written, and her testimony, after being reduced to writing, was read over and signed by them.

I further certify that I am neither of counsel nor of kin to either party to the cause or in anywise interested in the result thereof.

IN WITNESS WHEREOF, I hereto set my hand and seal as commissioner this the day of October, 1944.

Patricia F. Lord
Commissioner.

1304

Boydland

Bradford

Carlman

Jan Oct 16 1944
Boydland

THE BOARD OF DIRECTORS OF THE NATIONAL ASSOCIATION OF REALTORS
HAS APPROVED THE FOLLOWING RESOLUTIONS:

RESOLVED, THAT THE NATIONAL ASSOCIATION OF REALTORS
DOES HEREBY RECOMMEND TO THE CONGRESS OF THE UNITED STATES
AND TO THE STATES THE FOLLOWING LEGISLATION:

1. That the National Association of Realtors
do hereby recommend to the Congress of the United States
and to the States the following legislation:

2. That the National Association of Realtors
do hereby recommend to the Congress of the United States
and to the States the following legislation:

3. That the National Association of Realtors
do hereby recommend to the Congress of the United States
and to the States the following legislation:

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SADIE M. BRADFORD,
Petitioner
vs.
CLARENCE W. BRADFORD,
Defendant.

EQUITY NO. 1206
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO ANY SHERIFF OF BALDWIN COUNTY:

Puruant to an order made by the Honorable *Emmett A. Aldrich*
Judge of the Circuit Court of Baldwin County, Alabama you are hereby commanded
to summon CLARENCE W. BRADFORD to appear before said Judge at Bay Minette,
Alabama, Baldwin County, on 4th day of December, 1947 at 3:00 o'clock, P.M. then
and there to show cause why he should not be held in contempt for disobedience of
the orders of said Court embodied in the decree rendered in the above styled cause
on the 17th day of October, 1944 and have you then and there this writ.

Wesley J. ...
Register Circuit Court.

STATE OF ALABAMA
SHERIFF'S OFFICE
MONTGOMERY, ALA.

RECEIVED
SHERIFF'S OFFICE
MONTGOMERY, ALA.

TO THE SHERIFF OF THE COUNTY OF...

...of the County of ...
...of the County of ...
...of the County of ...
...of the County of ...
...of the County of ...

Original

Received in Sheriff's Office
this 2 day of Dec, 1947
TAYLOR WILKINS, Sheriff

Executed By Deputy as
Copy of the Written Warrant
in Free Movement.

Bradford this the 2nd
day Dec. 1947

Taylor Wilkins Sheriff
John B. Griffin D.S.

Special
12-27-47
Wm. J. Puckett

SADIE M. BRADFORD
Complainant

E Q U I T Y

vs

IN THE CIRCUIT COURT OF

CLARENCE WILLIAM BRADFORD
Respondent

BALDWIN COUNTY, ALABAMA

Comes CLARENCE WILLIAM BRADFORD, Respondent in the above styled cause, and his answer to the bill of complaint says he denies each and every allegation of same.

Respondent hereby waives notice of demand for oral examination of Complainant's witnesses; of the issue of commission to take testimony of the time and place set for taking same and of the right to introduce evidence in his own behalf. He further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

Clarence William Bradford
Respondent.

Before me the undersigned Notary personally appeared CLARENCE WILLIAM BRADFORD who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

Witness my hand and official seal this the 9th day of October, 1944.

Carl Hensel

Notary Public, Hillsborough County,
Florida.

Notary Public, State of Florida at Large
My Commission Expires April 9, 1945

No. 1206

E Q U I T Y

SADIE M. BRADFORD
Complainant

versus

CLARENCE WILLIAM BRADFORD,
Respondent.

-- --

ANSWER and WAIVER.

* * *

Filed Oct 13 1944
Clarence W. Bradford

SADIE M. BRADFORD,
Petitioner
vs.
CLARENCE W. BRADFORD,
Defendant.

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EQUITY NO. 1206
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO ANY SHERIFF OF BALDWIN COUNTY:

Pursuant to an order made by the Honorable F. W. Hare,
Judge of the Circuit Court of Baldwin County, Alabama you are
hereby commanded to summon CLARENCE W. BRADFORD to appear be-
fore said Judge at Mowbrayville, Alabama,
~~in the Court room of the Circuit Court of~~
~~Baldwin County, Alabama~~ on 16th, Oct.
1947 at 11 o'clock A.M. then and there to show cause why he
should not be held in contempt for disobedience of the orders
of said Court embodied in the decree rendered in the above
styled cause on the 17th day of October, 1944 and have you then
and there this writ.

Alice J. Luck
[Signature]

Register Circuit Court.

EQUITY NO. 1206.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

SADIE M. BRADFORD,

Petitioner,

VS.

CLARENCE W. BRADFORD,

Defenda nt.

~~RETURN~~ ORDER.

FILED

OCT 3 1947

ALICE J. DUCK, Register

Received in Sheriff's Office
this 3 day of Oct, 1947
TAYLOR WILKINS, Sheriff

Executed 10-8 1947
by serving copy of within Summons and
Complaint on

Clarence W. Bradford

Taylor Wilkins Sheriff
W. F. Kelly Deputy Sheriff

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA; IN EQUITY.

Comes SADIE M. BRADFORD, and by this her Bill of Complaint, presented against CLARENCE WILLIAM BRADFORD, respectfully shows:

FIRST: That Complainant and Defendant are both over the age of twenty-one years and natives and life-long residents of Baldwin County. She now living east of Fairhope, but he, though still a resident of Baldwin County is working at Ybor, Florida.

SECOND: That Complainant and Defendant were married on June 12, 1930 and have lived together near Fairhope as husband and wife since that date, and until he left Fairhope in October, 1943. To this marriage were born seven children whose names and ages are as follows:

Estelle	13 yrs.
Vivian	11 yrs.
Coleman	9 yrs.
Betty	7 yrs.
Alice	6 yrs.
Earle	4 yrs.
Lilly	2 yrs.

THIRD: That in the summer of 1943 the Defendant became infatuated with a woman with whom he worked in a defense plant in Mobile, and has since that date been guilty of adulterous relations with said woman who is also married and the mother of four children. Complainant endeavored to persuade Defendant to desist from this relationship but on October 25, 1943 he left Complainant and went to Florida where he has since been at work, and later was followed by his paramour with whom Complainant is informed Defendant is now living. Since this separation, Defendant has been sending Complainant Fifteen Dollars a week, which is inadequate for the support of their large family.

THE PREMISES CONSIDERED, Complainant prays that Clarence W. Bradford be made party defendant to this cause, and by proper process required to answer this Bill within the time prescribed by Law.

Complainant further prays that an order of reference be made directing the Register of this Court, after due notice to the parties to ascertain a suitable sum to be paid by De-

fendant as alimony for the maintenance and support of the children of this marriage, and a suitable sum to be allowed Complainant as counsel fees for the prosecution of this cause and that upon the finding of the Register an order be made directing payments out of the estate of the Defendant for the purpose aforesaid.

Complainant further prays that upon hearing of this cause a decree be rendered forever divorcing her from said Clarence W. Bradford, granting her the right to marry again should she so desire, and a suitable sum for the maintenance of the children of the marriage and such other, further or different relief as to equity may seem meet.

Elliott S. Rissler
Solicitor for Complainant.

SADIE M. BRADFORD,
Petitioner,
VS.
CLARENCE W. BRADFORD,
Defendant.



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

ORDER.

In this cause, it appears to the Court from the Petition filed herein on October 3, 1947, that the Defendant has failed to pay the alimony due in this cause and that the Petitioner or Plaintiff has prayed that he be required to appear and show cause why he should not be adjudged in contempt for disobedience to the former order of this Court:

It is therefore, ordered that the said Petition be and it hereby is set for hearing at 10:00 o'clock A. M. on May 13, 1948 at the Court House in Bay Minette, Alabama.

It is further ordered that the said Defendant have notice of the day set for the said hearing.

ORDERED, ADJUDGED AND DECREED this 1st day of May 1948.

JUDGE OF THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA

Received in Sheriff's Office
this 3 day of May, 1948
TAYLOR WILKINS, Sheriff

Referred to 5-6 1948
by serving copy of within Summons and
Complaint on

Clarence Wilkinson Bradford

Taylor Wilkins Sheriff
by *W. F. Wald* Deputy Sheriff

1206

Judice M. Bradford

vs.

Clarence Wilkinson Bradford

*Filed
5-9-48
New York*

BRITISH CONSUL, NEW YORK
100 F STREET, NEW YORK

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Clarence W. Bradford to appear in the Circuit Court of Baldwin County, Alabama at 10:00 o'clock A. M. on May 13, 1948 which is the day that has been set by this Court for hearing a Petition filed by Sadie M. Bradford, a copy of which Petition is hereto attached.

