

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Summer Lee Thompson, Complainant
vs.

Artis G. Thompson, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer and 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 Summer Lee Thompson is forever divorced from the said Artis G. Thompson for and on account of Cruelty

The Court hereby confirms the stipulated agreement filed with the proceeding and entered into by and between the parties and orders and adjudges that the parties comply therewith. The stipulation is made a part of this decree as through attached hereto.

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 Artis G. Thompson the Respondent pay the cost herein to be taxed, for which executed may issue.

This 4th day of November, 1955.

Hubert M. Hall
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

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

NOV 4 1955

ALICE J. DOCK, Register

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S T I P U L A T I O N

1. As a property division the Respondent has conveyed by
ce instrument to the Complainant his undivided interest in
al property together with the improvements thereon, which has
fore been jointly owned by the parties hereto. He has also
over to her all household furniture, fixtures and all other
ts of such dwelling, save and except his clothing and personal
s.

2. It is further stipulated and agreed that the Respondent shall have the right to go into said property and remove therefrom the garden tractor together with all of its accessories. The tools and other machinery are to be divided as agreed upon between the Respondent and his son, Tracy.

3. It is further stipulated and agreed by the parties hereto that the Complainant shall have the full care, custody and control of their minor children with the Respondent to have the right to visit such children at reasonable and proper times. The Respondent shall also have the right to have Tracy visit with him at any time that Tracy desires to do so and shall have the right to have his minor daughter spend at least one week-end with him out of each calendar month provided that some adult female member of the Respondent's family shall come with him to get his daughter and shall stay with him in his home on the nights that such minor daughter stays with

him. Should he come after his daughter on Friday afternoon of any week he shall return her to the Complainant's home before dark on Sunday afternoon.

4. It is further stipulated and agreed between the parties hereto that the Respondent shall pay the Complainant the sum of Twenty-five Dollars (\$25.00) a week for the support and maintenance of such minors said payments to be made on Saturday of each week. When his son becomes of age, enters the Army or becomes self-supporting such payments for support and maintenance shall be reduced to Fifteen Dollars (\$15.00) a week. These payments are to continue until his daughter marries or becomes of age or until changed by an order of this Court.

5. It is further stipulated and agreed between the parties hereto that the Respondent shall pay the 1955 taxes on the property which he has conveyed to the Complainant.

6. The Respondent hereby agrees to pay Ernest M. Bailey as solicitor's fee for the Complainant the sum of One Hundred Twenty Dollars (\$120.00) for representing the Complainant.

7. The Respondent agrees to pay the Complainant the additional sum of Six Dollars (\$6.00) a month to be applied upon the utilities until his payment for support of Tracy ceases; he will then pay the sum of Ten Dollars (\$10.00) a month upon such utilities.

8. The Respondent agrees to continue to carry Group hospitalization insurance for the minor children.

Dated this November 4, 1955.

Witness:

John Thompson
Ernest M. Bailey

Artis G. Thompson
Sumner Lee Thompson

RECORDED

FILED

NOV 4 1955

ALICE J. DECK, Registrar

| | | |
|----------------------|---|--------------------------|
| SUMMER LEE THOMPSON, | ¶ | IN THE CIRCUIT COURT OF |
| Complainant | ¶ | BALDWIN COUNTY, ALABAMA |
| vs. | ¶ | IN EQUITY |
| ARTIS G. THOMPSON, | ¶ | |
| Respondent | ¶ | <u>AMENDED COMPLAINT</u> |

Comes the Complainant, Summer Lee Thompson, in the above entitled cause and files this her amendment to the Bill of Complaint heretofore filed in this cause so that the same shall read as follows:

| | | |
|----------------------|---|-------------------------|
| SUMMER LEE THOMPSON, | ¶ | IN THE CIRCUIT COURT OF |
| Complainant | ¶ | BALDWIN COUNTY, ALABAMA |
| vs. | ¶ | IN EQUITY |
| ARTIS G. THOMPSON, | ¶ | |
| Respondent | ¶ | |

