

3226

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Sherman Jordan, 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 Shirley Nelson Jordan, as Complainant.

Witness my hand this 30th day of March, 1954.

Benjamin J. Smith
Register

LOLA MAE NELSON, as next friend to
SHIRLEY NELSON JORDAN,

COMPLAINANT,

VS

SHERMAN JORDAN,

RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

BEFORE THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY SITTING:

Your Complainant, Shirley Nelson Jordan, respectfully represents and shows
unto your Honor and this Honorable Court as follows:

1.

That your complainant and the respondent are bona fide residents of Baldwin
County, Alabama, the complainant is 13 years of age and the respondent is over
the age of 21 years.

2.

That your complainant and the respondent married in Lucedale, Mississippi,
on May 9, 1953, and lived together as husband and wife in Alabama until on, to-
wit, March 13, 1954.

3.

Your complainant avers and charges that the said respondent did on or about
the 13th day of March, 1954, and many times prior thereto assault, beat, hit
and strike complainant; that said respondent has committed actual violence on
her person attended with danger to her health or life; complainant avers and
charges that respondent has made numerous threats of doing her physical harm
and from his manner and conduct toward her, she is reasonable convinced that
he will commit an actual violence upon her person, attended with danger to her
life or health.

There are no children born as fruits of this marriage and there is no property to be divided.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper procedure make the said Sherman Jordan, party respondent to this bill of complaint, 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.

Inasmuch as your Complainant is without funds and not old enough to get work it is suggested that One Hundred (\$100.00) Dollars be allowed as a reasonable attorney's fee to your Complainant's Attorney for his services herein 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 what will be a reasonable amount to be allowed your Complainant's Solicitor for his services herein.

And your Complainant further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony ~~existing between your complainant and respondent, and that upon a final hearing~~ of this cause, that your complainant be awarded such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.

IN THE DISTRICT COURT OF
BALDWIN COUNTY, ALABAMA

TO WIT:

LOLA MAE NELSON, as next friend of
SHIRLEY NELSON JORDAN,

COMPLAINANT,

VS

SHERMAN JORDAN,

RESPONDENT.

Bill of Complaint

FILED

MAR 31 1954

ALICE A. DUCK, Register

C. L. Blair Thompson
Attorney at Law
Ray Linnette, Alabama

Received _____ day of _____ 19____
and on 7 day of Apr 1954
I served a copy of the within _____
on _____

By service on Sherman Jordan

TAYLOR WILKINS, Sheriff
By Pat Sellers D.S.