

MARGARET SOTA CROOK
COMPLAINANT
VS
SAMUEL F. CROOK
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
No. 988.

And now comes the Complainant and amends paragraph
2 of her bill of complaint heretofore on, to-wit, August 27th, 1943,
filed in this Court so that the same shall read as follows:

That the Complainant and Respondent are husband and wife,
having married on March 31st, 1943, in St. Bernard Parish, Louisiana;
that they lived together as husband and wife until August 25th, 1943,
when the Respondent voluntarily abandoned complainant's bed and board,
and has continuously abandoned since said time; that since said
abandonment Complainant and Respondent have lived separate and
apart from each other, and the Respondent has furnished nothing
toward the support and maintenance of the Complainant since, and during,
said separation.

BEEBE & HALL

By

MARGARET SOTA CROOK,
PLAINTIFF,
VS.
SAMUEL F. CROOK,
DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes the defendant and demurs to the bill of complaint
and assigns the following ground of demurrer:

1. There is no equity in the bill.
2. The bill is defective in failing to allege facts showing that the defendant abandoned the plaintiff without just cause.
3. No facts are alleged which would justify the court, in the exercise of its discretion, to enter a decree awarding separate maintenance to be paid by the defendant to the plaintiff.

Walter S. Brown
Walter S. Brown
Attorneys for defendant.

4- The Bill does not allege that
the Respondent failed or refused
to support the Complaint

Walter S. Brown

STATE OF ALABAMA
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon SAMUEL F. CROOK 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 MARGARET SOTA CROOK against the said Samuel F. Crook 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 execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this the 27th day of August, 1943.

R. S. Duck
Register.

MARGARET SOTA CROOK
COMPLAINANT

VS

SAMUEL F. CROOK
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, Margaret Sota Crook and humbly complaining against the Respondent, Samuel F. Crook, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant, Margaret Sota Crook is a bona fide resident of Baldwin County, Alabama, and has been for more than twelve months next preceding the filing of this Bill of Complaint, and is over twenty one years of age; that the Respondent Samuel F. Crook is a bona fide resident of the State of Alabama, and over twenty one years of age;

2.

That the complainant and the Respondent are husband and wife, having married on March 31st, 1943, in St. Bernard Parish, Louisiana; that they lived together as husband and wife until August 25th, 1943, when the Respondent

voluntarily abandoned the bed and board of the Complainant; that they were living at Bay Minette, in Baldwin County, Alabama, at the time of the separation.

3.

That the Respondent is a dentist by profession, and easily capable of earning and, in fact, earning from \$600.00 to \$800.00 per month; that the Complainant has no income except from her own labors; that it has been necessary to employ counsel to prosecute this suit, and that the Complainant is not financially able to pay the expenses thereof.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Samuel F. Crook party Respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the penalties and practice of this Honorable court; that your Honor will order a reference to determine a reasonable amount to be paid by the Respondent to the Complainant as separate maintenance; and also a reasonable amount to be paid by the Respondent on behalf of the Complainant for legal expenses incurred in this behalf.

The Complainant prays for such other, further, 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.

BESEE & HALL

By 
Solicitors for Complainant.

RECORDED

MARGARET SOTA CHROOK
COMPLAINANT

VS.

SAMUEL F. CHROOK
RESPONDENT.

AMENDMENT TO BILL OF COMPLAINT.

*Filed Oct 12 1945
D. J. [unclear]
[unclear]*

RECORDED

ORDER.

MARGARET SOTA CROOK,

Complainant,

VS.

SAMUEL F. CROOK,

Respondent.

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

ISSUED NOVEMBER 2, 1943.

Redmond
Register.

W.B.

988
RECORDED

DEPARTMENT

MARGARET SOPA CROOK,

Plaintiff,

VS.

SAMUEL F. CROOK,

Defendant.

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

FILED SEPTEMBER 23, 1943.

F. S. Mitchell
Register

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