Leon D. Long

DIVORCE DECREE

Printed by Moore Ptg. Co.

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

| Assignment grows systems (25 gives) a surprise some significant construction of the c | Respondent, Respondent | |
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| This cause coming on t | to be heard was submitted upon Bill of Complaint, Decree Pro | Confeed |
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| leration thereof, the Court is | and Testimony as noted by the Register, and of the opinion that the Complainant is entitled to the relief pr | l upon c |
| d bill. | opening that the complainant is entitled to the relief pr | rayed for |
| 4 - 4 - 4 | dindred and doorseld have to | |
| isting between the Complains | adjudged and decreed by the Court that the bonds of matrimon | y heretof |
| | nt and Defendant be, and the same are hereby, dissolved, a | nd that |
| d Leon L. Long | in fam. | |
| | is forever divorc | ed from |
| d Edith G. Long | for and on | account |
| Volumtánily abandom | | account |
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| and Linda Jorga Long | <u> 2010 minus 147 despois de perdis persons e</u> | |
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| sand manar conladred | at resourable hours and at resocrable intervals | |
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No. 2. 750 Page

The State of Alabama Baldwin County

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

JUL 8 1952

0 1002

Alice I. DUCK, Register

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

| <u> </u> | BON L. LONG | | , Complainant |
|--|--|--|---|
| | vs. | | |
| | TH J. LONG | i , i | , Respondent |
| This cause coming on to be hea | | pon Bill of Complain | nt, Decree 1716 Confessor on |
| Answer and Waiver | and Testim | ony as noted by the | Register, and upon con- |
| sideration thereof, the Court is of the or said bill. | pinion that the Com | plainant is entitled | to the relief prayed for in |
| It is therefore ordered, adjudged | and decreed by the | Court that the bond | ls of matrimony heretofore |
| existing between the Complainant and I | | * | _ |
| said Leon L. Long | | | s forever divorced from the |
| said Edith J. | Long | | for and on account of |
| A voluntarily abandonment. | It is furt | ther ordered, ad | ljudged and decreed |
| that the Complainant, Leon L. | Long, is here | by awarded the c | eare, custody and |
| control of Ronald D. Long and | Linda Joyce Lo | ong, both minor | children of the |
| parties hereto, and that the | said Edith J. I | ong, the Respon | dent, shall have the |
| right to visit the said minor | childred at re | asonable hours | and at reasonable |
| intervais. | | | |
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| It is further ordered, adjudged an to each other until sixty days after the a days, neither party shall again marry ex | endition of this dec | cree, and that if app | eal is taken within sixty |
| It is further ordered that the Cor | unlainant and Resi | oondent be, and the | ev are hereby permitted to |
| again contract marriage upon the payme | | | cy are mereoy permitted to |
| | Leon | L. Long | |
| It is further ordered that | | | |
| thepa | ay the cost herein to | be taxed, for which | execution may issue. |
| Thisday of | November | | . 19 51 |
| and the second | The same of the sa | Telfair J. Ms | |
| Make British Committee Com | | | ge Circuit Court, In Equity. |
| | | | |
| I, Alice J | . Duck | | , Register of the Circuit |
| Cc for Ju | regoing is a correct | ounty, Alabama, d copy of the origin Court in the above st | lo hereby certify that the al decree rendered by the ated cause, which said de- |
| | Witness mer ha | nd and seal this the | day |
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| of | ~~~~ ~~ | , 19 ⁵³ | - |
| | _ | Register | f Circuit Court, In Equity. |
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| In | Circuit | Con | _{et} , I | n Equity |
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| | | _ | Con | nplainant |
| | | vs. | | |
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The State of Alabama, Baldwin County

Circuit Court, In Equity

| LEON L. | LONG | vs. | | —, Complaina | int |
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| EDITH J. | LONG | Note that the second se | | , Responde | nt |
| This cause coming on | to be heard was | submitted upon | Bill of Com | plaint, Decree XP | 787C6H76388767 |
| Answer and Waiver | | and Testimony | as noted by | the Register, | and upon con |
| deration thereof, the Court is | | | | | |
| aid bill. | | | and the same | | |
| It is therefore ordered, | , adjudged and d | ecreed by the Co | ourt that the | bonds of matrix | nony heretofor |
| xisting between the Complaina | ant and Defendar | nt be, and the sa | ame are he | reby, dissolved, | and that the |
| oid Leon L. Long | | | a Comment | :- 6 3: | |
| id teon to Long | | : | | is forever div | orced from the |
| aid Edith J. Long | | | 11/11 | for and | on account of |
| en a state and a s | | | | | |
| voluntarily abando | nment. | | *, | | |
| Tt is furth | er ordered | . adindeed | and dec | reed that | the |
| Complainant, Leon | L. Long, i | s hereby a | warded t | the care, c | ustody an |
| control of Ronald | D. Long an | d Linda Jo | yce Long | g, both mir | or childr |
| of the parties here Respondent, shall | | | | | |
| at reasonable hour | | | | | Girraner. |
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| | fter the rendition | of this decree, | and that if | appeal is taker | within sixty |
| o each other until sixty days at ays, neither party shall again | fter the rendition | of this decree, each other durin | and that if | appeal is taker | within sixty |
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No. 2 750 Page____

