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LLOYD A. MAGNEY
ATTORNEY AND COUNSELLOR AT LAW
FOLEY, ALABAMA

September 9, 1938

Mrs. Mary Alice Stone,
Register in Chancery,
Bay Minette, Alabama

Dear Mrs. Stone:

I enclose herewith bill of complaint in the
case of Evie Willis vs Audley Willis, a proceeding
for divorce.

Please file and issue summons to the defendant.

The defendant may be found at the residence of
W. L. Willis just south of Foley.

Very truly yours,

Lloyd A. Magney

LAM:LP

Sheet Page 59
RECORDED

SERVE ON Audley Willis

**Circuit Court of Baldwin County
In Equity.**

No. _____

SUMMONS

Evie Willis

vs.

Audley Willis

Solicitor for Complainant

Recorded in Vol. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this _____
day of _____ 192 _____

Sheriff.

Executed this 16th day of
Sept 1933
by leaving a copy of the within Summons with

Audley Willis

Defendant,

W. R. Stewart

Sheriff.

By _____
Deputy Sheriff.

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 Audley Willis

of Baldwin 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

Evie Willis

against said Audley Willis

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, T. W. Richardson, Register of said Circuit Court, this 13th day of

September 1923

M. A. Stone Register

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

EVIE WILLIS,
COMPLAINANT,
-VS-
AUDLEY WILLIS,
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, Evie Willis, respectfully shows to the Court that she is over the age of twenty-one years and a resident of Baldwin County, Alabama; that the Respondent, Audley Willis, is also over the age of twenty-one years and a resident of Baldwin County, Alabama.

PART TWO

1. For complaint against the said Respondent, your Complainant alleges; that your Complainant and the Respondent were legally married in Baldwin County, Alabama on the 12th day of August, 1922 and that both parties have resided in Baldwin County, Alabama ever since said marriage.

2. That the issue of the marriage between the Complainant and the Respondent is three children, Clarence Willis now aged ten years, Archie Willis now aged seven years and David Willis now aged one and One-half years and your Complainant alleges that she is, and that for the reasons hereinafter stated the Respondent is not, a fit and proper person to have the care, custody and control of said minor children.

3. That since the marriage of the parties the Respondent has become addicted to habitual drunkenness.

4. That many times since said marriage the Respondent has committed actual violence on the person of your Complainant, attended with danger to her life and health and on August 12th, 1933 the Respondent did commit actual violence upon the person of your Complainant and did strike and beat her and did curse and threaten to do your Complainant and her children great bodily harm and from his conduct there was and is on the part of your Complainant reasonable apprehension of such violence from the Respondent in the future;

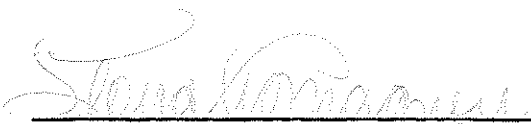
that by reason thereof the married life of your Complainant has been rendered intolerable to her and she desires and is entitled to a decree of divorce from the Respondent.

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, commanding the Respondent, Audley Willis, to appear before this Honorable Court within thirty days from the service of said writ, then and there to answer this bill of complaint and to abide such order and decree in the premises as to Your Honor shall seem meet; and your Complainant will ever pray &c.

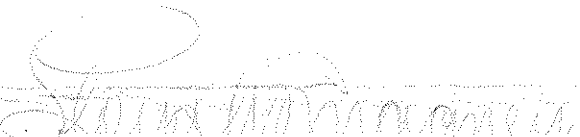
PRAYER FOR RELIEF

And your Complainant further prays that upon a hearing of this matter Your Honor will grant to her an absolute divorce from the Respondent and will grant to your Complainant the exclusive care, custody and control of the minor children of the parties to-wit: Clarence Willis, Archie Willis and David Willis; and that your Complainant may have such other and further relief in the premises as may be just and equitable.


Solicitor for Complainant.

FOOT NOTE

The Respondent, Audley Willis, is hereby required to answer the allegations of part two of this bill of complaint, numbered from one to four inclusive, but not under oath, oath to answer being hereby expressly waived.


Solicitor for Complainant.