

3626

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 Eugene Lee King 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 Myrtis Caroline King as Complainant against Eugene Lee King, as Respondent.

Witness my hand this 5 day of October, 1955.

Alvin J. Duck
Register

MYRTIS CAROLINE KING,
Complainant
vs.
EUGENE LEE KING,
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3626

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AND
TO THE HONORABLE H. M. HALL, JUDGE THEREOF:

Comes now your Complainant, Myrtis Caroline King, by her Solicitor, and files this Bill of Divorce, and shows unto this Honorable Court the following:

I

That the Complainant and the Respondent are both bona fide residents of Summerdale, Baldwin County, Alabama, and are both over the age of 21 years.

II

That your Complaint and the Respondent were married heretofore, to-wit: August 20, 1949, in Baldwin County, and lived together as man and wife until, on or about September 3, 1955, the Respondent struck the Complainant and beat her about the face; that he put your Complainant in fear of her life and forced her to leave their home; that the actions of the Respondent caused the Complainant reasonable apprehensions to fear her health and life were in danger should she continue to live with the Respondent

III

That there was born to the Complainant and Respondent, two children, to-wit; Leroy King, age two, and Michael Wayne King, age six months; that your Complainant is a fit and proper to have the complete care, control and custody of said children; that your Complainant has no income except \$18.00 per week earned as a waitress; that the Respondent is capable and physically able to earn the sum of \$160.00 per month; that it was necessary that she employ an attorney to institute these proceedings and to that end she had employed J. Connor Owens, Jr., as her solicitor in this case and she has no property and no money in which to employ such solicitor in her behalf.

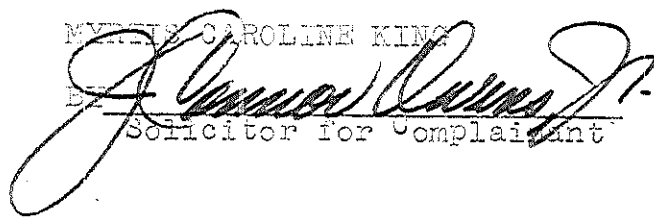
PRAYER FOR PROCESS

The premises considered, your Complainant prays that the above named Eugene Lee King be made a party Respondent to this cause by the usual writ of process of this Honorable Court requiring him to appear and plead, answer and demur within the time and under the penalty prescribed by the rules of this Court and the Statutes in such case made and provided.

PRAYER FOR RELIEF

The premises considered, your Complainant prays that upon the final hearing of this cause your Honor will enter an order divorcing your Complainant from the Respondent; your Complainant further prays that your Honor will also enter an order and decree awarding the care, control and custody of the said minor children to your Complainant; further that your Honor will award to the Complainant the sum of \$50.00 per month for the maintenance and support of the minor children; further that your Honor will award to the Complainant a reasonable attorney's fee; further that your Honor will also enter a decree allowing the Complainant to remarry if she sees fit. Should the Complainant be mistaken in the relief prayed for that there be granted to her such other and different relief that she may be entitled and as in duty bound she will forever pray.

MYREIS CAROLINE KING

BY  Solicitor for Complainant