

LAWRENCE A. GRASS)		
Complainant)	IN THE CIRCUIT COURT OF	
vs)	BALDWIN COUNTY, ALABAMA	
VELMA MARIE GRASS)	IN EQUITY	NO. <u>3992 A</u>
Respondent)		

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 Lawrence A. Grass, and respectfully represent and shows unto your Honor and unto this Honorable Court as follows:

-1-

That your complainant is over the age of 21 years and is presently a resident citizen of Mobile County, Alabama; and the respondent is over the age of 21 years and a resident citizen of Baldwin County, Alabama.

-2-

That your complainant and the respondent were previously married and that three children: Lawrence A. Grass, Jr., age about 10 years; Janell Marie Grass, age about 8 years; and Darnell Marie Grass, age 8 years, were born as fruits of this marriage between the parties to this cause.

-3-

That on to-wit, March 15, 1957, your Honor by proper decree divorced the parties to this cause and granted, the care, custody and control of said children to your petitioner.

-4-

That subsequently your Honor's original decree was modified whereby the respondent herein was granted the care, custody and control of said children.

-5-

That during the time the respondent has had the custody of said children, she has neglected their health, morals or welfare in that the said Lawrence A. Grass, Jr., played hooky from school seventeen days and Darnell Marie Grass was withdrawn from school for about six weeks without legal or proper excuse.

And further, that the respondent permitted the use of profanity in the home and in the presence of the children, one of which,

Darnell Marie Grass, was found to use said profanity on and about the school grounds, all of which is to the detriment of said children.

-6-

That the said respondent delivered said children to your petitioner and your petitioner has entered the children in school where they can be properly disciplined and properly educated.

-7-

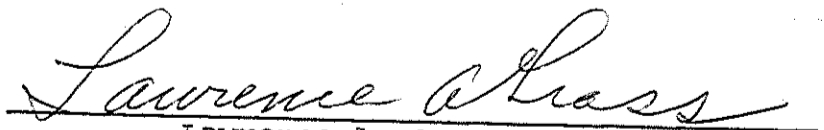
Your petitioner has remarried, marrying Betty Thurman on February 24, 1962, and has established a home in which the said children can be maintained and the said Betty Thurman Grass, your petitioner's wife is willing to have said children in the home and desires that this court so order.

WHEREFORE, the premises considered, your complainant respectfully prays that upon the filing of this petition this Honorable Court will cause the respondent to be made a party hereto by the service of process upon her in accordance with the statutes in such cases made and provided and the rules of this Honorable Court.

Your complainant further prays that upon the filing of this petition this Honorable Court will enter an order or decree awarding the care, custody and control of the said Lawrence A. Grass, Jr., age 10 years; Janelle Marie Grass, age 8 years; and Darnell Marie Grass, age 8 years; and will specifically provide in and by the terms of said order or decree that the respondent be restrained from removing said children from the care, custody and control of your petitioner pending such further orders as this Honorable Court may determine.

Your complainant prays for such other, further and different order or decree as in the premises may be meet and proper.

RESPECTFULLY SUBMITTED,


Lawrence A. Grass

STATE OF ALABAMA

BALDWIN COUNTY

Before me C. LeNoir Thompson, a Notary Public, in and for said County, in said State, personally appeared Lawrence A. Grass, who is known to me and who, after being by me first duly and legally sworn did depose and say under oath as follows:

BK-23-p.250-B

That his name is Lawrence A. Grass, and that he signed the foregoing petition and the facts alleged therein are true and correct and those matters which are alleged on information and belief he is informed and believes are correct.

Lawrence A. Grass
Lawrence A. Grass

Sworn to and subscribed before me
on this the 30 day of August, 1962.

[Signature]
Notary Public, Baldwin County, Alabama

FILED
AUG 30 1962
ALICE L. DUCK, CLERK
REGISTER

LAWRENCE A. GRASS

X

Complainant

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

VELMA MARIE GRASS

X

IN EQUITY

NO. 3992A

Respondent

X

ORDER

This day came Lawrence A. Grass and filed his verified petition in this Court in which he alleges that he and the respondent are the parents of Lawrence A. Grass, Jr., age 10 years; Janell Marie Grass, age 8 years and Darnell Marie Grass, age 8 years, and that the said respondent having neglected the health, morals or welfare of said children to their damage believes it would be detrimental to said children to remain in such condition; and the Court having considered all of the above is of the opinion that an order should this day be entered granting to the complainant the temporary care, custody and control of said minor children, it is, therefore

ORDERED and DECREED by the Circuit Court of Baldwin County, Alabama, in Equity, that Lawrence A. Grass be, and he is hereby awarded the care, custody and control of Lawrence A. Grass, Jr., age 10 years; Janell Marie Grass, age 8 years and Darnell Marie Grass, age 8 years; together with the right to take and remove the clothes of said children from the premises where Velma Marie Grass resided with said children, with the provision that said children be placed in school and properly looked after under the care, custody and control of the said complainant pending further orders of this court.

It is further ORDERED and DECREED by the Court that this temporary order remain in force and effect until a final determination of this cause or until changed by further orders of this Court.

It is further ORDERED and DECREED by the Court that a copy of this Order be served upon the respondent along with a copy of the Petition.

Done this 30 day of August, 1962.

Hubert M. Isaac

Judge.

