

<u>BETTY BROWN PLATTENBURG</u>	:	NO. <u>12,738 EQUITY</u>
PETITIONER	:	
	:	IN THE CIRCUIT COURT FOR
VS.	:	
	:	ANNE ARUNDEL COUNTY
	:	
<u>JAMES BERNARD PLATTENBURG</u>	:	
RESPONDENT	:	

.....

C O M P L A I N T

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY,
MARYLAND.

THE PETITION OF BETTY BROWN PLATTENBURG

respectfully shows:

1. That she is the wife of James Bernard Plattenburg,
the Respondent; that Petitioner was duly married to said Respondent on
or about August 17, 1939, at Annapolis, Maryland,
Date City State
and now resides at 129 West Street, Annapolis, Maryland.
Address

2. That petitioner is the mother and said Respondent is the father of
the following named dependents :

1. James Bernard, Jr., Born November 2, 1944.
2. Harriet, Born January 4, 1948.
3. _____, Born _____, 19____.
4. _____, Born _____, 19____.
5. _____, Born _____, 19____.
6. _____, Born _____, 19____.

3. THAT ~~Petitioner and~~ said children (~~is~~) (are) in need of and (~~is~~) (are)
entitled to support from the Respondent under the provisions of the
Maryland Uniform Reciprocal Enforcement of Support Act, Article 89C,
Annotated Code of Maryland, 1951.

4. THAT Respondent from on or about January 1958 and subsequent
thereto, failed, neglected, and refused to provide fair and reasonable
support for ~~Petitioner and~~ the ~~other~~ dependents according to his
means and earning capacity.

5. THAT, upon information and belief of Petitioner, Respondent now is
residing or domiciled at _____, Dodge,
Street City
Texas, which State has enacted a law substantially
State

similar and reciprocal to the Maryland Uniform Reciprocal Enforcement of Support Act above mentioned.

6. THAT she is without sufficient funds to obtain personal counsel, or to pay court costs.

WHEREFORE, the Petitioner prays for such an Order for Support, directed to said Respondent as shall be deemed to be fair and reasonable, and for such other further relief as the law provides.

(Mrs) Betty Brown Plattenburg
Petitioner

STATE OF MARYLAND : SS.
COUNTY OF ANNE ARUNDEL :

Betty Brown Plattenburg, being duly sworn, says that she is
Petitioner
the Petitioner herein, that she has read the foregoing petition, and
knows the contents thereof; that the same is true of her own knowledge,
except as to the matters therein stated to be alleged on information and
belief and all of which is true and correct to the best of her knowledge,
information and belief.

(Mrs) Betty Brown Plattenburg
Petitioner

Sworn to before me this 25th day
of June, 19 58.

Myrtle Stumm
Myrtle Stumm, Notary Public

STATE OF MARYLAND	*	IN
EX REL		
BETTY BROWN PLATTENBURG,	*	THE CIRCUIT COURT
Petitioner	*	
	*	FOR
vs.	*	
	*	ANNE ARUNDEL COUNTY
JAMES BERNARD PLATTENBURG,	*	NO.12,738 EQUITY
Respondent	*	

TESTIMONY ON BEHALF OF PETITIONER,

BETTY BROWN PLATTENBURG

July 14, 1958

Before

HON. MATTHEW S. EVANS

Q What is your full name?
A Betty Brown Plattenburg.

Q And are you married to the respondent, James Bernard Plattenburg?
A Yes, I am.

Q When and where were you married to him?
A Annapolis, Maryland, on August the 17th, 1939.

Q Were any children born of this marriage?
A Yes, there were, three, one deceased and two living.

Q Give their names and ages.
A James Bernard Plattenburg, Jr., age 13, born November the 2nd, 1944; Harriet Plattenburg, born January the 4th, 1948, in San Diego, California.

Q Are you still the wife of the respondent?
A Yes, I am.

Q Where are you now living?
A 129 West Street, Annapolis, Maryland.

Q When was it your husband last lived with you?
A The last time that he was at home was on October of '56.

