

LUCY PRICE,
Complainant,
-vs-
CHARLES E. PRICE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your Complainant, Lucy Price, respectfully represents and shows unto your Honor:-

1. That Complainant and Respondent are both over the age of twenty-one years and resident citizens of Baldwin County, Alabama.
2. That your Complainant and the Respondent were lawfully married on, to-wit, September 21, 1952.
3. The Complainant further avers and alleges that the Respondent has committed actual violence on her person attended with danger to her life or health and from his conduct she is reasonably apprehensive of other and further violence attended with danger to her life or health.
4. Complainant further avers that there was one child born of this marriage, namely, Donald Edward Price, age six months, and shows unto the Court that the Respondent is an able-bodied man gainfully employed and financially able to pay the sum of One Hundred and Fifty Dollars (\$150.00) per month as alimony and for the support and maintenance of this minor child who is in the care custody and control of the Complainant, and to pay attorney's fees for the Complainant's attorney which she is financially unable to do.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that CHARLES E. PRICE be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your Complainant

be granted a divorce from the Respondent and that she be granted the care, custody and control of the minor child of this marriage, namely, Donald Edward Price, and that she be awarded the sum of One Hundred and Fifty Dollars (\$150.00) per month as alimony and for the support and maintenance of this minor child. Complainant also prays to this Honorable Court to award attorney's fees as thought reasonable to the court to C. G. Chason, her attorney of record. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound, she will ever pray.


Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Charles E. Price

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

Charles E. Price

_____, Defendant_____

by Lucy Price

_____, Plaintiff_____

Witness my hand this 28th day of October 1953_____

Price J. Price

_____, Clerk

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

Oct. 23, 1953

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint in
the Divorce proceeding of Price vs Price.

Yours very truly,


C. G. Chason

CGC:dc

Encl. 1

No 3130

Lucy Price
vs.

Charles E. Price

Divorce

3130

FILED

OCT 28 1953

ALICE J. DUCK, Register

C. G. Chasman