

2575

STATE OF ALABAMA)
BALDWIN COUNTY)

You are hereby commanded to summon A. J. MALLORY, 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 PAULINE MALLORY, as Complainant, and against A. J. MALLORY, as Respondent.

WITNESS my hand this the 27th day of November, 1950.

Archie J. Mucke
Register

PAULINE MALLORY
Complainant
VS
A. J. MALLORY
Respondent

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

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

~~Your Complainant, PAULINE MALLORY, respectfully represents~~
and shows unto your Honor and this Honorable Court as follows:

1.
That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama and over twenty-one years of age.

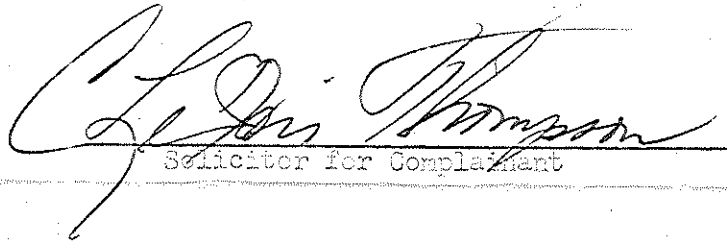
2.
That your Complainant and the Respondent married in Greenville, Alabama on December 26, 1935 and lived together as husband and wife in Baldwin County, Alabama until on to-wit: July 15, 1950.

3.
Your Complainant avers and charges that the said Respondent did on or about the 15th day of July, 1950, and many times prior thereto assault, beat, hit, and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health or life; 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 upon her person, attended with danger to her life or health.

Your Complainant further avers and alleges that said Respondent has been guilty of adultery with divers parties and persons whose names to your complainant are unknown.

WHEREFORE the premises considered your Complainant prays that your Honor will by proper process make the said A. J. Mallory, party Respondent to this bill of complaint, 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.

Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant

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RECORDED 2575

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PAULINE BILLOREY

COMPLAINANT

VS

A. J. BILLOREY

RESPONDENT

X m
De

BILL OF COMPLAINT

FILED

NOV 27 1950

ALICE J. BUCK, Register

From the law offices of
C. Lenoir Thompson
Bay Minette, Alabama

Temporary address:
24 Grant St.
Mobile Ala

Received in Sheriff's Office
this 28 day of Dec 1950
TAYLOR WILKINS, Sheriff

Received 4 Day of Dec 1950
and on 7 Day of Dec 1950
I served a copy of the within Complaint
on A J Billore
by service on

W. H. HOLCOMBE, Sheriff
By C. C. Maguire D.S.