

2314

STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to have the bodies of Milton Hadley and Gilbert Hadley, alleged to be detained by Daisy Hall and Junior Hall with the cause of such detention, before me Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama, on the 8 day of July, 1954., at the Court House at Bay Minette, Alabama, at 10 A. M. to do and receive what shall then and there be considered concerning the said Milton Hadley and Gilbert Hadley.

Dated this the 7 day of July, 1954.

Hubert M. Hall
Circuit Judge.

STATE OF ALABAMA

BALDWIN COUNTY

To Any Sheriff of the State of Alabama:

You are hereby commanded to serve a copy of the above and foregoing writ on Daisy Hall and Junior Hall by delivering a copy of said writ to them, and by showing the original if demanded.

Witness my hand this, the 7 day of July, 1954.

Hubert M. Allen
Circuit Judge.

EX PARTE

MILTON HADLEY

GILBERT HADLEY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

To Honorable Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama:

The petition of Roil Hadley, who is over the age of twenty-one years and who is a resident citizen of Baldwin County, Alabama, respectfully shows and represents unto your Honor:

1.

That he is the father of Milton Hadley and Gilbert Hadley, who are now restrained in the custody of Daisy Hall and Junior Hall, illegally.

2.

That the children of the aforesaid are, Milton Hadley, age about 6 years and Gilbert Hadley, age about 11 months, and that your Petitioner was awarded custody of said children by a decree of this Honorable Court dated the 24th day of April, 1954.

3.

That the children were taken without the knowledge or consent of your Petitioner on, to-wit, July 6, 1954.

4.

That the said children are fruits of the marriage between the Petitioner and Zeta Mae Hadley, and that the care, custody and control as aforesaid was agreed to by the Respondent in the decree dated April 24, 1954, and the decree as aforesaid rendered thereon.

Your Petitioner prays that a writ of habeas corpus be issued, directed to said Daisy Hall and Junior Hall, commanding them to bring the bodies of said children before your Honor at the time and place to be by you appointed, together with the cause of said detention.

Roil Hadley
Petitioner

C. LeNoir Thompson
Attorney for Petitioner

STATE OF ALABAMA

BALDWIN COUNTY

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

said petition are true.

Rail H. Lee
Petitioner

Sworn to and subscribed before me this 7 day of July, 1954.

C. J. Davis
Notary Public, Baldwin County, Alabama.

FILED

ALICE J. JACK, Clerk