

2506

LOUISE HUNTER ADDY,) (
Complainant,) (IN THE CIRCUIT COURT OF
-vs-) (BALDWIN COUNTY, ALABAMA
BUFORD W. ADDY,) (IN EQUITY
Respondent.) (

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, Sitting in Equity:

Your complainant, Louise Hunter Addy, respectfully
represents and shows unto your Honor:-

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

2. That your complainant and respondent were lawfully
married on or about, to-wit, June 4, 1934.

3. Your complainant avers and charges that the said
respondent did assault, beat, hit, and strike complainant; that
said respondent has committed actual violence on her person attend-
ed with danger to her life or health; 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 violence on her person,
attended with danger to her life or health.

4. Your complainant further avers and alleges that the
said respondent has, since her said marriage with him, become addict-
ed to habitual drunkenness, and that said habit has continued to the
filing of this bill.

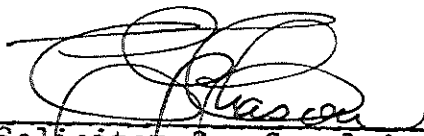
5. Your complainant further shows unto your Honor that
she has lived without adequate support for herself and her three
minor children for more than two years next preceding the filing of
this bill and during said period she has been a bona fide resident
of the State of Alabama.

6. Complainant shows that there were born unto your
complainant and respondent of this marriage three children, Buford
W. Addy, Jr., age fourteen; Alli Jean Addy, age thirteen; and

William Alton Addy, age five, which said children are in the custody and control of your complainant, and of which said children, complainant desires custody and control. Complainant further alleges that the respondent is regularly employed at a salary of Two Thousand Three Hundred Dollars (\$2,300.00) per year and is financially able to pay alimony and support in the amount of Thirty Dollars (\$30.00) per month for the support of each of the minor children, to a total of Ninety Dollars (\$90.00) per month.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your complainant prays that Buford W. Addy be made a party defendant to this cause by the usual process of this Honorable Court requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your complainant be granted a divorce from said respondent, and complainant further prays that upon a final decree in said cause your Honor will grant to her full custody and control of the minor children hereinabove named and as support and maintenance the sum of Thirty Dollars (\$30.00) per month for each minor child. Should your complainant be mistaken in the relief prayed for, that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound, she will ever pray.


Solicitor for Complainant

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 2506

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Buford W. Addy

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

Buford W. Addy, Defendant

by Louise Hunter Addy, Plaintiff.....

Witness my hand this 11th day of July 19 50

Alfred. Hunter, Clerk

No.

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

vs.

Plaintiffs

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk



Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff