

STATE OF ALABAMA)
)
 BALDWIN COUNTY)

IN THE CIRCUIT COURT
 IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Maggie Brown to appear within thirty (30) days from the service of this writ in the Circuit Court to be held for said county at the place of holding same, then and there to answer the complaint of James Brown.

WITNESS my hand this 1st day of June, 1949.

Wesley J. Duck
 Register

JAMES BROWN,

Complainant,

-vs-

MAGGIE BROWN,

Respondent.

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

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF SAID COURT:

Your complainant, James Brown, respectfully represents and shows unto your Honor:

1. That complainant is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, and has been a bona fide resident thereof for more than one year next preceding the filing of this Bill of Complaint; that Maggie Brown is over the age of twenty-one years and a resident of Foley, Baldwin County, Alabama.

2. That your complainant and the respondent were lawfully married on or about, to-wit, July 18, 1936.

3. That Maggie Brown, the respondent, has committed actual violence on his person attended with danger to his life or health and from her conduct, there is reasonable apprehension of further violence attended with danger to his life or health.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your complainant makes the said Maggie Brown a party respondent to this Bill of Complaint for di-

vorce, and in order that complainant may have the relief prayed for, may it please your Honor to cause the state's writ of subpoena to be issued, directed to the said Maggie Brown, commanding her 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 and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper~~ly~~ as your complainant will ever pray.


Solicitor for Complainant