

Lucile Hays,
Complainant.

Vs.

Garland D. Hays,
Respondent.

In the Circuit Court of
Baldwin County, Alabama.

In Equity

To the Honorable Telfair J. Washburn, Jr., Judge of said Court.

Comes now the complainant, Lucile Hays, and shows unto
your Honor the facts following:

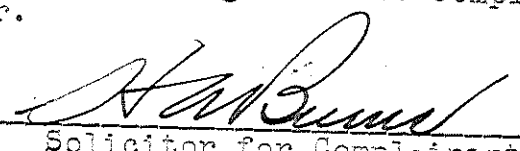
1st. That she is a resident of Baldwin County, Alabama;
that she is over the age of twenty one years; That respondent,
Garland D. Hays is a resident of Mobile County, Alabama and
is over the age of twenty one years.

2nd. That on to-wit, August 6, 1949 complainant was
married to respondent in Leeksville, Miss. and that they
lived together as man and wife until July 25, 1950.

3rd. That no children were born of such union.

4th. That on to-wit, July 25th, 1950 the respondent
committed actual violence upon the person of complainant,
that is to say, respondent struck the complainant in the face
with his fist, bruising and discoloring her face, he knocked
her down and kicked her, bruising her body and arms. That
thereupon complainant left the bed and board of respondent and
has since remained away from him.

Premises considered, your complainant prays that a summons
be issued to the respondent requiring him to appear and plead,
answer or demur to this bill of complaint within the time
required by law for pleading, and that upon a final hearing
of this cause your honor will grant to complainant a decree of
absolute divorce from the said Garland D. Hays, and that such
other, different or further relief may be granted to complainant
asto your Honor may seem proper.



Solicitor for Complainant.

TELEPHONE 8411

HARRY A. BURNS
ATTORNEY AT LAW
FAIRHOPE, ALABAMA

July 31, 1950.

Mrs. Alice J. Duck,
Register in Chancery,
Bay Minette, Alabama:

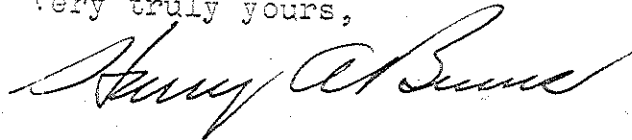
Dear Mrs. Duck:

I am enclosing herewith bill of complaint
in the cause entitled Hayes Vs. Hayes.

Will you please docket this case and forward
summons to the sheriff in order that he may forward same
to the Sheriff of Mobile County for service. You will
note that the Respondent lives at Eight Mile, Alabama.

Thanking you, I am,

Very truly yours,

A handwritten signature in cursive script, reading "Harry A. Burns". The signature is written in dark ink and is positioned below the typed name "Very truly yours,".

M 2515'

Lucille Hayes

vs.

Garland H. Hayes

Divorce

Filed 6-2-50

1. Sum & Compt
deb to Sher

2515

Ed. Burns

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 2575

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GARLAND D. HAYS

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

GARLAND D. HAYS

, Defendant

by LUCILE HAYS

, Plaintiff.....

Witness my hand this 2nd day of August 1950.....

Alice J. Wacker, Clerk

70,2513
RECORDED

No. 2573

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THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

LUCILE HAYS

vs.

Plaintiffs

GARLAND D. HAYS

Defendants

SUMMONS and COMPLAINT

Filed August 2nd, 1950

Alice Smith, Clerk

X88.

rept. lives at
Eight Mile

H. A. BURN

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Aug. 2, 1950

W. H. Holcomber, Sheriff

I have executed this summons

this Aug 8, 1950

by leaving a copy with

Garland D. Hays

W. H. Holcomber, Sheriff

H. B. Sanders, Deputy Sheriff