

(3268)

DIVORCE DECREE

PRINTED BY MOORE PEG. CO.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

AVIS COOPER, Complainant
vs.

L. B. COOPER, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer & Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said Avis Cooper is forever divorced from the said L. B. Cooper for and on account of

Non-Support - It is further ordered and decreed that the said L. B. Cooper shall convey to the said Avis Cooper the residence and four acres of land on which same is situate in lieu of alimony, said conveyance to be free of any lien or encumbrances.

It is further ordered and decreed that the said Avis Cooper shall be and she is hereby awarded the care, custody and control of the minor son, James Cooper.

It is further ordered and decreed that the said L. B. Cooper shall pay the sum of \$75.00 as a reasonable attorney fee to C. Leflor Thompson Solicitor for the Complainant herein.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that L. B. Cooper the Respondent, pay the cost herein to be taxed, for which executed may issue.

This 4th day of December, 1954

Julius M. Hester

Judge Circuit Court, In Equity.

I, _____, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19____

Register of Circuit Court, In Equity.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

AVIS DE COPIE

Complainant

VS.

J. R. COOPER

Respondent

DIVORCE DECREE

FILED

DEC 4 1954

ALICE J. DICK, Register

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

~~AVIS COOPER~~, Complainant
vs.

~~L. R. COOPER~~, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on ~~Answer & Waiver~~ and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said

~~Avis Cooper~~ is forever divorced from the said ~~L. R. Cooper~~ for and on account of

Non-Support - It is further ordered and decreed that the said L. R. Cooper shall convey to the said Avis Cooper the residence and four acres of land on which same is situate in lieu of alimony, said propert to be free of any lien or encumbrances.

It is further ordered and decreed that the said Avis Cooper shall be and she is hereby awarded the care, custody and control of the minor son, Jordan Cooper.

It is further ordered and decreed that the said L. R. Cooper shall pay the sum of \$75.00 as a reasonable attorney fee to C. LeNoir Thompson Solicitor for the Complainant herein.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that ~~L. R. Cooper~~ the ~~Respondent~~ pay the cost herein to be taxed, for which executed may issue.

This ~~14th~~ day of ~~December~~ 19 ~~54~~

~~Hubert M. Hall~~
Judge Circuit Court, In Equity.

I, ~~Alice J. Duck~~, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree, rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the ~~12th~~ day of ~~April~~, 19 ~~56~~

Register of Circuit Court, In Equity.

AMENDED COMPLAINT

BOOK 016 PAGE 98

AVIS COOPER,	¶	IN THE CIRCUIT COURT OF
CONPLAINANT,	¶	BALDWIN COUNTY, ALABAMA
VS	¶	IN EQUITY
L. R. COOPER,	¶	
RESPONENT.	¶	

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

Comes your Complainant, Avis Cooper, and amends here complaint heretofore
filed in said cause and respectfully represents and shows unto your Honor and
this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents
of Baldwin County, Alabama, and over the ages of 21 years.

2.

That your Complainant and the Respondent married in Baldwin County,
Alabama, on November 2, 1931, and lived together as husband and wife in
Baldwin County, until more than twelve months next preceding year on, to-
wit, January 1, 1950.

3.

That your Complainant avers and alleges that since their marriage that
said Respondent has been guilty of adultery with one Hattie Davis, whose
name to your Complainant is otherwise unknown and with divers parties and per-
ons whose names to your Complainant is unknown, which actions of the
Respondent have not been condoned by your Complainant.

4.

Your Complainant avers and charges that the said Respondent did on or
about the 10th day of April, 1954, and many times subsequent 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; Complain-
ant avers and charges that Respondent has made numerous threats of doing
her physical harm and from his manner and conduct toward her, she is rea-

sonbly convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

5.

Your Complainant further avers and alleges that the said Respondent has, since here said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

6.

The Complainant further show unto the Court that she has lived separate and apart from the bed and board of L. H. Cooper, her said husband, for two years and without support from him for two years next preceding the filing of this bill and during said period she has been a bona fide resident in the State.

