

4739

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE, COMPLAINANT

vs. No. 4739

DELBERT LYLE BRADSHAW, DEFENDANT

BILL OF COMPLAINT

The complaint of Mrs. Dorothy Nell Bradshaw Castle respectfully shows:

1. That she is the <sup>ex</sup>wife of Delbert Lyle Bradshaw, the defendant; that complainant was duly married to said Defendant on or about November 26, 1948 at Meridian, Mississippi, and now resides at 221 Carter Place, Meridian, Miss.
2. That complainant is the mother and said defendant is the father of the following named dependents:  
Susan Gail Bradshaw, nine years of age
3. That complainant and said children are entitled to support from the defendant under the provisions of the Uniform Reciprocal Enforcement of Support Act of this state (Chapter 211, Laws of 1954) copy of which is attached and made a part hereof.
4. That defendant, on or about May, 1959, and subsequent thereof, refused and neglected to provide fair and reasonable support for complainant and the other dependents according to his means and earning capacity.
5. That defendant ~~was~~ (is) present in the State of Alabama during the period for which support is sought.
6. That upon information and belief, defendant now is residing or domiciled at Bay Minette, Alabama is earning \$undetermined per (week) (month), and is within the jurisdiction of the court of the State of Alabama, which state has enacted a law substantially similar to the Uniform Reciprocal Enforcement of Support Act of this state.

WHEREFORE, the complainant prays for such an order for support directed to said defendant, as shall be deemed to be fair and reasonable, and for such other and further relief as the law provides.

*Mrs. Dorothy Nell Bradshaw Castle*

STATE OF MISSISSIPPI  
LAUDERDALE County

Personally appeared before me Mrs. Dorothy Nell Bradshaw Castle to me personally known and made oath that she has read the above bill of complaint and knows the contents thereof, and the same are true of her own knowledge except as to matters stated on information and belief, and as to these matters she believes them to be true. This the 16th day of October, 1959

*Sam M. Bailey, Chancery Clerk*  
*By: Lela B. Davis, J.C.*

# TESTIMONY OF COMPLAINANT

STATE OF MISSISSIPPI COURT OF CHANCERY

COUNTY OF LAUDERDALE Docket No. 4737

MRS. DOROTHY WELLS BRADSHAW vs. DELBERT LYLE BRADSHAW

CASTLE Complainant vs. BRADSHAW Defendant

Mrs. Dorothy Wells Bradshaw Castle, the complainant herein, being duly sworn on her oath testifies as follows:

Q. What is your full name?

A. Mrs. Dorothy Wells Valentine Castle

Q. What is your present address?

A. 221 Carter Place, Meridian, Mississippi

Q. When and where were you married to the defendant? (If complainant claims to be the common-law wife of the defendant, the following should also be answered.) When did you and defendant decide to assume the status of husband and wife? How was the assumption of this status made public? Where and for what length of time did you and defendant live together as husband and wife?

A. November 28, 1948, Lauderdale County, Meridian, Mississippi

Q. What were the circumstances leading to the separation from your husband?

A. Divorce

Q. Were any children born of this marriage?

A. Yes

Q. Are you now pregnant?

A. No

Q. What are the names and ages of the children now living?

A. Susan Gail Bradshaw, nine years of age

Q. Are they living with you?

A. Yes

Q. When was it your husband last lived with you?

A. November, 1954

Q. When and how much was his last contribution for support?

A. April, 1959 \$67.50

Q. Is there a complaint or an order for support in any court?

A. Yes

Q. Are you employed? What are your earnings?

A. Yes approximately \$220.00 monthly

Q. Have you any other source of income? If so, what is the source and what is the amount thereof?

A. No

Q. Are you and the children in good health?

A. Yes

Q. Have you any debts outstanding?

A. No

Q. What do you require for the support of yourself and children?

A. \$67.50 per month

MAZINSMOO & W. W. W. W. W.

Q. Do you know the present whereabouts of your husband? If so, please give his address. NO STATE

A. Bay Minette, Alabama

Q. Do you know if and where your husband is now employed? If so, state: Name and address of employer and give husband's social security number.

