

You are hereby commanded to summon EARL WILLIAM GRIFFITHS  to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against  EARLWILLIAM GRIFFITHS.  RESPONDATION  Witness my hand this 23rd. day of March.  19444	BA	TE OF ALA		NO.	Ma	arch	TER	км, 194 <u>4</u>
to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against  FARLWILLIAM CRIFFITHS  RESPONDA  ON BETTY JANE GRIFFITHS  COMPLANTA	ro any se	ERIFF OF THE	STATE OF	ALABAI	ΔA:			
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BETTY JANE GRIFFITHS,

Complainant,

VS.

EARL WILLIAM CRIFFITHS,

Respondent.

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

Comes your Complainant Betty Jane Griffiths and exhibits this her Bill of Complaint for Divorce against Earl William Griffiths, and shows unto your Honor and unto this Honor-able court as follows:-

## FIRST:

That your Complainant is a married woman fifteen years of age and that the Respondent is nineteen years of age; that both your Complainant and the Respondent are resident citizens of Baldwin County, Alabama, residing near Foley, both having lived there for more than five years last past.

## SECOND:

That your Complainant and the Respondent were married on heretofore to-wit: January 10, 1943, and lived together as man and wife until, on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and apart from him; that on to-wit: March 21, 1944 the said Respondent struck your Complainant with his fist and caused serious injury to her left ear; that she is still unable to hear properly out of this ear on account of the blow that he struck; that the Respondent also cursed and abused your Complainant and has called her many vile and abusive names; that the Respondent has on more than one occasion called your Complainant a bastard and a son-of-a-bitch and says she can not prove who her father is because he died when she was very young; that from his conduct your Complainant had reason to believe that he would commit such violence on her person attended with danger to her life or health if she should continue to live with him, and on March 23, 1944 your Complainant was compelled to leave said Respondent.

That there was born to your Complainant and the Respondent one child Robert Earl Griffiths, a boy now five months of age; that your Complainant is a fit and proper person to have the care, custody and control of such child and the Respondent is not a fit and proper person to have such control; that the Respondent is subject to fits of temper and when mad would be liable to commit acts of violence on the baby; that the Respondent is also very profane and would not properly raise this child if the custody of such child was awarded to him.

## PRAYER FOR PROCESS AND RELIEF.

The premises considered, your Complainant prays that the above named Earl William Griffiths be made a part Defendant to this cause by the usual writ of process of this Honorable Court requiring him to appear and 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 Honor will grant unto your Complainant an absolute divorce from said Respondent, and that your Honor will award your Complainant the custody of her son Robert Earl Griffiths. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such, other further and different relief as she may be entitled and as in duty bound she will ever pray.