7.

There were born as fruits of this marriage between the Complainant and the Respondent two children; Iris Cooper Wilson, who is now of age, and Jordan Cooper, age 16. That the mother of said children is a suitable, fit and proper person to have the care, custody and control of the monor child, Jordan Cooper.

8.

Your Complainant shows unto this Honorable Court that the Respondent owns considerable property among which are the following described parcels on which the home is situated and adjoining therto, which your Complainant helped procure through her labor and monies paid over by hereand which monies were earned by your Petitioner, said properties being as follows:

East Half of the East Half of the Northwest Quarter of the North-East Quarter, Section 15, Township 5 South, Range 3 East, being 9 acres.

and

The South Half of the Northwest Quarter of Southwest Quarter of the Southwest Quarter, Section 17, Township 5 South, Range 4 East, being 5 acres, less one acre to Cahrls and Iris Wilson, Section 15, Township 5 South, Range 3 East.

which comprise 14 acres of the 55 acres owned by the said Respondent.

9.

That siad property togehter with the remaining lands not mentioned in this petition were accumulated during coverture; and that your Petitioner had made a home for said Respondent in addition to the monies earned by your Petitioner and contributed to the purchase and maintenance of said property; and further that your Petitioner borne children for said Respondent, one of which is presently with your Petitioner, being maintained, cared for and supported by her.

10.

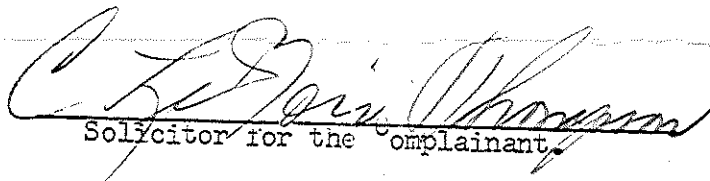
That your Petitioner has no separate estate of her own and that she has no money with which to pay her Solicitor's fee and that she is obligated for the support of the said son 16 years old now residing with her, but that the said Respondent is well able to pay said Solicitor fee and provided support for the said minor child.

11.

That all of the estate owned by the Respondent was acquired as aforesaid during coverture and that your Petitioner does not ask for one-half of the acreage so accumulated but only for the nine acre parcel and the home leaving the larger acreage to the Respondent.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said L. A. Cooper 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 to this Honorable Court.

That your Complainant be awarded the care, custody and control of the said minor child, Jordan Cooper, and that in lieu of permanent alimony for your Petitioner; that this Honorable Court will make and enter a decree ordering that she is the owner of the said nine acre parcel comprising the homestead, together with the personal property situate therein, all of which is necessary that a proper and suitable home be maintained for said minor and that your Honor will order that said Respondent shall pay a reasonable attorney fee in said matter to your Petitioner's Solicitor, in the premises; and that your Honor will make and enter a decree granting to her an absolute divorce from the said L. A. Cooper, and your Petitioner prays for such other, further or general relief that she may, in equity and good conscience be entitled to receive, as in duty bound she will ever pray.


Solicitor for the Complainant.

FILED

7-21-54

ALICE J. DUCK, Clerk

BOOK 016 PAGE 98

Received in Sheriff's Office
this 21 day of July 1954
TAYLOR WILKINS, Sheriff

3268

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

AVIS COOPER,

COMPLAINANT,

VS

L. R. COOPER

RESPONENT.

AMENDED COMPLAINT

FILED

JUL 21 1954

ALICE J. DUCK, Register

C. LeNoir Thompson
Attorney At Law
Bay Minette, - Alabama

Received 21 day of July 1954
and on 21 day of July 1954
I served a copy of the within
on Harry Wilder
By service on Harry Wilder
TAYLOR WILKINS, Sheriff
By Det. B. L. L. L.

ANSWER

AVIS COOPER

COMPLAINANT

VS

L. R. COOPER

RESPONDENT

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

Comes now the Respondent in the above styled cause and for answer to the amended complaint says as follows:

1.

He admits the allegations of Section 1.

2.