A. Self employed, social security number is not known

Q. What is his salary, if you know?

A. undetermined

Q. Are you receiving public aid; and how much?

A. No

Q. Give an accurate physical description of the defendant (color of hair, distinguishing marks, age, etc.), describe other names and aliases by which he is known and attach a recent photograph or snapshot of the defendant.

A. 6 ft., weighs approx. 200 lbs., lt. brwn. hair, glassy blue eyes 37 yrs. old, no distinguishing marks.

Taken and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Mrs. Dorothy Nell Bradshaw Battle  
Complainant

William J. Mullis  
Chancellor

THE STATE OF MISSISSIPPI

LAUDERDALE County.

CHANCERY COURT

I, WILLIAM NEVILLE, sole Presiding Chancellor of

the 12th Chancery District of the State of Mississippi, (said District including

the County of LAUDERDALE) do hereby certify that Sam M. Bailey

whose genuine signature appears to the foregoing Certificate, is now, and was at date of said Certificate the clerk of the Chancery Court of said county, duly elected and qualified according to law, and that all his official acts as such are entitled to full faith and credit; that his said certificate is in due form of law; that the seal thereto attached is the genuine seal of said Chancery Court, and that said Court is a Court of Record.

Given under my hand and seal at Meridian ~~12th~~ this 16th day of October 1959.

William Neville  
Chancellor.

THE STATE OF MISSISSIPPI

LAUDERDALE County.

I, SAM M. BAILEY, Clerk of the Chancery Court of said

County, do hereby certify that WILLIAM NEVILLE whose genuine signature appears to the above certificate, is now and was at the date of said certificate

the sole Presiding Chancellor of the Twelfth Chancery District of

said State (said district including the said County of Lauderdale) duly appointed and qualified according to law, to all whose official acts as such full faith and credit are and ought to be given.

Given under my hand and seal of said court, at my office in Meridian, Mississippi

this the 16th day of October, 1959.

Sam M. Bailey, Clerk.

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE

COMPLAINANT

vs.

No. 2739

DELBERT LYLE BRADSHAW

DEFENDANT

CERTIFICATE

The undersigned, the Chancery Court of Lauderdale County, Mississippi hereby certifies:

1.

That on October 16, 1959 a bill of complaint was verified by the above named complainant and duly filed in this court in a proceeding against the above named defendant commenced under the provisions of the Uniform Reciprocal Enforcement of Support Act (Chapter 211 Laws of 1954) to compel the support of the dependents named in that bill of complaint.

2.

That the above-named defendant is believed to be residing or domiciled in Bay Minette, Alabama and that the court of the State of Alabama may obtain jurisdiction of the defendant or his property.

3.

That the undersigned, the Chancery Court of Lauderdale County, Mississippi has examined the complainant under oath and she has reaffirmed the allegations contained in the bill of complaint; and that according to the testimony of the complainant the needs of the dependents named in the bill of complaint for support from the defendant are the sum of \$ 67.50 per ~~week~~ (month).

4.

That in the opinion of the undersigned Chancellor the defendant should be compelled to answer such bill of complaint and be dealt with according to law.

WHEREFORE, it is hereby ORDERED that this certificate together with certified copies of the bill of complaint be transmitted to the court of the State of Alabama

This the 16th day of October, 19 59.

  
Chancellor

IN THE CHANCERY COURT OF LAUDERDALE COUNTY, MISS.

Mrs. Dorothy Nell Bradshaw Castle, Complainant

Vs. No. \_\_\_\_\_

Delbert Lyle Bradshaw, Defendant

PAUPER'S AFFIDAVIT

Personally appeared before me, the undersigned authority in and for Lauderdale County, Mississippi, Mrs. Dorothy Nell Bradshaw Castle, who having been by me duly sworn, on oath states that she is the wife of <sup>EX</sup> Delbert Lyle Bradshaw, having been married in Meridian, Mississippi, on 28th day of November, 1948, and she is seeking support from him under the Uniform Reciprocal Enforcement Support Act of Mississippi.

