

2657

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons TOMMY STEWART to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ESTELLE DAY STEWART as Complainant and against TOMMY STEWART, as Respondent.

WITNESS my hand this the 31st day of May 1951.

Leslie L. Leach
Register

ESTELLE DAY STEWART
COMPLAINANT
VS
TOMMY STEWART
RESPONDENT

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

TO HONORABLE TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Your Complainant, Estelle Day Stewart, respectfully represents
unto Your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent were both bona fide residents of Baldwin County, Alabama at the time of their separation and more than two years prior thereto; that Complainant is a resident of Baldwin County but that Respondent is now a resident of Escambia County Florida, and his address is Route 3, Box 499-B, Pensacola, Florida; that the Complainant is over the age of eighteen and the Respondent is over the age of twenty-one.

2.

That your Complainant and the Respondent married at Pascagoula, Mississippi, on October 18, 1948, and lived together as husband and wife until on to-wit, March 9, 1951.

3.

That on to-wit March 9, 1951, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the

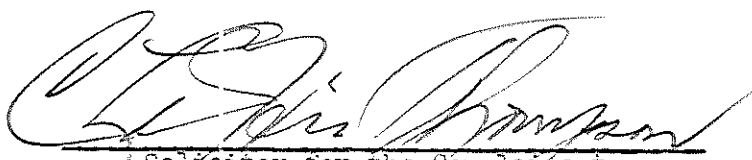
Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to your Complainant and the Respondent one child, Dorothy Jean Stewart age less than one year; that your Complainant is the suitable, fit and proper person to have the care, custody and control of a child of such tender age.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Tommy Stewart party respondent to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Respondent; that your Complainant be awarded the care, custody and control of said child, Dorothy Jean Stewart; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.

RECORDED

no 2657

ESTELLE DAY STEWART

COMPLAINANT

VS

TOMMY STEWART

RESPONDENT

SUMMONS AND COMPLAINT

From the law offices of
C. LeNoir Thompson
Bay Minette, Alabama

FILED

MAY 31 1951

ALICE J. DUCK, Register

2057
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