He admits the allegations of Section 2.

3.

He denies the allegations of section 3.

4.

He denies the allegations of Section 4.

5.

He denies the allegations of Section 5.

6.

He denies the allegations of Section 6, and says that until recently he and the Complainant lived together, that he supported her adequately and in a manner in keeping with his income.

7.

He admits the allegations of Section 7.

8.

He denies the allegations of Section 8 and says that he owns the lands described therein; that the tract first described is, in the opinion of the Respondent, worth \$5000.00; that the other tract of land described is worth \$700.00.

9.

He denies the allegations of Section 9 and says the property described in Section 8 of the complaint were purchased with his money and as a result of his efforts.

FILED
AUG 10 1954
ALICE J. DYCK, Register

10.

He denies the allegations of Section 10.

Wilters & Brantley

By: Albert M Brantley
Solicitor for the Respondent.

FILED

8-10-54

ALICE J. DUCK, Clerk

RECEIVED
JUL 10 1954
JUL 10 1954

3268

L.R. Cooper

vs

Avis Cooper

FILED
AUG 10 1954
ALICE J. DUCK, Register

AVIS COOPER
COMPLAINANT
VS
R. L. COOPER
RESPONDENT

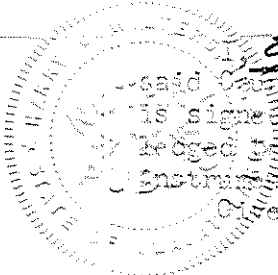
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Now comes the Respondent, in his own proper person, and admits the allegations contained in the bill of complaint filed in the above styled cause, as to ages, residence and marriage, but denies all other allegations contained therein and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine the Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

R. L. Cooper

STATE OF ALABAMA
BALDWIN COUNTY



Henry J. Walters Jr., a Notary Public, in and for said County, in said State, hereby certify that R. L. Cooper, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date. Given under my hand and seal on this the 3 day of December, 1954.

Henry J. Walters Jr.
Notary Public,

AVIS COOPER

COMPLAINANT

VS

L. R. COOPER

RESPONDENT

Q

Q

Q

Q

Q

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

DEMURRERS

Comes now the Respondent in the above styled cause and demurs to the Complainant's Complaint and for grounds for said demurrers says:

1.

The Bill of Complaint fails to allege that the Complainant has been a bona fide resident of Baldwin County for the period required to give the Court Jurisdiction of this cause.

2.

The Bill of Complaint fails to allege that the Complainant is a citizen of the State of Alabama.

3.

The Third section of the Bill of Complaint fails to show whether the acts of adultery complained of were committed since the time the parties to this suit were married.

4.

Section Four of this Complaint fails to set out the acts of cruelty complained of with sufficient particularity.

5.

Section Six is antagonistic to and inconsistent with Section Four of this Complaint.

6.

That the Complainant is a suitable and proper person to have custody of Jordan Cooper is but a conclusion of the pleader.

7.

Section 8, of the Complaint is not full enough to apprise the Respondent of what he is called upon to answer therein.

8.

Section 9 fails to allege which of the children named in the bill of complaint presently resides with the Complainant.

The Complaint fails to state a cause of action.

FILED

7-8-54

ALICE J. BUCK, Clerk

Wilters & Brantley

BY:

Robert M Brantley
Attorneys for the Respondent

3268

AVIS COOPER

COMPLAINANT

VS

L. R. COOPER

RESPONDENT

DEMURRERS

FILED

JUL 8 1954

ALICE J. BOCK, Register

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Myrtleene Nixon

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Avis Cooper and Maybelle Ard

as witnesses in behalf of Avis Cooper in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Avis Cooper

and L. R. Cooper, Complainant

Respondent
on oath, to be by you administered, upon
to take and certify the deposition^s of the witness^{es} and return the same to our Court, with all convenient speed, under your hand.

Witness 4 day of Dec, 1944

Reice L. Adams
Register.

Commissioner's Fee, \$

Witness' Fees, \$

AVIS COOPER

vs.

