

3555

hold papers  
until judge  
sets date of  
hearing

3535

CASSIE M. MYRICK  
COMPLAINANT  
VS  
ALEXANDER C. MYRICK  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT:

Comes CASSIE M. MYRICK and, by this her bill of complaint presented against ALEXANDER C. MYRICK, respectfully shows:

FIRST: That the complainant and defendant are both over the age of twenty-one years, and that both are now and have been for more than three years next preceding the filing of this, her bill of complaint, bona fide residents of Baldwin County, Alabama, living in Fairhope.

SECOND: That complainant and defendant were married at Pascagoula, Mississippi, on, to-wit, the 18th day of June, 1938, and have lived together as husband and wife in Fairhope, Baldwin County, Alabama, up until the 17th day of June, 1955.

THIRD: That on, to-wit, the 17th day of June, 1955, the defendant, at their home in Fairhope, Alabama, did threaten the complainant by saying that he would strike her with a broom handle and beat her up; and complainant further shows that previously he has struck her viciously; and that she is not a physically strong woman and that, from defendant's conduct, there is reasonable grounds for her to fear, and she does fear that if she continued to live with this defendant he would commit actual violence on her person attended with damage to her life or health.

Complainant further shows that the defendant is an able bodied man making good wages at Brookley Air Force Base, to-wit, approximately TWO HUNDRED TWENTY-FOUR DOLLARS (\$224.00) per month, and that she has no estate and is unable to work because she is physically handicapped and is without funds for her support and the support of her minor child or to pay her solicitor for prosecuting her suit for this divorce.

To this manner, there is involved one son, WALTER F. MYRICK, age 16, and that it is to the best interest of the said child to be with his mother, this complainant, and that this complainant is a suitable person to have custody of said child.

Complainant further shows that, as a result of complainant's and defendant's efforts, they have accumulated a suite of household furniture.


PREMISES CONSIDERED, prays that this Honorable Court will take jurisdiction in this cause and order a hearing set to determine a reasonable allowance for the support of the wife, while she is prosecuting this and will issue appropriate processes requiring defendant to answer or demur.

And that, on a final hearing of this cause, the Court will:

Decree to the wife an allowance out of the estate of the husband considerable for her support, and will order defendant to pay a reasonable amount for complainant's solicitor's services in prosecuting this cause, and will determine who shall have the care and custody of Walter F. Myrick, minor child of said marriage, and award said custody, and will order a division of the suite of household furniture belong to said parties and will render a decree forever divorcing the complainant and defendant from the bonds of matrimony and granting the complainant the right to resume her maiden name.

RICKARBY AND RICKARBY

BY

  
Solicitor for Complainant

3555-

Cassie M. Myrick  
vs.  
Alexander C. Myrick

FILED

JUN 23 1955

ALICE J. DUCK, Clerk

CASSIE M. MYRICK

COMPLAINANT

VS

ALEXANDER C. MYRICK

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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RICKARBY AND RICKARBY

BY

  
Solicitor for Complainant

Complaint further shows that, as a result of complainant's  
and defendant's efforts, they have accumulated a suite of household  
furniture.  
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divorcing the complainant and defendant from the bonds of matrimony  
and granting the complainant the right to resume her maiden name.

RICHARDY AND RICHARDY

Solicitor for Complainant

BY

FILED  
JUN 10 1955  
APR 10 1955  
APR 10 1955

35-5-4  
my wife  
1/15  
my wife

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

June 22, 1955

Mrs. Alice Duck, Clerk  
Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

We this, we are handing you divorce papers in the matter  
of Cassie M. Myrick vs. Alexander C. Myrick.

Please process and oblige. I have not sent her cost  
in this matter because our client is totally without  
funds.

Yours very truly,



EGR/rl

c/c Mrs. Myrick

*I'd up till you hear  
from me again*



CASSIE M. MYRICK

Complainant

VS.

Alexander C. Myrick

Defendant

)

)

)

)

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

ORDER OF REFERENCE

IT IS HEREBY ORDERED, that a reference be held at 2:00 P. M. Thursday July 28, 1955 to determine proper amount of support for the respondent to pay complainant in said cause and such other matters as may be proper before the court.

Done this the \_\_\_\_ day of \_\_\_\_\_, 1955.

\_\_\_\_\_  
Circuit Judge

33-58

CASSIE M. MYRICK

VS.

ALEXANDER C. MYRICK

CIRCUIT COURT

Order for Reference.

ALEXANDER C. MYRICK  
Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT:

Comes the Complainant in the above styled cause, and shows to this court that she is without funds for her own support and to pay the services of her solicitor in this cause, and that her husband is an able-bodied man earning good wages and has funds to pay for her support.

WHEREFORE, Complainant moves that this court will order that the defendant, Alexander C. Myrick, appear in the Circuit Court of Baldwin County, Alabama on the twenty-eighth day of July 1955 at 2:00 P. M. and that a reference be held at that time and place, to determine proper amount for the respondent to pay for complainants support and solicitors fees and such other matters as may be properly presented before the court.

Solicitor for Complainant

CASSIE M. MYRICK

VS.

ALEXANDER C. MYRICK

CIRCUIT COURT

Motion for Reference

ELLIOTT G. RICKARBY  
(DECEASED)

LAW OFFICES  
**RICKARBY & RICKARBY**

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

July 9, 1955

Mrs. Alice Duck, Clerk  
Circuit Court  
County Court House,  
Bay Minette, Alabama

Dear Mrs. Duck:

In Re: Myrick vs. Myrick

With this we are handing you motion for reference in this case. Process in this matter is being held up. Please proceed with having service made.

If the court request service of motion of reference, please proceed to have this motion served. If I can have it granted on an ex-parte motion, please have Judge Hall sign the enclosed order.

I have spoken to Mr. Engel, Myricks attorney, as to that date for a reference and hope it is going to be agreeable with the court.

Yours very truly,



EGR/rl  
c/c Mr. Engel  
c/c Mr. Myrick

ELLIOTT G. RICKARBY

LAW OFFICES

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

July 20, 1955

Mrs. Alice Duck  
Clerk, Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Divorce Suit  
Cassie M. Myrick  
vs  
Alexander C. Myrick  
Our File: 3362

About a month ago I filed a bill for divorce in the case of Myrick vs. Myrick.

I am happy to report now that the parties have adjusted their difficulties and are back together again, and so I ask that this bill be dismissed.

Make the costs as light as you can and send me a bill for them and I will send it to them. I think that before a final order is made in this case you'd like to get those costs and see that you get them as quickly as possible.

Yours very truly,



EGR/fm  
7-30-55

cc: Mr. Mylan R. Engel  
Attorney at Law  
Mobile

*Please notify Judge Hall  
w/ this for his signing  
for hearing on the 28<sup>th</sup>  
as it will not come off.*