

2811

Mary Lou Odom
Complainant

vs

William L. Odom
Respondent

Circuit Court
Baldwin County
Alabama
IN EQUITY

To the Honorable Telfair J. Mashburn, Jr., Judge of said Court,
sitting in Equity,

Comes Mary Lou Odom and exhibits this, her bill of complaint against
William L. Odom and shows unto Your Honor as follows:

1. Complainant, whose age is 20 years, and Respondent, whose age is
21 years, intermarried on May 20th 1950 at Lueddale, Mississippi.

3. Prior to their marriage and ever since, both parties have been
residents of Baldwin County, Alabama

4. Until they separated as a result of the acts hereinafter com-
plained of, on numerous occasions, Respondent committed acts of
physical violence upon the person of Complainant so as to put her
in fear of her life, health and limbs and, from his conduct, there
is reasonable apprehension that he might continue such acts.

5. During the month of February, 1952, as a result of the acts com-
plained of, Complainant ceased living with Respondent and they have
lived separate and apart ever since.

The premises considered, Complainant prays that said William L. Odom
be, by all due and appropriate process, made party defendant to this
suit, that he be compelled to plead, answer or demur to the several
paragraphs hereof within the time prescribed by law and that he be
compelled to obey and abide all orders and decrees made in the premises.

Further, Complainant prays, upon a hearing of the within cause, that
she be granted an absolute divorce from said William L. Odom and such
other, further and different relief as may, in Equity, seem meet and
proper.

W. A. Cramer
Solicitor for Complainant

Mary Lou Odom
Complainant