Affiant states that by reason of her poverty, she is not able to pay or otherwise secure costs which may accrue in any court in this proceeding, and she, therefore, prays for relief which she is entitled to under said support act, and to other relief which may be granted by the proper court of competent jurisdiction, without being held accountable for such costs which may accrue.

Mrs Dorothy Nell Bradshaw Castle

Sworn to and subscribed before me, this the 16th day of October, 1959.

Sam M. Bailey, Chancery Clerk  
Notary Public  
By: John S. Davis, D.D.

DOROTHY NELL BRADSHAW CASTLE  
COMPLAINANT

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA

DELBERT LYLE BRADSHAW  
RESPONDENT

IN EQUITY, CASE NO. \_\_\_\_\_

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 1962

Delbert M. Stone  
Judge Circuit Court, In Equity.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

}

Circuit Court, Baldwin County

No. 4737

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DELBERT LYLE BRADSHAW

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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.....

DELBERT LYLE BRADSHAW....., Defendant.....

by DOROTHY NELL BRADSHAW CASTLE.....

....., Plaintiff.....

Witness my hand this 19 day of October 1959.

*Alice J. Huck* Clerk



No. 4737 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

DOROTHY NELL BRADSHAW CASTLE  
Plaintiffs

vs.

DELBERT LYLE BRADSHAW

Defendants

Summons and Complaint

Filed October 19, 19 59

Alice J. Duck Clerk

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

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE, COMPLAINANT

vs. No. \_\_\_\_\_

DELBERT LYLE BRADSHAW, DEFENDANT

BILL OF COMPLAINT

The complaint of Mrs. Dorothy Nell Bradshaw Castle respectfully shows:

1. That she is the <sup>ex</sup>wife of Delbert Lyle Bradshaw, the defendant; that complainant was duly married to said Defendant on or about November 28, 1948 at Meridian, Mississippi, and now resides at 221 Carter Place, Meridian, Miss.

2. That complainant is the mother and said defendant is the father of the following named dependents:  
Susan Gail Bradshaw, nine years of age

3. That complainant and said children are entitled to support from the defendant under the provisions of the Uniform Reciprocal Enforcement of Support Act of this state (Chapter 211, Laws of 1954) copy of which is attached and made a part hereof.

4. That defendant, on or about May, 1959, and subsequent thereof, refused and neglected to provide fair and reasonable support for complainant and the other dependents according to his means and earning capacity.

5. That defendant ~~was~~ (is) present in the State of Alabama during the period for which support is sought.

6. That upon information and belief, defendant now is residing or domiciled at Bay Minette, Alabama is earning \$ undetermined per (week) (month), and is within the jurisdiction of the court of the State of Alabama, which state has enacted a law substantially similar to the Uniform Reciprocal Enforcement of Support Act of this state.

WHEREFORE, the complainant prays for such an order for support directed to said defendant, as shall be deemed to be fair and reasonable, and for such other and further relief as the law provides.

*Mrs. Dorothy Nell Bradshaw Castle*

STATE OF MISSISSIPPI  
LAUDERDALE County

Personally appeared before me Mrs. Dorothy Nell Bradshaw Castle to me personally known and made oath that she has read the above bill of complaint and knows the contents thereof, and the same are true of her own knowledge except as to matters stated on information and belief, and as to these matters she believes them to be true. This the 16th day of October, 1959.

*Sam M. Bailey Chancery Clerk*  
*By: Col. B. Davis, D.C.*

# TESTIMONY OF COMPLAINANT

STATE OF MISSISSIPPI

COURT OF CHANCERY

COUNTY OF LAUDERDALE

Docket No. 1737

MRS. DOROTHY NEIL BRADSHAW

DELBERT LYLE BRADSHAW

vs.

CASTLE

Complainant

Defendant

Mrs. Dorothy Nell Bradshaw Castle, the complainant herein, being duly sworn on her oath testifies as follows:

Q. What is your full name?

A. Mrs. Dorothy Nell Valentine Castle

Q. What is your present address?

A. 221 Carter Place, Meridian, Mississippi

Q. When and where were you married to the defendant? (If complainant claims to be the common-law wife of the defendant, the following should also be answered.) When did you and defendant decide to assume the status of husband and wife? How was the assumption of this status made public? Where and for what length of time did you and defendant live together as husband and wife?

A. November 28, 1948, Lauderdale County, Meridian, Mississippi

Q. What were the circumstances leading to the separation from your husband?

A. Divorce

Q. Were any children born of this marriage?

A. yes

Q. Are you now pregnant?

A. No

Q. What are the names and ages of the children now living?

A. Susan Gail Bradshaw, nine years of age

Q. Are they living with you?

A. Yes

Q. When was it your husband last lived with you?

A. November, 1954

Q. When and how much was his last contribution for support?

A. April, 1959 \$67.50

Q. Is there a complaint or an order for support in any court?

A. Yes

Q. Are you employed? What are your earnings?

A. Yes approximately \$220.00 monthly

Q. Have you any other source of income? If so, what is the source and what is the amount thereof?

A. No

Q. Are you and the children in good health?

A. Yes

Q. Have you any debts outstanding?

A. No

Q. What do you require for the support of yourself and children?

A. \$67.50 per month

THE STATE OF MISSISSIPPI

LAUDERDALE County.

CHANCERY COURT

I, WILLIAM NEVILLE, sole Presiding Chancellor of

the 12th Chancery District of the State of Mississippi, (said District including

the County of LAUDERDALE) do hereby certify that Sam M. Bailey

whose genuine signature appears to the foregoing Certificate, is now, and was at date of said Certificate the clerk of the Chancery Court of said county, duly elected and qualified according to law, and that all his official acts as such are entitled to full faith and credit; that his said certificate is in due form of law; that the seal thereto attached is the genuine seal of said Chancery Court, and that said Court is a Court of Record.

Given under my hand and seal at Meridian ~~16th~~ this 16th day of October 1959

William Neville  
Chancellor.

THE STATE OF MISSISSIPPI

LAUDERDALE County.

I, SAM M. BAILEY, Clerk of the Chancery Court of said

County, do hereby certify that WILLIAM NEVILLE whose genuine signature appears to the above certificate, is now and was at the date of said certificate

the sole Presiding Chancellor of the Twelfth Chancery District of

said State (said district including the said County of Lauderdale) duly appointed and qualified according to law, to all whose official acts as such full faith and credit are and ought to be given.

Given under my hand and seal of said court, at my office in Meridian, Mississippi

this the 16th day of October, 1959

Sam M. Bailey, Clerk.

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE

COMPLAINANT

vs.

No. 4737

DELBERT LYLE BRADSHAW

DEFENDANT

CERTIFICATE

The undersigned, the Chancery Court of Lauderdale County, Mississippi hereby certifies:

1.

That on October 16, 1959 a bill of complaint was verified by the above named complainant and duly filed in this court in a proceeding against the above named defendant commenced under the provisions of the Uniform Reciprocal Enforcement of Support Act (Chapter 211 Laws of 1954) to compel the support of the dependents named in that bill of complaint.

2.

That the above-named defendant is believed to be residing or domiciled in Bay Minette, Alabama and that the court of the State of Alabama may obtain jurisdiction of the defendant or his property.

3.

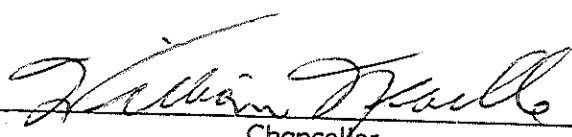
That the undersigned, the Chancery Court of Lauderdale County, Mississippi has examined the complainant under oath and she has reaffirmed the allegations contained in the bill of complaint; and that according to the testimony of the complainant the needs of the dependents named in the bill of complaint for support from the defendant are the sum of \$ 67.50 per ~~week~~ (month).

4.

That in the opinion of the undersigned Chancellor the defendant should be compelled to answer such bill of complaint and be dealt with according to law.

WHEREFORE, it is hereby ORDERED that this certificate together with certified copies of the bill of complaint be transmitted to the court of the State of Alabama

This the 16th day of October, 19 59.

  
Chancellor

IN THE CHANCERY COURT OF LAUDERDALE COUNTY, MISS.

Mrs. Dorothy Nell Bradshaw Castle, Complainant

Vs. No. \_\_\_\_\_

Delbert Lyle Bradshaw, Defendant

PAUPER'S AFFIDAVIT

Personally appeared before me, the undersigned authority in and for Lauderdale County, Mississippi, Mrs. Dorothy Nell Bradshaw Castle, who having been by me duly sworn, on oath states that she is the <sup>ex</sup>wife of Delbert Lyle Bradshaw, having been married in Meridian, Mississippi, on 28th day of November, 1948, and she is seeking support from him under the Uniform Reciprocal Enforcement Support Act of Mississippi.

Affiant states that by reason of her poverty, she is not able to pay or otherwise secure costs which may accrue in any court in this proceeding, and she, therefore, prays for relief which she is entitled to under said support act, and to other relief which may be granted by the proper court of competent jurisdiction, without being held accountable for such costs which may accrue.

Mrs. Dorothy Nell Bradshaw Castle

Sworn to and subscribed before me, this the 16th day of October, 1959.

Sam M. Bailey, Chancery Clerk  
Notary Public  
By: Lola H. Davis, D. C.

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE, COMPLAINANT

vs.

No. 4739

DELBERT LYLE BRADSHAW, DEFENDANT

**BILL OF COMPLAINT**

The complaint of Mrs. Dorothy Nell Bradshaw Castle respectfully shows:

1. That she is the <sup>ex</sup>wife of Delbert Lyle Bradshaw, the defendant; that complainant was duly married to said Defendant on or about November 28, 1948 at Meridian, Mississippi, and now resides at 221 Carter Place, Meridian, Miss.
2. That complainant is the mother and said defendant is the father of the following named dependents:  
Susan Gail Bradshaw, nine years of age
3. That complainant and said children are entitled to support from the defendant under the provisions of the Uniform Reciprocal Enforcement of Support Act of this state (Chapter 211, Laws of 1954) copy of which is attached and made a part hereof.
4. That defendant, on or about May, 1959, and subsequent thereof, refused and neglected to provide fair and reasonable support for complainant and the other dependents according to his means and earning capacity.
5. That defendant ~~was~~ (is) present in the State of Alabama during the period for which support is sought.
6. That upon information and belief, defendant now is residing or domiciled at Ray Minette, Alabama is earning \$ undetermined per (week) (month), and is within the jurisdiction of the court of the State of Alabama, which state has enacted a law substantially similar to the Uniform Reciprocal Enforcement of Support Act of this state.

WHEREFORE, the complainant prays for such an order for support directed to said defendant, as shall be deemed to be fair and reasonable, and for such other and further relief as the law provides.

*Mrs. Dorothy Nell Bradshaw Castle*

STATE OF MISSISSIPPI

LAUDERDALE County

Personally appeared before me Mrs. Dorothy Nell Bradshaw Castle to me personally known and made oath that she has read the above bill of complaint and knows the contents thereof, and the same are true of her own knowledge except as to matters stated on information and belief, and as to these matters she believes them to be true. This the 16th day of October, 1959.

*Sam M. Bailey, Chancery Clerk*  
By: *John B. Davis, D.C.*

# TESTIMONY OF COMPLAINANT

STATE OF MISSISSIPPICOURT OF CHANCERYCOUNTY OF LAUDERDALEDocket No. 1737MRS. DOROTHY NELL BRADSHAWDELBERT LYLE BRADSHAW

vs.

