

1655

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Dorothy Wright and T. J. McCall to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of Hobbard H. Black.

Witness my hand this 9th day of May, 1951.

W. J. H. H. H.
Clerk.

COMPLAINT:

HOBARD H. BLACK,

Plaintiff,

vs.

DOROTHY WRIGHT and
T. J. McCALL,

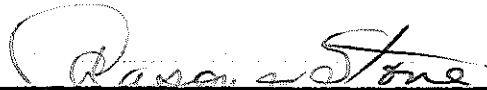
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
LAW SIDE.

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Fifteen Thousand Dollars (\$15,000.00) as damages, for that, whereas, on to-wit, April 16, 1951, at about 7:30 o'clock P. M., at a point on U. S. Highway #90 just East of a restaurant known as the Silver King in Baldwin County, Alabama, Randy Lee Black, who was the son of the Plaintiff and who was at that time eight months of age, was riding as a passenger in an automobile traveling West on U. S. Highway #90 at said time and place, which automobile was being driven by Charles Cooper, where he had a right to be and at said time and place, the Defendant, T. J. McCall, who was driving an automobile owned by the Defendant, Dorothy Wright, negligently drove said automobile into or against the automobile in which the said Randy Lee Black was riding and as a proximate cause of the negligence of the Defendants, the said Randy Lee Black was killed, all to the damage

of the Plaintiff in the sum aforementioned. The Plaintiff avers that at the time of the collision the Defendant, Dorothy Wright, who was the owner of the automobile driven by the Defendant T. J. McCall, knowing that the said T. J. McCall was under the influence of intoxicating liquors and that he was wholly incompetent and unfit to drive said automobile and while she was present in said automobile at said time and place, negligently allowed the said T. J. McCall to drive said automobile on said occasion and while the said T. J. McCall was under the influence of such intoxicating liquors, he did so negligently operate the automobile belonging to the said Dorothy Wright as to cause it to run into or against the automobile in which the said Randy Lee Black was riding and as the proximate cause of such negligence the said Randy Lee Black was killed, all to the damage of the Plaintiff in the sum aforementioned.


Attorneys for the Plaintiff.

165-5 RECORDED

SUMMONS AND COMPLAINT

HOBARD H. BLACK, _____,

Plaintiff,

vs.

DOROTHY WRIGHT and T. J.
McCALL, _____

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

Filed: May 9th, 1951.

Alice J. Quick
Clerk.

LAW OFFICES

~~H. BART~~, CHASON & STONE

BAY MINETTE, ALABAMA

EX PARTE

JANICE GWENDOLYN CAMPBELL

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

To Honorable Telfair J. Washburn, Jr., As Judge of the Circuit
Court of Baldwin County, Alabama:

The petition of ~~Sibyl~~ Sibyl Thomas Campbell, who is over the age of
twenty years and who is a resident citizen of Baldwin County, Alabama,
respectfully shows and represents unto your Honor:

First.

That she is the mother of Janice Gwendolyn Campbell, who is now
restrained in the custody of Mrs. Gladys Campbell, Mrs. Rachel Campbell,
Ethel Campbell, A. C. Campbell Jr., and William J. Campbell, illegally.

Second.

That the child aforesaid is an infant of tender years being:
Janice Gwendolyn Campbell, age fourteen months, and that the proper
party to have the custody and care for this infant would be her mother,
your Petitioner, and that such restraint of said child away from her
mother, your Petitioner, is against the welfare of said child inasmuch
as said child was taken from your Petitioner's custody and control by
force and against the will and wishes of your Petitioner.

Third.

That said child was taken by force, intimidation on to-wit, May
8, 1951.

Fourth.

That said infant is fruits of a marriage between your Petitioner and
William J. Campbell and that the said William J. Campbell is over twenty
years of age. That Ethel Campbell is eighteen years of age and the other
respondents are over the age of twenty-one years. The said infant is at
present in the custody and control of the named Respondents.

Your Petitioner prays that a writ of habeas corpus be issued, directed
to said Mrs. Gladys Campbell, Mrs. Rachel Campbell, Ethel Campbell, A. C.
Campbell Jr., and William J. Campbell, commanding them to bring the body
of said infant before your Honor at the time and place to be by you
appointed, together with the cause of said infant.