Comes your Complainant, SUMMER LEE THOMPSON, and files this her Bill of Complaint for divorce against ARTIS G. THOMPSON, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That Your Complainant and the Respondent are over the ages of twenty-one years, and that Your Complainant is a resident citizen of Baldwin County, Alabama, residing at Daphne, and the Respondent's last known residency to the best of her knowledge and belief was Mathiston, Mississippi in the care of Mr. W. A. Thompson, or in the care of Mrs. C. G. Nix, Route 15, Box 602, Birmingham, Alabama, and the Respondent's residency is otherwise unknown to her and cannot be ascertained by reasonable effort.

SECOND:

That the Complainant and the Respondent were married on, heretofore, to-wit, August, 1930 at Mathiston, Mississippi, and lived together as man and wife until on, to-wit, the 23rd day of April, 1955, when, on account of the matters hereinafter complained of, Your Complainant was compelled to live separate and apart from the Respondent; that on April 23rd, 1955 the Respondent, ARTIS G. THOMPSON, committed actual violence on her person, attended with danger to life or health in

that on or about said date he did grab the Complainant violently, pulled her hair very severely and abused the Complainant physically; that at times prior thereto the Respondent, ARTIS G. THOMPSON, has struck the Complainant severe blows with his hand; that such violence was attended with danger to the Complainant's life or health of which she had reasonable apprehension if she continued to live with the Respondent and therefore, on or about the 23rd day of April, 1955, she ceased to live with him as his said wife and has since in no way condoned the said treatment of her.

THIRD:

That there were born of this marriage between Your Complainant and the Respondent the following named children, viz: William Tracy Thompson, seventeen years of age and Mary Ellen Thompson, eight years of age. That Your Complainant is a fit and proper person to have the care, custody and control of such children. That Your Complainant has no money or property with which to properly support and educate such children and that the Respondent is able to pay your Complainant such sufficient amounts to properly support and educate such children.

FOURTH:

That your Complainant and Respondent are jointly owners of certain real property located in Baldwin County, Alabama and described as follows:

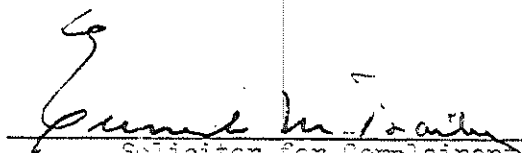
From the NW corner of Section 20, T5S, R2E, run South on the Section line 2872.7 feet and East 40 feet to the beginning corner; thence run East 388 feet to a corner; thence 200 feet to a corner; thence West 387 feet to a corner on the highway; thence run North 200 feet to the beginning point. Containing 1.37 acres and lying in the SW 1/4 of Sec. 20, T5S, R2E. Less that portion conveyed to W. O. Pope by Warranty Deed recorded in Deed Book 156, page 461 in Records of the Judge of Probate, Baldwin County, Alabama.

that your Complainant is now in possession of the premises and is occupying said premises as a homestead or home site for herself and the children of this marriage; that your Complainant and the Respondent, ARTIS G. THOMPSON have accumulated certain personal property during the period of their marriage, to-wit, One Thousand Dollars (\$1,000.00) jointly held United States Government Bonds, and certain funds deposited in the Bank of Fairhope, Fairhope, Alabama, in the amount of Two Thousand Three Hundred and Eleven Dollars and Thirty-nine Cents (\$2,311.39), all of which is now in the possession of the Respondent, ARTIS G. THOMPSON, The Respondent is able to pay your Complainant one-half of the said amounts to properly support and educated such children of this marriage; that your Complainant has employed Ernest M. Bailey as

her Solicitor of Record to prosecute this cause of action and she is unable to pay him a reasonable Solicitor's fee for his services in this matter.