RECORDED

3992-A

Received 31 day of Aug 1962
and on 4th day of Sept 1962
I served a copy of the within Petitions
on Velma Marie Grass

Lawrence A. Grass

HE 2.6.166

05-

By service on _____

TAYLOR WILKINS, Sheriff

By Fred Sabert D.S.
F hope

Velma Marie Grass
162 Pierce St
Fairhope

Sheriff claims 70 miles at
Ten Cents per mile, Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Sherbert
DEPUTY SHERIFF

- 1. Petition
- 2. Order

FILED

AUG 30 1962

ALICE L. DUCK, CLERK REGISTER

LAWRENCE A. GRASS,)	
)	IN THE
Petitioner,)	
)	CIRCUIT COURT OF BALDWIN COUNTY,
VS.)	
)	ALABAMA. INEQUITY
VELMA MARIE GRASS,)	
)	NO. 3992A
Respondent.)	
)	
)	

This cause coming on to be heard is submitted upon the petition to modify the decree heretofore entered in this cause relative to the custody of minor children.

The Court, after considering the pleadings and testimony of the witnesses, taken ore tenus, is of the opinion and finds as follows:

1. That it is to the best interest of the said minor children, Lawrence A. Grass, Jr., Janell Marie Grass and Darnell Marie Grass, that they be placed in the custody of the Petitioner, Lawrence A Grass, subject to the rights of the said Velma Marie Grass as hereinafter set out.

2. That the said Velma Marie Grass is to have the custody of the said children the third week-end in each month, beginning Friday afternoon at 4:00 o'clock and ending Sunday afternoon at 5:00 o'clock; that she is to have the custody, care and control of said minor children during the Christmas week, beginning on December 25th at 4:00 o'clock in the afternoon and ending December 31st, at 4:00 o'clock in the afternoon, and that in addition to the times herein set out, the said Velma Marie Grass shall have the custody, care and control of said minor children for the month of July of Each year.

It is ordered that the Petitioner, Lawrence A. Grass, pay the costs herein, for which execution may issue.

Dated at Bay Minette, Alabama, this the 14th day of
December, 1962.

Hubert M. Hall

Judge

FILED

DEC 15 1962

ALICE J. DUCK, CLERK

LAWRENCE A. GRASS	X		
Complainant	X	IN THE CIRCUIT COURT OF	
vs	X	BALDWIN COUNTY, ALABAMA	
VELMA MARIE GRASS	X	IN EQUITY	NO. <u>3992-A</u>
Respondent	X		

PETITION FOR MODIFICATION

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 files this his petition and respectfully shows unto the Court and your Honor as follows:

-1-

That the complainant is over the age of twenty-one years; that he is a bona fide resident and citizen of the State of Alabama and now resides in Mobile, Alabama, at 3015 Riverside Drive; that he has been a bona fide resident and citizen of the State of Alabama for more than one year next preceding the time of filing of this petition; that the respondent, Velma Marie Grass, is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama.

-2-

That the complainant and the respondent were permanently divorced from the bonds of matrimony by a decree rendered out of the Circuit Court of Baldwin County, Alabama, on the 15th day of March, 1957, for and on account of abandonment on the part of the said respondent.

-3-

That there were born to the union of the complainant - petitioner and the respondent three children, Lawrence A. Grass, Jr., ten years of age, Janell Marie Grass eight years of age, and Darnell Marie Grass, eight years of age; that by said decree the complainant, Lawrence A. Grass, was awarded the care, custody and control of the said minor children, giving the respondent the right to visit the said minor children and have them to visit with her at reasonable and proper times.

-4-

That since the time of this divorce, the said respondent petitioned this Honorable Court to modify said decree and through some error

B.K-23 p. 250-D

your complainant failed to answer the said petition in time and the said respondent obtained a judgment pro confesso on to-wit: the 23rd day of August, 1958, and on the 26th day of August, 1958, this Honorable Court rendered a decree modifying that certain decree dated March 15, 1957, copy attached hereto and made a part hereof as Exhibit "A".

-5-

That on to-wit, February 24, 1962, your petitioner entered into a marriage with Betty Thurman and your petitioner has established a home with her at 3015 Riverside Drive, Mobile, Alabama, and that said home is ample for the occupancy of your petitioner and his wife herein noted and the three children herein named.

-6-

That the said respondent has neglected the health, welfare or morals of said children in that Lawrence A. Grass, Jr., has run away from school causing confusion and creating a delinquency; that the said Darnell Marie Grass has not been properly cared for and supervised in that your petitioner has just learned that said child was expelled from the public school in Fairhope, Alabama, and that the actions of all three children clearly show the lack of adequate supervision, proper rearing, and that they are not being given suitable and proper religious training, all of which is necessary to their well-being and the making of good citizens.

-7-

Your complainant further avers that he has a comfortable place for said minor children and he is a suitable and proper person to have the care, custody and control of his said minor children.

PRAYER FOR PROCESS

WHEREFORE, the premises considered, your Petitioner prays that your Honor will by proper process make the said Velma Marie Grass, a proper party to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

WHEREFORE, the premises considered, your Complainant respectfully prays that on a final hearing of this cause, Your Honor will enter a decree modifying the said decree entered on August 26, 1958, which decree modified that certain divorce decree heretofore referred to and rendered on the 15th day of March, 1957, so as to grant to yourpetitioner the permanent care, custody and control of Lawrence A. Grass, Jr., Janell Marie Grass and Darnell Marie Grass.

Your complainant prays for such other, further or different relief as in the premises he may be entitled to receive.

Respectfully Submitted,

Lawrence A. Grass
Complainant

THOMPSON & WHITE
Attorneys for Lawrence A. Grass.

FILED

AUG 31 1962

ALICE J. DUCK, CLERK REGISTER

Received 31 day of Aug 1962
and on 4th day of Sept 1962

I served a copy of the within petition for modification
on Velma Marie Grass

By service on _____

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Jud Serbert
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff
By Jud Serbert D. S.
J. Hoyle