

3599

SUMMONS

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THE STATE OF ALABAMA,)
BLADWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon GEORGE T. INGRAM, 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, Alabama, at Bay Minette, against George Ingram, by LOLA INGRAM.

Witness my hand this the 25 day of August, 1955.

Deane J. French
Clerk

BILL OF COMPLAINT

LOLA INGRAM,	)	
	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	
	)	BALDWIN COUNTY, ALABAMA
VS:	)	
	)	IN EQUITY
GEORGE T. INGRAM,	)	
	)	
RESPONDENT	)	

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

Sitting in Equity:

Your complainant, LOLA INGRAM, respectfully represents and shows unto your Honor:

1. That the complainant is over the age of twenty-one years and is a resident citizen of said State and County; that GEORGE T. INGRAM is over the age of twenty-one and resides in Baldwin County, Alabama.
2. That your complainant and respondent were lawfully married on or about, to wit: the 1st day of July, 1939, at Birmingham, Alabama.
3. Your complainant further avers and alleges that the said respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.
4. Your complainant avers and charges that the said respondent did on or about the 21st day of April, 1955, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual

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violence upon her person, attended with danger to her life or health.

5. There has been born to said marriage three children, namely, George Ingram, II, age 14, Charles Ingram, age 9, and Penny Ingram, age 7, and the complainant alleges that she is a person of good moral character and a prudent parent and is a suitable person to take proper care of said minor children.

The premises considered, your complainant makes the said George T. Ingram a party respondent to this bill of complaint, and in order that the complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said George T. Ingram, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, a mensaet thoro, a divorce from bed and board; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray, etc.

Lola Ingram
Complainant

Wm. G. C. Smith
Solicitor for Complainant