Q When and how much was his last contribution for support?
A One Hundred and Fifty Six Dollars and Ninety Cents (\$156.90), and the last time I received that was February the 3rd, 1958.

Q Is there a complaint or an order for support outstanding in any court?
A No.

Q Are you employed?
A Yes, I am.

Q Where do you work?
A I work for the Board of Education at Parole School.

Q How much do you make?
A Three Hundred and Eighteen Dollars and Twenty Seven Cents (\$318.27) a month; I began working in February.

Q What do you do with the Board of Education?
A I teach at Parole School, I started in February of this year.

Q Have you any other source of income?
A No, I haven't.

Q Do you own any property?
A No.

Q Are you and the children in good health?
A Yes.

Q Have you any debts outstanding?
A Yes.

Q How much?
A Almost as much as I make, I imagine, just about anyway, I mean I have all the household bills to take care of.

(Court)
Do you have any bills you owe now, money you've borrowed?
(Witness)
No, I don't have any loans.

Q Well, do you owe any bills at this time?
A Yes, I have bills.

Q I mean, not just what you spend each month, bills that you owe.
A I run clothing bills for myself and the children.

Q What are they?
A At Naomi's Dress Shop for myself and I have an account at Field's for the little girl, and the little boy, I have paid his bill, but I usually have credit with Greengold's for him.

Q Well, how much do you owe them?
A Well, approximately Seventy Five Dollars now, altogether, and I have a furniture bill at Hopkins and one at Hecht's.

Q How much are they?
A I think I owe Hopkins about Seventy Eight Dollars and at Hecht's I owe, Ninety Two.

Q What amount do you require per week for the support of your children?
A At least Thirty Dollars a week for the two, Fifteen Dollars each.

Q Do you know where your husband is now living?
A Yes, I received a letter from him day before yesterday.

Q Where is he?
A Soley, Alabama.

Q Do you know where he is living there, do you have any street address?
A No.

Q Do you know what size town that is?
A I've never been there, it's a new place that's just recently opened to the Navy, the Navy opened up an air base there.

Q What does your husband do when he works?
A He's a retired navy man, he was in the navy, he retired in Soley.

Q And you don't know whether he's working or not?
A Well, according to this letter that he sent, he said, he wasn't working at the present time.

Q Do you know how much retired pay he gets?
A No, I don't.

Q You're not receiving public aid?
A No.

(Court) Do you know how much retirement pay your husband gets?
(Witness) No, I don't have any idea.

(Court) What was his classification when he retired?
(Witness) I'm not positive, I know it was either second or third class Steward.

Q Prior to January, 1958, how much did he give you?
A One Hundred and Fifty Six Dollars and Ninety Cents.

Q What, he sent that to you?
A That came through Cleveland, from the allotment bureau.

(Court) Court will sign an order for Twenty Five a week.

Irene Hazel, Court Reporter

I.H. \$5.00

STATE OF MARYLAND
Ex Rel.

IN THE CIRCUIT COURT FOR ANNE
ARUNDEL COUNTY, MARYLAND

BETTY BROWN PLATTENBURG
Petitioner

NO. 12,738 EQUITY

Vs.

JAMES BERNARD PLATTENBURG
Respondent

.....

CERTIFICATE

THE UNDERSIGNED, JUDGE of the Circuit Court for Anne Arundel County, State of Maryland, hereby certifies:

1. THAT on the 25th day of June, 1958, a Petition was verified by the above named Petitioner and duly filed in this Court in a proceeding against the above named Respondent commenced under the provisions of the Uniform Reciprocal Enforcement of Support Act, Article 89C, Annotated Code of Maryland, 1951, to compel the support of the dependents named in that Petition.

2. THAT the above named Respondent is believed to be residing or domiciled in Foley, Alabama.

3. THAT the undersigned, JUDGE of the Circuit Court for Anne Arundel County, Maryland has examined the Petitioner under oath and she has reaffirmed the allegations contained in the Petition; that according to the testimony of the Petitioner the needs of the dependents named in the Petition for Support from the Respondent are the sum of \$25.00 per week, monthly.