CASTLE

Complainant

Defendant

Mrs. Dorothy Nell Bradshaw Castle, the complainant herein, being duly sworn on her oath testifies as follows:

Q. What is your full name?

A. Mrs. Dorothy Nell Valentine Castle

Q. What is your present address?

A. 221 Carter Place, Meridian, Mississippi

Q. When and where were you married to the defendant? (If complainant claims to be the common-law wife of the defendant, the following should also be answered.) When did you and defendant decide to assume the status of husband and wife? How was the assumption of this status made public? Where and for what length of time did you and defendant live together as husband and wife?

A. November 28, 1948, Lauderdale County, Meridian, Mississippi

Q. What were the circumstances leading to the separation from your husband?

A. Divorce

Q. Were any children born of this marriage?

A. yes

Q. Are you now pregnant?

A. No

Q. What are the names and ages of the children now living?

A. Susan Gail Bradshaw, nine years of age

Q. Are they living with you?

A. Yes

Q. When was it your husband last lived with you?

A. November, 1951

Q. When and how much was his last contribution for support?

A. April, 1959 \$67.50

Q. Is there a complaint or an order for support in any court?

A. Yes

Q. Are you employed? What are your earnings?

A. Yes approximately \$220.00 monthly

Q. Have you any other source of income? If so, what is the source and what is the amount thereof?

A. No

Q. Are you and the children in good health?

A. Yes

Q. Have you any debts outstanding?

A. No

Q. What do you require for the support of yourself and children?

A. \$67.50 per month

(Continued—Over)



Q. Do you know the present whereabouts of your husband? If so, please give his address.

A. Bay Minette, Alabama

Q. Do you know if and where your husband is now employed? If so, state: Name and address of employer and give husband's social security number.

A. Self employed. social security number is not known

Q. What is his salary, if you know?

A. undetermined

Q. Are you receiving public aid; and how much?

A. No

Q. Give an accurate physical description of the defendant (color of hair, distinguishing marks, age, etc.), describe other names and aliases by which he is known and attach a recent photograph or snapshot of the defendant.

A. 6 ft., weighs approx. 200 lbs., lt. brwn. hair, glassy blue eyes  
37 yrs. old, no distinguishing marks.

Taken and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Mrs. Dorothy Mae Bradshaw Castle  
Complainant

William J. Gault  
Chancellor

THE STATE OF MISSISSIPPI

CHANCERY COURT

LAUDERDALE County.

I, WILLIAM NEVILLE, sole Presiding Chancellor of the 12th Chancery District of the State of Mississippi, (said District including the County of LAUDERDALE) do hereby certify that Sam M. Bailey

whose genuine signature appears to the foregoing Certificate, is now, and was at date of said Certificate the clerk of the Chancery Court of said county, duly elected and qualified according to law, and that all his official acts as such are entitled to full faith and credit; that his said certificate is in due form of law; that the seal thereto attached is the genuine seal of said Chancery Court, and that said Court is a Court of Record.

Given under my hand and seal at Meridian this 16th day of October 1959.

William Neville  
Chancellor.

THE STATE OF MISSISSIPPI

LAUDERDALE County.

I, SAM M. BAILEY, Clerk of the Chancery Court of said County, do hereby certify that WILLIAM NEVILLE whose genuine signature appears to the above certificate, is now and was at the date of said certificate the sole Presiding Chancellor of the Twelfth Chancery District of said State (said district including the said County of Lauderdale) duly appointed and qualified according to law, to all whose official acts as such full faith and credit are and ought to be given.

Given under my hand and seal of said court, at my office in Meridian, Mississippi

this the 16th day of October, 1959.

Sam M. Bailey, Clerk.

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE

COMPLAINANT

vs.

No. 4737

DELBERT LYLE BRADSHAW

DEFENDANT

**CERTIFICATE**

The undersigned, the Chancery Court of Lauderdale County, Mississippi hereby certifies:

1.

That on October 16, 1959 a bill of complaint was verified by the above named complainant and duly filed in this court in a proceeding against the above named defendant commenced under the provisions of the Uniform Reciprocal Enforcement of Support Act (Chapter 211 Laws of 1954) to compel the support of the dependents named in that bill of complaint.

