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DOUGLAS STANARD

LAWYER

904 FIRST NATIONAL BANK BUILDING

MOBILE 13, ALABAMA

PHONE 3-8692

April 16, 1953

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

Re: Evelyn Hill Jackson  
VS  
Braxton Brooks Jackson

Dear Mrs. Duck:

Please dismiss the above styled cause without  
prejudice.

Very truly yours,

  
Douglas Stanard

DS/gas

The Complainant prays that Your Honors will take jurisdiction

PRAYER FOR PROCESS

The Respondent has voluntarily abandoned the bed and board of the Complainant for more than one year next preceding the filing of this Bill of Complaint, herein.

THREE

The Complainant and Respondent were legally married to each other at Columbus, Mississippi on September 1, 1943. There were two children born as issue of said marriage, namely, Linda Joyce Jackson, a girl 5 years of age and James Brooks Jackson, a boy 5 years of age. Said children are in the custody and control of the Complainant and the Complainant is a fit and proper person to have the control of said minor children.

TWO

The Complainant is the wife of the Respondent. The Complainant is over the age of 21 years and she is a bona fide resident citizen of the State of Alabama and she has been such for more than one year next preceding the filing of this Bill of Complaint, herein. The Respondent is over the age of 21 years and he is a bona fide resident of the State of Alabama.

ONE

Comes the Complainant and shows unto Your Honors and unto this Honorable Court as follows:


TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY

EVELYN HILL JACKSON :  
COMPLAINANT :  
BALDWIN COUNTY, ALABAMA :  
VS :  
BRAXTON BROOKS JACKSON :  
RESPONDENT :  
NO :  
IN EQUITY :

of this cause, will make the said Braxton Brooks Jackson, party-respondent hereto, and will cause him to appear, plead answer or demur hereto within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will grant her an absolute divorce from the bonds of matrimony with the Respondent; that she be granted the custody and control of the above mentioned minor children; Complainant further prays for such other further different and additional relief as in equity she may be due; and in duty bound she will ever pray, etc.

  
DOUGLAS STEWARD, SOLICITOR FOR THE  
COMPLAINANT

C. C. EQUITY 24-3M-1-51  
**RECORDED**  
No. 1900

**CIRCUIT COURT  
OF MOBILE COUNTY  
MOBILE, ALABAMA**  
IN EQUITY

EVELYN HILL JACKSON

COMPLAINANT

vs.

BRAXTON BROOKS JACKSON

RESPONDENT

ORIGINAL BILL

Filed \_\_\_\_\_, 19\_\_\_\_

Register.

Solicitor.

1900