

THELMA FULFORD,

Complainant,

vs.

PRESTON FULFORD,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your complainant, Thelma Fulford, respectfully represents unto Your Honor that she is over the age of twenty-one years and a life long resident of Baldwin County, Alabama, residing near Bon Secour therein; that the respondent, Preston Fulford, is also over the age of twenty-one years and a resident of Baldwin County, Alabama, residing near Bon Secour therein.

PART TWO

1. Your complainant further avers that she and the respondent were legally married in Bon Secour, Alabama on the 29th day of September, 1935, have resided in Baldwin County ever since said marriage and the issue of said marriage is one child, Doris Fulford, now aged four years.

2. That ever since said marriage, she has conducted herself towards the respondent as a faithful and obedient wife, but the respondent, regardless of his marital duties, has been guilty of committing actual violence on her person ever since said marriage; he is possessed of an uncontrollable temper and many times has committed actual violence on the person of your complainant, and has made threats against her until her health has been effected and she is unable to continue to live with him as his wife, and has separated from him because of such cruel treatment.

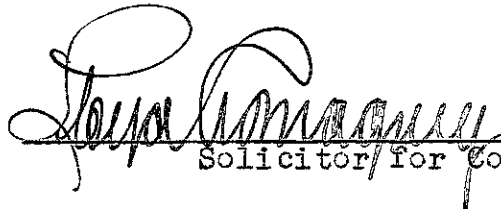
3. Your complainant avers that she is a suitable and proper person to have the custody of the said Doris Fulford and is able to support and take care of her and that the respondent is not a fit person to have the care, custody and control of said minor child.

PRAYER FOR PROCESS

The premises considered, your complainant prays that Your Honor will grant to her the writ of summons of the State of Alabama, directed to the respondent, Preston Fulford, requiring him to appear in this Honorable Court and answer or plead to this Bill of Complaint within the time required by law and to stand to and abide such order and decree as may be entered herein.

PRAYER FOR RELIEF

Your complainant further prays that on the final hearing of this cause, Your Honor will grant to her a decree of absolute divorce from the respondent, Preston Fulford, and will grant to your complainant the exclusive care, custody and control of the said Doris Fulford, the minor child of the parties, and that she may have such other and different relief in the premises as may be just and equitable.


Solicitor for Complainant.

RECORDED

IN THE CIRCUIT COURT OF
BARBEN COUNTY, ALABAMA
IN CHANCERY

THELMA FULFORD,

Complainant,

vs.

PRESTON FULFORD,

Respondent.

BILL OF COMPLAINT

Filed January 26, 1941
R. S. DUCK
clerk - registrar

By _____ Deputy

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

THELMA FULFORD

Complainant

vs.

PRESTON FULFORD,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

APPEARANCE AND WAIVER OF SUM-
MONS

Comes now Preston Fulford, the above named respondent,
and enters his voluntary appearance in the above entitled cause
and expressly waives the issuance and service of summons.

Dated this 18 day of January, 1941.

Preston Fulford

Respondent.

RECORDED 94

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

THELMA FULFORD,

Complainant,

vs.

PRESTON FULFORD

Respondent.

APPEARANCE AND WAIVER OF SUM-
MONE

Filed January 28, 1941

R. S. DUCK

clerk - register

By _____

Deputy

THELMA FULFORD,

Complainant,

vs.

PRESTON FULFORD,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

AFFIDAVIT

STATE OF ALABAMA)
BALDWIN COUNTY)

Thelma Fulford, being first duly sworn on her
oath deposes and says:

That she is the above named complainant and that
the respondent, Preston Fulford, is not in any branch of military
or naval service of the United States.

Thelma Fulford

Subscribed in my presence and sworn to before me
this 19th day of March, 1941.

Stuart Tompkins
Notary Public.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

RECORDED

THELMA FULFORD
Complainant,
vs.
PRESTON FULFORD,
Respondent.

AFFIDAVIT

Filed March 21, 1941
R. S. Dush, Register

THELMA FULFORD,

Complainant,

Vs.

PRESTON FULFORD,

Respondent.

In the Circuit Court.

In Equity No. 694

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent an Appearance and Waiver of Issuance and Service of Summons was filed by the Respondent on January 28, 1941.

by the Sheriff of _____ County, on the _____ day of _____, 194_____.

And it further appears to the Register, that the said _____

PRESTON FULFORD,

_____, the Respondent, having to the date hereof, failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of LLOYD A. MAGNEY, Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said _____

PRESTON FULFORD.

This 7th day of March, 1941

R. S. Smith

Register.

RECORDED

No. _____

**CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY**

THELMA FULFORD,

Complainant

Complainant,

Vs.

PRESTON FULFORD,

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 7th day of March,
1941.

R. S. Smith

Register.

The State of Alabama, }
BALDWIN COUNTY.

No. 694 CIRCUIT COURT IN EQUITY.

THELMA FULFORD, Complainant

vs.

PRESTON FULFORD, Defendant

Motion is hereby made for a Decree Pro Confesso against

PRESTON FULFORD, Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since ~~service of summons upon said~~ appearance and waiver of issuance and service of summons was filed by the Respondant;

~~Defendant, and that said summons was duly served according to law, and that said Defendant, ha. S. failed~~

to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 7th day of March 1941

Solicitor.

RECORDED

No. 694 Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

THELMA FULFORD,

Complainant,

Vs.

PRESTON FULFORD,

Respondent.

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed MARCH 7th, 1941 192

W. S. Smith

Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.