PRAYER FOR PROCESS AND RELIEF:

The premises considered Your Complainant prays that the above named ARTIS G. THOMPSON be made a party Defendant to this cause by the usual writ or process, registered mail or process by publication of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that Your Honor will award Your Complainant custody and control of her minor children herein named and will order and decree that the Respondent shall pay Your Complainant the sum of Forty Dollars (\$40.00) a week as support for such children. That Your Honor will also order and decree that the real property hereinabove described is vested in Your Complainant full title and interest in and to the same; that Your Honor will order and decree that the Respondent will be required to pay to her one-half of the personal property hereinabove referred to and that Your Honor will also order and decree that the Respondent be required to pay Ernest M. Bailey a reasonable Solicitor's fee for his services in prosecuting this cause. That Your Honor will also grant unto the Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to remarry if they see fit and that the Respondent is not to harass Your Complainant in any way or means. Should Your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO:

Louise Wrenbury

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 Summer Lee Thompson

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

SUMMER LEE THOMPSON

, Complainant

and

ARTIS G. THOMPSON

Respondent

on oath, to be by you administered, upon Summer Lee Thompson to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 4 day of Nov, 1945

Reis J. Wicks
Register.

Commissioner's Fee, \$

Witness' Fees, \$

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

SUMMER LEE THOMPSON

Complainant

VS.

ARTIS G. THOMPSON

Respondent

I, _____
as Register and Commissioner _____
have called and caused to come before me _____ Summer Lee Thompson

witness _____ named in the Requirement for Oral Examination, on the _____ day of November
19 55, at the office of _____

in _____, Alabama, and having first sworn said Witness _____ to speak the
truth, the whole truth, and nothing but the truth, the said _____ Summer Lee Thompson

_____ doth depose and say as follows:

My name is Summer Lee Thompson and I am the wife of the Respondent, Artis G. Thompson. I am over the age of twenty-one years and am a resident of Daphne, Baldwin County, Alabama. The Respondent and I were married in Mathison, Mississippi in August, 1930 and lived together as husband and wife until the 23rd day of April, 1955.

On or about the 23rd day of April, 1955 the Respondent committed acts of violence on my person, in that he violently grabbed my hair and very severely abused me physically. He has frequently committed acts of violence to my person and has committed acts which I fear have endangered my life and health.

Summer Lee Thompson
Summer Lee Thompson

ORAL EXAMINATION

I, Louise Dusenbury, 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-----and read over to her and she signed the same in the presence of myself Ernest M Bailey-----
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-----; 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 4th day of November, 1955
Louise Dusenbury (L. S.)

No. _____ Page _____

The State of Alabama
Baldwin County.

In Circuit Court, In Equity

SUMMER LEE THOMPSON
vs.
Complainant

ARTIS G. THOMPSON
Respondent

Oral Deposition

FILED
10/14/55
Recorded in
AUG 13 1955, Register
Record

Filed _____, 19____

Vol. _____ Page _____, Register

8581. NOTE OF TESTIMONY

Printed by the Baldwin Times, Bay Minette, Alabama.

SUMMER LEE THOMPSON

vs.

ARTIS G. THOMPSON

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, _____

Oral Testimony of Summer Lee Thompson

and in behalf of Defendant upon Answer and Waiver

Glenn M. Bailey
Attorney for Complaint

Reese J. Hume
Register.

RECORDED

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

SUMNER LEE THOMPSON

vs.

ARTIS G. THOMPSON

NOTE OF TESTIMONY

Filed in Open Court this

day of **FILED**, 194

NOV 4 1955

ALICE J. BECK, Register.

