

3278

State of Alabama
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon Viola Joyner to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in Circuit Court of Baldwin County, Alabama in Equity by Huey Joyner as Complainant and against Viola Joyner as Respondent.

Witness my hand, this the 19th day of June 1954.

W. J. Duck
Register

Huey Joyner

Complainant

Vs-

Viola Joyner

Respondent

In the Circuit Court of
Baldwin County, Alabama
In Equity

To the Honorable Hubert M. Hall, Judge of The Circuit Court of Baldwin County, Alabama.

Your Complainant, Huey Joyner respectfully represents unto your Honor and this Honorable Court as follows:

1.
Your Complainant is a bona fide resident of Baldwin County, Alabama and over the age of Eighteen years; the respondent is over the age of fifteen years and is a bona fide resident of Baldwin County, Alabama.

2.
That your complainant married at Leaksville, Miss. on to-wit April 24, 1954 and lived together as husband and wife until on to-wit June 12, 1954 when they seperated because of the cruelty of the respondent.

3.
That on to-wit June 12, 1954 and on several occasions prior thereto, the Respondent threatened and abused the Complainant, threatened to do violence to his person and actually did do violence to his person which would necessarily endanger his life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and he did actually believe that if he continued to live with her that she would carry out her threats and do actual violence to his person which would necessarily endanger his life and health.

4.
That there are no children as fruits of this marriage and no property to be divided.

5.
Wherefore, the premises considered, your complainant prays that your Honor will by proper procedure make the said Viola Joyner party respondent to this Bill of Complaint, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practices of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof Your Honor will grant to him an absolute divorce, forever barring the bonds of matrimony existing between your Complainant and Respondent and your Complainant prays for such other, further, different or General relief as he may be in Equity and good conscience entitled to receive.

Robert F. McNeely
Solicitor for the Complainant

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County of Baldwin

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Witness my hand, this the 19th day of June 1954.

Reverend J. H. Henshaw
Register

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Complainant

Vs

Viola Joyner

Respondent

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In Equity

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Hubert M. Hall
Solicitor for the Complainant

W 3278
Dismissed 10-20-54

Huey Joyner
Complainant

Vs

Viola Joyner
Respondent

If not in Rabun
see where she is

Summons and Complaint

Filed 6-19-54
A. J. French
Register

Received in Sheriff's Office
this 19 day of June 1954
TAYLOR WILKINS, Sheriff

Atmore

Returned ~~27~~ day of ~~June~~ 1954
Not found in my county after diligent search and in-
quiry.
By ~~Taylor Wilkins Sheriff~~
~~Deputy Sheriff~~

Returned to Court on
order of Plaintiff
at the undersigned
Taylor Wilkins
Sheriff
8-6-54