Sibyl J. Campbell
Petitioner

STATE OF ALABAMA

BALDWIN COUNTY

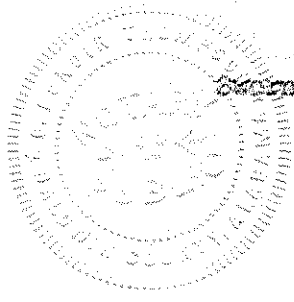
C. LeNair Thompson
Attorney for Petitioner

Before me, C. LeNair Thompson, a Notary Public in and for said County and State personally appeared Sibyl Thames Campbell, the above named petitioner, who being first by me duly sworn doth depose and say that the facts stated in said petition are true.

Sibyl T. Campbell
Petitioner.

Sworn to and subscribed before me this 9 day of May, 1951.

C. LeNair Thompson
Notary Public, Baldwin County, Alabama.



EX PARTE

JANICE GWENDOLYN CAMPBELL

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

To Honorable Telfair J. Mashburn, Jr., As Judge of the Circuit
Court of Baldwin County, Alabama:

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twenty years and who is a resident citizen of Baldwin County, Alabama,
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your Petitioner, and that such restraint of said child away from her
mother, your Petitioner, is against the welfare of said child inasmuch
as said child was taken from your Petitioner's custody and control by
force and against the will and wishes of your Petitioner.

Third.

That said child was taken by force, intimidation on to-wit, May
8, 1951.

Fourth.

That said infant is fruits of a marriage between your Petitioner and
William J. Campbell and that the said William J. Campbell is over twenty
years of age. That Ethel Campbell is eighteen years of age and the other
respondents are over the age of twenty-one years. The said infant is at
present in the custody and control of the named Respondents.

Your Petitioner prays that a writ of habeas corpus be issued, directed
to said Mrs. Gladys Campbell, Mrs. Rachel Campbell, Ethel Campbell, A. C.
Campbell Jr., and William J. Campbell, commanding them to bring the body
of said infant before your Honor at the time and place to be by you
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Sibyl T. Campbell
Petitioner

STATE OF ALABAMA

BALDWIN COUNTY

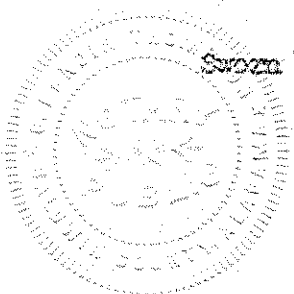
C. LeNoir Thompson
Attorney for Petitioner

Before me, C. LeNoir Thompson, a Notary Public in and for said County and State personally appeared Sibyl Thames Campbell, the above named petitioner, who being first by me duly sworn doth depose and say that the facts stated in said petition are true.

Sibyl L. Campbell
Petitioner.

Sworn to and subscribed before me this 7 day of May, 1951.

C. LeNoir Thompson
Notary Public, Baldwin County, Alabama.



EX PARTE

JANICE GWENDOLYN CAMPBELL

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

To Honorable Telfair J. Macburn, Jr., as Judge of the Circuit
Court of Baldwin County, Alabama:

The petition of ~~Sibyl~~ Thomas Campbell, who is over the age of
twenty years and who is a resident citizen of Baldwin County, Alabama,
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your Petitioner, and that such restraint of said child away from her
mother, your Petitioner, is against the welfare of said child inasmuch
as said child was taken from your Petitioner's custody and control by
force and against the will and wishes of your Petitioner.

Third.

That said child was taken by force, intimidation on to-wit, May
8, 1951.

Fourth.

That said infant is fruits of a marriage between your Petitioner and
William J. Campbell and that the said William J. Campbell is over twenty
years of age. That Ethel Campbell is eighteen years of age and the other
respondents are over the age of twenty-one years. The said infant is at
present in the custody and control of the named Respondents.

