

IRMA INEZ HINOTE,  
Complainant,  
VS.  
WOODROW MILEY HINOTE,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 3609

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Your complainant, IRMA INEZ HINOTE, respectfully represents  
and shows unto your Honor:

1. That complainant is over the age of twenty-one years and  
is a resident of Baldwin County, Alabama, and has been a bona  
fide resident of said State for more than two years next preced-  
ing the filing of this bill of complaint; that WOODROW MILEY  
HINOTE is over the age of twenty-one years and resides in Loxley,  
Baldwin County, Alabama.

2. That your complainant and the respondent were lawfully  
married on or about, to-wit, the 14th day of June, 1941, at  
Pascagoula, Mississippi.

3. Your complainant avers and charges that the said respon-  
dent did on or about the 27th day of October, 1953, and many times  
subsequent and prior thereto assault, beat, hit and strike com-  
plainant; that said respondent has committed actual violence on  
her person attended with danger to her life or health; and com-  
plainant 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 further actual  
violence upon her person, attended with danger to her life or health.

4. That there are three children born of this marriage: Jimmy  
Woodrow Hinote, age 13; Ronnie Gene Hinote, age 11; and Thomas Dale  
Hinote, age 8; that the respondent is not a fit and proper person  
to have the care, custody and control of said minor children; and  
that your complainant is a fit and proper person to have the care,  
custody and control of said minor children.

5. That the respondent is a strong, able-bodied man and is able  
work and has a good income; that your complainant has no trade and  
is without funds and not able to work; that she has no funds to pay

her solicitor in this cause; and that she is without funds to provide for her maintenance and support and for the maintenance and support of her minor children as aforesaid.

THE PREMISES CONSIDERED, your complainant makes the said WOODROW MILEY HINOTE a party respondent to this bill of complaint, and in order that complainant may have the relief hereinafter prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said WOODROW MILEY HINOTE, commanding him to plead, answer or demur to this bill of complaint within the time required by law. Your Complainant prays that on a final hearing of this cause, your Honor will make and enter a decree divorcing your complainant from the respondent, granting your complainant the permanent care, custody and control of the minor children of this marriage, ordering the respondent to pay to your complainant a reasonable amount each week for the support of herself and her children, and ordering the respondent to pay to complainant's Solicitor, Telfair J. Mashburn, Jr., a reasonable Solicitor's fee; and complainant prays for such other, further, different or general relief as unto your Honor may seem just and proper, and, as in duty bound, your complainant will ever pray, etc.

Telfair J. Mashburn, Jr.  
SOLICITOR FOR COMPLAINANT.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3609

Sept.

TERM, 19 55

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WOODROW MILEY HINOTE

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

WOODROW MILEY HINOTE

, Defendant

by

IRMA LEE HINOTE

, Plaintiff

Witness my hand this 8th day of Sept. 19 55

Clerk

No. 3609

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The State of Alabama

Baldwin County

CIRCUIT COURT

IRMA INEZ HINOTE

Plaintiffs

vs.

WOODROW MILEY HINOTE

Defendants

Summons and Complaint

Filed SEPT. 8th 19 55

Clerk

TELFATR J. MASHEURN, JR.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Sept. 8 19 55

\_\_\_\_\_, Sheriff

I have executed this summons

this 10, Oct 19 55

by leaving a copy with

Woodrow Miley Hinote

Taylor Wilkins Sheriff

Ellie H. Stubbins Deputy Sheriff