

2801

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons JOHN L. CRAWFORD to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by RACHEL CRAWFORD as Complainant and against John L. Crawford, as Respondent.

WITNESS my hand this the 25th day of April, 1952.

Alice L. Duck
Register

RACHEL CRAWFORD

COMPLAINANT

VS

JOHN L. CRAWFORD

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY #2801

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

Your Complainant, Rachel Crawford, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and has been all of her life; that she is over twenty-one years of age; that the Respondent is over twenty-one and a bona fide resident of the State of Alabama; that he is presently staying at Huxtsboro, Alabama.

2.

That your Complainant and the Respondent married in Luquedale, Mississippi, on February 28, 1949, and lived together as husband and wife until June 7, 1950.

3.

That on to-wit, June 7, 1950, the Respondent voluntarily abandoned the bed and board of your complainant and has remained away voluntarily and continuously since that time.

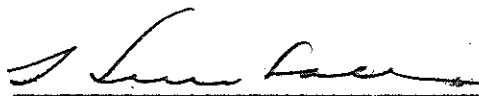
4.

That there was born to the marriage between your Complainant and the Respondent one child, John Robert Crawford, now 2½ years old; that he is now and has been all of his life living with your Complainant; that the Complainant has no property and no income except from her own labor; that

the Respondent is an able bodied man fully capable and able to care and provide for the said child and your Complainant.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said John L. Crawford party respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that your Honor will order a reference to determine a reasonable attorney fees to be paid by the Respondent to the attorney of the Complainant, and also a reasonable amount as alimony pendente lite to be paid by the Respondent to the Complainant.

Your Complainant further prays that upon a final Hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that the Complainant be awarded the permanent custody, care and control of the minor child, John Robert Crawford and that she be awarded such amount as to your Honor shall seem meet and proper as permanent alimony and as support for the said minor child; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

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BALDWIN COUNTY

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WITNESS my hand this the 25th day of April, 1952.

Alfred J. Duck
Register

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COMPLAINANT

VS

JOHN L. CRAWFORD

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

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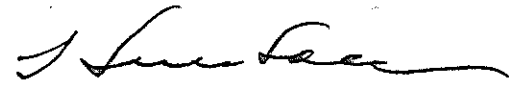
3.

That there was born to the marriage between your Complainant and the Respondent one child, John Robert Crawford, now 2½ years old; that he is now and has been all of his life living with your Complainant; that the Complainant has no property and no income except from her own labor; that

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Solicitor for the Complainant

Received in Sheriff's Office
this 25 day of April, 1952
TAYLOR WILKINS, Sheriff

2801

RECORDED

Returned 23 day of Jan, 1953
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By Taylor Wilkins
Deputy Sheriff

Not found in
Russell Co.
1728/12
J. P. Mattingly
Sheriff

RECEIVED
COMPLAINT
JAN 23 1953
J. P. MATTINGLY
SHERIFF

FILED
2801

FILED
APR 25 1952
ALICE L. DUCK, Register