Your Petitioner prays that a writ of habeas corpus be issued, directed
to said Mrs. Gladys Campbell, Mrs. Rachel Campbell, Ethel Campbell, A. C.
Campbell Jr., and William J. Campbell, commanding them to bring the body
of said infant before your Honor at the time and place to be by you
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Sibyl J. Campbell
Petitioner

STATE OF ALABAMA

BALDWIN COUNTY

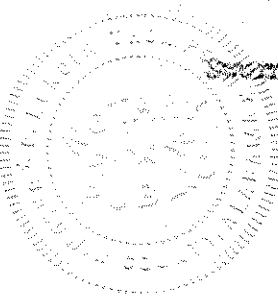
C. L. Thompson
Attorney for Petitioner

Before me, C. Lelair Thompson, a Notary Public in and for said County and State personally appeared Sibyl Thomas Campbell, the above named petitioner, who being first by me duly sworn doth depose and say that the facts stated in said petition are true.

Sibyl T. Campbell
Petitioner.

Sworn to and subscribed before me this 9 day of May, 1951.

C. L. Thompson
Notary Public, Baldwin County, Alabama.



EX PARTE

JANICE GWENDOLYN CAMPBELL

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

To Honorable Telfair J. Nashburn, Jr., as Judge of the Circuit
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8, 1951.

Fourth.

That said infant is fruits of a marriage between your Petitioner and
William J. Campbell and that the said William J. Campbell is over twenty
years of age. That Ethel Campbell is eighteen years of age and the other
respondents are over the age of twenty-one years. The said infant is at
present in the custody and control of the named Respondents.

Your Petitioner prays that a writ of habeas corpus be issued, directed
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Sibyl J. Campbell
PETITIONER

STATE OF ALABAMA

BALDWIN COUNTY

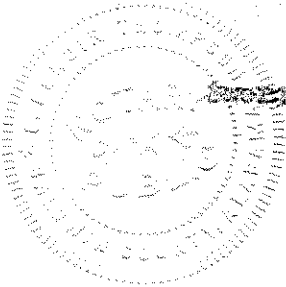
C. L. LeVair Thompson
Attorney for Petitioner

Before me, C. LeVair Thompson, a Notary Public in and for said County and State personally appeared Sylvi Thames Campbell, the above named petitioner, who being first by me duly sworn both depose and say that the facts stated in said petition are true.

Sylvi T. Campbell
Petitioner.

Sworn to and subscribed before me this 9 day of May, 1951.

C. L. LeVair Thompson
Notary Public, Baldwin County, Alabama.



EX PARTE

JANICE GWENDOLYN CAMPBELL

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

To Honorable Telfair J. Mashburn, Jr., As Judge of the Circuit
Court of Baldwin County, Alabama:

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twenty years and who is a resident citizen of Baldwin County, Alabama,
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Sibyl J. Campbell
Petitioner

STATE OF ALABAMA
BALDWIN COUNTY

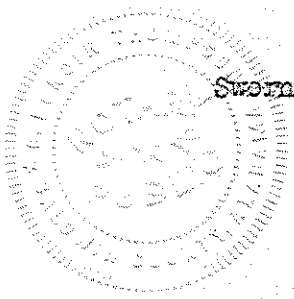
C. L. Thompson
Attorney for Petitioner

Before me, C. LeNoir Thompson, a Notary Public in and for said
County and State personally appeared Sibyl Thames Campbell, the above
named petitioner, who being first by me duly sworn doth depose and say
that the facts stated in said petition are true.

Sibyl T. Campbell
Petitioner.

Sworn to and subscribed before me this 7 day of May, 1951.

C. L. Thompson
Notary Public, Baldwin County, Alabama.



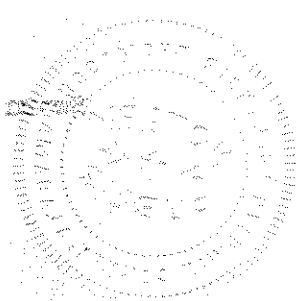
[Handwritten signature]
Attorney for Respondent

STATE OF ALABAMA
JULY 10 1955
JULY 10 1955

Witness me, C. Lewis Thompson, a Notary Public in and for said
County and State personally appeared Ethyl Thomas Campbell, the above
named petitioner, who being first by me duly sworn both before and say
that the facts stated in said petition are true.

[Handwritten signature]
Petitioner

Witness to and subscribed before me this _____ day of May, 1955.



[Handwritten signature]
Notary Public, Alabama