

2812

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU are hereby commanded to summons TOMMY EDDINS 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 LORELEI EDDINS as Complainant and against Tommy Eddins, as Respondent.

WITNESS my hand this the 19th day of May, 1952.

W. J. ...
Register

LORELEI EDDINS
COMPLAINANT
VS
TOMMY EDDINS
RESPONDENT

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

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

Your Complainant, Lorelei Eddins, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Bay Minette, