

In The Chancery Court of LAUDERDALE County, Mississippi

MRS. DOROTHY NELL BRADSHAW CASTLE	COMPLAINANT
vs.	No. 4739
DELEGG LYLE READSHAW	DEFENDANT
BILL OF COMPLAINT	
	gramma and the second s
The complaint of Mrs. Torothy Well Fredshaw Castle espectfully shows:	
. That she is the wife of Delbert Lyle Bredshew	
he defendant; that complainant was duly married to said Defendant on or a	bout Warrange and the
	* · · · · · · · · · · · · · · · · · · ·
ot Meridian. Wississippi , and now resides at 221 Carter	
That complainant is the mother and said defendant is the father of the	tollowing named dependents:
Susan Gail Bredshaw, nine years of age	
3. That complainant and said children are entitled to support from the defe he Uniform Reciprocal Enforcement of Support Act of this state (Chapter 211 s attached and made a part hereof.	ndant under the provisions of , Laws of 1954) copy of which
That defendant, on or about 1959, 1959, and subsequected to provide fair and reasonable support for complainant and the other	ent thereof, refused and neg- dependents according to his
neans and earning capacity	
That defendant (1998) (is) present in the State of Alebana	
eriod for which support is sought.	during the
That upon information and belief, defendant now is residing or domiciled	ot Bay Minette, Alaba m
That upon information and belief, defendant now is residing or domiciled searning \$20066600000000000000000000000000000000	at les Minobbe, Alabe n
That upon information and belief, defendant now is residing or domiciled searning \$Undeterminedper (week) (month), and is within the, which state has enacted a lange, which state has enacted a lange,	at les Minobbe, Alabe n
That upon information and belief, defendant now is residing or domiciled searning \$2006ctermined per (week) (month), and is within the the State of Alabama, which state has enacted a lauriform Reciprocal Enforcement of Support Act of this state. WHEREFORE, the complainant prays for such an order for support directions.	atBer Minotte, Alabam e jurisdiction of the court of aw substantially similar to the ted to said defendant, as shall
That upon information and belief, defendant now is residing or domiciled searning \$UDGetermined per (week) (month), and is within the the State of Alahama , which state has enacted a lauriform Reciprocal Enforcement of Support Act of this state. WHEREFORE, the complainant prays for such an order for support directed deemed to be fair and reasonable, and for such other and further relief as	at price of the court of aw substantially similar to the ted to said defendant, as shall the law provides.
That upon information and belief, defendant now is residing or domiciled a earning Sundetermined per (week) (month), and is within the the State of Alshams , which state has enacted a law Juiform Reciprocal Enforcement of Support Act of this state. WHEREFORE, the complainant prays for such an order for support direct edeemed to be fair and reasonable, and for such other and further relief as Australy O	at provides.
That upon information and belief, defendant now is residing or domiciled searning standetermined per (week) (month), and is within the the State of Alahama , which state has enacted a lad uniform Reciprocal Enforcement of Support Act of this state. WHEREFORE, the complainant prays for such an order for support directed deemed to be fair and reasonable, and for such other and further relief as TATE OF MISSISSIPPI	atBer Minotte, Alabam e jurisdiction of the court of aw substantially similar to the ted to said defendant, as shall
That upon information and belief, defendant now is residing or domiciled a earning \$222determined per (week) (month), and is within the the State of Alahama , which state has enacted a lad Inform Reciprocal Enforcement of Support Act of this state. WHEREFORE, the complainant prays for such an order for support directed deemed to be fair and reasonable, and for such other and further relief as TATE OF MISSISSIPPI LANDERDALE County Personally appeared before method Donothy Net 3 Bradaham (mown and made oath that she has read the above bill of complaint and knows	e jurisdiction of the court of aw substantially similar to the ted to said defendant, as shall the law provides. The Bradshad (a) the contents thereof, and the
per (week) (month), and is within the the State of Alahame , which state has enacted a lad Uniform Reciprocal Enforcement of Support Act of this state. WHEREFORE, the complainant prays for such an order for support direct deemed to be fair and reasonable, and for such other and further relief as TATE OF MISSISSIPPI LADDERDALE County	e jurisdiction of the court of aw substantially similar to the ted to said defendant, as shall the law provides. The Bradshad (a) the contents thereof, and the

TESTIMONY OF COMPLAINANT

STATE	OF_WISSISSIPPI	COURT OF COU
COUNT	Y OF TATOLETALE	Docket No. 4737
		gradisms in planta plantare de la contradicación de
10000	DOPOTHY NELL HEALSHAW	TOTALE INT. BRANSHAR
	14. M. Mar. Charles	vs.
	Complainant	onter on the control of the control
	inena la sivila di cita di la la la calenda la compania di conserva di conserv	describinativis og gjeropoj koj koja pod Josephan in eraklijanje je prije. En 197
<u> 10</u>	ra. Torothy Well Bradsha	, the complainant herein, being duly sworn on
ner oati	n testifies as follows:	and the control of t The control of the control of
47.1	What is your full name?	
,	What is your present address?	
	221 Carter Place, Merid	ion, Wieslesippi
wife of sume th	the defendant, the following should one status of husband and wife? How wangth of time did you and defendant li	to the defendant? (If complainant claims to be the common-law also be answered.) When did you and defendant decide to asvas the assumption of this status made public? Where and for ve together as husband and wife? **Mordale County. Meridian. Mississippi **Mordale County.**
Q.	What were the circumstances leadin	g to the separation from your husband?
Q. A.	Were any children born of this ma	rriage?
_й Q ₅	Are you now pregnant?	
Q.	What are the names and ages of th Susan Gall Bradshaw, n	
Q.	Are they living with you?	
Q.	When was it your husband last live	ed with you?
À.,	November, 1954	•
Q. A	When and how much was his last of April, 1959 % 2.50	contribution for support?
Q.	Is there a complaint or an order for	support in any court?
Q.	Are you employed? What are your early to a sport of the second of the se	ornings? 220.00 monthly
Q.	Have you any other source of incom	ne? If so, what is the source and what is the amount thereof?
Q.	Are you and the children in good h	ealth?
Q.	Have you any debts outstanding?	
Q.	What do you require for the support	of yourself and children?

Q. Do you know the present whereabouts of your husband? If so, please give his address. Ray Winette, 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. social security number is not known Salf amployai, Q. What is his salary, if you know? moleterel ned Q. Are you receiving public aid; and how much? 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. Mrs. Darathy Dece & Complainant ted intermedia and the benefit of a contract of the benefit of a contract of the benefit of the Chancellor/

THE STATE OF MISSISSIPPI LAUDERDALE County.

CHANCERY COURT

I, WILLIAM NEVILLE	, sole Presiding Chancellor o
the 125h Chancery Distr	rict of the State of Mississippi, (said District including
in, it invaded total tour to the start	
the County of LAUDERDALE) do hereby certify that Name N. Bailey
Certificate, is now and was at date of said Co	whose genuine signature appears to the foregoing ertificate the clerk of the Chancery Court of said county,
duly elected and qualified according to law, and	I that all his official acts as such are entitled to full
faith and credit; that his said certificate is in d	ue form of law; that the seal thereto attached is the
genuine seal of said Chancery Court, and that said	d Court is a Court of Record.
Meridia Given under my hand and seal at Inter-	To Control of the Con
	this 10 th day of October 19 59
	Willia Truell
	Chancellor.
HE STATE OF MISSISSIPPI	
TA WITCHISTON, A T TO	
LAUDERDALE County.	
I, <u>SAM M. BATIEY</u>	, Clerk of the Chancery Court of said
ounty, do hereby certify that WILLIAM NEW	
was governe signature appears to the above cer	rtificate, is now and was at the date of said certificate
ne sole Presiding Chancellor of the Twelft	b
	Chancery District of
aid State (said district including the said County	of
opointed and qualified according to law, to all v	whose official acts as such full faith and credit are and
ught to be given.	
Given under much and and a land of	Series - Company of the Company of t
Given under my hand and seal of said	court, at my office in Meridian, Wississippi
this the 16th day of 9	Stober 10 CO
duy 01	, 19
	Sandy B. Sand
	Clerk.

In The Chancery Court of LAUDERDALE	_County, Mississippi
MRS. DOBOTHY NELL BRADSHAW CASTLE	, COMPLAINANT
vs.	No. 4737
THE WALL WE WANT PROJECT WITH WE WANTED WITH WITH A WAY WAS WANTED AS WAY.	BEEEN ID ANIT
DELEGRY LYLE BRADSHAW	, DEFENDANT
CERTIFICATE	
The undersigned, the Chancery Court of <u>Lauderdale</u> C	ounty, Mississippi hereby certifies:
 Description of the second of th	
That on <u>October 16, 1959</u> a bill of complaint was	varified by the chove named com-
plainant and duly filed in this court in a proceeding against the above na	
the provisions of the Uniform Reciprocal Enforcement of Support Act (Cha	
the support of the dependents named in that bill of complaint.	apter 211 Edws of 1934) to comper
the support of the dependents hamed in that bill of complaint.	
2.	
en e	
That the above-named defendant is believed to be residing or domici	led 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 exam-
ined the complainant under oath and she has reaffirmed the allegations of	contained in the bill of complaint;
and that according to the testimony of the complainant the needs of the de	ependents named in the bill of com-
plaint for support from the defendant are the sum of \$ 67.50 p	er (Weel o (month).
4.	
That in the opinion of the undersigned Chancellor the defendant sh	ould 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 Alaba	ws.

This the 16th day of October

William Thurston Chancellor IN THE CHANCERY COURT OF LAUDERDALE COUNTY, MISS.

Mrs. Dorothy Well Bradshaw Castle	, Complainant
Vs. No	
Delbert Lyle Bredshew	, Defendant
PAUPER'S AFFIDATE Personally appeared before	VIT re me, the undersigned author-
ity in and for Lauderdale County, I	Mississippi, Mrs. Dorothy Well
Bradshaw Cestle , who ha	ving been by me duly sworn,
on oath states that she is the wife	
having been married in Meridian	•
on 28th day of November	
ing support from him under the Uni	iona kecipiocai milorcement
Support Act of Mississippi. Affiant states that by	reason of her poverty, she is
not able to pay or otherwise secure	e costs which may acorue in
any court in this proceeding, and	she, therefore, prays for re-
lief which she is entitled to under	r said support act, and to
other relief which may be granted	by the proper court of compe-
tent jurisdiction, without being he	eld accountable for such costs
which may accrue.	
	before me, this the 16th day
of <u>October</u> , 19 <u>59</u> .	
	San in Baley Change

DOROTHY NELL BRADSHAW CASTLE COMPLAINANT

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA

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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

The State of Alabama, Baldwin County.	Circuit Court, Baldwin County No. 4737
)TERM, 19
TO ANY SHERIFF OF THE STA	TE OF ALABAMA:
You Are Hereby Commanded to Sur	nmon <u>DELBERT LYLE BRADSHAW</u>
to appear and plead, answer or demu-	r, 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 BRAI	DSHAW Defendant
by DOROTHY NELL BRADSE	law castle
	·, Plaintiff
Witness my hand this	day of October 1959

No1737 Page.				Defend	ant live	s at	
The State of Alab Baldwin County	oama		· · · · · · · · · · · · · · · · · · ·			-	
CIRCUIT COU	RT			Receive	d In C	Office	
,	A CONTRACTOR OF THE PROPERTY O					:	_ 19
:	······································						_, Sheriff
DOROTHY NELL BRADSHAW CAS	STLE Plaintiffs			ave execut			
vs.			this				19
DELBERT LYLE BRADSHAW			by leavin	g а сору v	vith		
	Defendants	• .					
Summons and Con	nplaint						
			***************************************		-		
FiledOctober 19,	19_59	ļ			:	:	
Alice J. Duck	Clerk	e de la composition della comp			:		
			-				
			***************************************	•			
Plaintiff	's Attorney						Sheriff
Defendan	t's Attorney	•				Dep	uty Sherif

MRS. DOROTHY NELL BRADSHAW CAST	rr.w	COMPLAINANT
		, COMPLEMIATION
/s.		No
DELBERT LYLE BRADSHAW		_, DEFENDANT
BILL OF	COMPLAINT	•
The complaint of Mrs. Dorothy Well	Bradehar Cast	
espectfully shows:	THE STATE STATE OF THE STATE OF	
. That she is the wife of <u>Delbert Lyle B</u>	gradshaw	
ne defendant; that complainant was duly married t	to said Defendant on o	r about November 28 1918
t Meridian, Mississippi , and now r	racidos et 227 Cem	tom Dinos Mandadas 300
. That complainant is the mother and said defen	dant is the father of t	the following named dependents:
Susan Gail Bradshaw, nine year	's of age	
ected to provide fair and reasonable support for conneans and earning capacity		ner dependents according to his
2 marie 2	of Alabama	during the
eriod for which support is sought.		· · · · · · · · · · · · · · · · · · ·
eriod for which support is sought. That upon information and belief, defendant nov	w is residing or domicil	ed at Bay Minette, Alaban
eriod for which support is sought. That upon information and belief, defendant nov earning \$ wodetermined per (week) (ma	w is residing or domicil	led at Bay Minette, Alaba the jurisdiction of the court of
eriod for which support is sought. That upon information and belief, defendant novel earning \$ wadetermined per (week) (mother the State of Alabama, which	w is residing or domicil onth), and is within ich state has enacted o	led at Bay Minette, Alaba the jurisdiction of the court of
eriod for which support is sought. That upon information and belief, defendant novel searning \$ week) (meaning \$ week)	w is residing or domicil onth), and is within ich state has enacted of this state.	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall
That upon information and belief, defendant now earning \$ wode termined per (week) (mother State of Alabama , which will be a support of Support Act of WHEREFORE, the complainant prays for such a deemed to be fair and reasonable, and for such other such of the such of t	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support dinter and further relief	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides.
That upon information and belief, defendant now earning \$ wode termined per (week) (mother State of Alabama , which will be a support of Support Act of WHEREFORE, the complainant prays for such a deemed to be fair and reasonable, and for such other such of the such of t	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support dinter and further relief	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall
That upon information and belief, defendant now earning \$ wode termined per (week) (me the State of Alabama , which inform Reciprocal Enforcement of Support Act of WHEREFORE, the complainant prays for such as deemed to be fair and reasonable, and for such other	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support dinter and further relief	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides.
That upon information and belief, defendant now earning \$ undetermined per (week) (method State of Alahama , whiniform Reciprocal Enforcement of Support Act of WHEREFORE, the complainant prays for such as deemed to be fair and reasonable, and for such other washings and the such of	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support dinter and further relief	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides.
That upon information and belief, defendant now earning \$ wodetermined per (week) (method State of A7ahama , which while the State of A7ahama , while the State o	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support dinter and further relief	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides.
That upon information and belief, defendant now earning \$ wode termined per (week) (methe State of Alabama , which will be state of Alabama , which inform Reciprocal Enforcement of Support Act of WHEREFORE, the complainant prays for such a deemed to be fair and reasonable, and for such other termined to be for and reasonable and for such other termined to be for and reasonable and for such other termined to be for the work of the county of the property of th	w is residing or domicile onth), and is within onth), and is within ich state has enacted of this state. an order for support dinher and further relief This - Well Bredsh I of complaint and known	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides. Bull Bull (2)
That upon information and belief, defendant now searning \$ rodetermined per (week) (mether State of Alabama , which while the State of Alabama , which will be supported to be fair and reasonable, and for such of the deemed to be fair and reasonable, and for such other than the support of the such of the support of the such of the support of the such of the support	w is residing or domicile onth), and is within onth), and is within other state has enacted of this state. an order for support differ and further relief This Almathy Nell Bredsh I of complaint and known of the stated on informations.	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides. Bull Bullau (2) aw Castle to me personally ows the contents thereof, and the ation and belief, and as to these
That upon information and belief, defendant now searning \$ watermined per (week) (method State of Alabama , which will be state of A	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support disher and further relief Mell Bradsh of complaint and known stated on information and of Octob	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides. Bull Bull (2) aw Castle to me personally ows the contents thereof, and the ation and belief, and as to these
That upon information and belief, defendant now searning \$ watermined per (week) (method State of Alabama , which will be state of Alabama , which inform Reciprocal Enforcement of Support Act of WHEREFORE, the complainant prays for such a deemed to be fair and reasonable, and for such other than the search of	w is residing or domicile onth), and is within ich state has enacted at this state. an order for support disher and further relief Mell Bradsh of complaint and known stated on information and of Octob	the jurisdiction of the court of a law substantially similar to the rected to said defendant, as shall as the law provides. Bull Bullau (2) aw Castle to me personally as the contents thereof, and the ation and belief, and as to these

TESTIMONY OF COMPLAINANT

STATE OF MISSISSIPPI	COURT OF CHANCERY
COUNTY OF LAUDERDALE	Docket No. 1/739
	estanten (dipensen influente branco), en espois ou objetio este de la colo esta dipensión dipensen
MRS. DOROTHY NELL BRADSHAW	- DEIBERT LYLE BRADSHAW
	vs.
CASTLE	
Complainant	Proposition and the Defendant to the Proposition of
Mrs. Dorothy Well Bradshaw C	astle , the complainant herein, being duly sworn o
her oath testifies as follows:	
Q. What is your full name?	- North Carlos (1985) (1985) (1985) (1985) - North Market (1986) (1985) (1986) (1986) (1986) (1986) (1986) (1986) (1986) (1986) (1986) (1986) (1986) (19
A Mrs. Derothy Nell Valenti	ine vastie a didicio de la companya
Q. What is your present address? A 221 Carter Place. Meridian	
Commence of the second	
wife of the defendant, the following should also I	ne defendant? (If complainant claims to be the common-labe answered.) When did you and defendant decide to a the assumption of this status made public? Where and foogether as husband and wife?
A November 28, 1948, Laude	erdale County, Meridian, Mississippi
Q. What were the circumstances leading to	the separation from your husband?
Q. Were any children born of this marriage	ge?
A yes	
Q. Are you now pregnant?	
A No	
Q. What are the names and ages of the ch	hildren now living?
A Susan Gail Bradshaw, nine	years of age
Q. Are they living with you?	
AYes	
Q. When was it your husband last lived w	vith you?
A November, 195/2	
Q. When and how much was his last contr	ribution for support?
AApril, 1959 \$67.50	
Q. Is there a complaint or an order for supp	port in any court?
A. Yes	
Q. Are you employed? What are your earning	ngs?
A Yes approximately \$220	.00 monthly
Q. Have you any other source of income? I	f so, what is the source and what is the amount thereof?
Q. Are you and the children in good health	n?
Q. Have you any debts outstanding?	
Q. What do you require for the support of your services of the support of your services of the support of your services.	Juisen and Children:

THE STATE O	F MISSISSIPPI
TAIDERDALE	

CHANCERY COURT

WILLIAM NEVILLE			, sole Pr	esiding Chancellor of
	D :=====	of the State of	Micciccinni (co	id District including
he <u>12th</u> Ch	ancery District	of the State of	Mississippi, (sc	ad District including
	erija di aliberi	San		77 7 -2 7
he County of LAUDERDALE) do hereby certi	fy that Sam	M. Bailey
			•	
		_whose genuine s	signature appe	ars to the foregoing
Certificate, is now, and was at date	of said Certi	ficate the clerk of	the Chancery	Court of said county,
duly elected and qualified according	to law, and th	hat all his officio	al acts as such	are entitled to full
aith and credit; that his said certif	icate is in due	form of law; the	at the seal the	ereto attached is the
genuine seal of said Chancery Court,	and that said (Court is a Court o	f Record.	Company of the second
and the second second second second	Meridian		· · · · · · · · · · · · · · · · · · ·	
Given under my hand and seal a		this_ 161	thday of Octo	<u> 1959.</u>
			100 mayor	The second secon
The second of the second		Millian	Me	ill.
	e e e e e e e e e e e e e e e e e e e			Chancellor.
			(State	
The second se				Marine Committee
THE STATE OF MISSISSIPPI				
LAUDERDALE County.	,			
1	ž.			
I, SAM M. BATLEY		<u> </u>	Clerk of the C	Chancery Court of said
County, do hereby certify that WI	T.I.TAM NEV	TIJ.B		
whose genuine signature appears to			nd was at the c	late of said certificate
the sole Presiding Chancellor of the	Twelfth	3		Chancery District of
said State (said district including th	id Causti	Lauderda	le) duly
appointed and qualified according	to law to all a	whose official acts	as such full fo	•
ought to be given.	10 1dw, 10 dii 1	W1103C 0111C.G. GC.		
ought to be given.				
<u> </u>	1 1 4 1		:- Moralda	an Wiggingin
Given under my hand o	ind seal of saic	i court, at my offi	CE III INTELLIE	
	And the state of t	- Programme of the state of the		
this the <u>16th</u>	day of(etober	, 19_	_59.
	- 100 mg/m		1	
	tage*	Mun	Wai	Clerk
				V -,

	County, Mississippi
MRS. DOROTHY WELL BRADSHAW CASTLE	, COMPLAINANT
vs.	No. 4737
DELBERT LYLE BRADSHAW	DEECNIDANIT
	, DEFENDANT
CERTIFICATE	er de la companya de
The undersigned, the Chancery Court of Lauderdale	
Court of The Court	County, Mississippi hereby certifies:
The first of the first beautiful and the second of the second	
That on October 16, 1959 a bill of complaint	was verified by the above named com-
plainant and auly filed in this court in a proceeding against the above	e 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.	
	• •
That the above-named defendant is believed to be residing or do	miciled in <u>Bay Minette, Alab</u> s
and that the court of the State of Alabama	.
defendant or his property.	may obtain jurisdiction of the
3.	
That the undersigned, the Chancery Court of Landerdale	County Mississippi has a
ned the complainant under oath and she has reaffirmed the allegation	ns contained in the hill of complaints
and that according to the testimony of the complainant the needs of the	e dependents named in the bill of com-
plaint for support from the defendant are the sum of \$ 67.50	_per (xeeks) (month).
4.	
4.	
That in the opinion of the undersigned Chancellor the defendant	should be some that a
ill of complaint and be dealt with according to law.	should be compelled to answer such
WHEREFORE, it is hereby ORDERED that this certificate togethe	an autah au are
, and this continue togethe	er with certified copies of the bill of
omplaint be transmitted to the court of the State of Alak	deme
This the 16th day of October	, 19 <u>_59</u>
This the 16th day of October	, 19 <u>_59</u> _
This the 16th day of October	
This the 16th day of October	

IN THE CHANCERY COURT OF LAUDERDALE COUNTY, MISS.

Mrs. Dorothy Well Brads	<u>baw Castle</u> , Complainant
Vs. No	•
Delbert Lyle Bradshaw	, Defendant
PAUPI	R'S AFFIDAVIT
Personally app	peared before me, the undersigned author-
ity in and for Lauderdal	e County, Mississippi, Wrs. Dorothy Well
Bredshew Castle	, who having been by me duly sworn,
And the state of t	is the wife of Delbert Lyle Bredshaw ,
having been married in 1	Meridian , Mississippi ,
17%	$\frac{1948}{4}$, and she is seek-
ing support from him und	er the Uniform Reciprocal Enforcement
Support Act of Mississip	ppi.
Affiant state	es that by reason of her poverty, she is
not able to pay or other	wise secure costs which may accrue in
any court in this procee	ding, and she, therefore, prays for re-
lief which she is entitl	ed to under said support act, and to
other relief which may b	e granted by the proper court of compe-
tent jurisdiction, without	out being held accountable for such costs
which may accrue.	
	Mis Doestly Dele Brodelian Carl
	in the least of th
	subscribed before me, this theday
of <u>October</u> ,	19 <u>59.</u>
,	Notary Public &
	Some D. C.

In The Chancery Court of LAUDERDALE County, Mississippi

DEFENDANT BILL OF COMPLAINT The complaint of Mrs. Darathy Well Englished Castle respectfully shows: 1. That she is the wife of Delbert Lyle Bradshed the defendant; that complainant was duly married to said Defendant on or about. Naverner 28, 1948 at Meridien. Mississippi and now resides at 221 Janter Place, Meridien, Mis 2. That complainant is the mother and said defendant is the fother of the following named dependents: Susan Gail Bradshed, nane 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 (wook (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 Kinatta, Alabama per (week) (month), and is within the jurisdiction of the court of this State of Alabama per (week) (month), and is within the jurisdiction of the court of this State as Alabama per (week) (month), and is within the jurisdiction of the court of this 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. STATE OF MISSISSIPS!	MRS. DOROTHY NELL BRADSHAW CASTLE	COMPLAINANT
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STATE OF MISSISSIPPI	Mr. Dauethy	Delle Bridshaw Cast
91/11 Or 14(100)000 C1	STATE OF MISSISSIPPI	
LAUDERDALE County	LAUDERDALE County	
Personally appeared before me <u>Mrs. Dorothy Nell Bradshaw Castle</u> 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	known and made oath that she has read the above bill of complaint and know	s the contents thereof, and the
matters she believes them to be true. This the 16th day of October , 19 59.	matters she believes them to be true. This the 16th day of 0ctobe	r, 19_59.
250 Sans M. Bailey Chancey Clerk.	Sam M. Bail	y Chancy Clack

