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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:

The petition of Sibyl Thames 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 L. Campbell
Petitioner

STATE OF ALABAMA §
BALDWIN COUNTY §

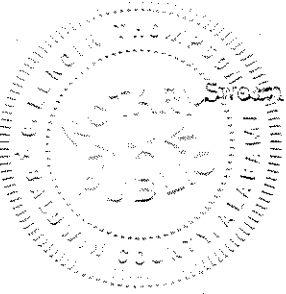
C. LeNoir Thompson
Attorney for Petitioner

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.

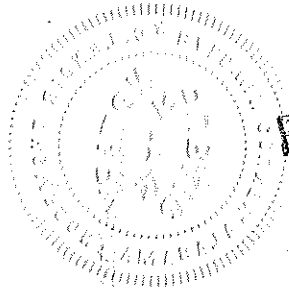
Sibyl T. Campbell
Petitioner.

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

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



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RECORDED

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FILED
MAY 10 1951
ALICE L. BUCK, CLERK

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

TO TAYLOR WILKINS, SHERIFF OF BALDWIN COUNTY:

You are hereby commanded to have the body of JANICE GWENDOLYN CAMPBELL, alleged to be detained by you, by whatsoever name the said JANICE GWENDOLYN CAMPBELL, is called or charged, with the cause of such detention, before me TELFAIR J. MASHBURN JR., Judge of the Circuit Court of Baldwin County, Alabama, on the 10th day of May, 1951, at the Court House at Bay Minette, Alabama, at 10:00, A. M., to do and receive what shall then and there be considered concerning the said JANICE GWENDOLYN CAMPBELL.

Dated this the 10th day of May, 1951.

Telfair J. Mashburn, Jr.
CIRCUIT JUDGE.

Received Sheriff's Office
this *12* *May* 1951
TAYLOR V. *Williams*, Sheriff

165-6

RECORDED

Ex parte
Janice Gwendolyn Campbell

Habeas Corpus

FILED

MAY 10 1951

ALICE J. DUCK, Clerk