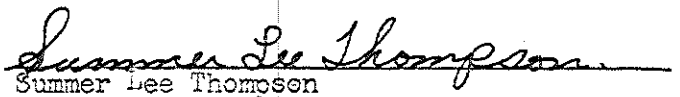
Printed by the Baldwin Times

STATE OF ALABAMA)
BALDWIN COUNTY)

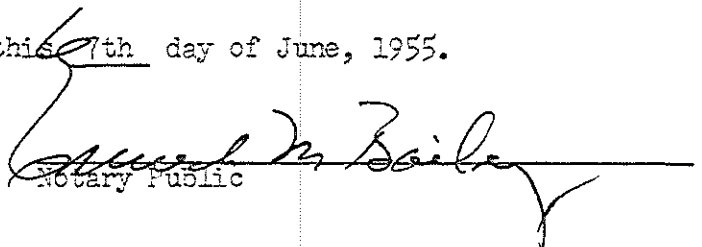
A F F I D A V I T

Before me, Ernest M. Bailey, Notary Public in and for the State of Alabama at Large, personally appeared Summer Lee Thompson, who is known to me and who being by me first duly sworn, deposes and says:

That she is the Complainant in that certain action pending in the Circuit Court of Baldwin County, Alabama, wherein Summer Lee Thompson is the Complainant and Artis G. Thompson is the Respondent; That the last known residency of the said Respondent, Artis G. Thompson, was to the best of her knowledge and belief, Mathison, Mississippi, in care of W. A. Thompson, or in the care of Mrs. C. G. Nix, Route 15, Box 602, Birmingham, Alabama; That the residency of the Respondent, Artis G. Thompson is otherwise unknown to her and cannot be ascertained by reasonable effort; That the Respondent, Artis G. Thompson, is over the age of twenty-one years.


Summer Lee Thompson

Sworn to and subscribed before me on this 6th day of June, 1955.


Notary Public



SUMMER LEE THOMPSON
Complainant

vs

ARTIS G. THOMPSON
Respondent

AFFIDAVIT

3548

[Handwritten signature and text, including "J. B. ..."]

ERNEST M. BAILEY
ATTORNEY AT LAW
303 FAIRHOPE AVE.
TELEPHONE WAVERLY 8-9759
FAIRHOPE, ALABAMA

June 13, 1955

Mrs Alice Duck
Clerk, Circuit Court
Baldwin County
Bay Minette, Alabama

In re Thompson vs Thompson

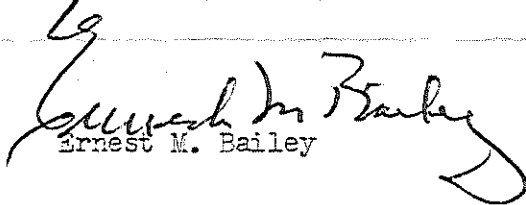
Dear Mrs Duck:

Attached herewith find Bill of Complaint and Affidavit
necessary for service by registered mail. in the case as stated above.

As will be noted the Respondent is at either of two
addresses insofar as the Complainant knows, otherwise his address is
unknown. I will appreciate you mailing copies of the complaint to the
two addresses (two copies inclosed) registered mail, and mark on the
outside of the envelop " For delivery only to the addressee".

I am attaching my check to cover the necessary cost. Thank
your for your very kind cooperation.

Very truly yours,


Ernest M. Bailey

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT -- IN EQUITY

BOOK 017 PAGE 488

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ARTIS G. THOMPSON 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 SUMMER LEE THOMPSON, as complainant, against ARTIS G. THOMPSON, as respondent.

Witness my hand this 12 day of June, 1955.

Reis J. Lewis
Register

| | | |
|----------------------|---|-------------------------|
| SUMMER LEE THOMPSON, | Q | IN THE CIRCUIT COURT OF |
| Complainant, | Q | BALDWIN COUNTY, ALABAMA |
| VS. | Q | IN EQUITY |
| ARTIS G. THOMPSON, | Q | |
| Respondent | Q | |

Comes your Complainant, Summer Lee Thompson, and files this her Bill of Complaint for divorce against Artis G. Thompson, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and that your Complainant is a resident citizen of Baldwin County, Alabama, residing at Daphne, and the Respondent's last known residency to the best of her knowledge and belief was Mathiston, Mississippi in the care of Mr. W. A. Thompson, or in the care of Mrs. C. G. Nix, Route 15, Box 602, Birmingham, Alabama, and the Respondent's residency is otherwise unknown to her and cannot be ascertained by reasonable effort.