4. THAT in the opinion of the undersigned JUDGE of the Circuit Court for Anne Arundel County the Respondent should be compelled to answer such Petition and be dealt with according to law.

WHEREFORE, it is hereby ORDERED that this certificate together with the exemplified copies of the Petition be transmitted to Circuit

Court, Bay Minette, Baldwin County,
City, Town County

Alabama.
State

Matthew S. Evans
Judge of the Circuit Court for
Anne Arundel County

Dated 26 July 1958

EXEMPLIFICATION

STATE OF MARYLAND :
COUNTY OF ANNE ARUNDEL : SS

I, George T. Cromwell, Clerk of the Circuit Court for Anne Arundel County, DO HEREBY ATTEST AND CERTIFY that, as such Clerk, I am keeper and custodian of all court records, papers, proceedings and process in and for the Circuit Court for Anne Arundel County and that said records, papers, proceedings and process are kept by me in my files in conformity with the law.

I do further attest and certify that the annexed is a true copy of the original record now on file in this Court, in the matter of Betty Brown Plattenburg, Petitioner, against James Bernard Plattenburg Respondent, No. 12,738 Equity, April term, 1958; that I have compared the transcript hereto annexed with the said original record and that the same is a true and correct transcript of the said original record.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the SEAL of the said Court this 25 day of July, 1958.

SEAL

George T. Cromwell
CLERK OF COURT

STATE OF MARYLAND : SS
COUNTY OF ANNE ARUNDEL :

I, Matthew S. Evans, JUDGE of the Circuit Court for Anne Arundel County, Maryland, DO HEREBY CERTIFY that George T. Cromwell, whose name is subscribed to the foregoing attestation and certificate was at the time of subscribing, the Clerk of the Circuit Court for Anne Arundel County, Maryland and that full faith and credit are due to all his official acts as such and that his foregoing attestation and certificate is in due and legal form.

I further certify that I know the signature of said George T. Cromwell, and that the signature affixed to the foregoing attestation and certificate is the genuine signature of the said George T. Cromwell.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the SEAL of the said County this 26 day of July, 1958.

SEAL

Matthew S. Evans
Judge of the Circuit Court for
Anne Arundel County

STATE OF MARYLAND : SS
COUNTY OF ANNE ARUNDEL :

I, George T. Cromwell, Clerk of the Circuit Court for Anne Arundel County, Maryland, DO HEREBY CERTIFY that Matthew S. Evans, whose name is subscribed to the foregoing certificate was, at the time of subscribing same, JUDGE of the Circuit Court for Anne Arundel County, Maryland, duly commissioned and qualified and that full faith and credit are due to all his official acts as such and that his foregoing certificate is in due legal form.

I further certify that I know the signature of the said Matthew S. Evans, and that the signature affixed thereto is the genuine signature of the said Matthew S. Evans.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the SEAL of said Court this 25 day of July, 1958.

SEAL

George T. Cromwell
Clerk of the Court

UNIFORM RECIPROCAL ENFORCEMENT OF
SUPPORT ACT

GENERAL PROVISIONS

1950, ch. 12, sec. 1. 1951, ch. 301, sec. 1

1. Purposes. The purpose of this Article are to improve and extend by reciprocal legislation the enforcement of duties of support and to make uniform the law with respect thereto.

1951, ch. 301, sec. 2.

2. Definitions. (a) As used in this Article unless the context requires otherwise,

(b) "State" includes any state, territory or possession of the United States and the District of Columbia in which this or a substantially similar reciprocal law has been enacted.

(c) "Initiating state" means any state in which a proceeding pursuant to this or a substantially similar reciprocal law is commenced.

(d) "Responding state" means any state in which any proceeding pursuant to the proceeding in the initiating state is or may be commenced.

(e) "Court" means the Circuit Court of any county in this State or either the Circuit Court or the Circuit Court No. 2 in Baltimore City; Juvenile Courts and Trial Magistrates having jurisdiction over the enforcement of laws respecting duties of support; and when the context requires, means the court of any other state as defined in a substantially similar reciprocal law.

