

421

IRA STAFFORD
A SPENDTHRIFT

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA,
BALDWIN COUNTY

Comes the complaint in the above cause by the Solicitors,
Stone & Stone, and dismisses the bill of complaint in this cause
filed.

STONE & STONE
SOLICITORS FOR COMPLAINANT

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 IN THE MATTER OF,)
 IRA STAFFORD,)
 A SPENDTHRIFT.)
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IN THE CIRCUIT COURT-EQUITY SIDE
 STATE OF ALABAMA.
 BALDWIN COUNTY.

TO THE HONORABLE, THE CIRCUIT COURT OF
 BALDWIN COUNTY, STATE OF ALABAMA, EQUITY SIDE, AND
 THE HONORABLE JOHN D. LEIGH, JUDGE THEREOF SITTING
 IN EQUITY.

Comes Sarah Stafford, a Minor, by Henry M. Gilly, as her next friend, and files this, her Bill in Chancery, under the provisions of Chapter One Hundred (100) of the Code of Alabama of 1907 to preserve the estate of Ira Stafford, from further waste and for general relief and shows unto your Honor and unto this Court as follows:-

F I R S T.

That the said Ira Stafford, Sarah Stafford and Henry M. Gilly are all bona fide residents of Baldwin County, State of Alabama, residing at Lillian; that the said Ira Stafford is a man over the age of twenty one (21) years; that Sarah Stafford is his sister and is a minor 15 years of age and that Henry M. Gilly is over the age of twenty one (21) years and brings this Bill as the next friend of the said Sarah Stafford, a Minor.

S E C O N D.

That said Ira Stafford, by reason of being mentally disabled, which has superinduced grand mal, idiopathic with incipient dementia is unfit to manage his estate and is thereby in danger of being reduced to poverty and want and by reason of such condition this relief is prayed; that the said Ira Stafford was formerly in the military service of the United States and his present afflictions and disabilities, having been incurred while in such military service, entitle him to receive from the United States Government certain funds by way of compensation and for vocational training. That under a claim heretofore made by him, being numbered in the United States Veterans Bureau C-198, 765, he has been adjudged and awarded monies as compensation but by reason of being unfit and incapable to manage his estate the payment to him of such funds by the Government is refused and with-

held on account of his incompetency to receive and properly disburse the same as will more fully appear by letter from the United States Veterans Bureau hereto attached and marked "Exhibit A" and made a part of this Bill; that the estate of the said Ira Stafford, insofar as your petitioner can learn, consists of the United States Government funds to which he is entitled and not more and that such funds at this time, to the best of your petitioner's knowledge and information, amount to about forty dollars (\$40.00) per month.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED. Your Petitioner prays that your Honor will make and enter such orders and decrees and cause to be issued such summons and notices as will make the said Ira Stafford party defendant hereto, requiring him to appear and plead, answer or demur within the time required by Law.

PRAYER FOR RELIEF.

UPON A FINAL HEARING OF THIS CAUSE. Petitioner prays that your Honor will render, adjudge and decree that the said Ira Stafford is unfit to manage his estate; that he be deprived of all further control over it and that provisions be made for its safekeeping by the appointment of a Trustee. And, as in duty bound, your Petitioner will ever pray, etc.,

SARAH STAFFORD, A MINOR.

By, Henry M. Gilly
As her next friend.

STONE & STONE,
SOLICITORS FOR COMPLAINANT.

State of Alabama,

Baldwin County.

Before me, Phillip Ickler, a Notary Public in and for said state and county, personally appeared Henry M. Gilly, who is known to me and who, after being by me first duly sworn, deposes and says under oath:-

That he, as the next friend of Sarah Stafford, a Minor, brings the foregoing Bill and that the allegations of said Bill, with which he is acquainted, are true.

Sworn to and subscribed
before me this 29 day
of January, 1924.

Henry M. Gilly

xy Phillip Ickler
Notary Public, Baldwin
County, Alabama.

