

2720

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CULLEN D. LEE, 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 DOROTHY LEE, as Complainant and against Cullen D. Lee, as Respondent.

WITNESS my hand this the 18th day of September, 1951.

Alice J. Duck
Register

DOROTHY LEE	↓	IN THE CIRCUIT COURT OF
COMPLAINANT	↓	BALDWIN COUNTY, ALABAMA,
VS	↓	IN EQUITY
CULLEN D. LEE	↓	NO. <u>2720</u>
RESPONDENT	↓	

TO HONORABLE TELFAIR J. WASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Dorothy Lee, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both over twenty-one years of age and a bona fide residents of Baldwin County, Alabama.

2.

That your Complainant and the Respondent are husband and wife having intermarried at Pineapple, Alabama, on May 2, 1937; that they lived together as husband and wife, in Baldwin County, Alabama, until September 13, 1951.

3.

That on September 13, 1951, the Respondent threatened and abused your Complainant and did acutal violence to her person by striking her; that the conduct of the Respondent was such as to given yobr Complainant every reasonable apprehension to believe and she does actually believe that if she continues to live with him he will carry out his threats and do violence to her person which would necessarily endanger herlife and health.

4.

That there was born to the marriage between your Complainant and the Respondent two children, LaVerne Lee age 13 and Robert Lee age 6; that said children are now and have been all of their lives with your Complainant, who is a suitable, fit and proper person to have their care, custody and control; that the Respondent is not a suitable, person to have the care, custody and control of said minor children.

5.

That the Respondent is an able bodied man and makes a salary of approximately \$4000.00 per year; that the Complainant has no property or means of income except from her own labor.

6.

That your Complainant and the Respondent have a home near Robertsdale in Baldwin County, Alabama; that the said home was acquired through the mutual efforts of the Complainant and the Respondent.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Cullen D. Lee party Respondent, to this cause of action requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this honorable court; that your Honor will order a reference to determine a reasonable amount to be paid by the Respondent to the Complainant as alimony pendente lite and for the support of the minor children, and also to determine a reasonable attorney fee to be paid by the Respondent to the Complainant.

Complainant further prays that upon a final hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony between your Complainant and the Respondent; that the Complainant be awarded also a reasonable amount as may seem just and proper as permanent alimony and for the support of the minor children, LaVerne Lee and Robert Lee; that Your Complainant be awarded the custody, care and control of the said children; that your Honor determine and establish the rights of your Complainant to the homestead which is described as West half of East half of Northwest quarter of Southeast quarter of Section 31, Township 5 South, Range 4 East;

That your Honor will award to the Complainant such other, further,
different or general relief as she may be in equity and good conscience
entitled to receive.

J. L. Lee

Solicitor for the Complainant

Received in Sheriff's Office
this 12 day of Sept, 1951
TAYLOR WILKINS, Sheriff

NO. 2720 9-24-51

RECORDED

DOROTHY LEE

COMPLAINANT

VS

CULLEN D. LEE

RESPONDENT

2720

BILL OF COMPLAINT

FILED

SEP 18 1951

ALICE A. BUCK, Register

Executed Sept, 24, 1951
By Serving Copy on

Cullen, D. Lee.

Sheriff
Taylor Wilkins
By
Edleigh Steadham