(f) "Law" includes both common and statute law.

(g) "Duty of support" includes any duty of support imposed or imposable by law, or by any court order, decree or judgement, whether interlocutory or final, whether incidental to a proceeding for divorce, judicial separation, separate maintenance or otherwise.

(h) "Obligor" means any person owing a duty of support.

(i) "Obligee" means any person to whom a duty of support is owed.

1951, ch. 301, sec. 3.

3. Remedies Additional to Those Now Existing. The remedies herein provided are in addition to and not in substitution for any other remedies.

1951, ch. 301, sec. 4.

4. Extent of Duties of Support. The duty of support imposed by the laws of this State or by the laws of the state where the obligee was present when the failure to support commenced as provided in Section 7 and the remedies provided for enforcement thereof, including any penalty imposed thereby, bind the obligor regardless of the presence or residence of the obligee.

CRIMINAL ENFORCEMENT

1951, ch. 301, sec. 5.

5. Interstate Rendition. The Governor of this State (1) may demand from the Governor of any other state the surrender of any person found in such other state who is charged in this State with the crime of failing to provide for the support of any person in this State and (2) may surrender on demand by the Governor of any other state any person found in this State who is charged in such other state with the crime of failing to provide for the support of a person in such other state. The provisions for extradition of criminals not inconsistent herewith shall apply to any such demand although the person whose surrender is demanded was not in the demanding state at the time of the commission of the crime and although he had not fled therefrom. Neither the demand, the oath nor any proceedings from extradition pursuant to this section need state or show that the person whose surrender is demanded has fled from justice, or at the time of the commission of the crime was in the demanding or the other state.

1951, ch. 301, sec. 6.

6. Relief from Criminal Enforcement. Any obligor contemplated by Section 5, who submits to the jurisdiction of the court of such other state and complies with the court's order of support, shall be relieved of extradition from desertion or non-support entered in the courts of this State during the period of such complicity.

CIVIL ENFORCEMENT

1951, ch. 301, sec. 7. 1952, ch. 44, sec. 7.

7. What Duties are Enforceable. Duties of support enforceable under the Article are those imposed or imposable under the laws of Maryland upon the alleged obligor during the period for which support is sought.

1951, ch. 301, sec. 8. 1953, ch. 498.

8. Remedies of a State or Political Subdivision Thereof Furnishing Support. Whenever the state or a political subdivision thereof has furnished support to an obligee it shall have the same right to invoke the provisions hereof as the obligee to whom the support was furnished for the purpose of securing reimbursement of expenditures so made and of obtaining continuing support.

1951, ch. 301, sec. 9

9. How Duties of Support are Enforced. All duties of support are enforceable by petition irrespective of relationship between the obligor and obligee. Jurisdiction of all proceedings hereunder shall be vested in the Circuit Court of any county in this State, either the Circuit Court or the Circuit Court No. 2 in Baltimore City, Juvenile Courts and Trial Magistrates having jurisdiction over the enforcement of laws respecting duties of support.

1951, ch. 301, sec. 10. 1953, ch. 498.

10. Contents of Petition for Support. The petition shall be verified and shall state the name and, so far as known to

the petitioner, the address and circumstances of the obligor and his or her dependents for whom support is sought and all other pertinent information. The petitioner may include in or attach to the petition any information which may help in locating or identifying the obligor including, but without limitation by enumeration, a photograph of the obligor, a description of any distinguishing marks of his person, other names and aliases by which he has been or is known, the name of his employer, his fingerprints, or social security number.

1951, ch. 301, sec. 11. 1952, ch. 44, sec. 11.
1953, ch. 498.

