

State of Alabama
County of Baldwin
To any Sheriff of the State of Alabama:

You are hereby commanded to summon Eula Merle Joyner to appear and plead, answer or demurr within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama in Equity by Everette Joyner as Complainant and against Eula Merle Joyner as Respondent.

Witness my hand, this the 9th day of January 1954.

W. J. H. H. H.
Register

Everette Joyner

Complainant

Vs

Eula Merle Joyner

Respondent

In the Circuit Court of
Baldwin County, Alabama
In Equity.

To the Honorable Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama.

Your Complainant Everette Joyner respectfully represents unto your Honor and this Honorable Court as follows:

1.

Your Complainant is a bona fide resident of Baldwin County, Alabama and is over the age of twenty years and the Respondent is over the age of fifteen years and a resident of Baldwin County, Alabama.

2.

That your Complainant and Respondent married at Lucedale, Mississippi on to-wit May 28, 1952 and lived together as husband and wife until November 7, 1953 when they separated because of the Cruelty of the Respondent.

3.

That on to-wit November 7, 1953 and on several occasions prior thereto the Respondent so abused the Complainant with actual violence to his person which would necessarily endanger his life and health, and that the Complainant had reasonable apprehension to believe that if he continued living with her, that she would do such violence to his person, as would necessarily endanger his life and health.

4.

That there are no children as fruits of this marriage and no property to be divided.

5.

Wherefore the premises considered, your Complainant prays that your Honor will by proper procedures make the said Eula Merle Joyner party Respondent to this bill of complaint, requiring her to plead, answer or demur to the same within the time under the penalties prescribed by law and the practices of this Honorable Court.

Your Honor, your Complainant further prays that upon a final hearing hereof, that you will grant to him an absolute divorce, forever barring the bonds of matrimony existing between your Complainant and Respondent and Your Complainant prays for such other, farther, different or general relief as he may be in equity and good conscience entitled to receive.

Hubert M. Hall
Solicitor for Complainant.

1103175
Everette Joyner

Complainant

RECORDED
Vs

Eula Merle Joyner *Don Secor*

Respondent

Executed Feb. 16. 1954
By Serving Copy on
Eula Merle Joyner

Sheriff
Taylor Wilkins
By
Edleigh Steadham

Summons and Complaint

S

FILED
JAN 9 1954
ALICE J. DICK, Register

2-16-54
Returned *30* day of *Jan* 1954
Not found in my county after diligent search and in-
quiry.

By *T. Steadham*
Deputy Sheriff
Taylor Wilkins, Sheriff