

PEARL BROOKS  
Complainant  
VS.  
CURLEY BROOKS  
Respondent

In the Circuit Court of Baldwin County,  
State of Alabama.  
IN EQUITY.

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY.

Your Oratrix, Pearl Brooks, a resident of Baldwin County, Alabama, and over the age of twenty-one years, respectfully exhibits this bill of complaint against Curley Brooks, residing in the County of Baldwin, State of Alabama, and over the age of twenty-one years, and shows unto Your Honors as follows:

1. That your Oratrix and Respondent are both over the age of twenty-one years, of sound mind and have been residents of Baldwin County, Alabama, for more than three years next preceding the filing of this bill.

2. That on to-wit, November 25, 1917 your Oratrix intermarried with Curley Brooks, in the said State and County, but that your Oratrix and Respondent have not lived together as husband and wife since

3. That said Respondent, Curley Brooks, did voluntarily abandon bed and board on

4. Your Oratrix would further show unto Your Honors that she has been a bona fide resident of Baldwin County, Alabama for the three years next preceding the filing of this bill.

5. That there is an infant born as the result of this marriage between your Oratrix and Curley Brooks.

6. The premises considered, Oratrix prays that a subpoena be issued out of this Honorable Court, directed to said Curley

Brooks, directing him to answer the charge herein made against him, under the rules of this Court and that he, Curley Brooks be made a party defendant to this bill; and that upon a final hearing of the evidence Your Honors will order adjudge and decree that the bonds of matrimony heretofore existing between your Oratrix and said Curley Brooks be forever dissolved; that your Oratrix be given the custody of the infant which is the fruit of this marriage; and your Oratrix further prays for such other relief as may in equity and good conscience be due your Oratrix.

And your Oratrix will ever pray, etc.

xx Pearl Brooks

The Respondent is required to answer Sections 1 to 6, inclusive, of this bill, but answer under oath is hereby waived.

H. Gaillard  
Solicitor for Complainant.

STATE OF ALABAMA, )  
COUNTY OF MOBILE. )

Before me, Henrietta Petthory, a Notary Public in and for said County, in said State, personally appeared Pearl Brooks, who is known to me and whose name is subscribed to the above bill of Complaint, and who being by me first duly sworn deposes and says that she has read the foregoing bill of complaint subscribed by her, and knows the contents thereof, and that the matters alleged therein are true to her best knowledge and belief.

xx Pearl Brooks

Subscribed and sworn to, before me,  
this the 2<sup>nd</sup> day of January, 1920.

Henrietta Petthory  
Notary Public, Mobile County, Alabama.

(214)

LAW OFFICES OF  
GAILLARD, MAHORNER & ARNOLD  
66 ST. FRANCIS STREET  
MOBILE, ALABAMA

S. PALMER GAILLARD  
MATTHIAS MAHORNER, JR.  
VIRGINIUS L. ARNOLD

Jan. 13, 1920

Registrar of the Chancery Court of  
Baldwin County, Ala.

Bay Minette, Alabama.

Dear Sir:

Enclosed find the testimony of Nancy Randler, taken before Miss Henrietta Petithory, a Notary Public of Mobile County, Alabama. This is an oral examination taken in the case of Brooks vs. Brooks, examination before a commission having been waived by the Respondent.

Yours truly,



TWENTY-FIRST JUDICIAL CIRCUIT  
OF ALABAMA  
JOHN D. LEIGH, JUDGE  
BREWTON, ALA.

Apr. 9, 1920.

Mr. T. W. Richerson  
Bay Minette Ala.

Dear Mr. Richerson:-

In reply to your letter in regard to Curley Brooks vs. Pearl Brooks will say that I have gone over everything in my office and the same is not here. When I received your first letter inquiring as to file of Brooks vs. Brooks I did not recollect the same, but when you wrote the second letter using the names of Curley Brooks vs. Pearl Brooks, I recollected the names and I know that file has been in this office. My recollection is that I returned it for some additional proof, declining to sign it until said proof had been made. Possibly you returned it to Gaillard & Mahorner, or I may have myself returned it direct to them for the additional proof. Please see if it is in their office. I am indeed sorry for the delay and confusion in this matter.

With best wishes for you, I am,

Very truly yours,  
*John D. Leigh*