

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 3249

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Roscoe Wilmer James

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Roscoe Wilmer James, Defendant

by

Sarah James

-----, Plaintiff

Witness my hand this

10th

day of

May

1954

Beice J. Duck

-----, Clerk

SARAH JAMES,)	
)	IN THE CIRCUIT COURT OF
Complainant,)	
)	BALDWIN COUNTY, ALABAMA
-vs-)	
)	IN EQUITY
ROSCOE WILMER JAMES,)	
)	
Respondent.)	

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

Comes your Complainant, Sarah James, and files this her Bill of Complaint for divorce against Roscoe Wilmer James, 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 Roscoe Wilmer James is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, State of Alabama.

2. That the Complainant and Respondent were lawfully married on, to-wit, December 19, 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 reasonable 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 was born of this marriage one child, namely, Elaine James, age six months, and Complainant further shows unto the Court that this child is in her care, custody and control.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Roscoe Wilmer James be made a party defendant of this cause by the usual process 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 custody and control of the minor child herein named. Complainant further prays that the Respondent be directed by the Court to pay the sum of Fifty Dollars (\$50.00) per month for the support and maintenance of the minor child herein 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 the Complainant

Respondent resides in
Aaronville, Foley, Alabama.

FILED
May 10 1954
ALICE J. DUCK, Register

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3249

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Roscoe Wilmer James

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Roscoe Wilmer James, Defendant

by

Sarah James

Plaintiff

Witness my hand this

10th

day of

May

1954

Beice J. Duck

Clerk

SARAH JAMES,

Complainant,

-vs-

ROSCOE WILMER JAMES,

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, Sarah James, and files this her Bill of Complaint for divorce against Roscoe Wilmer James, 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 Roscoe Wilmer James is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, State of Alabama.

2. That the Complainant and Respondent were lawfully married on, to-wit, December 19, 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 reasonable 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 was born of this marriage one child, namely, Elaine James, age six months, and Complainant further shows unto the Court that this child is in her care, custody and control.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Roscoe Wilmer James be made a party defendant of this cause by the usual process 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;

(first page)

That upon a final hearing of this cause that she be granted a divorce from the said Respondent and that she be granted custody and control of the minor child herein named. Complainant further prays that the Respondent be directed by the Court to pay the sum of Fifty Dollars (\$50.00) per month for the support and maintenance of the minor child herein 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 the Complainant

Respondent resides in
Aaronville, Foley, Alabama.

FILED
JAN 10 1924
JAN 10 1924

(((((

IN EQUITY

BEFORE THE CIRCUIT COURT OF

DADE COUNTY, FLORIDA

(((((

Respondent

ROSCOE WILSON

-vs-

Complainant

EMMA HARRIS

FILED

945334

203249

BILL OF COMPLAINT

SARAH JAMES,
Complainant,

-vs-

ROSCOE WILMER JAMES,
Respondent.

(((((

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

(((((

FILED
MAY 10 1954
ALICE J. DUCK, Register

Respondent residing in
Birmingham, Alabama.

Notarized for the complainant



entitled and as in and to which she will ever be
lawful and different and general letter to which she may be
taken in the letter dated for that she be granted such order,
of the minor child herein named. Should you complainant be wife
of fifty dollars (\$50.00) per month for the support and maintenance
bills that the respondent be directed by the court to pay the sum
and control of the minor child herein named. Complainant further
prayer from the said respondent and that she be granted custody
that upon a final hearing of this cause that she be granted a