

2440

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon, VICTOR ALEX MARTIN, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 ZEDIA MARTIN against the said VICTOR ALEX MARTIN and further to do and perform what said Judge shall order and direct in that behalf, and this the defendant shall in no wise omit, under penalty of the law; and we further command that you return this writ with your endorsement thereof, to our said court immediately upon the execution thereof.

WITNESS, Alice J. Duck, Register of said Circuit Court, this 7th day of March, 1950.

Alice J. Duck  
Register.

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ZEDIA MARTIN	§	IN THE CIRCUIT COURT OF
COMPLAINANT	§	BALDWIN COUNTY, ALABAMA.
VS	§	
VICTOR ALEX MARTIN	§	IN EQUITY.
DEFENDANT	§	

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your complainant, Zedia Martin, and humbly complaining against the defendant, Victor Alex Martin, respectfully represents and shows unto your Honor:

FIRST:

That your complainant and the said Victor Alex Martin are each over the age of 21 years, and have been residents of Baldwin County, Alabama since the early spring of 1949.

SECOND:

That your complainant and Victor Alex Martin are husband and wife having intermarried at Brewton, Alabama, March 15, 1947 and lived together as husband and wife until June 27, 1949, when they separated at Brantley, Alabama; that there were no children born of this marriage.

THIRD:

That the said defendant at the time of their marriage

was a sober, and industrious man, kind, gentle and affectionate but subsequent to their marriage has become, and is now, an habitual drunkard, and when drinking is a man of violent and ungovernable temper and from time to time has threatened, cursed and abused complainant; that on the 27th day of June, 1949, while visiting in Brantley, Alabama, the defendant while drinking became enraged and without just cause or reasonable excuse threatened, cursed and struck your complainant; that from his conduct complainant had reasonable cause to believe and does believe that if she continued to live with him he would do her bodily harm attendant with danger to her life or helath.

WHEREFORE your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said Victor Alex Martin, party defendant hereto and by appropriate process require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this complainant and the said defendant, and complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive in the premises.

W C Beebe  
Solicitor for Complainant