

3218

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

March 15, 1954

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint in the Divorce
Action of George J. Weeks -vs- Margaret M. Weeks.

Yours very truly,


C. G. Chason

CGC:fm

encls. 1

No 3218

George H. Weeks

vs.

Margaret M. Weeks

Verdict

3-17-5-61

1. Sum & court
del. to sheriff

C. H. Chasman

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Circuit Court, Baldwin County

Baldwin County.

No. 3218

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Margaret M. Weeks

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

Margaret M. Weeks

, Defendant

by George J. Weeks

, Plaintiff

Witness my hand this 17th day of March 1954

Alice J. Duck, Clerk
Register

No. 3218 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

GEORGE J. WEEKS

Plaintiffs

vs.

MARGARET M. WEEKS

Defendants

Summons and Complaint

Filed 3-17-54 19____

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff

Deputy Sheriff

GEORGE J. WEEKS,

Complainant,

-VS-

MARGARET M. WEEKS,

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:-

Comes your Complainant, George J. Weeks, and files this his
Bill of Complaint for divorce against Margaret M. Weeks, and res-
pectfully represents and shows unto your Honor:

1. That the Complainant is over the age of twenty-one years
and is a resident citizen of the State of Alabama, Baldwin County;
that the Respondent is over the age of twenty-one years and is a
resident of Mobile County, State of Alabama.

2. That the Complainant and Respondent were lawfully married
on, to-wit, September 27, 1952.

3. The Complainant further avers that the Respondent has
committed actual violence on his person attended with danger to his
life and health and from her conduct he is reasonably apprehensive
of other and further violence, so much so that he can no longer
live with the Respondent; that the Respondent has made numerous
threats of doing him physical harm and from her manner and conduct
toward him he is reasonably convinced that she will commit actual
violence on his person attended with danger to his life or health.

4. Complainant further shows to the Court that there has been
born of this marriage one child, namely, George Joseph Weeks, Jr.,
whose age is six months.

PROCESS FOR PRAYER AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Margaret
M. Weeks be made a party defendant of this cause by the usual pro-
cess, of this Honorable Court, requiring her 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 he be granted a divorce from the said Respondent and that he be granted care, custody and control of the minor child herein named. Should your Complainant be mistaken in the relief prayed for, that he be granted such other, further, different and general relief to which he may be entitled and as in duty bound he will ever pray.


Solicitor for Complainant

Respondent's address is:

c/o John H. Nolan
2804 Hayes Street
Crighton Station
Mobile, Alabama

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3218

TERM, 19

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Margaret M. Weeks, Defendant

by George J. Weeks

Plaintiff

Witness my hand this 17th day of March 19 54

W. J. Weeks Clerk
Register

No. 3218

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

GEORGE J. WEEKS

Plaintiffs

vs.

MARGARET M. WEEKS

Defendants

Summons and Complaint

Filed 3-17-54 19

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

, Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

Bay Minette, Ala.,

3/18, 1954

To the Sheriff of

Mobile County,

Mobile, Alabama.

I enclose herewith

Bill of lading for Margaret M. White
Co. John W. Deane 2804 Hayes St. Cracker
Station, Mobile

Please serve and return as early as possible.

Seymour Hillman
Sheriff Baldwin County Alabama.

(If not found in your county please advise promptly giving information as to present location if possible)

GEORGE J. WEEKS,

Complainant,

-VS-

MARGARET M. WEEKS,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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3. The Complainant further avers that the Respondent has committed actual violence on his person attended with danger to his life and health and from her conduct he is reasonably apprehensive of other and further violence, so much so that he can no longer live with the Respondent; that the Respondent has made numerous threats of doing him physical harm and from her manner and conduct toward him he is reasonably convinced that she will commit actual violence on his person attended with danger to his life or health.

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