(1900)

STATE OF ALABAMA BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - - GREETING:

WE COMMAND YOU, that you summon RUDOLPH SCOTT to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of the summons, and there to answer, plead, or demur without oath to a bill of complaint, lately exhibited by EDITH SCOTT and further to do and perform what the said Judge shall order and direct in that behalf, and this the Defendant shall in no wise omit, under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court immediately upon the execution thereof.

day of WITNESS, R. S. DUCK, Register of said Circuit Court, this the

EDITH SCOTT,

COMPLAINANT

VS

RUDOLPH SCOTT,

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

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

Now comes your Complainant, EDITH SCOTT, and humbly complaining against the Respondent, Rudolph Scott, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over twenty one years of age, and bona fide residents of Baldwin County, Alabama, living at Summerdale;

2...

That the Complainant and the Respondent were married at Bay Minette, Alabama, on to-wit the 4th day of June, 1941, and lived together as husband and wife until, to-wit, August 5th, 1944;

3.

That on, to-wit, the 5th day of August, and at various times prior thereto, the Respondent cursed, threatened and abused the complainant and on various and sundry occasions did actual violence to her person by striking her, which necessarily endangered her life and health; that the conduct of the Respondent is such as to give the complainant every reasonable apprehension to believe, and she does actually believe, that if she continues to live with him he will carry out

his threats and do further violence to her person which will necessarily endanger her life and health.

4.

That there was born to said marriage between your Complainant and the Respondent, one child, JOYCE MARIE SCOTT, now twenty two months of age; that the Complainant is pregnant with another child to be born in November 1944; that the Complainant is a suitable, fit and proper person to have the care, custody and central of the said children; that the Respondent is of such type and character that he is not a suitable, fit or proper person to have their care, custody and control.

5.

That the Complainant is feeble in health, has no funds or property, and no means of supporting herself and the children, or employing counsel to prosecute this suit;

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Rudolph 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.

Complainant further prays that a proper decree be made and entered ordering a reference to determine the amount of attorney's fee to be paid by the Respondent for the benefit of the Complainant, and also a reasonable alimony pen dente lite for the maintenance and support of the Complainant and the said Joyce Marie Scott;

Complainant further prays that upon a final hearing of this cause an order and decree be made granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that the Respondent be required to pay to the Complainant for the support of herself and the minor child aforesaid such amount as permanent alimony as to your Honor shall seem meet and proper; that a further decree be made and entered awarding to her the custody, care and control of said said minor child, oyce Marie Scott;

Your Complainant prays for such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

REEBE & HALL

BY Solicitors for Complainant.

Prefuted Lug 22. 1844

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RUDOLPH SCOTT, RESPONDENT

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EDITH SCOTT, COMPLAINANT