

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 Millard A. Weeks 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 Thelma Ione Weeks, as complainant, against Millard A. Weeks, as Respondent.

Witness my hand this 10<sup>th</sup> day of August, 1955.

Alicia J. Dugan  
Register.

THELMA IONE WEEKS, )

Complainant, )

vs. )

MILLARD A. WEEKS, )

Respondent. )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes your Complainant, Thelma Ione Weeks and files this her Bill of Complaint for divorce against Millard A. Weeks, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

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

SECOND:

That your Complainant and the Respondent were married on heretofore to-wit, November 22, 1952, and lived together as man and wife until, on account of matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and apart from him; that on, to-wit, August 6, 1955, the Respondent committed acts of violence on the person of your Complainant by striking her on the face with his fist, and your Complainant had reasonable apprehension that if she continued to live with him her

life and health would be endangered.

THIRD:

That there was born of the marriage of your Complainant and the Respondent one child, Millard A. Weeks, Jr., who is a child nineteen months of age. That such minor is now in the custody and control of your Complainant. That your Complainant is a fit and proper person to have the care, custody and control of said minor and the Respondent is not a fit and proper person to have the care, custody and control of such minor.

FOURTH:

That the Respondent is an able-bodied man owning property and is able to support and maintain your Complainant and said minor child. That your Complainant does not have any money and the only property owned by her is a few hogs and cows. That she is unable to properly support herself and said minor child. That the Respondent is indebted to your Complainant for money she loaned him last year in the sum of Six Hundred and Twenty-five Dollars (\$625.00).

FIFTH:

That your Complainant has employed Chason and Stone as her solicitors to prosecute this cause and she does not have the money with which to pay them a reasonable solicitors' fee.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Complainant prays that the above named Millard A. Weeks 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 an absolute divorce from said Respondent; that your Honor will award your Complainant the full custody and control of her minor child; that your Honor will also decree that the complainant be allowed to remarry if she sees fit. That your Honor will also ascertain and fix a reasonable amount of alimony and support to be paid by the Respondent to the Complainant for her maintenance and support and for the mainten-

ance and support of the said Millard A. Weeks, Jr. That your Honor will ascertain and fix a reasonable solicitors' fee to be paid by such Respondent to your Complainant's solicitors of record, Chason and Stone. Should your Complainant be mistaken in the relief prayed for, that to 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.

Thelma Dow Weeks  
Complainant.

CHASON & STONE

Solicitors for Complainant.