

No. 3229

Page

The State of Alabama

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY

Margie Jones

vs.

Mack Jones

SUMMONS

Returned by the Sheriff and filed in office, this

the day of, 19.....

....., Register.

Received in office, this the day of

....., 19.....

....., Sheriff.

I have executed the within by leaving a copy

thereof with Margie Jones

defendant named herein, on this the 7

day of April, 1934

Joyce Whitins, Sheriff.

By J. D. Hock, Deputy.

3229

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Mack Jones

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State.

Margie Jones

against Mack Jones

Herein fail not. Due return make of this writ as the law directs.

Witness this 6th day of April, 1954

W. J. Jones, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

MARGIE JONES,

Complainant,

-vs-

MACK JONES,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Margie Jones, and files this her Bill of Complaint for divorce against Mack Jones, and respectfully represents and shows unto your Honor:

1. That the Complainant is over the age of twenty-one years and is a resident citizen of the State of Alabama, Baldwin County. That Mack Jones is over the age of twenty-one years and is a resident citizen of the State of Alabama, Baldwin County.

2. That the Complainant and the Respondent were lawfully married on, to-wit, August 25, 1952.

3. The Complainant further avers that the Respondent has committed actual violence on her person attended with danger to her life and health and from his conduct she is reasonably apprehensive of other and further violence, so much so that she can no longer live with the Respondent; that the Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her she is reasonably convinced that he will commit actual violence on her person attended with danger to her life or health.

4. Complainant further shows to the Court that there has been born of this marriage two children, namely, Fay Barbara Ann Jones, age 2 years, and Elliott Dewitt Jones, age 9 months, which said children are in the care, custody and control of the Complainant. Complainant further alleges that the Respondent is financially able to pay the sum of Thirty Dollars (\$30.00) per month for maintenance and support of the said minor children.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Mack Jones be made a party defendant of this cause by the usual process, by personal service, of this Honorable Court, requiring him to 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 she be granted a divorce from the said Respondent and that she be granted care, custody and control of the minor children herein named. Complainant further prays that the Respondent be directed by the Court to pay the sum of Thirty Dollars (\$30.00) per month for the support and maintenance of the minor children hereinabove named. Should your Complainant be mistaken in the relief prayed for, that she be granted such other, further and different and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant