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SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 1083.

CIRCUIT COURT BALDWIN COUNTY

March

TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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 in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

EARL WILLIAM GRIFFITHS.

RESPONDANT

by BETTY JANE GRIFFITHS

COMPLAINANT

Witness my hand this 23rd. day of March. 1944

R. B. [Signature]

Clerk.

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.

Betty Jane Griffiths
Mrs Earl Wm Griffiths
Complainant.