SECOND:

That the Complainant and the Respondent were married on heretofore, to-wit, August 1930 at Mathiston, Mississippi, and lived together as man and wife until on, to-wit, the 23rd day of April, 1955, when, on account of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that in April, 1955 and at times prior thereto, the Complainant states that the Respondent committed acts of violence on her person, attended with danger to her health and life; Complainant avers and charges that the Respondent has made numerous threats of doing her physical harm and from his manner and conduct towards

BOOK 017 PAGE 489

her, she is reasonably certain that he will commit such violence on her person, attended with danger to her life and health.

THIRD:

That there were born of this marriage between your Complainant and the Respondent the following named children, viz: William Tracy Thompson, seventeen years of age and Mary Ellen Thompson, eight years of age. That your Complainant is a fit and proper person to have the care, custody and control of such children. That your Complainant has no money or property with which to properly support and educate such children and that the Respondent is able to pay your Complainant such sufficient amounts to properly support and educate such children.

FOURTH:

That your Complainant and the Respondent are jointly possessed of real property located in Baldwin County, Alabama and described as follows, to-wit:

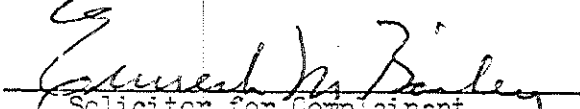
From the NW corner of Section 20, T5S, R2E, run South on the Section line 2872.7 feet and East 40 feet to the beginning corner; thence run East 388 feet to a corner; thence 200 feet to a corner; thence West 387 feet to a corner on the highway; thence run North 200 feet to the beginning point. Containing 1.37 acres and lying in the SW1/4 of Sec. 20, T5S, R2E. Less that portion conveyed to W. O. Pope by Warranty Deed recorded in Deed Book 156, page 461 in Records of the Judge of Probate, Baldwin County, Alabama.

that your complainant is now, and has been, occupying said property as a homestead for herself and the children of this marriage; that your Complainant and the Respondent are possessed of certain jointly held United States Government Bonds in the amount of One Thousand Dollars (\$1,000.00) and in addition thereto, certain funds deposited in the Bank of Fairhope, Fairhope, Alabama in the amount of Two Thousand Three Hundred and Eleven Dollars (\$2,311.39) and Thirty-nine Cents, and the Respondent is able to pay your Complainant one-half of the said amounts to properly support and educate such children of this marriage; that your Complainant has employed Ernest M. Bailey as her Solicitor of Record to prosecute this cause of action and that she is unable to pay him a reasonable Solicitor's fee for his services in this matter.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Artis G. Thompson be made a party Defendant to this cause by the usual writ or process, registered mail or process by publication of this Honorable Court requiring him to

appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Honor will award your Complainant custody and control of her minor children herein named and will order and decree that the Respondent shall pay your Complainant the sum of Forty Dollars (\$40.00) a week as support for such children. That your Honor will also order and decree that the property hereinabove described is vested in your Complainant full title and interest in and to the same; that your Honor will order and decree that the Respondent will be required to pay to her one-half of the monies hereinabove referred to and that your Honor will also order and decree that the Respondent be required to pay Ernest M. Bailey a reasonable Solicitor's fee for his services in prosecuting this cause. That your Honor will also grant unto the Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to remarry if they see fit and that the Respondent is not to harass your Complainant in any way or means. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

SUMMER LEE THOMPSON,

Complainant,

vs.

ARTIS G. THOMPSON,

Respondent

I

I IN THE CIRCUIT COURT OF

I BALDWIN COUNTY, ALABAMA

I IN EQUITY

I

Comes the Respondent in the above styled cause and demurs to the Bill of Complaint filed in said cause and to each and every paragraph thereof separately and severally and assigns the following separate and several grounds, viz:

1. That said Bill of Complaint does not state a cause of action.

2. That said Bill of Complaint fails to allege what date in April, 1955, the Respondent is alleged to have committed acts of violence on the person of the Complainant.