The State of Alabama BALDWIN COUNTY

In Circuit Court, In Equity

LEON L. LONG

Complainant

vs.

EDITH J. LONG

Respondent

DIVORCE DECREE

FILED

NOV 29 1951

ALICE J. DUCK, Register

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LEON L. DONG

COMPLAINANT

VS

VS

RDITH J. LONG

RES PONDENT

V

IN THE CHROUIT COURT OF BALDWIN COUNTY, ALMBANA,

EN EQUITY

NO. 2750

TO HOMORABLE TELEFAIR J. MASHBURN IR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY;

Now comes the Respondent, Edibh J. Long, and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1

That on November 29, 1951, a Secree of divorce was granted by this court wherein Leon L. Long was Complainant and Edith J. Long Respondent; that a copy of said divorce is hereto attached marked Exhibit A, and asked to be taken as a part hereof as though herein fully set out.

2.

Phat in, by and as a part of mid decree the two children of the Complainant and the Respondent: Ronal | D. Long and Linda Joyce Long both minors were awarded to the Complainant with the right of the Respondent to visit with the said children at reasonable hours and at reasonable intervals.

2

That the Complainant Leon L. Long is now in Amerillo, Texas, in the Air Service; that so far as this Exspendent knows this Complainant has not remarried; that he has left the miter children, Ronald D. Long and Linda Joyce Long with their maternal Grandfather and Grandmother, Walter Jones and Irene Jones, in Bay Minette, Alabara.

1.

That the Respondent since the granting of said divorce has remarried and now has a home in Pensacola, Florida; and that she is fully capable and financially responsible to care and provide for the said minor children in the manner in which they should be provided for.

7.

That the said minor children: Ronald D. Long and Linda Joyce Long, are now four and two years of age respectively.

5.

That due to the tender years of the said minors they are in need of

their mother's care; that their maternal grantfather and grandmother are of nature age and the said children are more or less a burden to them.

7.

That the Respondent and her hisband are planning on a vacation leaving Fersacola, Florida, Thrusday night next and plan to visit through the Morth and into-Canada-the-bome-of the huband of the Respondent; that it would be beneficial to the said children that they be permitted to take the trip with the Respondent, their mother and her husband.

0.

That the Respondent is now madried to Charles Dean, who is presently employed with Link Aviation Inc., at Corry Field, near Fensacola, Florida.

WHEREFORE, the premises considered, your Respondent prays that such orders and decrees may be made and entered and notices given as to place the matters herein alleged in issue; that Your Monor will forthwith enter an order and decree permitting the Respondent, Edith J. Long Dean, the custody and control of the said minor children so that she may take them on the vacation trip; that your Respondent further prays that upon a final hearing hereof the decree heretofore entered in this cause be modified so as to award to this Respondent the permanent care, custody and control of the minor children, Ronald D. Long and Linda Joyca Long, subject to the right of the Complainant, Ieon I. ong to visit with them at reasonable hours and at reasonable intervals.

Said J. Agag Alax

The Complainant's address is: Aray llo Air Force Base, C/o Station Hospital, Amarillo, Texas.

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| VS | | .8. | Estrali colury, Alabaka, |
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| | | × | MC. 2750 |
| | res pótinti t | N. | as a man find |

This cause coming on to be in indice submitted upon the published of the minor the Respondent, Edith J. Long Dean to be awarded the custody of the minor children, Ronald D. Long and Linda Joyce Long, that they may take a vacation trip extending over a period of time ending July 26th or about that date; and

It appearing to the court that the request of the petitioner is reasonable and that it will be to the interest of the said minors that they take the said trip; and

It further appearing to the court that the sold minor children are now in the custody of their maternal grandfother and grandmother, Walter Jones and Irene Jones of Bay Wineta, Alabama.