Dated this 3rd day of ^{May}~~March~~, 1948.

Alice J. Neuk
Register.

1206

Received in Sheriff's Office
this 3 day of July, 1948
TAYLOR WILKINS, Sheriff

Executed 5-6 19 48
by serving copy of within Summons and
Complaint on

Lawrence W. Bradford

Taylor Wilkins Sheriff
W. F. Bradford Deputy Sheriff

SADIE M. BRADFORD,
Petitioner
vs.
CLARENCE W. BRADFORD,
Defendant.

EQUITY NO. 1206
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

PETITION

TO THE HONORABLE FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA IN EQUITY SITTING:

Comes the Petitioner and shows unto your honor as follows:

1. That your Petitioner is a Bona fide resident citizen of Baldwin County, residing presently at Summerdale, Alabama, and is over the age of 21 years; that CLARENCE W. BRADFORD is over the age of 21 years and is a resident of Fairhope, Baldwin County, Alabama.
2. That the Petitioner and the Defendant were legally divorced in this Court on, to-wit; October 17, 1944; that your Petitioner was the Complainant in this cause and that by the terms of the said decree, a certified copy of which is hereto attached and made a part hereof as though fully set out herein, your Petitioner was awarded the care and custody of the seven children of this marriage, to-wit: ESTELLE JOSEPHINE age 16 years, VIVIAN age 14 years, WILLIAM COLEMAN age 12 years, BETTY age 10 years, ALICE AILEEN age 8 years, EARL age 6 years, LILLIE MAE age 5 years. That it was further ordered that the Defendant here pay to your Petitioner for the support of their children the sum of \$20.00 per week.
3. That the Defendant has never paid one cent of the money he was ordered to pay for the support of their children; that your Petitioner has made repeated requests on him to fulfill his obligations all of which he has refused; that the Defendant has recently without your Petitioner's consent and against her wishes taken from her care and custody four of the children above named, to-wit; ESTELLE JOSEPHINE, VIVIAN, WILLIAM COLEMAN AND EARL; That although often requested to return said children to your Petitioner Defendant has refused to do so.
4. That the Defendant has repeatedly made threats of bodily harm against your Petitioner if she should try to obtain relief in the Courts.
5. That your Petitioner has maintained a decent home for said children since her divorce; and that she is prepared to continue to do so.

PRAYER FOR PROCESS AND RELIEF

WHEREFORE, THE PREMISES CONSIDERED, Petitioner prays that your Honor will take jurisdiction of this matter and that by proper process CLARENCE W. BRADFORD be made party defendant hereto and that said Defendant be required to appear at a time and place fixed by this Honorable Court to show cause why he should not be adjudged in contempt for disobedience to the order of this Court.

Your Petitioner further prays that upon a final hearing hereof your Honor will order the Defendant to return to her the care and custody of the four children he has seized and to pay to her the money he owes for their maintenance as previously ordered by this Court.

Your Petitioner further prays that upon a final hearing hereof your Honor will make and enter an order ordering the Defendant to refrain from interfering with or molesting your Petitioner.

Julian F. Maddox, Jr.
ATTORNEY FOR PETITIONER

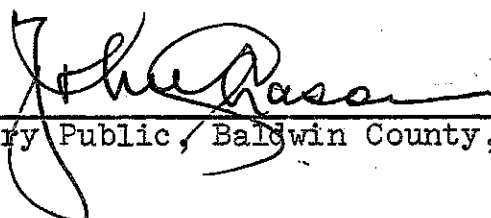
Subscribed and sworn to before me this
3rd day of October 1947.

W. H. Hare
NOTARY PUBLIC, Baldwin County, Alabama.

STATE OF ALABAMA, 0
 0
COUNTY OF BALDWIN. 0

Before me, the undersigned authority, in and for said State and County, personally appeared TELFAIR J. MASHBURN, JR., who is known to me, and who, being by me first duly and legally sworn, stated on oath that he is the Solicitor for the Petitioner named in the foregoing instrument; that he has read and understands the same; and that he is informed and believes and, on such information and belief, states that the facts therein alleged are true; and he subscribed to the petition in my presence thereafter.

Given under my hand and official seal on this the 3rd day of October, 1947.


Notary Public, Baldwin County, Alabama.