3. That said Bill of Complaint fails to allege what acts of violence the Respondent committed upon the person of the Complainant.

4. That the allegation in Paragraph Second of the Bill of Complaint that the Respondent committed acts of violence on the Complainant is but a conclusion of the Pleader.

5. That the allegation in Paragraph Second of the Bill of Complaint that the Respondent committed acts of violence on the Complainant, attended with danger to her health and life is but a conclusion of the Pleader and does not allege what acts of violence he committed or what the danger was.

6. That the allegation in Paragraph Second of the Bill of Complaint that the Respondent has made numerous threats of doing her physical harm is but a conclusion of the Pleader.

7. That the Complaint fails to allege when the Respondent made any threats against the Complainant and what said threats consisted of.

8. That said Bill of Complaint fails to allege that the Complainant had reasonable apprehension that if she continued to live with the Respondent that her life or health would be in danger.

9. That the property referred to in Paragraph Fourth of the Bill of Complaint is not sufficiently described.

10. That the allegation in Paragraph Fourth of the Bill of Complaint that the Complainant is occupying said property as a home-stead for herself and children is but a conclusion of the Pleader.

11. That Paragraph Fourth of the Bill of Complaint fails to allege that the Respondent owns the Government bonds referred to therein.


12. That the allegation in Paragraph Fourth of the Bill of Complaint that the Complainant and the Respondent are possessed of certain jointly held United States Government bonds in the sum of One Thousand Dollars (\$1000.00) fails to allege whether the Respondent has possession of such bonds or whether they are in the possession of the Complainant and also fails to allege that such bonds are owned either by the Complainant or the Respondent.

13. That the allegation in Paragraph Fourth of the Bill of Complaint that the Complainant and the Respondent are possessed of certain funds in the Bank of Fairhope in the amount of Two Thousand Three Hundred Eleven and 39/100 Dollars (\$2,311.39) fails to allege in whose name such money is deposited and who owns such money.

14. That Paragraph Fourth of the Bill of Complaint fails to allege that at the time of the filing of the Bill of Complaint the Respondent was the owner of the bonds referred to and that the money referred to was on deposit to his account in such Bank.

CHASON & STONE

By:


Solicitors for Respondent.

STATE OF ALABAMA)
BALDWIN COUNTY)

SUMMER LEE THOMPSON,
Complainant

vs.

ARTIS G. THOMPSON
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof separately and severally, says:

1. Respondent admits the allegations of the first paragraph of the Bill of Complaint.

2. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and date of separation but denies all other allegations of this paragraph and demands strict proof of the same.

3. Respondent admits the allegations of the third paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Complaint in this cause and waives further service of the same. The Respondent also waives notice of taking of testimony in this cause and notice of submission of said cause and agrees that the testimony may be taken and the cause submitted without further notice to him.

Artis G. Thompson

Witness:

[Signature]

ANSWER AND WAIVER

SUMMER LEE THOMPSON,
Complainant

vs.

ARTIS G. THOMPSON,
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED

NOV 4 1955

ALICE J. DICK, Register

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT -- IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ARTIS G. THOMPSON 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 SUMMER LEE THOMPSON, as complainant, against ARTIS G. THOMPSON, as respondent.

Witness my hand this 15th day of June, 1955.

Deice J. Duck
Register

SUMMER LEE THOMPSON,
Complainant,

VS.

ARTIS G. THOMPSON,
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes your Complainant, Summer Lee Thompson, and files this her Bill of Complaint for divorce against Artis G. Thompson, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and that your Complainant is a resident citizen of Baldwin County, Alabama, residing at Daphne, and the Respondent's last known residency to the best of her knowledge and belief was Mathiston, Mississippi in the care of Mr. W. A. Thompson, or in the care of Mrs. C. G. Nix, Route 15, Box 602, Birmingham, Alabama, and the Respondent's residency is otherwise unknown to her and cannot be ascertained by reasonable effort.

