

3406

GERALDINE ANDERSON,	1
Complainant,	1 IN THE CIRCUIT COURT OF
vs.	1 BALDWIN COUNTY, ALABAMA
MORRIS ANDERSON, JR.,	0 IN EQUITY
Respondent.	1

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY,
AND TO THE HONORABLE HUBERT M. HALL, JUDGE THEREOF:

Comes your Petitioner, the undersigned Geraldine Anderson,
and respectfully represents and shows unto your Honor and unto this
Honorable Court as follows:

FIRST:

That she is over the age of twenty-one years and is presently
residing in the State of Michigan, her more particular address being
1357 East Alexanderine Street, Detroit 7, Michigan. That the Res-
pondent is over the age of twenty-one years and is presently resid-
ing in Corpus Christi, Texas, his more particular address being un-
known to your Complainant.

SECOND:

That your Complainant and the Respondent were married on
November 6, 1945, in Bay Minette, Alabama, but they have been separ-
ated for approximately four years. That four children were born
to your Complainant and the Respondent; Emmanuel Earl Anderson, who
is now ten years of age, Lary Labon Anderson, who is now eight years
of age, Laurette Anderson, who is now five years of age and Diane
Anderson, who is now four years of age.

THIRD:

That all of said children are presently residing with your
Complainant's mother in Bay Minette, Alabama, and your Complainant's
mother is unable to properly maintain and educate said children with-
out financial help from your Complainant and the Respondent. That
the Respondent has never contributed to the support of said minor
children since his separation from your Complainant and your Com-
plainant is informed and believes and upon such information and be-
lief alleges that the Respondent is gainfully employed in Texas and

is able to assist your Complainant and her mother in careing for said children. That it is to the best interest of said children that they remain in Bay Minette with your Complainant's mother whose home is in all respects suitable and proper and a correct environment for said children. That your Complainant has regularly sent to her mother financial help but she is unable to send all that is required in the circumstances.

PRAYER FOR PROCESS:

The premises considered your Complainant respectfully prays that the Respondent, Morris Anderson, Jr., be made a party to this cause by the usual writ of process requiring him to plead or answer to this complaint within the time prescribed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF:

The premises considered your Complainant respectfully prays that upon a final determination of this proceeding that your Honor will enter an order requiring the Respondent to contribute monthly to the support and maintenance of his said minor children and will award the custody of said children to your Complainant with the right in her to leave said children with her said mother. And your Complainant prays for such other, further and different relief as in Equity will be meet and proper.

X Geraldine Anderson
Geraldine Anderson

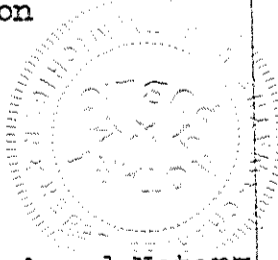
STATE OF MICHIGAN

WAYNE COUNTY

Before me, Charles Lebes, the undersigned Notary Public in and for said County in said State, personally appeared Geraldine Anderson who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That her name is Geraldine Anderson and that her name is signed to the foregoing petition and that the facts alleged therein are true.

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Dated this 15 day of November, 1954.

Geraldine Anderson
Geraldine Anderson

Sworn to and subscribed
before me this 15 day
of November, 1954.

Charles Leber
Notary Public, Wayne County, Michigan



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