

3550

BOOK 021 PAGE 225

TO THE HONORABLE H. M. HAIL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes MARGARET R. PONDER and, by this her bill of complaint presented against ELLIS C. PONDER, respectfully shows:

FIRST: That the complainant and defendant are both over the age of twenty-one years and both are now and have been for over three years next preceding the filing of this bill bona fide residents of Baldwin County, Alabama, residing in Point Clear.

SECOND: Complainant and defendant were married on, to-wit, the 26th day of September, 1935, in Bay Minette, Alabama, and have lived together as husband and wife until the first part of June, 1955.

THIRD: That after said marriage, defendant became addicted to the habit of drunkenness and said condition has continued until the filing of this bill.

FOURTH: That to this marriage there have been born four children: Ellis Ponder, Jr., age 18, Margaret Ann Ponder, age 15, Portia Ponder, age 10, and Karen Ponder, age 8; and the complainant is expecting to have a child within a few months.

Complainant further states that the defendant is not a fit and suitable person to have the custody of said children; complainant further states that she is a fit and suitable person to have custody of said children, and it is to their best interests that she have custody of said children.

Complainant alleges that she is, at present, in a delicate condition and without sufficient funds to support herself and minor children, or pay for the costs in this proceeding, and the defendant is an able-bodied man, earning good wages at Barin Field.


PREMISES CONSIDERED, complainant prays that ELLIS C PONDER be made party defendant to this cause and by proper process required to plead, answer or demur within the time prescribed by law.

Complainant further prays the court to issue notice to defendant requiring him to attend a hearing to determine what will be a just and fair amount for him to pay for the support of said children and complainant's expenses for the proceedings of this bill, and he be ordered to pay said sums.

Complainant further prays that on a final hearing of this cause, a decree of divorce be granted forever divorcing her from the said ELLIS C. PONDER, and requiring him to pay support of said minor children and her costs and expenses in securing this divorce, and awarding her custody of said minor children.

RICKARBY AND RICKARBY

BY


E. G. Rickarby, Jr.
Solicitor for Complainant

3558

Ponder
vs

Ponder

FILED

JUL 1 1955

ANCE L. DECK, Register

No. 3558

Page

The State of Alabama
Baldwin County

CIRCUIT COURT

MARGARET R. PONDER

Plaintiffs

vs.

ELLIS C. PONDER

Defendants

Summons and Complaint

Filed JULY 1 19 55

Archie Newch Clerk

E. G. RICKARBY, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Aug. 16 19 *55*
Taylor Wilkins Sheriff

I have executed this summons

this *8. Sept* 19 *55*
by leaving a copy with

Ellis C. Ponder

Taylor Wilkins Sheriff

Edleigh Standish Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

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The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3558

August

TERM, 19 55

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~at~~ ELLIS C. PONDER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

ELLIS C. PONDER

, Defendant.

by

MARGARET R. PONDER

, Plaintiff.

Witness my hand this 16th day of August 1955.

Deice J. Alcock

Clerk