11. Duty of Court of this State as Initiating State

(a) Transmission of certified copies of petition to responding state.--If the Court of this State acting as an initiating state finds that the petition sets forth facts from which it may be determined that the respondent owes a duty of support and that a court of the responding state may certify and shall cause certified copies of the petition, the certificate and this Article to be transmitted to the Court of the responding State. If the name and address of such court is unknown and the responding state has an information agency comparable to that established in the initiating state, it shall cause such copies to be transmitted to the state information agency or other proper official of the responding state, with a request that it forward them to the proper court, and that the court of the responding state acknowledge their receipt to the court of the initiating state.

(b) Counsel when petitioner without funds.--In the event the petitioner makes oath that she is without sufficient funds to obtain personal counsel it shall be the duty of the city solicitor of Baltimore City or the counsel to the county commissioners of the respective counties to act, without charge to the petitioner on behalf of the petitioner.

(c) Petitioner may be relieved of fees and costs.--The court of this State acting as an initiating state has discretion to discharge all duties imposed by this Article without fees or other costs to the petitioner.

1951, ch. 301, sec. 12. 1953, ch. 498.

12. Duty of the Court of This State as Responding State.

(a) Docketing, setting hearing, etc.--When the court of this state, acting as a responding state, receives from the court of an initiating state the aforesaid copies, it shall (1) docket the cause, (2) notify the State's Attorney of the jurisdiction, (3) set a time and place for a hearing, and (4) take such action as is necessary in accordance with the laws of this State to obtain jurisdiction.

(b) State's Attorney to prosecute.--When any court of this state, acting as a responding State, shall receive a petition from a Court of an initiating State in any proceeding, whether civil or criminal, it shall be the duty of the State's Attorney of the jurisdiction to prosecute such cause.

(c) Waiver of fees and costs to petitioner.--The Court of this State acting as a responding state, may, pursuant to the statement of the court of the initiating state or on its

own initiative discharge all duties imposed by this article without fees or other costs to the petitioner.

(d) Action when court unable to obtain jurisdiction.-- If a court of this State, acting as a responding state, is unable to obtain jurisdiction of the obligor or his property due to inaccuracies or inadequacies in the petition or otherwise, the court shall communicate this fact to the court in the initiating state, shall on its own initiative use all means at its disposal to trace the obligor or his property, and shall hold the case pending the receipt of more accurate information or an amended petition from the court in the initiating state.

1951, ch. 301, sec. 13.

13. Order of Support. If the court of the responding state finds a duty of support, under the laws of Maryland, it may order the obligor to furnish support or reimbursement therefor and subject the property of the obligor to such order.

1951, ch. 301, sec. 14.

14. Responding State to Transmit Copies to Initiating State. The Court of this State when acting as a responding state shall cause to be transmitted to the court of the initiating state a copy of all orders of support or for reimbursement therefor.

1951, ch. 301, sec. 15.

15. Additional Powers of Court. (a) In addition to the foregoing powers, the court of this State when acting as the responding state has the power to subject the obligor to such terms and conditions as the court may deem proper to assure compliance with its orders and in particular.

(b) To require the obligor to furnish recognizance in the form of a cash deposit or bond of such character and in such amount as the court may deem proper to assure payment of any amount required to be paid by the obligor.

(c) To require the obligor to make payments at specified intervals to the clerk of the court, probation officer, probation department, or other agency established by the court for the purpose of collecting such payments or the obligee and to report personally to such clerk, probation officer, probation department, or other agency of such court as such court may direct at such times as may be deemed necessary.

(d) To punish the obligor who shall violate any order of the court to the same extent as provided by law for contempt of the court in any other suit or proceeding cognizable by the court.

1951, ch. 301, sec. 16.

16. Additional Duties of the Court of This State When Acting as a Responding State. (a) The court of this State when acting as a responding state shall have the following duties which may be carried out through the clerk of the court, probation officer, probation department or other agency of said court.

(b) Upon the receipt of a payment made by the obligor pursuant to any order of the court or otherwise, to transmit the same forthwith to the court of the initiating state, and

(c) Upon request to furnish to the court of the initiating state a certified statement of all payments made by the obligor.

1951, ch. 301, sec. 17

17. Additional Duty of the Court of This State When Acting as an Initiating State. The court of this State when acting as an initiating state shall have the duty which may be carried out through the clerk of the court, probation officer, probation department or other agency of said court to receive and disburse forthwith all payments made by the obligor or transmitted by the court of the responding state.

1953, ch. 498.

17A. State Information Agency. The State Department of Public Welfare is hereby designated as the State Information Agency under this subtitle, and it shall be its duty:

(1) To compile a list of the courts and their addresses in this State having jurisdiction under this subtitle and transmit the same to the state information agency of every other State which was adopted this or a substantially similar act.

(2) To maintain a register of such lists received from other states and to transmit copies thereof as soon as possible after receipt to every court in this State having jurisdiction under this subtitle.

1951, ch. 301, sec. 18.

18. Evidence of Husband and Wife. Laws attaching a privilege against the disclosure of communications between husband and wife are inapplicable to proceedings under this Article. Husband and wife are competent witnesses (and may be compelled) to testify to any relevant matter, including marriage and parentage.

1951, ch. 301, sec. 19.

19. Rules of Evidence. In any hearing under this law the court shall be bound by the same rules of evidence that bind the courts of common law jurisdiction in the State of Maryland.

1953, ch. 498.

19A. Application of payments. Any order of support issued by a court of this State when acting as a responding state shall not supersede any previous order of support issued in a divorce or separate maintenance action, but the amounts for a particular period paid pursuant to either order shall be credited against amounts accruing or accrued for the same period under both.

1951, ch. 301, sec. 20.

20. Severability. If any provision hereof or the application thereof to any person or circumstances is held invalid,

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4366

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JAMES BERNARD PLATTENBURG

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

JAMES BERNARD PLATTENBURG, Defendant

by BETTY BROWN PLATTENBURG, Plaintiff

Witness my hand this 25 day of August 1958

Marie J. ..., Clerk

No. 4366

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

BETTY BROWN PLATTENBURG

Plaintiffs

vs.

JAMES BERNARD PLATTENBURG

Defendants

Summons and Complaint

Filed August 25, 1958 19

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Holey

Received In Office

Aug 25 1958

_____, Sheriff

I have executed this summons

this *Sept 17 1958*
by leaving a copy with

James Bernard Plattenburg

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY

Address
DEPUTY SHERIFF

Anthony Wilkins Sheriff
Orlinda D. Deputy Sheriff

Holey

BETTY BROWN PLATTENBURG
COMPLAINANT

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA

JAMES BERNARD PLATTENBURG
RESPONDENT

IN EQUITY, CASE NO. 4366

D E C R E E

It appearing to the Court that the above cause is inactive, upon consideration, it is ORDERED, ADJUDGED and DECREED by the Court that said cause be and hereby is transferred to the inactive docket of this Court, and

It further appearing to the Court that the execution for costs against the Defendant was returned by the Sheriff of this County, "No Property Found", it is therefore, ORDERED and DECREED by the Court that the costs be and hereby are now taxed against the State of Alabama pursuant of Section 119, (b), Title 34, 1955 Cumulative Pocket Parts, Code of Alabama.

This 5th day of January, 19 62.

Robert M. Hall
Judge Circuit Court, In Equity.

County Commissioners

FOR

Anne Arundel County

P. O. BOX 1831
ANNAPOLIS, MARYLAND

MORTON, JAMES C., JR.
COUNSEL

LOS KosKY, LUCY F.
CLERK

COMMISSIONERS

WILDE, FRANK W., PRESIDENT
CARR, SAMUEL J.
BOEHM, LOUIS A.
PITCHER, PAUL T.
WIGLEY, HENRY C., SR.
KLIMA, EDWARD J.
RUSSELL, DR. CARL P.
COLLINSON, JOSEPH F., JR.

April 17, 1959

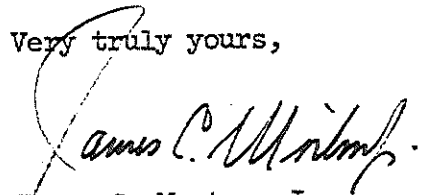
Clerk of the Circuit Court
for Baldwin County
Court House
Bay Minette, Alabama

In re: State of Maryland Ex Rel Betty Brown Plattenburg vs.
James Bernard Plattenburg, Folley, Alabama, Equity No.
12738, Circuit Court for Anne Arundel County, State
of Maryland

Dear Sir:

Under the law of the State of Maryland I am required to represent indigent persons entitled to relief under the Uniform Reciprocal of Support Act. Papers in the above matter were forwarded to your court on August 5, 1958, by George T. Cromwell, Clerk of our Circuit Court. To date there has been no acknowledgment of the receipt of said papers, nor any information concerning action on the same. Would you please examine your files to ascertain the present status of this particular case and report same to this office. Your cooperation is very much appreciated.

Very truly yours,


James C. Morton, Jr.
Counsel

CLERK'S OFFICE

CIRCUIT COURT FOR ANNE ARUNDEL COUNTY

ANNAPOLIS, MARYLAND

August 5, 1958

Circuit Court for Baldwin County
Court House
Bay Minette, Alabama

Re: State of Maryland, Ex Rel
BETTY BROWN PLATTENBURG vs.
JAMES BERNARD PLATTENBURG
No. 12,738 Equity

Dear Sir:

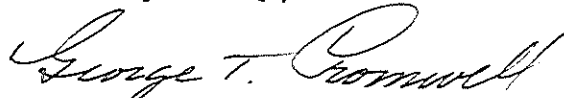
Enclosed please find three exemplified copies of Complaint for Support, Testimony and Certificate, three copies of the Uniform Reciprocal Enforcement of Support Act of the State of Maryland and bill for our costs in the above matter.

Please docket this case and set it for hearing at the earliest possible date.

Kindly send us a copy of any Decree that may be signed therein, and forward all payments for Support to the Juvenile-Probation Officer of Anne Arundel County, Court House, Annapolis, Maryland.

Your courtesy in this matter will be greatly appreciated.

Yours very truly,


George T. Cromwell, Clerk

CLERK'S OFFICE
CIRCUIT COURT FOR ANNE ARUNDEL COUNTY
ANNAPOLIS, MARYLAND

STATE OF MARYLAND, Ex Rel
Re: BETTY BROWN PLATTENBURG VS. JAMES BERNARD PLATTENBURG

Your Uniform Reciprocal Enforcement of Support Act No. _____

Our case No. 12,738 Equity

Dear Sir:

We hereby acknowledge receipt of the Reciprocal Support papers
in the above matter.

Any further correspondence should be sent to:

NAME: _____

TITLE: _____

ADDRESS: _____

This matter is expected to be heard on or about _____

Acknowledged by: _____

Date: _____

County Commissioners

FOR

Anne Arundel County

P. O. BOX 1831
ANNAPOLIS, MARYLAND

MORTON, JAMES C., JR.
COUNSEL

LOS KosKY, LUCY F.
CLERK

COMMISSIONERS

WILDE, FRANK W., PRESIDENT
CARR, SAMUEL J.
BOEHM, LOUIS A.
PITCHER, PAUL T.
WIGLEY, HENRY C., SR.
KLIMA, EDWARD J.
RUSSELL, DR. CARL P.
COLLINSON, JOSEPH F., JR.

November 18, 1959

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

Re: Betty Brown Plattenburg vs.
James Bernard Plattenburg
Our File No: 3062

Dear Mrs. Duck:

In your letter of August 10, 1959 to this office, you mentioned that our inquiry concerning the above case (with respect to present status) would be called to the attention of the Solicitor upon his return from vacation. We have heard nothing since that date and would appreciate some response. Mrs. Plattenburg advises that it has been over three years since she has had any support from Mr. Plattenburg. I am sure that you will agree that this is an extremely long time.

Any courtesies extended will be deeply appreciated.

Very truly yours,

James C. Morton, Jr.
James C. Morton, Jr.
Counsel (wBB)

PJR