

CECIL G. CHASON

ATTORNEY-AT-LAW  
FOLEY, ALABAMA

December 19, 1958

41437

Mr. James A. Brice  
Attorney at Law  
Foley, Alabama

Dear Mr. Brice:

I am today sending to Mrs. Duck the original of the enclosed appearance.

This matter has been referred to me by an attorney in Rhode Island, and I need additional information before filing an answer. As soon as I hear from him I will either file an answer and agree with you for a date for hearing, or will concede and withdraw.

Yours, very truly,

  
C. G. Chason

CGC:fm

encls. 1

cc: Mrs. Alice J. Duck, Register  
Bay Minette, Alabama

4773

LAW OFFICES  
JAMES A. BRICE  
FOLEY, ALABAMA

JAMES A. BRICE  
RICHARD C. LACEY

P. O. Box 298  
WHITEHALL 3-3601

November 23, 1959

Mrs. Alice J. Duck  
Register in Equity  
Bay Minette, Alabama

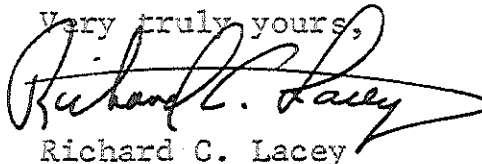
Re: Merlin E. Miller  
vs: Georgia B. Miller

Dear Mrs. Duck:

As attorneys for Merlin E. Miller, the complainant in subject cause, we direct that a non-suit be entered in this cause.

Enclosed please find complaint, the defendant in which is a non-resident. Please serve her by registered mail at No. 12 Spencer Street, Pawtucket, Rhode Island.

Very truly yours,



Richard C. Lacey

RCL/vd

Enclosure

4437

LAW OFFICES OF  
ANTONIO S. ALMEIDA

TEL. RES. PA 2-5269  
TEL. OFFICE PA 5-5820

188 ~~1270~~ Main Street  
Pawtucket, Rhode Island

December 19, 1958

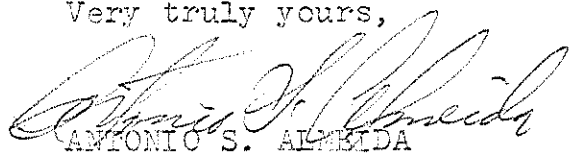
Clerk, Circuit Court  
Baldwin County  
Alabama

Re: Merlin E. Miller Vs Georgia Brousseau Miller

Dear Sir:

Please be advised that a letter has been forwarded to  
Attorney Cecile Chaison, retaining him on behalf of Mrs.  
Georgia Brousseau Miller.

Very truly yours,

  
ANTONIO S. ALMEIDA

ASA/l

CECIL G. CHASON

ATTORNEY-AT-LAW  
FOLEY, ALABAMA


December 22, 1958

Mrs. Alice J. Duck, Register  
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing herewith Answer in the case of Miller  
-vs- Miller, being case number 4437, a copy of which  
is being sent to Mr. Brice.

Yours very truly,



C. G. Chason

CGC:fm

encls. 1

cc: Mr. James A. Brice  
Attorney at Law  
Foley, Alabama

JAMES A. BRICE  
ATTORNEY AT LAW  
FOLEY, ALABAMA

POST OFFICE BOX 298

November 18, 1958

WHITEHALL 3-3601

Mrs. Alice J. Duck  
Register in Equity  
Bay Minette, Alabama

Re: Merlin E. Miller  
Vs: Georgia Brousseau Miller

Dear Mrs. Duck:

Defendant in enclosed cause is a non-resident. Please serve her registered mail at No. 12 Spencer Street, Pawtucket, Rhode Island.

Sincerely,



JAMES A. BRICE

JAB:bp

Enclosure as noted.

MERLIN E. MILLER,  
 Complainant,  
 -vs-  
 GEORGIA BROUSSEAU MILLER,  
 Respondent.

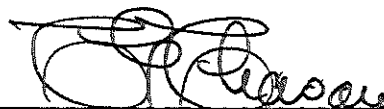
)  
 ) IN THE CIRCUIT COURT OF  
 ) BALDWIN COUNTY, ALABAMA  
 ) IN EQUITY  
 )  
 ) CASE NO. 4437  
 )

ANSWER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint heretofore filed herein, shows to this Honorable Court the following:-

1. Respondent admits the allegations of Paragraph 1 of the Bill of Complaint.
2. Respondent admits that she and the Complainant were lawfully married on the 23rd day of March, 1951, at Central Falls, Rhode Island, and that they are still legally married, and admits that to this date there has been no issue born to this marriage, but shows that as a result of cohabitation with her husband she is now pregnant.
3. Respondent denies the allegation of Paragraph 3 of the Bill of Complaint, and shows to the Court that Complainant and Respondent lived together as husband and wife in Baldwin County, Alabama, from August, 1958, to October, 1958, which said cohabitation resulted in the pregnancy of the Respondent.

