

2661

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons LESLIE GEE 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 ANNIE C. GEE as Complainant and against LESLIE GEE as Respondent.

WITNESS my hand this the 14th day of June, 1951.

David L. Hensley
Register

ANNIE C. GEE
COMPLAINANT
VS
LESLIE GEE
RESPONDENT

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

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

Your Complainant, Annie C. Gee, respectfully represents unto your
Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents
of Baldwin County, Alabama, and over twenty-one years of age.

2.

That your Complainant and the Respondent married at Bay Minette,
Alabama, on October 28, 1948, and lived together as husband and wife
until on to-wit May 19, 1951.

3.

That on to-wit May 19, 1951, the Respondent threatened and abused the
Complainant and threatened to do actual violence to her person which would
necessarily endanger her life and health; that 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
do actual violence to her person which would necessarily endanger her life
and health.

4.

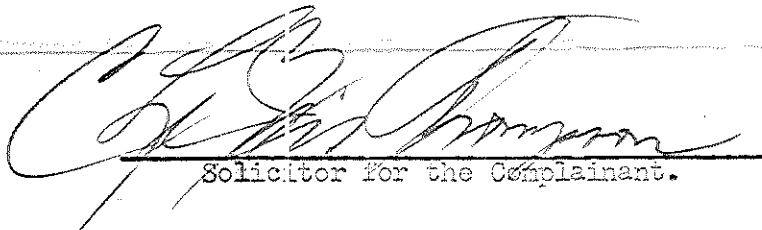
Your Complainant further avers and alleges that the said Respondent has,
since her said marriage with him, become addicted to habitual drunkenness,
and that said habit has continued to the filing of this bill.

5.

That your Complainant and the Respondent have no children and no property to be divided.

WHEREFORE, the premises considered, The Complainant prays that your Honor will by proper process make the said Leslie Gee 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; 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.

Received in Sheriff's Office
this 4 day of June, 1957
TAYLOR WILKINS, Sheriff

RECORDED

W 2661

Printed this 21 -
the day of July by
seeing Leslie Gee
in person -

Taylor Wilkins Sheriff
George Harty D.S.

ARLIE C. GEE

COMPLAINANT

VS

LESLIE GEE

RESPONDENT

SUBJONS AND COMPLAINT

2661

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

Filed 6-14-57

Garfield
Mist