

3244

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Anthony J. Klumpp, Jr., 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 Nadine M. Klumpp, as Complainant, against Anthony J. Klumpp, Jr., as Respondent.

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

Arice J. Venable
Register.

 Springer

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

The Bill of Complaint presented by Nadine M. Klumpp, Complainant, vs. Anthony J. Klumpp, Jr., Respondent, respectfully shows:

1. Complainant and Respondent are both residents of Baldwin County, Alabama, and over the age of twenty-one (21) years.

2. Complainant, Nadine M. Klumpp, is the wife of the Respondent, Anthony J. Klumpp, Jr., they having intermarried on the 19th day of October, 1946, in Mobile County, Alabama; there having been born of said marriage two (2) children, Sandra Janay Klumpp, a daughter, now six (6) years of age, and Anthony J. Klumpp, III, a son, practically three (3) years of age, which children are in the control and custody of your Complainant, and live with her.

3. Respondent quit their home and residence on, to-wit, the 6th day of December, 1953, and continues to live apart from complainant and family. Complainant avers that the respondent has been guilty of adultery with another woman prior to and since their separation.

4. Respondent owns 20% interest in Klumpp Motor Company, Inc., a corporation, with its office and principal place of business in Fairhope, Alabama, it being engaged in the automobile business, having the Chevrolet and Oldsmobile agency in Fairhope; and he further owns a 20% interest in Klumpp Dairy of Fairhope, Alabama. Respondent has an annual income

of approximately \$14,000.00 per year, and is well able to support your complainant and her two children.

5. Complainant is the proper and suitable person to have the care and custody of their said children and Respondent is not a proper and suitable person to have their said custody.

6. Complainant says that she has employed solicitors to represent her in this case and that she is without funds to pay the same for their services herein.

PRAYER FOR PROCESS

The premises considered, Complainant prays that the Respondent, Anthony J. Klumpp, Jr., be made a party respondent to this Bill of Complaint; that process of this Court in the usual form be issued out of this Court to the Respondent, ordering and commanding him to be and appear before this Court within the time required by law, then and there to plead, answer or demur to this Bill of Complaint.

PRAYER FOR RELIEF

The premises further considered, the Complainant would pray that a decree be made awarding her alimony pendente lite and support for herself and minor children, and attorneys' fees for prosecuting this suit; that upon the final hearing hereof your Honor would be pleased to grant to your Complainant a decree of divorce, dissolving the bonds of matrimony now existing between Complainant and Respondent, and awarding her permanent monthly alimony and support for herself and minor children, and also alimony in solido.

And, if Complainant has not prayed for the proper relief, may it please the Court to grant unto her such other, further, different and general relief as in equity and good conscience she may be entitled to, the premises considered.

Racine Stone
Phenton, McCall, & Potts
Solicitors for Complainant

Anthony J. Klumpp, Jr.
Complainant