

2636

You are hereby commanded to summons HENRY EDWARD DOUGLAS to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin, Alabama, in equity by JANE DOUGLAS as Complainant and against Henry Edward Douglas as Respondent.

David L. Hensch
Register

TO HONORABLE TELFAIR, J. MASHEURN, JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

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3.

That the Respondent after marriage became addicted to habitual drunkenness; that on to-wit April 14, 1951, the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would do actual violence to her person which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent two children, Annie Mae Douglas age 17 and Edward Douglas Jr. age 12; that your Complainant is the proper person to have the care, custody and control of the said minor children; that that the Respondent is not a suitable, fit or proper person to have the care and control of the said minor children.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Henry Edward Douglas 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.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to her the custody, care and control of the minor children Annie Mae Douglas and Edward Douglas Jr. Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

Received in Sheriff's Office
this 2 day of May, 1951
TAYLOR WILKINS, Sheriff

✓
RECORDED
CORDED
no 2636

Specified 5-4-51 By
filing copy of the
Within Bill of Complaint
on Henry Edward Douglas

Taylor Wilkins Sheriff
147 Hall P.S.

JAMES DOUGLAS

COMPLAINANT

VS

HENRY EDWARD DOUGLAS

Douglas
RESPONDENT

BILL OF COMPLAINT

2636

FILED
MAY 2 1951
ALICE J. DUCK, Register