TESTIMONY OF COMPLAINANT

STATE OF	F MISSISSIPPI	COURT OF CHANCERY
COUNTY	OF_LAUDERDALE	Docket No. 4737
All Comments		galinentus oleh middi bir verkirus (h. 1905). 1907 - Bratis Bratis oleh Bratis Bratis (h. 1907).
	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	DELBERT LYLE BRADSHAW
MRS. D	OROTHY NELL BRADSHAW	
~	C OT The	VS.
<u>UB</u>	STLE Complainant	Defendant
	•	
in the second		real regression in the contract of the contrac
		w Castle , the complainant herein, being duly sworn on
ner oath t	estifies as follows:	
Q. W	Vhat is your full name?	
Ā. <u></u>	Mrs. Dorothy Nell Vale	ntine Castle
Q. W	Vhat is your present address?	
A2	221 Carter Place. Merid	ian. Mississippi
wife of the	e defendant, the following should a status of husband and wife? How w th of time did you and defendant liv	to the defendant? (If complainant claims to be the common-law also be answered.) When did you and defendant decide to asvas the assumption of this status made public? Where and for ve together as husband and wife? uderdale County, Meridian, Mississippi
A	Vhat were the circumstances leading Divorce Vere any children born of this mar	g to the separation from your husband? rriage?
A	yes	
Q. A	re you now pregnant?	
Α	No	
Q. V	Vhat are the names and ages of th	ne children now living?
A	Susan Gail Bradshaw, n	ine years of age
Q. A	re they living with you?	
A	Yes	
Q. V	Vhen was it your husband last live	ed with you?
A	November, 1954	
_	Vhen and how much was his last o	contribution for support?
A	April, 1959 \$67.50	
Q. Is	there a complaint or an order for	support in any court?
A	Yes	
Q. A	are you employed? What are your ed	arnings?
Α	Yes approximately \$3	220.00 monthly
Q. H	lave you any other source of incom	ne? If so, what is the source and what is the amount thereof?
A	No	
Q. A	are you and the children in good he	ealth?
Α	Yes	
Q. H A	lave you any debts outstanding? No	
Q. V	What do you require for the support	•
A	\$67.50 per month	

	ing a state of the	g 200- 1			
	know if and where your husband is no and give husband's social security nu		it so, state: N	ame and ad	aress ot em
<u>Self</u>	employed, social secur	<u>ity number</u>	· is not k	nown	
Q. What is	his salary, if you know?				. •
und	etermined				
. Are you	receiving public aid; and how much?	>	100		
No No					
etc.), de	accurate physical description of the c escribe other names and aliases by what of the defendant.				
4. 6 ft.	, weighs approx. 200 lbs	., lt. brw	m. hair,	glassy b	lue eyes
37 yr Token and	s. old, no distinguishin sworn to before me thisday	g marks.			, 19
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THE STATE OF MISSISSIPPI

TAUDERDALE County.

CHANCERY COURT

I, <u>WILLIAM NEVILLE</u>	, sole Presiding Chancellor of
the <u>12th</u> Chancery District	of the State of Mississippi, (said District including
the County of <u>LAUDERDALE</u>) do hereby certify that <u>Sam M. Bailey</u>
Certificate, is now, and was at date of said Certi duly elected and qualified according to law, and the	
	Tillia Juille Chancellor.
THE STATE OF MISSISSIPPI	
I, <u>SAW W. RAILEV</u>	, Clerk of the Chancery Court of said
County, do hereby certify that <u>WTT.T.AM NEVT</u> whose genuine signature appears to the above cert	tificate, 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 appointed and qualified according to law, to all vought to be given.	of <u>Lauderdale</u>) duly whose official acts as such full faith and credit are and
	court, at my office in Meridian, Mississippi October , 19 59.
	Sambu Bailey, Clerk.

In The Chancery Court of LAU	DERDALE County, Mississippi
MRS. DOROTHY NELL BRADSHAW CA	ASTIE , COMPLAINANT
vs.	No. 4737
•	No
DELBERT LYLE BRADSHAW	
CER	RTIFICATE
The undersigned, the Chancery Court of	Lauderdale County, Mississippi hereby certifies:
	1.
plainant and duly filed in this court in a proceeding	bill of complaint was verified by the above named com- gragainst the above named defendant commenced under ent of Support Act (Chapter 211 Laws of 1954) to compel of complaint.
•	2.
That the above-named defendant is believed t	to be residing or domiciled in <u>Bay Minette, Alab</u> am
and that the court of the State of Alaba defendant or his property.	mamay obtain jurisdiction of the
	3.
ined the complainant under oath and she has reaffi	Lauderdale County, Mississippi has examirmed the allegations contained in the bill of complaint; nant the needs of the dependents named in the bill of com-
plaint for support from the defendant are the sum o	of \$ 67.50 per (xxxxx (month).
	4.
That in the opinion of the undersigned Chance bill of complaint and be dealt with according to la	ellor the defendant should be compelled to answer such
WHEREFORE, it is hereby ORDERED that this	s 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	
	William Junto
253	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 author-
ity 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 <u>Delbert Lyle Bradshaw</u> , having been married in <u>Meridian</u> , <u>Mississippi</u> ,
on 28th day of November , 1948, and she is seek-
ing 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 re-
lief which she is entitled to under said support act, and to
other relief which may be granted by the proper court of compe-
tent jurisdiction, without being held accountable for such costs
which may accrue.
Mrs Donathy Bell Bridelian Ca
Sworn to and subscribed before me, this the 16thday
of <u>october</u> , 1959. <u>lam on Bailly, Mancey club</u> Notary Public Rg: Fala b. Danie J.C.

The State of Alabama,	Circuit Court, Baldwin County
The State of Alabama, Baldwin County. No. 14737.	Circuit Court, Baldwin County TERM, 19
TO ANY SHERIFF OF THE STATE OF ALABA	MA:
You Are Hereby Commanded to SummonDELBE	
to appear and plead, answer or demur, within thirty de	ys from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabam	a, at Bay Minette, against
DELBERT LYLE BRADSHAW	, Defendant
by DOROTHY NELL BRADSHAW CASTLE	
Witness my hand thisday of	October 19-59 When I Market Clerk

No. 14737 Page	Defendant lives at
The State of Alabama Baldwin County	Dry Minte
CIRCUIT COURT	Received In Office
DOROTHY NELL BRADSHAW CASTLE Plaintiffs	I have executed this summons
DELBERT LYLE BRADSHAW	by leaving a copy with
Defendants	
Summons and Complaint	
Filed October 19, 19 59	
Alice J. Duck Clerk	
Plaintiff's Attorney	Sherif
Defendant's Attorney	Deputy Sheril

1. (N. 194

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

CORLIN	a MITP201	N 		, (Complainant	
		vs.				
YANCE	Y DAVID	WILSON	₹		Dogwoodont	
and a second control of the second control o		***	A State of the sta	4, 4, 4	Kespondent	
This cause coming on to be heard	d was subm	itted upor	Bill of Cor	mplaint.	Decree Pro Confesso	on
Answer and walver and No	te of /	_and Test	imony as not	ed by the	e Register, and upon c	on-
sideration thereof, the Court is of the o	pinion that	the Comp	lainant is en	titled to	the relief prayed for	in
said bill.	***					
It is therefore ordered, adjudged	and decree	ed by the (Court that th	e bonds	of matrimony heretof	ore
existing between the Complainant and	Defendant	be, and th	le same are b	ereby dis	ssolved, and that the s	aid
Corine Wilson				is	forever divorced from	the
said Yancey David Wilson					for and on accoun	t of
Cruelty - reasonable a	pprehen	sion o	f physic	al vic	lence.	
It is further ORD that the care, custody	ERED, A	DJUDGEI	Dand DE	CREED	by the Court	V.
David Lee Wilson and Ja	ames Ar	thur W	ilson, i	s awar	ded to Corine	
- Wilson, the mother, wi	th the	right	on the p	art of	their father	
to visit said children the father, Yancey Dav	at rea id Wils	on, pa	y to the	ir mo	ther the sum of	-
thirty dollars (\$30.00) every	two w	<u>eeks for</u>	the:	support and	
maintenance of said ch of age, or until each	ildren married	until which	they bec	ome tw	venty-one year:	5 172
<u> </u>		7				
-	C. 2					
It is futher ordered, adjudged ar						
to each other until sixty days after the						xty
days, neither party shall again marry e	except to ea	ch other d	uring the pe	ndency o	t said appeal.	
It is futher ordered that the Con	plainant a	nd Respon	ident be, ar	id they	are hereby permitted	to
again contract marriage upon payment			it.			
It is futher ordered thatCor	ine Wil	son,				
the Complainant,			ein to be tax	ed, for w	which executed may iss	ue.
This 24 day of	Nove	mber	195	<u> </u>		
11113		91	bee X		14000	
and the second s		191		Tandara.	Circuit Court In Four	
				Juage	Circuit Court, In Equ	
Alice J. Du	ck				, Register of the Circ	rnit
1,					hereby certify that	
					decree, rendered by	
			enrolled in the		stated cause, which s	alu
	Wi	tness my l	and and sea	l this the		day
<u>.</u> :	ofNov	ember	, 19	<u> 52.</u>		
·^.			Re	gister of	Circuit Court, In Equ	ity.
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