

4539

HAROLD BRASHIER)
COMPLAINANT)
-VS-)
BEATRICE BRASHIER)
RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

BILL OF COMPLAINT

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

Comes now your Complainant, in the above styled cause and respectfully shows unto your Honor and this Honorable Court as follows:

I

That your Complainant, Harold Brashier, is over the age of twenty-one years, and is a resident of Baldwin County, Alabama; that the Respondent, Beatrice Brashier, is over the age of eighteen years, and is a resident of Baldwin County, Alabama.

II

That your Complainant and the Respondent were married on or about the 22nd day of June, 1956, at Leaksville, Mississippi, and lived together as husband and wife until on to wit: the 10th day of February, 1959.

III

That there was born as fruits of this marriage one child, Harold Brashier Jr., age nineteen months old, and the said minor child is now in the possession of his mother.

IV

That on to wit; the 10th day of February, 1959, and on various occasions prior thereto and since the time of marriage between your Complainant and the Respondent, the Respondent has committed Adultery with one Robert Drawdy, and that the Respondent was committed Adultery with various other men whose names are at the time unknown to your Complainant; said acts have been committed without the connivance or consent of your Complainant and have occurred since the date of the marriage between your Complainant and the

Respondent.

V

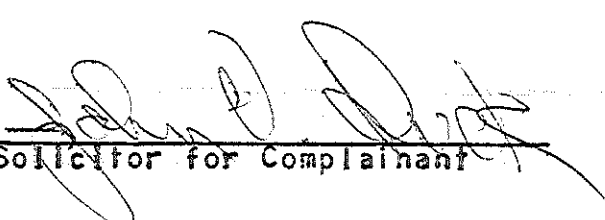
That your Complainant is a fit and proper person to have the permanent care, custody and control of the said minor child, Harold Brashier Jr.; That your Complainant has a suitable place in which to rear the said minor child.

PRAYER FOR PROCESS AND RELIEF

WHEREFORE THE PREMISES CONSIDERED, your Complainant prays that this Court will by proper process make the said Beatrice Brashier, a party Respondent to this his Bill of Complaint and in order that he may have the relief hereinafter prayed for, he prays that your Honor will order the States Writ of Subpoena to be issued direct and to the said Respondent, commanding her to plead, answer or demur to this Bill of Complaint within the time prescribed and the rules of this Honorable Court.

And upon a final hearing hereof your Complainant prays that Your Honor will Decree that the bonds of matrimony heretofore existing between the Complainant and the Respondent be dissolved, and that the Complainant be awarded the permanent care, custody and control of the said minor child; and that your Complainant prays for such other, further and general relief as unto the Court may seem just and proper in the premises.

HAROLD BRASHIER
Harold Brashier


Solicitor for Complainant

Filed Mar. 26, 1957
Alic J. Weeks, Register

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 BEATRICE BRASHIER

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

..... BEATRICE BRASHIER, Defendant

by HAROLD BRASHIER

....., Plaintiff

Witness my hand this 26 day of March 1959

Executed 3/26/59 Alice J. Luck, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

~~Harold~~ BRASHIER

Plaintiffs

vs.

~~BEATRICE~~ BRASHIER

Defendants

Summons and Complaint

Filed _____ 19____

FILED

MAR 26 1959

Clerk

ALICE J. DUCK, Register

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
ROBERTSDALE, ALA.
across the st. in front of Hol.
Church. near cresote plant on
Pensacola Rt.

Received In Office

3 / _____ 19____

19____

_____, Sheriff

I have executed this summons

this 3-26 1959

by leaving a copy with

Beatrice Brasher

Sheriff claims 50 miles at 5

Ten Cents per mile Total \$
TAYLOR WILKINS, Sheriff

BY

Taylor Wilkins
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Charles Shedd Deputy Sheriff

Robertsdale
Ala