

2636

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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.

WITNESS my hand this the 2<sup>nd</sup> day of May, 1951.

Alice L. Reck  
Register

JANE DOUGLAS  
COMPLAINANT  
VS  
HENRY EDWARD DOUGLAS  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainant, Jane Douglas, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.

2.

That your Complainant and the Respondent married at Haynesboro, Mississippi, on December 23, 1929, and lived together as husband and wife until on to-wit April 14, 1951.

3.

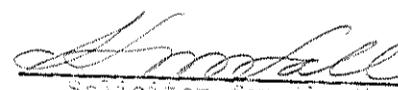
That the Respondent after marriage became subject to habitual drunkenness; that on to-wit April 14, 1951, the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was 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  
MAY 2 1951  
202636

Searched 5-4-51 By  
Serving copy of the  
Within Bill of complaint  
on Henry Edward Douglas

Taylor Wilkins Sheriff  
107 Hall P. 3.

JAMES DOUGLAS

COMPLAINANT

VS

HENRY EDWARD DOUGLAS

Douglas RESPONDENT

BILL OF COMPLAINT

202636

FILED  
MAY 2 1951  
ALICE J. DUCK, Register