It is the opinion of the cour, that the Respondent, Edith J. Long Dean, is entitled to the relief prayed for.

IT IS THEREFORE CREENIN, ADJUNCTE WID DECREED by the court that the said Edith J. Long Dean be ewarded the custody of the said minor children for the time ending July 26, 1952, at which time she is to return the said children to their maternal grandfather and grandmother, subject to the further orders of this court.

IT IS FURTHERCRDERED, ADJUDGED AND DECREED by the court that the said Walter Jones and Irene Jones be and they are hereby directed and ordered to surrender the custody of the said minor children to the Respondent, Edith J. Long Dean.

Debed buis tier bit day of tally his so-

Felfois J. Mashbury Jr.

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

| _ | LEON L. LONG | Complainant |
|----------------|---|---------------------------------------|
| | VS. | • |
| | EDITH J. LONG | |
| I, AL | ICE L. MILLER | |
| | nd caused to come before me Wrs. W | |
| | amed in the Requirement for Oral Exam | nination, on the 29thay of November |
| in Bay Min | ette, Alabama, and having | first sworn said Witness to speak the |
| truth, the who | ole truth, and nothing but the truth, the | said <u>Mrs. Walter Jones</u> |
| | doth depose and say a | |

That her name is Mrs. Walter Jones and that she is over the age of twenty-one years and lives in Bay Minette, Alabama. That Edith J. Long, the Respondent named in this cause, is her daughter and that her daughter married Leon L. Long on October 25, 1946 and they lived together as man and wife until February 9, 1950, when Edith J. Long voluntarily abandoned Leon L. Long without just cause or legal excuse and they have not lived together as man and wife since February of 1950. That Leon L. Long is over the age of twenty-one years of age and is a resident of Bay Minette, Alabama. That he is presently in the Army and is stationed in Amarillo, Texas. That Edith J. Long is now living in Mobile, Alabama. That Leon and Edith had two children, Ronald D. Long who is now 3½ years of age and Linda Joyce Long who is now 1½ years old and both of the children are with Leon in Amarillo, Texas. That Edith Long is not a fit and proper person to have the care, custody and control of Ronald and Linda Joyce because she has repeatedly refused to give them the proper care required or to devote sufficient time to their needs. That Leon L. Long is a fit and proper person to have the care, custody and control of these children.

Mrs. Walter Jones.

| I, Alice L. Miller , as Register and Commissioner hereby certify |
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| that the foregoing deposition—on Oral Examination was taken down by me in writing in the words |
| of the witness and read over to her and she signed the same in the presence of |
| myself and Norborne C. Stone |
| at the time and place herein mentioned; that I have personal knowledge of personal identity of |
| said witness—or had proom made before me of the identity of said witness—; that I am not of |
| counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof |
| I enclose the said Oral Examination in an envelope to the Register of said Court. |
| Given under my hand and seal, this 29th day of November , 19451. |
| alice L. Millers |

| Filed Movember 29, 194, 51 Recorded in Page Record Register. | vs. Complainant EDITH L. LONG Respondent. Oral Deposition | IN CIRCUIT COURT, IN EQUITY. LEON L. LONG | PAGE THE STATE OF ALABAMA BALDWIN COUNTY |
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THE STATE OF ALABAMA, Baldwin County.

CIRCUIT COURT

| TO: | ALICE | L. MILLER, | BAY MINE | CUTE, AI | LABAMA | | |
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| Commissi | ioner, and b | y these present | ts do author | ize you, at | such time a | nd place as y | ou may appoint, |
| to call be | efore you and | d examine | rs. Walte | r Jones | s and Mi | rs. Elber | t Wood |
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| as witnes | sses in beha | lf of <u>Leon</u> | L. Long | | | _ in a cause | pending in our |
| Circuit C | ourt in Bald | win County, of | said State, w | zherein | <u>Leo</u> | n L. Long | |
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| and | <u>Edith J</u> | • roug | | <u></u> | | | |
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| | | | | · | - | | Respondent |
| on oath, t | to be by you | administered, ı | upon | · | | | |
| to take a | nd certify th | e deposition_s_ | of the witne | esses and | return the | same to our | Court, with all |
| convenier | nt speed, und | ler your hand. | | | | | |
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| Witne | ess 29th | day of | November | . I — i i 2 grand i seena dei parico | , 195 | <u> </u> | |
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| Commissi | oner's Fee, | <u> </u> | | | | | |
| Witness' | Fees, \$ | | | | | | |

