

2669

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM J. CAMPBELL 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 SIBYL THAMES CAMPBELL as Complainant and against WILLIAM J. CAMPBELL, as Respondent.

WITNESS my hand this the 18th day of June, 1951.

Archie H. Houch
Register.

SIBYL THAMES CAMPBELL
COMPLAINANT
VS
WILLIAM J. CAMPBELL
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:

Comes your Complainant SIBYL THAMES CAMPBELL, and respectfully represents unto your Honors:

1.

That she is over the age of twenty years and is a bona fide resident of Baldwin County, Alabama; that the Respondent, WILLIAM J. CAMPBELL, is over the age of twenty years and is a bona fide resident of Baldwin County, Alabama.

2.

That said Complainant and Respondent are lawfully married, having been married at Waynesboro, Mississippi on September 26th, 1949.

3.

The Complainant avers that the said respondent did voluntarily abandon your complainant about one month before the filing of this bill, and has not lived with nor contributed to complainant's support since said abandonment; that said abandonment was through no fault on the part of the complainant.

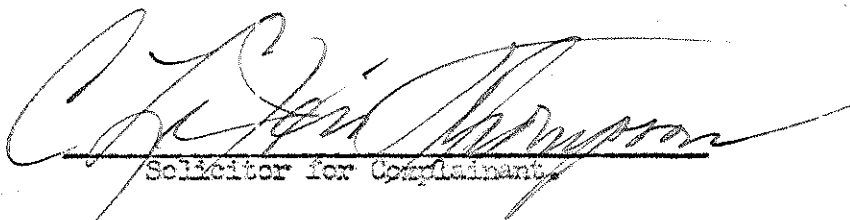
4.

That on to-wit May 8, 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.

5.

Your complainant avers that said complainant owns no property, and has no means of support, and that said respondent has refused and failed to provide for the support and maintenance of the complainant. Your complainant further avers that she is without means to pay her solicitors for their services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honors will order service to be had according to law upon said respondent commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law, and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance pending this suit, and a reasonable amount for the support and maintenance of two children, fruits of this marriage; to-wit, Janice Gwendolyn Campbell age fourteen months, Perry Wayne age about one month, and One Hundred Twenty-five (\$125.00) Dollars to be allowed your complainant's solicitors for their services herein, and that upon a final hearing of this cause, that your Honors will render a decree granting to your complainant permanent alimony for her support and maintenance, and your complainant prays for such other, further or general relief to which she may be entitled, and your complainant prays, etc.


Solicitor for Complainant.

FILED
JUN 13 1951
CLERK OF COURT

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM J. CAMPBELL 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 SIBYL THAMES CAMPBELL as Complainant and against WILLIAM J. CAMPBELL, as Respondent.

WITNESS my hand this the 18th day of June, 1951.

Deirdre Henscher
Register.

SIBYL THAMES CAMPBELL
COMPLAINANT

VS

WILLIAM J. CAMPBELL
RESPONDENT

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

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

Comes your Complainant SIBYL THAMES CAMPBELL, and respectfully
represents unto your Honors:

1.

That she is over the age of twenty years and is a bona fide resident
of Baldwin County, Alabama; that the Respondent, WILLIAM J. CAMPBELL,
is over the age of twenty years and is a bona fide resident of Baldwin
County, Alabama.

2.

That said Complainant and Respondent are lawfully married, having
been married at Waynesboro, Mississippi on September 26th, 1949.

3.

The Complainant avers that the said respondent did voluntarily abandon
your complainant about one month before the filing of this bill, and has
not lived with nor contributed to complainant's support since said
abandonment; that said abandonment was through no fault on the part of
the complainant.

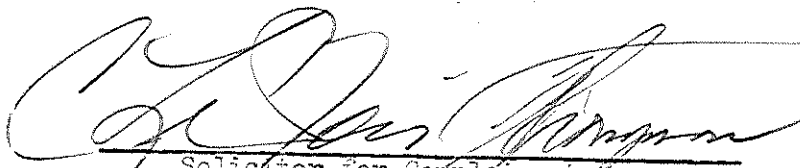
4.

That on to-wit May 8, 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.

5.

Your complainant avers that said complainant owns no property, and has no means of support, and that said respondent has refused and failed to provide for the support and maintenance of the complainant. Your complainant further avers that she is without means to pay her solicitors for their services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honors will order service to be had according to law upon said respondent commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law, and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance pending this suit, and a reasonable amount for the support and maintenance of two children, fruits of this marriage; to-wit, Janice Gwendolyn Campbell age fourteen months, Perry Wayne age about one month, and One Hundred Twenty-five (\$125.00) Dollars to be allowed your complainant's solicitors for their services herein, and that upon a final hearing of this cause, that your Honors will render a decree granting to your complainant permanent alimony for her support and maintenance, and your complainant prays for such other, further or general relief to which she may be entitled, and your complainant prays, etc.


Solicitor for Complainant

Received in Sheriff's Office
this 18 day of June, 1951
TAYLOR WILKINS, Sheriff

700 2-6-67

RECORDED

STLEY THAMES CAMPBELL

COMPLAINANT

VS

WILLIAM J. CAMPBELL

RESPONDENT

2669

FILED
JUN 18 1951
JUL 2 1951 Register

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