

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298

May 13, 1958

WHITEHALL 3-3601

4283

Mrs. Alice J. Duck
Register in Equity
Bay Minette, Alabama

Dear Mrs. Duck:

Please attach summons to the enclosed
Bill of Complaint.

Mr. Fred Nelson may be served at his
Bon Secour residence.

Thank you.

Sincerely,


James A. Brice

JAB:ecg

Enclosure as noted

Company and Station
Address
City, State, Zip

15664 11/15/1983

15664 11/15/1983

15664 11/15/1983

760, 4783

SECTION 501 (C) (3)

ALL OR PART OF THIS

[Handwritten signature]

15664 11/15/1983

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

May 28, 1958

WHITEHALL 3-3601

Mrs. Alice J. Duck
Register in Equity
Bay Minette, Alabama

4283

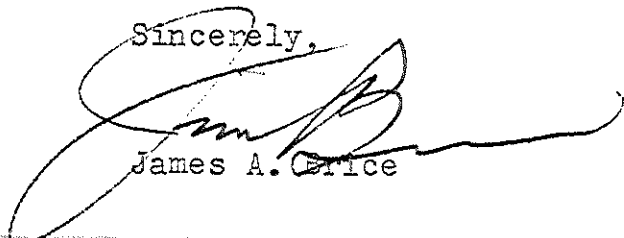
Re: Carrie Smith Nelson
Vs: Fred Nelson
In Equity

Dear Mrs. Duck:

Please dismiss the above action and send
me a cost bill.

Thank you.

Sincerely,


James A. Brice

JAB:ecg

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Fred Nelson

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against-----

Fred Nelson-----, Defendant-----

by-----

Carrie Smith Nelson-----, Plaintiff-----

Witness my hand this 14th day of May 1958

Walter H. Smith-----, Clerk

BILL OF COMPLAINT

CARRIE SMITH NELSON)	
	:	IN THE CIRCUIT COURT OF
COMPLAINANT	:	BALDWIN COUNTY, ALABAMA
VS.	:	IN EQUITY
	:	
FRED NELSON)	
	:	
RESPONDENT	:	

----- TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY: -----

Comes your Complainant, Carrie Smith Nelson, and respectfully shows unto this Honorable Court as follows:

1. That she is over the age of twenty-one years and a bona fide resident citizen of Baldwin County, Alabama; that Fred Nelson, the Respondent in this cause, is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama.
2. That on, to-wit: the 14th day of December, 1929, your Complainant and the Respondent were intermarried in Mobile County, Alabama; and are still husband and wife; that there were eight children born of this marriage, namely: Carl Nelson, Janice M. Rowe, Betty N. Gillam, Fred H. Nelson, Carrie Ette W. Hess, all over the age of twenty-one years, and Beryl S. Nelson, 17 years of age, and Larry F. Nelson, 15 years of age, both of whom are in the custody of your Complainant.
3. Your Complainant further avers and charges that the Respondent did on the 2nd day of May, 1958, commit acts of physical violence upon the body of the Complainant by hitting her upon the side of her head with a glass object, by slapping her with his open hand, and by hitting her with his fists, all attended with danger to her health and life; that she is reasonably convinced the Respondent will commit further actual violence upon her person, attended with danger to her health or life; that on the 2nd day of May, 1958, she separated from and abandoned the Respondent, and is now living separate and apart from him.
4. Your Complainant further avers that since her marriage to the Respondent he has become habitually addicted to the use of alcohol, and is habitually addicted to the use of alcohol at this time.
5. Complainant further avers that Respondent at divers times, and at Bon Secour, Alabama, has committed adultery by unlawful cohabitation with an adult female who is known to Complainant as Corine Joyce.
6. Complainant further avers that Respondent is a person of financial means, being employed as a captain of a commercial fishing vessel; that his average yearly income is \$7,000.00; that he is able to contribute the sum of \$150.00 per month to the Complainant for the care, support and maintenance of the aforesaid minor children.

THE PREMISES CONSIDERED, Complainant prays that Fred Nelson be made a party Respondent to this Bill of Complaint by the usual process of this Honorable Court, and the statutes in such case made and provided, requiring him to plead, answer or demur within the time and within the manner provided by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your Complainant from said Respondent, granting the Complainant the right to remarry, granting and awarding to the Complainant the care, custody, and control of the minor children of the marriage, and granting the Complainant the right to resume her maiden name; and awarding the sum of \$150.00 per month to be paid by the Respondent to the Complainant for the care, support and maintenance of said minor children; and Complainant further prays that your Honor will grant such other further, different and general relief to which the Complainant may be entitled, and as in duty bound she will ever pray.

James A. Quinn
Solicitor for COMPLAINANT

FILED
FEB 14 1933
COURT HOUSE
MEMPHIS, TENN.

42-83

be entitled, and as in such case will ever be. The
 further, difference and General relief to which the Commission was
 and Commission further stated that they will have their own opinion
 present for the case, subject and subject to the Commission's
 sum of \$120,000 per month to be paid in the amount of \$10,000
 Commission the right to receive the same; and according to the
 and control of the same subject to the Commission's
 to remain; and subject to the Commission's
 Commission from such respondent, stating the Commission the right
 this case, that such honor will have a review of the same
 within the manner provided in law; and that on a final hearing of
 ailed, retaining him as clerk, except on terms which the Commission
 of this Honorable Court, and the expenses in such case may be pro-
 a party respondent to this Bill of Commission by the usual process
 THE HONORABLE COMMISSION, Commission Judge that they should be made

[Handwritten signature]
 SECRETARY FOR COMMISSION

FILED
 MAY 14 1958
 CHARLES J. DUCK, Register

BILL OF COMPLAINT

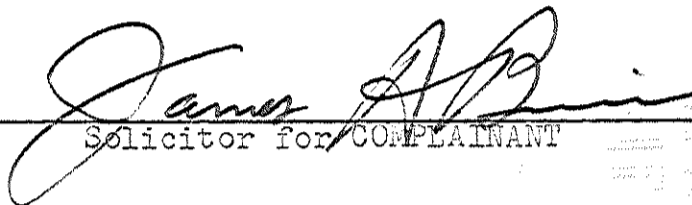
CARRIE SMITH NELSON)	
	:	IN THE CIRCUIT COURT OF
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VS.	:	IN EQUITY
)	
FRED NELSON	:	
	:	
RESPONDENT)	

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Solicitor for COMPLAINANT

SUMMONS AND COMPLAINT

Moore Prtg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

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You Are Hereby Commanded to Summon ~~Fred Nelson~~

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Fred Nelson

-----, Defendant-----

by-----

Carrie Smith Nelson

-----, Plaintiff-----

Witness my hand this 14th day of May 19 58

Wm. J. Hunter-----, Clerk

No. 4283

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

CARRIE SMITH NELSON
Plaintiffs

vs.

FRED NELSON
Defendants

Summons and Complaint

Filed 5-14-58 19

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

May 14 1958

_____, Sheriff

I have executed this summons

this _____ 19

by leaving a copy with

*Return to
W/O Justice*

_____, Sheriff

_____, Deputy Sheriff