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| LEON L. | LONG, | | | es d' profi espafica | | <u> </u> |
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| EDITH J. | LONG, | <u> </u> | | | | # * |
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| - 100 A | nesp | ondent. | Circ | uit Court | of Baldwin | County |
| | 2006 2006 2006 2006 | | | | | |
| This cause is | s submitted in | behalf of Com | plaint upon th | e original Bi | ll of Complain | t, |
| the Answer | positions | of Mrs. W | alter Jone | s and Mr | s. Elbert | Wood |
| the oral de | positions | of Mrs. W | alter Jone | s and Mr | s. Elbert | Wood |
| the oral de | positions | of Mrs. W | alter Jone | s and Mr | s. Elbert | Wood |
| the oral de | positions Defendant up | of Mrs. W | alter Jone | r | s. Elbert | Wood |
| the oral de | positions Defendant up | of Mrs. W | alter Jone | s and Mr | s. Elbert | Wood Register. |

| THE STATE OF ALABAMA Baldwin County |
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| IN EQUITY Circuit Court of Baldwin County |
| LEON L. LONG |
| Complainant, |
| vs. |
| EDITH J. LONG, |
| Respondent. |
| |
| NOTE OF TESTIMONY |
| iled in Open Court this 29th ay of November , 194:5] |
| Register. |
| Register. Printed By The Baldwin Times |

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

| 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | LEON L. | LONG | | | Complainar | et |
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| | EDITH J | . LONG | VS. | | | |
| - , | lice L. M | iller | | | Respond | |
| as Registers have called | and caused t | o come before | me Mrs | pointed by Elbert | y this Court Nood | |
| | | | | and the second s | | |
| | | e Requirement of Chason | | | the 29thday of s at Law | November |
| in Bay M truth, the w | | | | | said Witness Elbert Woo | |
| | | doth de | | | | |

That her name is Mrs. Elbert Wood and that she is over twenty-one years of age and lives in Bay Minette, Baldwin County, Alabama. That she is personally acquainted with Leon L. Long and Edith J. Long his wife and has known them for about five or six years. That both Edith and Leon are over 21 years of age and that Leon is now in the Army and stationed at Amarillo, Texas, and Edith is now in Mobile, Alabama. That Edith and Leon were married in 1946 and they lived together as man and wife until February, 1950, at which time Edith left Leon voluntarily for no good reason and that as far as she knows they have not lived together as man and wife since that time. That Edith and Leon have two children, Ronald who is $3\frac{1}{2}$ years of age and Linda Joyce, who is $1\frac{1}{2}$ years of age and that both of the children are now with Leon in Amarillo, Texas. That she does not believe that Edith is a fit and proper person to have the care and custody of the two children because of her past actions and that Leon is a fit and proper person to have the care and custody of the children because he is a very attentive father. That she is not related to either Leon or Edith in any way.

Mrs. Elbert Wood.

| I, Alice L. Miller , as Register and Commissioner hereby certify |
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| that the foregoing deposition—on Oral Examination was taken down by me in writing in the words |
| of the witness and read over to andsigned the same in the presence of |
| myself and Morborne C. Stone |
| at the time and place herein mentioned; that I have personal knowledge of personal identity of |
| said witness—or had proom made before me of the identity of said witness—; that I am not of |
| counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof |
| I enclose the said Oral Examination in an envelope to the Register of said Court. |
| Given under my hand and seal, this 29th day of November, 19x 51. |
| Clice L Miller (L. S.) |
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| Recorded in Page Register. Register. | Oral Deposition | Respondent. | vs. Complainant | LEON I. LONG | IN CIRCUIT COURT, IN EQUITY. | THE STATE OF ALABAMA BALDWIN COUNTY | NO. 275-0 PAGE |
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| LEON L. LO | ONG | | | | |
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| VS. | Con | nplainant, | BALDWIN | CIRCUIT COU COUNTY, ALA IN EQUITY. | |
| EDITH J. I | ONG | The state of the s | | | |
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| COMES the | Complainant, | by attorney, and | represents to the | e Court as follo | |
| | | And the state of t | ending and the control of the second | NATIONAL CONTRACTOR CO | (1) 190 <u>0</u> |
| 1. That the | following na | med witnesses | reside within | one hundred | miles from |
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| Bay Minette | •••••••••••••••••••••••••••••••••••••• | , in the Count | y ofBaldwi | n. | 743 6 6 7 8 8 8 |
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| Alabama, the place | of trial of said | cause to-wit- | Bow Winotto | A 7 - 3 | |
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| 0 700 | | * | | | |
| 2. That said | complainant re | quires an oral ex | camination of sai | d witnesses be | efore a com- |
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| missioner appointed | by the Registe | er of this Court. | | | , |
| | | | CH | ASON & STO | NE |
| | | BY: | 11 100 | | |
| | | | Sel | icitor for Com | olainant |
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| NOTE: | | | | | |
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| Complaniant Su | ssesis ine nam | e ofAlice | L. Willer | ., | |
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| as a suitable and comp | petent person t | o act as commissio | oner upon the exa | mination of sai | d witnesses. |
| And the second s | er en | | | | |
| | | | lei Vera. | YIV | |
| | | , and the second | So | ligitor for Com | plamant. |
| | | | v | u . | |