Having answered the Bill of Complaint filed in this cause, Respondent further shows unto the Court that she has insufficient funds with which to employ counsel for the defense of this suit, and asks the Court to order and direct the Complainant to pay such sum as is meet and proper to C. G. Chason, Attorney at Law, Foley, Alabama, her Solicitor of record, for the defense of this matter in her behalf.



Solicitor for Respondent

*Filed  
 12-29-58*

MERLIN E. MILLER,  
Complainant,  
-vs-  
GEORGIA BROUSSEAU MILLER,  
Respondent.

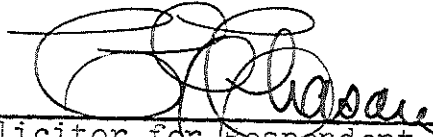
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY  
CASE NO. 4437

DEMURRER

Comes the Respondent in the above styled cause and demurs to the Bill of Complaint heretofore filed therein, and each paragraph and aspect thereof, separately and severally, and as grounds for demurrer shows, separately and severally, the following:-

1. There is no equity in the Bill.

*Filed 12-20-58*

  
Solicitor for Respondent

BILL OF COMPLAINT

MERLIN E. MILLER	)	IN THE CIRCUIT COURT OF
Complainant	)	BALDWIN COUNTY, ALABAMA
vs.	)	
GEORGIA BROUSSEAU MILLER	)	IN EQUITY
Respondent	)	

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

Comes your complainant, Merlin E. Miller, and respectfully shows unto this Honorable Court and unto Your Honor as follows:

1. That he is over the age of 21 years and is a resident citizen of Baldwin County, Alabama and has been such for more than one year next preceeding the filing of this cause; that he resides at Elberta, Alabama; that Georgia Brousseau Miller, the respondent, is over the age of 21 years.

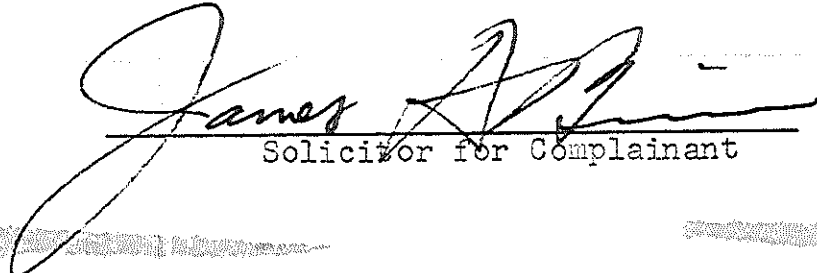
2. That on, to-wit the 23rd day of March, 1951, your complainant and respondent were intermarried at Central Falls, Rhode Island and are still lawfully married. That there have been no issue born of said marriage.

3. Your complainant further avers and charges that prior to the filing of this action, on or about the 2nd day of March, 1952, the respondent seperated from, abandoned and deserted your complainant without cause or justification on his part; that since that day, complainant and respondent have not lived together as man and wife, and are not now living together as man and wife; that complainant has made numerous attempts to secure the return of respondent to his bed and board, but respondent has steadfastly refused to do so.

The premises considered your complainant prays that respondent be made a party respondent to this Bill of Complaint by the usual procedures of law, and the status in such cases made and provided, requiring her to plead, answer or demur within the time and manner



required by law; and upon a final hearing of this cause Your Honor will grant a decree divorcing Complainant from respondent; and complainant further prays that Your Honor will grant such other, further, different and general relief to which he may be entitled as in duty bound he would ever pray.

  
Solicitor for Complainant

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 \_\_\_\_\_

Georgia Brousseau Miller

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 \_\_\_\_\_

~~Georgia Brousseau Miller~~ \_\_\_\_\_, Defendant.

by Merlin E. Miller \_\_\_\_\_

\_\_\_\_\_, Plaintiff.

Witness my hand this 20 day of Nov 1956

Deirdre F. ..., Clerk

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19 \_\_\_\_\_

Clerk

4437

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

\_\_\_\_\_ 19 \_\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_ 19 \_\_\_\_\_

by leaving a copy with

\_\_\_\_\_ Sheriff

\_\_\_\_\_ Deputy Sheriff