

438

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon

E. P. PATTERSON,

, 6025 NW 22nd Avenue, Miami, Florida

of ~~County~~ to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

BESSIE PATTERSON,

against said

E. P. PATTERSON,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 12th day of July 1938

Robert S. Duck

Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

BESSIE PATTERSON,
Complainant,

-vs-

E. P. PATTERSON,
Respondent.

) IN THE CIRCUIT COURT OF BALDWIN COUNTY,
) ALABAMA.
) IN EQUITY.

To The Honorable F. W. Hare, Judge of the Circuit Court of
Baldwin County, Alabama; In Equity:

Comes your complainant BESSIE PATTERSON and humbly complains against the respondent E. P. PATTERSON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

FIRST: That your Complainant and the Respondent are both over the age of twenty-one years and your Complainant is a resident of Robertsdale, County of Baldwin, State of Alabama, and that your Respondent, E. P. Patterson, is a resident at the present time of Miami, Florida and at the address of 6025 Northwest 22nd Avenue, and over twenty-one years of age.

SECOND: Your Complainant and the Respondent were lawfully married and have been married in excess of eighteen years.

THIRD: That the Respondent has deserted your Complainant and left her without any means of support for herself and seven minor children and that she is now in a destitute condition and that he, without any lawful excuse, deserted and wilfully neglected and refuses and fails to provide for your Complainant's support and the support and maintenance of his children whose names and ages are as follows: Leslie Patterson, age 17; Tom Patterson, age 13; Clarence Patterson, age 13; Clifton Patterson, age 11; Walter Patterson, age 9; Johnnie Patterson, age 7; Earl Patterson, age 3; that your Complainant has on numerous times asked him for support and explained to him her destitute circumstances and he fails, refuses and neglects to in any way provide for and maintain or support his family. And your Complainant shows further unto this Honorable Court that the Respondent has been employed in Miami, Florida ever since the time he deserted your Complainant and he has been making a large salary doing carpenter work and refuses to provide for his family in any way. Your Complainant shows further unto this Honorable Court that the Respondent is

the owner of real property located in Baldwin County, Alabama and owner of live stock in addition to the waves above referred to and he is in able circumstances to provide for his family, which your Complainant is ready, willing and able to prove.

WHEREFORE, THE PREMISES CONSIDERED, Complainant prays that your Honor will by proper process, make the said E. P. Patterson party respondent to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalty described by law and the practice of this Honorable Court.

The Complainant further prays that upon the final hearing of this cause, that this Honorable Court will give and grant unto her in some form or manner maintenance and support for herself and seven dependent minor children, that your Honor will enter an order and decree awarding to her maintenance and support for herself and these minor children in any amount that this Honorable Court may see fit and that your Honor will allow a reasonable attorney fee for her solicitor and tax the costs of this proceeding to the Respondent; that your Honor will give and grant unto her such other, further, different and/or general relief as she may be in equity and good conscience entitled to receive and as in duty bound she will ever pray.

Bessie Patterson
Complainant

Wm. M. Adams
Solicitor for Complainant.

FOOTNOTE: The Respondent, E. P. Patterson, is required to answer each every allegation contained in the foregoing complaint, paragraphs numbered from 1 to 3, inclusive, but not under oath, oath being hereby expressly waived

Bessie Patterson
Complainant

Wm. M. Adams
Solicitor for Complainant.

RECORDED *Duck*

7-502

E. P. Patterson,
6025 NW 22nd Avenue,
Miami, Fla.

Serve on

Circuit Court of Baldwin County
IN EQUITY

No. 458

SUMMONS

BESSIE PATTERSON,

Complainant,

VS.

E. P. PATTERSON,

Respondent.

ORVIS M. BROWN

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____

193_____

by leaving a copy of the within Summons with _____

Defendant

Sheriff

By _____ Deputy Sheriff

This is to certify that I have this day mailed a copy of the complaint in the within styled cause, together with Summons, to the Respondent named therein, at 6025 NW 22nd Avenue, Miami, Florida, by Registered Mail, Return receipt request, marked "fer deliver only to the person to whom addressed." ed,

DATED this _____ day of July, 1938.

R. S. Duck

R. S. DUCK, REGISTER OF THE
CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY.

RECORDED

7-5-23

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BESSIE PATTERSON,
Complainant,

vs.

E. P. PATTERSON,
Respondent.

BILL OF COMPLAINT.

Filed this 12 day July 1923

R. S. Shelton
Clerk-Register

Post Office Department

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$500

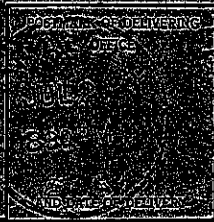
OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 33

INSURED PARCEL

No. _____



Return to R. A. Duck - Register & Print

Street and Number, or Post Office Box of The Great Day Mailing Co

Post Office at Bay Minette

City, State Ala

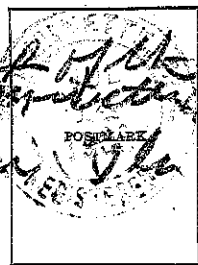
RECEIPT FOR REGISTERED ARTICLE No. 33

14 fee paid, 7-14 class postage paid, 1938

Declared value \$ Legal Papers & other Surcharge paid, \$ _____

From R. A. Duck - Register & Print

Addressed to 60256 1st St



Accepting employees will place initials in space below, indicating restricted delivery
Return receipt fee 3 in person or order _____ Special delivery fee 14
Delivery restricted to addressee _____ Postmaster, per 14
Fee paid 14