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

Filed this 29 th day of now

1940.7....

Register.

| LEON L. | LONG | | |
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| | Complainant, | | IN THE CIRCUIT COURT OF |
| vs. | | | BALDWIN COUNTY, ALABAMA |
| EDITH J. | TONG | · · · · · · · · · · · · · · · · · · · | IN EQUITY. |
| EDEKK U. | | : 4 | |
| atanaa aa sa s | Respondent. | | The house was a second control of the control of th |

ANSWER AND WAIVER

Comes now the Respondent, Edith J. Long, and for answer to the Bill of Complaint heretofore filed against her in said cause says as follows:

l. That she denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to said Bill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said Complaint and hereby waives any further notice to her of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does hereby consent that the same may be submitted and testimony taken without further notice to her.

Sworn to and subscribed

before me this 514

day of November, 1951.

Notary Public, Politiounty, Texas.

My Commission Expires Cone 1, 1253

Answer and Waiver

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Edith J. Long

RECORDED

FILED
NOV 29 1951

| BALDWIN COUNTY) IN | THE CIRCUIT COURT - IN EQUITY |
|----------------------------------|--------------------------------------|
| TO ANY SHERIFF OF THE STATE OF A | LABAMA: |
| You are hereby commande | d to summon Edith J. Long to appear |
| and plead, answer or demur, with | nin thirty days from the service |
| hereof, to the Bill of Complaint | filed in the Circuit Court of |
| Baldwin County, Alabama, In Equi | ity, by Leon L. Long, as Complainant |
| against Edith J. Long, as Respon | ndent. |
| Witness my hand this | day of, 1951. |
| | |
| | Register. |
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| LEON L. LONG, | ≬ | IN THE CIRCUIT COURT OF |
|----------------|----------|-------------------------|
| Complainant, | Ĭ | BALDWIN COUNTY, ALABAMA |
| vs. | Q | IN EQUITY. |
| EDITH J. LONG, | Q | |
| Respondent. | Ž. | |

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY, AND TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE THEREOF:

Comes your Complainant and files this, his Bill of Complaint for divorce against Edith J. Long and respectfully represents and shows unto your Honor and unto this Court as follows:

FIRST:

That your Complainant is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama, residing at Bay Minette, Alabama, and has been a resident citizen of said State all of his life; that the Respondent is over the age of twenty-one years and is presently residing in Mobile, Mobile County, Alabama, her more particular address being 808 North Carolina Avenue.

SECOND:

That your Complainant and the Respondent were married on heretofore to-wit, October 25, 1946, and they lived together as man and wife until February 9, 1950, when the Respondent voluntarily abandoned your Complainant without just cause or legal excuse and they have not lived together as man and wife since that time.

THIRD:

That two children were born to the Complainant and the Respondent from said marriage and their names and ages are as follows: Ronald D. Long, 3½ years old and Linda Joyce Long, 1½ years old; that both of said children are presently residing with your Complainant in Amarillo, Texas. Your Complainant further alleges that the Respondent is not a fit and proper person to have the care, custody and control of said children and that your Complainant is a fit and proper person to have the care, custody and control of said children.

PRAYER FOR PROCESS

The premises considered your Complainant prays that the Respondent, Edith J. Long, be made a party Respondent to this Bill of Complaint by the usual Writ of Process of this Honorable Court requiring her to plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the Statutes in such cases made and provided.

PRAYER FOR RELIEF

Your Complainant prays that upon a final hearing of this cause that your Honor will grant unto the Complainant an absolute divorce from the said Respondent and that your Complainant, by the terms of said decree, be awarded the care, custody and control of the said minor children named above. Your Complainant further prays that your Honor will also allow your Complainant to remarry if he should see fit to do so. And your Complainant prays for such other, further, different and general relief as in Equity may be meet and proper.

CHASON & STONE

BY Solicitors for Complainant