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STATE OF ALABAMA
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon HORACE KENNEDY to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a Bill of Complaint lately exhibited by VANIE KENNEDY against the said HORACE KENNEDY and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent 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, R. S. DUCK, Register of said Circuit Court, this 24th day of June, 1943.

R. S. Duck
Register.

VANIE KENNEDY

COMPLAINANT

VS

HORACE KENNEDY

RESPONDENT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

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

Now comes your Complainant, VANIE KENNEDY and humbly complaining against the Respondent, HORACE KENNEDY, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over the ages of twenty one years, and residents of Baldwin County, Alabama;

2.

That your Complainant and the Respondent are husband and wife, having married in Shelby County, Indiana, on September 3rd, 1920; that they lived together as husband and wife until in May, 1943.

3.

That the Respondent is a man that drinks quite a bit; that he has used strong drink from time to time and it has grown worse from time to time; that while

under the influence of strong drink, the Respondent has often cursed, threatened and abused the Complainant; that the conduct of the Respondent is such as to cause the Complainant every reasonable apprehension to believe, and she does believe, that if she continues to live with him he will carry out his threats and to injury to her person which would necessarily endanger her life and health;

4.

That the Complainant has no money and no property in her own right, that she has worked with and assisted the Respondent in the accumulation of real and personal property which is now in the name of the Respondent; that the Respondent has real and personal property of the value of approximately \$30,000.00; that the Complainant is not able financially to employ counsel to prosecute this suit and enforce and protect her rights.

WHEREFORE, the premises Considered, Complainant prays that your Honor will, by proper process make the said HORACE KENNEDY party Respondent to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

That your Honor will order a reference to determine a reasonable attorneys fee and alimony pendente lite and permanent alimony to be paid by the Respondent to and for the Complainant;

Complainant further prays that upon a final hearing of this cause, your Honor will give and grant to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a further decree be made and entered awarding her such reasonable permanent alimony as to your Honor shall seem just and proper. Complainant prays for such other, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray,

BEEBE & HALL,

BY *S. L. Lee*
Solicitors for Complainant.

Executed July 6th 1943
by copy of valid summons and
Complaint on

Horace Kennedy

W.R. Stewart Sheriff
B.S. Greene Deputy Sheriff

of within So

RECORDED

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W.R. Stewart
Sheriff's Office
this 24th day of June, 1943
W. R. STUART, Sheriff
COMPLAINANT

VS

HORACE KENNEDY
RESPONDENT.

SUMMONS AND COMPLAINT.

July 24 1943
W.R. Stewart
out