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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 John H. Sanspree, 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 Ella Mae Sanspree, as Complainant, against John H. Sanspree, as Respondent.

Witness my hand this 18 day of July, 1955.

Archie L. Reese
Register.

ELLA MAE SANSPREE,
Complainant,
vs.
JOHN H. SANSPREE,
Respondent.

I
I IN THE CIRCUIT COURT OF
I BALDWIN COUNTY, ALABAMA
I IN EQUITY
I

Comes your Complainant, Ella Mae Sanspree, and files this her Bill of Complaint for divorce against John H. Sanspree, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are both over the age of twenty-one years and are both resident citizens of Baldwin County, Alabama, residing near Foley, Alabama. That they have both been resident citizens of Baldwin County, for more than the past 15 years.

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit: November 5, 1929, and they have lived together as man and wife until July 16, 1955, when the Complainant was com-

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pelled to leave the Respondent on account of the matters hereinafter complained of. That on July 16, 1955, the Respondent drew his knife on your Complainant and threatened to kill her and drove her out of their home. That she returned to such home on July 17th to get her clothes and the Respondent again drew his knife on her and again threatened to kill her. That your Complainant has reasonable apprehension that if she continues to live with the Respondent that her life or health will be in danger.

THIRD:

That your Complainant and the Respondent have some children born of their marriage who are now of age or are self-supporting and also have the following named children who were residing with your Complainant and the Respondent at the time of the separation, viz: Agnes Sanspree, a girl sixteen years of age; Johnnie Zell Sanspree, a girl thirteen years of age; Ella Max Sanspree, a girl eleven years of age; Roger Sanspree, a boy eight years of age; Ralph Sanspree, a boy four years of age. That your Complainant is a fit and proper person to have the care, custody and control of such minors and the Respondent is not a fit and proper person to have their care, custody and control.

FOURTH:

That your Complainant and the Respondent jointly own the following described real property situated in Baldwin County, Alabama, viz:

Lot 6, Block B of the re-plat of the revised plat of Magnolia Heights Subdivision in Fractional Section 28, Township 7 South, Range 3 East; the revised re-plat being recorded in the Office of the Judge of Probate of Baldwin County, Alabama, in Map Book 3, at page 87 and the re-plat thereof being recorded in the Office of the Judge of Probate of Baldwin County, Alabama, in Map Book 4, page 49, together with a dwelling located thereon.

That your Complainant also owns a substantial portion of the furniture and fixtures in such dwelling and owns a 1955 Chevrolet automobile. That your Complainant does not own any other property and does not have any money with which to pay a reasonable solicitor's fee for prosecuting this cause and any money with which to properly maintain, support and educate such minor children or any money with

which to support herself. That she has employed Chason & Stone Solicitors of Bay Minette, Alabama, to prosecute this cause.

FIFTH:

Your Complainant further shows unto this Court that the Respondent has removed something from her Chevrolet automobile which was purchased in her name so that it will not run and the Respondent has refused to allow your Complainant to get her clothes and other personal belongings from the dwelling in which they were living.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named John H. Sanspree be made a party Defendant to this cause by the usual writ or process 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 grant unto your Complainant a divorce from the bonds of matrimony existing between your Complainant and the Respondent and that your Honor will order the Register of this Court to convey the interest of the Respondent in the above described real property to your Complainant in lieu of alimony and that your Honor will award your Complainant the care, custody and control of the above named minor children and that your Honor will ascertain and fix a reasonable amount of support to be paid your Complainant by the Respondent for the support and maintenance of said minor children and that your Honor will ascertain and fix a reasonable solicitor's fee to be paid by the Respondent to the Solicitors of your Complainant. Your Complainant further prays for such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Ellen M. Sanspree
Complainant

CHASON & STONE

By: John H. Chason

Solicitors for Complainant

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