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STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - - - GREETING:

WE COMMAND YOU that you summon DOCK J. FRANKLIN to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery Jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by IDELL FRANKLIN against the said DOCK J. FRANKLIN, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. Duck, Register of said Circuit Court this the 4th day of November, 1943.

R. S. Duck

IDELL FRANKLIN	}	IN THE CIRCUIT COURT OF
COMPLAINANT		
VS		
DOCK J. FRANKLIN	}	BALDWIN COUNTY, ALABAMA
DEFENDANT		
		IN EQUITY.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes your Complainant, Idell Franklin, and humbly complaining against Dock J. Franklin, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

Your Complainant and the said Dock J. Franklin are each over the age of twenty-one years and residents of Baldwin County, Alabama;

2.

Your Complainant and the said Dock J. Franklin are husband and wife having intermarried in Uriah, Alabama in the year 1921,

man of sober and industrious habits but subsequent to their marriage has become, and is now, an habitual drunkard. That because of such habitual drunkenness this Complainant was compelled to separate from him as aforesaid about one year ago in Foley, in Baldwin County, Alabama.

4.

That there were born to this Complainant and the said Defendant the following children all of whom are in the care and custody of this Complainant: Lucile Franklin aged 17 years, Lenora Franklin aged 15 years, Kenneth Franklin aged 11 years, Billie Franklin aged 9 years, Jack Franklin aged 6 years, Voncile Franklin aged 3 years and Bobbie Franklin aged 2 years; that because of Defendant's habitual drunkenness he is not the proper person to have the care and custody of said children.

5.

Your Complainant is without means of support for herself and the said children, and without means to pay counsel for the prosecution of this suit; that Defendant is an able bodied man and earns a substantial wage, which your Complainant is informed and believes is more than \$25.00 a week and upon such information and belief she alleges that his weekly earnings are more than \$25.00 and that he is amply able to support complainant and to maintain, support and educate their said children.

Wherefore, the premises considered, your Complainant prays this Honorable Court will, by proper process, make the said Dock J. Franklin party defendant to this bill of complaint and require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practices of this Honorable Court.

Complainant further prays that this Honorable Court will cause a reference to be had to ascertain a reasonable attorney's fee for Complainant's Solicitors in this cause and that the said Defendant by proper order of this court be required to pay the same.

Complainant further prays that upon such reference a reasonable alimony pending this suit be awarded to this Complainant against the said Defendant and that he be required to pay the same under proper order of this Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter an order and decree forever dissolving the bonds of matrimony existing between this Complainant and the said Dock J. Franklin, that she be awarded the custody of said minor children; and that this Court ascertain and decree to this Complainant as against the Defendant a reasonable sum as alimony for herself and the support, maintenance and education of said minor children; and Complainant prays for such other further or different relief as in equity and good conscience she shall be entitled to receive in the premises.

BEEBE & HALL

By W. C. Beebe
Solicitors for Complainant.

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WITNESS, R. S. Duck, Register of said Circuit Court this the 4th day of November, 1943.

R. S. Duck
Reg.

IDELL FRANKLIN
COMPLAINANT

VS

DOCK J. FRANKLIN
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

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2.

Your Complainant and the said Dock J. Franklin are husband and wife having intermarried in Uriah, Alabama in the year 1921, and have lived together as husband and wife until a year ago when they separated at Foley, in Baldwin County, Alabama.

3.

That the said Defendant at the time of their marriage was a

man of sober and industrious habits but subsequent to their marriage has become, and is now, an habitual drunkard. That because of such habitual drunkenness this Complainant was compelled to separate from him as aforesaid about one year ago in Foley, in Baldwin County, Alabama.

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BEESY & HALL

By W. C. Beesey
Solicitors for Complainant.