L. R. COOPER

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, AS RETURNED
and testimony of witnesses: Avis Cooper and Marielle Ard

and in behalf of Defendant upon Answer to Complaint

C. L. G. Thompson

Benjamin J. Smith

Register.

The State of Alabama, } Circuit Court of Baldwin County, Alabama
Baldwin County. } (In Equity)

AVIS COOPER

Complainant

VS.

L. R. COOPER

Respondent

I, Lytleone Nixon

as Registered and Commissioner

have called and caused to come before me Avis Cooper and Maybelle Ardwitness, as named in the Requirement for Oral Examination, on the ----- day of December,1954, at the office of C. LeNoir Thompsonin Bay Minette, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said Avis Cooper and Maybelle Ard

doth depose and say as follows:

That my name is Avis Cooper I am over the age of 21 and a resident of Baldwin County, Alabama, and have been more than two years next preceding year. The Respondent, L. R. Cooper, and I were married in Baldwin County, Alabama, on November 2, 1931, and lived together as husband and wife in Baldwin County until on or about January 1, 1950; that the Respondent since that date has failed or refused to provide maintenance and support for me and the children, one of which is now married and the younger, Jordan Cooper being age 16 years; that I have maintained and support the said Jordan Cooper during this period and have had his care, custody and control since birth I respectfully represent unto this Honorable Court that I am a fit, suitable and proper person to have the care, custody and control of the said Jordan Cooper, who resides with me. A property settlement having been entered into whereby the Respondent has agreed to convey the residence and four acres of land to your Complainant herein and said conveyance having been executed, your Complainant respectfully represents that the remaining portion of said property settlement be incorporated as a part of this testimony and same be included in the decree of this Honorable Court as may be pertinent. I know that we shall never live together as husband and wife again and respectfully ask this Honorable Court for a divorce.

Avis Cooper.

That my name is Mrs. Maybelle Ard, I know both parties to this cause they are both over the age of 21 and residents of Baldwin County, Alabama. They were married on November 2, 1931, in Baldwin County, Alabama, and have lived together as husband and wife until the time of the separation which occurred in Baldwin County; they were separated on or about January 1, 1950, and have not lived together as husband and wife since that time and so far as I know the Respondent has not supported the Complainant in this cause since that time. I respectfully represent that the Complainant is a fit, suitable and proper person to have the care, custody and control of Jordan Cooper, age 16, who is fruits of their marriage.

Maybelle Ard

ORAL EXAMINATION

I, Lyrleene Nixon, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition...on Oral Examination was taken down by me in writing in the words of the witness es...and read over to them...and they...signed the same in the presence of myself and C. LeNoir Thompson at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness... or had proom made before me of the identity of said witness es...; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this...day of December, 1951

Lyrleene Nixon (L. S.)

No.....	Page.....
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
AVIS OCCUPY	
I, <u>2. OCCUPY</u>	vs. Complainant
Respondent	
Oral Deposition	
Filed	, 19...
Recorded in	
, Register	
Vol.....	Page.....
, Register	

3-1-2

AMENDED COMPLAINT

AVIS COOPER,	1	IN THE CIRCUIT COURT OF
COMPLAINANT,	1	BALDWIN COUNTY, ALABAMA
VS	1	IN EQUITY
L. R. COOPER,	1	
RESPONDENT.	1	

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

Comes your Complainant, Avis Cooper, and amends her complaint heretofore
filed in said cause and respectfully represents and shows unto your Honor and
this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents
of Baldwin County, Alabama, and over the ages of 21 years.

2.

That your Complainant and the Respondent married in Baldwin County,
Alabama, on November 2, 1931, and lived together as husband and wife in
Baldwin County, until more than twelve months next preceding year on, to-
wit, January 1, 1950.

3.

The Complainant further shows unto the Court that she has lived
separate and apart from the bed and board of L. R. Cooper, her said husband,
for two years and without support from him for two years next preceding
the filing of this bill and during said period she has been a bona fide
resident in the State.

4.

