

1824

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

TO THE SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to have the body of Mary Ellen Bartlett, alleged to be detained by you, by whatever name the said Mary Ellen Bartlett, is called or charged, with the cause of such detention, before me, William J. Marshall, Jr., Judge of the Circuit Court of Baldwin County, Alabama, INSTANTLY, at the Court House at Bay Minette, Alabama, to do and receive what shall then and there be considered concerning the said Mary Ellen Bartlett.

Dated this the 2nd day of July, 1952.

William J. Marshall, Jr.
CIRCUIT JUDGE.

[Faint handwritten notes and signatures in the bottom left corner]

1824

Ex parte

Mary Ellen Bartlett

FILED
JUL 2 1952
ALICE L. DUCK, Clerk

EX PARTE: MARY ELLEN BARTLETT

BEFORE THE CIRCUIT JUDGE,

THOMAS J. BASHBURN,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

TO THE HONORABLE THOMAS J. BASHBURN, as Judge of the Circuit Court of Baldwin County, Alabama, the petition of Ernest R. Bartlett, who is over the age of 21 years, and who is a resident citizen of Conecuh County, Alabama, respectfully shows and represents unto your Honor:

F I R S T

That he is the father of Mary Ellen Bartlett, who is now restrained in the custody of Mrs. Vivian Lucille Bartlett, Clara Mae Strouhn, and Edith Pettis, illegally.

S E C O N D

Your petition further shows unto this Honorable Court that on the 12th day of April, 1949 a divorce was granted by this Honorable Court dissolving the marriage of Ernest R. Bartlett and Vivian Lucille Bartlett, and that under this decree the said Lucille Bartlett was granted the care, custody, and control of the minor Mary Ellen Bartlett, but that your petitioner and his daughter a sister of Mary Ellen Bartlett have been denied the right to see and visit the said Mary Ellen Bartlett.

T H I R D

That on or about June 11th the said Mary Ellen Bartlett, now of a legal age to choose her guardian did leave the Respondent and return to the care, custody, and control of your Petitioner for the well being and welfare of said minor child, that on the 26th day of June, 1952, the Respondent came to the home of Your Petitioner and forcefully removed the minor child.

F O U R T H

That it is necessary for the welfare, safety and well being of the said Mary Ellen Bartlett, that she be removed from the home of the Respondent and that the Respondent is a user of alcoholic beverages to the detriment of said minor child, and is guilty of divers other acts in detriment to the moral welfare and well being of said minor child.

F I F T H

That the said Mary Ellen Bartlett has been struck, beat, bruised, and abused in a manner that is unreasonable and dangerous to the health, welfare and well being of said Mary Ellen Bartlett.

S I X T H

That the child, Mary Ellen Bartlett, is fruit of the marriage between the parties to this cause.

WHEREFORE, the premises considered, your petitioner prays that a writ of Habeas Corpus be issued directly to the said Vivian Lucille Bartlett, commanding her to bring the body of said Mary Ellen Bartlett before your Honor at the time and places to be by your appointed together with the cause of said instance.

Ernest R. Bartlett
Petitioner

C. D. Smith Thompson
Solicitor for Petitioner

STATE OF ALABAMA

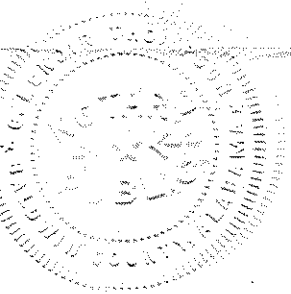
BALEWIN COUNTY

Before me, C. D. Smith Thompson Notary Public in and for said County and State personally appeared Ernest R. Bartlett, the above named petitioner, who being first by me duly sworn doth depose and say that the facts stated in said petition are true.

Ernest R. Bartlett
Petitioner

Sworn to and subscribed before me this 2 day of July, 1952.

C. D. Smith Thompson
NOTARY PUBLIC



Bartlett

vs

Bartlett
file

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ALICE J. DUCK, Clerk



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