2.

That the above-named defendant is believed to be residing or domiciled in Bay Minette, Alabama and that the court of the State of Alabama may obtain jurisdiction of the defendant or his property.

3.

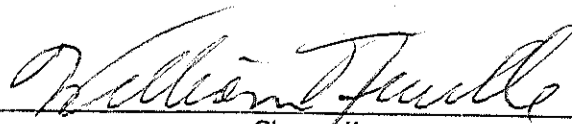
That the undersigned, the Chancery Court of Lauderdale County, Mississippi has examined the complainant under oath and she has reaffirmed the allegations contained in the bill of complaint; and that according to the testimony of the complainant the needs of the dependents named in the bill of complaint for support from the defendant are the sum of \$ 67.50 per ~~week~~ (month).

4.

That in the opinion of the undersigned Chancellor the defendant should be compelled to answer such bill of complaint and be dealt with according to law.

WHEREFORE, it is hereby ORDERED that this certificate together with certified copies of the bill of complaint be transmitted to the court of the State of Alabama

This the 16th day of October, 1959.

  
Chancellor

IN THE CHANCERY COURT OF LAUDERDALE COUNTY, MISS.

Mrs. Dorothy Nell Bradshaw Castle, Complainant

Vs. No. \_\_\_\_\_

Delbert Lyle Bradshaw, Defendant

PAUPER'S AFFIDAVIT

Personally appeared before me, the undersigned authority in and for Lauderdale County, Mississippi, Mrs. Dorothy Nell Bradshaw Castle, who having been by me duly sworn, on oath states that she is the <sup>ex</sup>wife of Delbert Lyle Bradshaw, having been married in Meridian, Mississippi, on 28th day of November, 1948, and she is seeking support from him under the Uniform Reciprocal Enforcement Support Act of Mississippi.

Affiant states that by reason of her poverty, she is not able to pay or otherwise secure costs which may accrue in any court in this proceeding, and she, therefore, prays for relief which she is entitled to under said support act, and to other relief which may be granted by the proper court of competent jurisdiction, without being held accountable for such costs which may accrue.

Mrs. Dorothy Nell Bradshaw Castle

Sworn to and subscribed before me, this the 16th day of October, 1959.

Sam M. Bailey, Chancery Clerk  
Notary Public  
By: Walter B. Davis, D.C.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. 4737

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DELBERT LYLE BRADSHAW

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.....

DELBERT LYLE BRADSHAW....., Defendant.....

by DOROTHY NELL BRADSHAW CASTLE.....

....., Plaintiff.....

Witness my hand this 19 day of October 1959.

*Alice J. Hester*, Clerk

No. 4737 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

DOEOTHY NELL BRADSHAW CASTLE  
Plaintiffs

vs.

DELBERT LYLE BRADSMAN  
Defendants

Summons and Complaint

Filed October 19, 19 59

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Buy Mente

Received In Office

10/20 1959

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

I have executed this summons

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

by leaving a copy with

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

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

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DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

CORINE WILSON, Complainant

vs.

YANCEY DAVID WILSON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer and waiver and Note of Testimony and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said Corine Wilson is forever divorced from the said Yancey David Wilson for and on account of

Cruelty - reasonable apprehension of physical violence.

It is further ORDERED, ADJUDGED and DECREED by the Court that the care, custody and control of the minor children, namely David Lee Wilson and James Arthur Wilson, is awarded to Corine Wilson, the mother, with the right on the part of their father to visit said children at reasonable times and places, and that the father, Yancey David Wilson, pay to their mother the sum of thirty dollars (\$30.00) every two weeks for the support and maintenance of said children until they become twenty-one years of age, or until each married, whichever event shall first occur.

It is futher ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is futher ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is futher ordered that Corine Wilson, the Complainant, pay the cost herein to be taxed, for which executed may issue.

This 24 day of November 1959.

Hubert M. Stone Judge Circuit Court, In Equity.

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree, rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the day of November 1959.

Register of Circuit Court, In Equity.