

3346

STATE OF ALABAMA
BALDWIN COUNTY

You are hereby com anded to summon James Nathan Scott, 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 Lois Marrell Scott, as Complainant.

Witness my hand this 7th day of September, 1954.

Reigelman
Register.

LOIS MARRELL SCOTT,	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT,	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY.
JAMES NATHAN SCOTT,	Ø	
RESPONDENT.	Ø	

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

Your Complainant, Lois Marrell Scott, 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 are both over the age of 21 years.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on March 19, 1950, and lived together as husband and wife until on, to-wit, September 2, 1954.

3.

Your Complainant further avers and alleges that said Respondent was guilty of adultery, on June 6, 1954, with divers parties and persons whose names to your Complainant are unknown.

4.

Your Complainant avers and charges that the said Respondent did on or about the 2nd day of September, 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 reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

5.

There was born as fruits of this marriage between the Complainant and the Respondent, two children; Michael Dean Scott, age about 13 months and James Ladon Scott, age about 3 years; that the mother of said children is a suitable, fit and proper person to have the care, custody and control.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said James Nathan Scott, 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 minor children, Michael Dean Scott, age about 13 months and James Ladon Scott, age about 3 years; that your Honor will grant to the Complainant permanent maintenance for said children in the amount of Fifty (\$50.00) Dollars per month and inasmuch as your Complainant is without funds it is suggested that One Hundred (\$100.00) Dollars be allowed as a reasonable Solicitor's fee to your Complainant's Solicitor for his services herein and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your Complainant as alimony for her support and maintenance pending this suit, and what will be a reasonable amount to be allowed your Complainant's Solicitor for his services herein; and provide that your Petitioner may remove from the premises, without interference by the Respondent, her clothing, household goods and furniture, and that upon a final hearing of this cause, that your Honor will render a decree granting to your Complainant permanent alimony for the support and maintenance of said minor children, and Your Complainant prays for such other, further or general relief to which she may be entitled and your Complainant prays, etc.


Solicitor for the Complainant.

Received in Sheriff's Office
this 7 day of Sept., 1954
TAYLOR WILKINS, Sheriff

203346

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

LOIS MARRELL SCOTT,

COMPLAINANT,

VS

JAMES NATHAN SCOTT,

RESPONDENT

Bill of Complaint

FILED

9-7-54

ALICE J. DUCK, Register

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

Received _____ day of _____ 19____
and on 8 day of Sept., 1954
I served a copy of the within Bill of Complaint
on _____

By service on James Nathan Scott

TAYLOR WILKINS, Sheriff

By J. D. [Signature] D. S.