There were born as fruits of this marriage between the Complainant and
the Respondent two children; Iris Cooper Wilson, who is now of age and
Jordan Cooper, age 16. That the mother of said children is a suitable,
fit and proper person to have the care, custody and control of the minor
child, Jordan Cooper.

5.

Your Complainant shows unto this Honorable Court that the Respondent
owns considerable property among which are the following described parcels
on which the home is situated and adjoining thereto, which your Complainant
helped procure through her labor and monies paid over by her and which
monies were earned by your Petitioner, said properties being as follows:

East Half of the East Half of the Northwest Quarter of the North-East Quarter, Section 15, Township 5 South, Range 3 East, being 9 acres.

and

The South Half of the Northwest Quarter of Southwest Quarter of The Southwest Quarter, Section 17, Township 5 South, Range 4 East, being 5 acres, less one acre to Charles and Iris Wilson, Section 15, Township 5 South, Range 3 East.

which comprise 14 acres of the 15 acres owned by the said Respondent.

6.

That said property together with the remaining lands not mentioned in this petition were accumulated during coverture; and that your Petitioner had made a home for said Respondent in addition to the monies earned by your Petitioner and contributed to the purchase and maintenance of said property; and further that your Petitioner borne children for said Respondent, one of which is presently with your Petitioner, being maintained, cared for and supported by her.

7.

That your Petitioner has no separate estate of her own and that she has no money with which to pay her Solicitor's fee and that she is obligated for the support of the said son, 16 years old, now residing with her, ~~but that the said Respondent is well able to pay said Solicitor fee and~~ provide support for the said minor child.

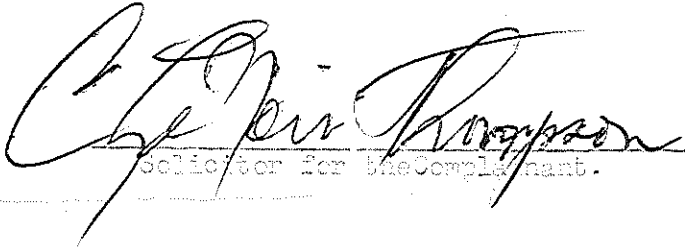
8.

That all of the estate owned by the Respondent was acquired as aforesaid during coverture and that your Petitioner does not ask for one-half of the acreage so accumulated but only for the four acre parcel and the home leaving the larger acreage to the Respondent.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said L. B. Cooper 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 to this Honorable Court.

That your Complainant be awarded the care, custody and control of the said minor child, Jordan Cooper, and that in lieu of permanent alimony for your Petitioner; that this Honorable Court will make and enter a decree ordering that she is the owner of the said four acre parcel comprising the homestead, together with the personal property situate therein, all of which is necessary that a proper and suitable home be maintained for said minor and that your Honor will order that said Respondent shall pay a reasonable attorney fee in said matter to your Petitioner's Solicitor, is the premises;

and that your Honor will make and enter a decree granting to her an absolute divorce from the said L. A. Cooper, and your Petitioner prays for such other, further or general relief that she may, in equity and good conscience be entitled to receive, as in duty bound she will ever pray.


C. A. Robinson
Solicitor for the Complainant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN WRIT

AVIS COOPER,

COMPLAINANT,

VS

L. H. COOPER,

RESPONDENT.

Amended Complaint

*Filed 12/4/50
Hutton*

From the Law Offices:

C. Leloir Thompson
Attorney at Law
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

BOOK 016 PAGE 99

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon L. R. Cooper, 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 Avis Cooper, as Complainant.

WITNESS my hand this ____ day of June, 1954.

Register.

AVIS COOPER,	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT,	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY.
L. R. COOPER,	Ø	
RESPONDENT.	Ø	

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

Your Complainant, Avis Cooper, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and over the ages of 21 years.

2.

That your Complainant and the Respondent married in Baldwin County, Alabama, on November 2, 1931, and lived together as husband and wife until on, to-wit, January 1, 1950.

3.

