4 (4413)

HAZEL BROWN,	Ĭ	IN THE CIRCUIT COURT OF
Complainant,	Х	BALDWIN COUNTY, ALABAMA
-vs-	¥	IN EQUITY:
EDWARD LEE BROWN, SR.,	Ĭ	
Respondent.	X	NO.

BALDWIN TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF MOXXXX COUNTY, ALABAMA, SITTINGIN EQUITY:

Comes the Complainant and shows unto Your Honors and unto Your Honors as follows:

ONE

Complainant is the wife of the Respondent and they were married to each other on August 17, 1952 in Dillon, South Carolina. The Complainant is a bona-fide resident citizen of Mobile County, Alabama and has been such for more than one year next preceding the filing of the bill of complaint herein. The Respondent is a resident of North Carolina. There is one minor child as issue of their marriage, Edward Lee Brown, Jr., age five years. Said child lives and resides with the Complainant and she is a fit and proper person to be granted his custody and control.

TWO

The Respondent voluntarily abandoned the bed and board of the Complainant for more than one year next preceding the filing of the bill of complaint herein.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of this cause, will make the said Edward Lee Brown, S_{r} , party-respondent hereto, and will cause him to appear, plead, answer or demur hereto within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Homrs will see fit to see fit to grant her an absolute divorce from the bonds of matrimom y with the Respondent, and Complainant further prays that your Homors will grant her the custody and control of their minor child, and Complainant prays for such other, further and different relief as in equity she may be due, and as in duty bound she will ever pray, etc

File!

det. 36, 1958

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