2482

Arm Jane Gable : CIRCUIT COURT

Complainant

BALDWIN COUNTY

٧s

ALABAMA

Charles William Gable

Respondent

In Equity

To the Honorable Telfair J. Mashburn, Jr., Judge of said Court, sitting in Equity, comes Ann Jane Gable and exhibits this, Her Bill of Complaint against Charles William Gable, and represents unto Your Honor as follows:

First: Complainant, whose age is 29 years, and Respondent, Charles William Gable, whose age is 32 years, intermarried April 1st 1939 at Pensacola, Florida.

Second: At the time of said marfiage, the parties were both residents of Baldwin County, Alabama, and continued as husband and wife thereafter to be residents of Fairhope in said Baldwin County and still remain residents of said Fairhope although now separated from each other.

Third: To said marriage were born three children, to wit: Wayne E, now aged 9 years, Paullette Adele, now aged 4 years and Charles G., now aged 2 years.

Fourth: For some time past, Respondent has committed acts of physical violence upon the person of Complainant and has conducted himself in such manner as to put her in fear of her life, limb and health and, from his attitude and actions, there is reasonable apprehension that he might continue to do so.

The premises considered, Complainant prays that said Charles William Gable be made party defendant by due and appropriate legal process and that he be compelled to plead, demur or answer to the several paragraphs of the within Bill of Vomplaint and that he be further compelled to abide and obey all orders and decrees made in the premises.

Further, Complainant prays, upon a hearing of the within cause, that a decree be granted her forever divorcing her from said Charles William Gable, granting her the custody and control of said minor children, ordering Respondent to pay such amounts as alimony and support for said minor children as, to Your Honor, may seem meet and proper, and granting her such other, further and different relief as, to Your Honor, may seem meet and proper.

fr Solicitor for Complainant.

Ann Jane Gable Conflainant Amm Jame Gable

CIRCUIT COURT

Complainant

BAIDWIN COUNTY

VS

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Solicitor for Complainant.

and

## E. A. CRAMER

ATTORNEY AT LAW FAIRHOPE, ALABAMA

June 1st 1950.

Mrs. Alice Duck, Register Circuit Court Bay Minette, Alabama.

Re: Gable vs Gable

Dear Miss Alice:

Please assign a number to the enclosure and hold it until I notify you as to whether or not there will be a contest. I believe that there will be a Waiver Answer filed and no need for service.

With best personal good wishes.

EAC:gw Encl.

Sincerely,