That your Complainant avers and alleges that said Respondent has been guilty of adultery with one Hattie Davis, whose name to your Complainant is otherwise unknown and with divers parties and persons whose names to your Complainant is unknown.

4.

Your Complainant avers and charges that the said Respondent did on or about the 10th day of April, 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 reason-

BOOK 016 PAGE 100

ably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

5.

Your Complainant further avers and alleges that the said Respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

6.

The Complainant further shows unto the Court that she has lived separate and apart from the bed and board of L. R. Cooper, her said husband, for two years and without support from him for two years next preceding the filing of this bill and during said period she has been a bona fide resident in the State.

7.

There were born as fruits of this marriage between the Complainant and the Respondent two children; Iris Cooper Wilson, who is now of age, and Jordan Cooper, age 16, that the mother of said children is a suitable fit and proper person to have the care, custody and control of the minor child, Jordan Cooper.

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Your Complainant shows unto this Honorable Court that the Respondent owns considerable property among which are the following described parcels on which the home is situated and adjoining thereto, which your Complainant helped procure through her labor and monies paid over by her and which monies were earned by your Petitioner, said properties being as follows:

East Half of the East Half of the Northwest Quarter of the North-East Quarter, Section 15, Township 5 South, Range 3 East, being 9 acres.

and

The South Half of the Northwest Quarter of Southwest Quarter of the Southwest Quarter, Section 17, Township 5 South, Range 4 East, being 5 acres, less one acre to Charles and Iris Wilson, Section 15, Township 5 South, Range 3 East.

which comprise 14 acres of the 55 acres owned by the said Respondent.

9.

That said property together with the remaining lands not mentioned in this petition were accumulated during coverture; and that your Petitioner had made a home for said Respondent in addition to the monies earned by your Petitioner and contributed to the purchase and maintenance of said property; and further that your Petitioner has borne children for said Respondent, one of which is presently with your Petitioner, being maintained, cared for and supported by her.

10.

That your Petitioner has no separate estate of her own and that she has no money with which to pay her Solicitor's fee and that she is obligated for the support of the said son 16 years old now residing with her, but that the said Respondent is well able to pay said Solicitor fee and provided support for the said minor child.

11.

That all of the estate owned by the Respondent was acquired as aforesaid during coverture and that your Petitioner does not ask for one-half of the acreage so accumulated but only for the nine acre parcel and the home leaving the larger acreage to the Respondent.

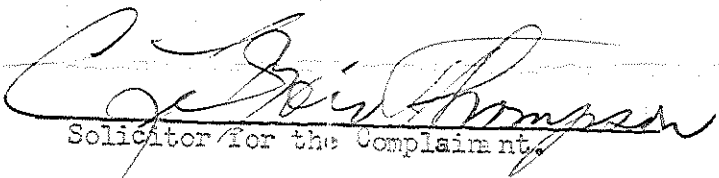
WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said L. R. Cooper party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

That your Complainant be awarded the care, custody and control of the said minor child, Jordan Cooper, and that in lieu of permanent alimony for your Petitioner; that this Honorable Court will make and enter a decree ordering that she is the owner of the said nine acre parcel comprising the homestead, together with the personal property situate therein, all of which is necessary that a proper and suitable home be maintained for said minor and that your Honor will order that said Respondent shall pay a reasonable attorney fee in said matter to your Petitioner's Solicitor, in the premises; and that your Honor will make and enter a decree granting to her an absolute divorce from the said L. R. Cooper, and your Petitioner prays for such other, further or general relief that she may, in equity and good conscience be entitled to receive, as in duty bound she will ever pray.

FILED

6-4-54

ALICE L. DUCK, Clerk


Solicitor for the Complainant.

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Received 7 day of June 1954
and on 7 day of June 1954
served a copy of the within

service on L R Cooper

TAYLOR WILKINS, Sheriff
By Collins & Stead S.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AVIS COOPER,
COMPLAINANT,
VS
L. R. COOPER,
RESPONDENT.

Bill of Complaint

FILED
JUN 7 1954

ALICE J. DUCK, Register
C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama.

105-1000-100

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