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her, she is reasonably certain that he will commit such violence on her person, attended with danger to her life and health.

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That there were born of this marriage between your Complainant and the Respondent the following named children, viz: William Tracy Thompson, seventeen years of age and Mary Ellen Thompson, eight years of age. That your Complainant is a fit and proper person to have the care, custody and control of such children. That your Complainant has no money or property with which to properly support and educate such children and that the Respondent is able to pay your Complainant such sufficient amounts to properly support and educate such children.

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That your Complainant and the Respondent are jointly possessed of real property located in Baldwin County, Alabama and described as follows, to-wit:

From the NW corner of Section 20, T5S, R2E, run South on the Section line 2872.7 feet and East 40 feet to the beginning corner; thence run East 388 feet to a corner; thence 200 feet to a corner; thence West 387 feet to a corner on the highway; thence run North 200 feet to the beginning point. Containing 1.87 acres and lying in the SW1/4 of Sec. 20, T5S, R2E. Less that portion conveyed to W. O. Pope by Warranty Deed recorded in Deed Book 156, page 461 in Records of the Judge of Probate, Baldwin County, Alabama.

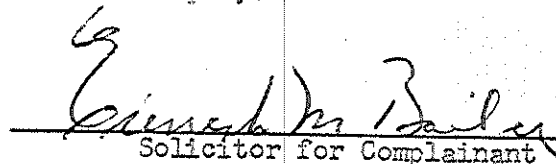
that your complainant is now, and has been, occupying said property as a homestead for herself and the children of this marriage; that your Complainant and the Respondent are possessed of certain jointly held United States Government Bonds in the amount of One Thousand Dollars (\$1,000.00) and in addition thereto, certain funds deposited in the Bank of Fairhope, Fairhope, Alabama in the amount of Two Thousand Three Hundred and Eleven Dollars (\$2,311.99) and Thirty-nine Cents, and the Respondent is able to pay your Complainant one-half of the said amounts to properly support and educate such children of this marriage; that your Complainant has employed Ernest M. Bailey as her Solicitor of Record to prosecute this cause of action and that she is unable to pay him a reasonable Solicitor's fee for his services in this matter.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Artis C. Thompson be made a party Defendant to this cause by the usual writ or process, registered mail or process by publication of this Honorable Court requiring him to

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appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Honor will award your Complainant custody and control on her minor children herein named and will order and decree that the Respondent shall pay your Complainant the sum of Forty Dollars (\$40.00) a week as support for such children. That your Honor will also order and decree that the property hereinabove described is vested in your Complainant full title and interest in and to the same; that your Honor will order and decree that the Respondent will be required to pay to her one-half of the monies hereinabove referred to and that your Honor will also order and decree that the Respondent be required to pay Ernest M. Bailey a reasonable Solicitor's fee for his services in prosecuting this cause. That your Honor will also grant unto the Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to remarry if they see fit and that the Respondent is not to harass your Complainant in any way or means. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

No. 3548

SUMMER LEE THOMPSON
Complainant

vs

ARTIS G. THOMPSON
Respondent

BILL OF COMPLAINT

That there be granted to her such other, further and different relief to which she is lawfully entitled. Should your Complaint be mistaken in the relief prayed for, the Respondent is not to answer your Complaint in any way or sense. Should your Complaint be mistaken in the relief prayed for, the Respondent is not to answer your Complaint in any way or sense. The Respondent will also order and decree that the Respondent will be required to pay to her one-half of the monies hereinbefore received and interest in and to the same; that your Honor will order and decree that the Respondent shall pay your Complaint the sum of Forty Dollars (\$40.00) and counsel on her minor children herein named and will order and decree upon a finding of this case that your Honor will award your Complaint on the rules of the Court and the statutes in such cases made and provided; that sheen and blessed summer or dawn again the time and under the benighted darkness

FILED
JUN 15 1955

CLERK, District

Collector for Complaints