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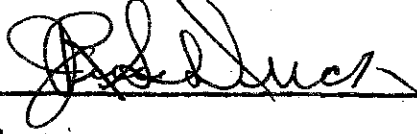
STATE OF ALABAMA |

BALDWIN COUNTY |

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. L. Boothe to appear within thirty days from the service of this Writ in the Circuit Court, Equity Side, to be held for said county at the place of holding same, then and there to demur, plead to or answer the Bill of Complaint of Irene Boothe.

Witness my hand this 19<sup>th</sup> day of June, 1944.



Register.

Respondent, W. L. Boothe, resides at ~~Fairhope, Alabama.~~

*110 Conception St  
Mobile*

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Oratrix, Irene Boothe, presents this Bill of Complaint against W. L. Boothe and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix and the Respondent are each over twenty-one years of age and each reside at Fairhope in Baldwin County, Alabama.

2. Your Oratrix was lawfully married to the Respondent in Bay Minette, Alabama on to-wit, March 14, 1933, and lived together as man and wife until on to-wit, June 11, 1944, when they separated. Immediately prior to the separation the Respondent, while under the influence of intoxicating liquors, became angry with your Oratrix bit a piece out of her leg and threatened to kill her, and from the said acts and threats on the part of the Respondent, your Oratrix is put in fear of being severely injured or done great bodily harm if she tried to continue to live with the Respondent.

3. Your Oratrix is the mother and the Respondent is the father of V. D. Boothe, a boy ten years of age and Louis Elizabeth Boothe, a girl eight years of age, each of whom are now in the custody of your Oratrix and who have always been in the custody and under the control of your Oratrix, who is a fit and proper person to have the permanent custody and control of the said minors.

4. The Respondent is an able bodied man who is capable of earning from fifty to sixty dollars per week. Your Oratrix does not have sufficient means to maintain and support herself and her two minor children. Your Oratrix further alleges that she has no funds or money to pay her solicitor for the services rendered by him in this cause.

#### PRAYER FOR PROCESS

Your Oratrix prays that the Court will take jurisdiction of the cause made by this Bill of Complaint and that due notice thereof be given to the Respondent, W. L. Boothe, in the form and manner prescribed by law requiring him to demur, plead to or answer

the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

THE PREMISES CONSIDERED your Oratrix respectfully prays for the following relief:

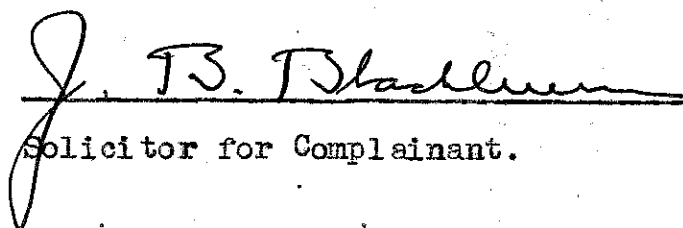
1. That the Court will order a reference to be held before the Register in order that he may ascertain and report the amount of alimony pendente lite that should be allowed your Oratrix, the amount of solicitor's fees that should be allowed the solicitor for your Oratrix and the amount which should be allowed and paid for the maintenance and support of the said minor children.

2. That the bonds of matrimony now existing between your Oratrix and the said Respondent be dissolved and that your Oratrix be forever divorced from him.

3. That your Oratrix be given and granted the permanent custody and control of the said minor children.

4. That alimony pendente lite, permanent alimony, maintenance and support of the said minors be allowed and that the Respondent, by proper Decree, be compelled to pay same.

5. Your Oratrix prays for such other, further and general relief as she may be equitably entitled to the premises considered.

  
Solicitor for Complainant.

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BILL OF COMPLAINT

IRENE BOOTHE,

Complainant,

VS.

W. L. BOOTHE,

Respondent.

110 Conception St  
Mobile Ala

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Filed June 19, 1944  
[Signature]

8-3-44

W. H. HOLCOMBE, Sheriff  
R. H. Matthews

BY SERVICE ON

Received [Signature] Day of August 1944  
and on [Signature] Day of August 1944  
I served a copy of the within [Signature] on [Signature]  
[Signature]