

THE ALABAMA STATE HOSPITALS
AND

OFFICE OF THE SUPERINTENDENT
J. S. TARWATER, M. D.

THE PARTLOW STATE SCHOOLS

TUSCALOOSA, ALA.

March 1, 1955

Hon. Alice J. Duck,
Register,
Circuit Court in Equity,
Baldwin County,
Bay Minette, Alabama

Re: Case No. 3476
Jerry Eddins
vs.
Sally Mae Eddins

NOTICE TO: Mrs. Sally Mae Eddins, a patient in
Bryce Hospital, Tuscaloosa, Alabama

Dear Madam:

Mrs. Sally Mae Eddins has received summons, together with a copy of the original bill of complaint, filed in the above captioned case.

Mrs. Sally Mae Eddins was admitted in the Bryce Hospital, Tuscaloosa, Alabama, on November 29, 1953, and has been continuously a patient since that date. It is my opinion that Mrs. Sally Mae Eddins is presently mentally incompetent and mentally incapable of responding to process of law.

Very truly yours,

J. S. Tarwater
J. S. Tarwater, M. D.
Superintendent

JST/ecw

JERRY EDINS
Complainant
VS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

SALLY MAE EDINS

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

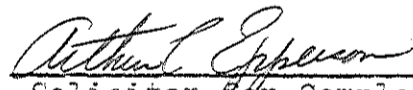
Your complainant, Jerry Edins, respectfully represents and shows
unto your Honor:

1. That the complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona-fide resident for more than one year next preceding the filing of this bill of complaint; that Sally Mae Edins is over the age of twenty-one years, who is now confined in Bryce Hospital in Tuscaloosa.

2. That your complainant and respondent weremarried on the twenty-first day of April, 1953, at Greenville, Alabama.

That the said respondent at the time said marriage was contracted was insane and suffering from such mental derangement as to prevent her from comprehending the nature of the contract of marriage and from giving to it her free and intelligent consent and that said mental incapacity of respondent was then and there unknown to your complainant.

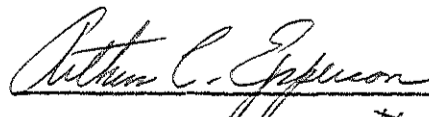
The premises considered, your complainant makes party defendant to this bill of complaint the said Sally Mae Edins, and prays that service may be had upon her in the manner required by law, and that a guardian ad litem may be appointed by this Honorable Court to defend this bill in her behalf, and upon a hearing hereof your complainant prays that this Honorable Court may annul and declare for naught the said purported marriage and may adjudge, and decree that the said Jerry Edins and Sally Mae Edins are not legally married but are single persons, and your complainant prays that he may have such other, further or different relief as in equity he may be entitled.


Solicitor for Complainant

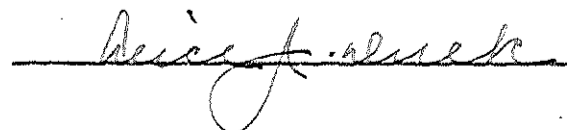
State of Alabama
Baldwin County

Before me, Alice J. Duck, Clerk of Circuit Court in and for said state and county, personally appeared Arthur C. Epperson, who is known to me, and who being first duly sworn, deposes and says:

That he is the attorney for complainant in the bill of complaint this day filed in the Circuit Court of Baldwin County, Alabama, in Equity, under the style of Jerry Edins Vs. Sally Mae Edins; that Sally Mae Edins, one of the respondents, is, in the belief of the affiant, over the age of twenty-one years; that the said Sally Mae Edins is a person of unsound mind, and that she is at present confined in the Alabama Bryce Hospital at Tuscaloosa, Alabama, all of which facts are alleged upon information and belief, and according to the best of affiant's information and belief are true.



Sworn to and subscribed before me this 24th day of
February, 1955.



3476

JERRY EDINS
Complainant

VS.

SALLY MAE EDINS
Respondent

FILED
FEB 24 1955

ALICE J. DUCK, Register

FILED
FEB 24 1955

ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Sally Mae Eddins

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State by Jerry Eddins

against Sally Mae Eddins

Herein fail not. Due return make of this writ as the law directs.

Witness this 24th day of February, 19 55

[Signature], Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

No. 3476

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The State of Alabama

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY

JERRY EDDINS

vs.

SALLY MAE EDDINS

SUMMONS

Returned by the Sheriff and filed in office, this the ... day of ..., 19... Register.

3476

Received in office, this the 24 day of

Feb., 1955

Myler J. ... Sheriff.

I have executed the within by leaving a copy thereof with Mrs. Sally Mae Eddins, Presently a patient in the Bryce Hospital, Tuscaloosa, Alabama, and I attach hereto statement of Dr. J. S. Terwater, Supt. relative to the present mental condition of the said Mrs. Sally Mae Eddins.

defendant named herein, on this the 1st day of March, 1955

Nathan Olson, Sheriff. Tuscaloosa County, Alabama T. L. Winters, Deputy.

T. L. Winters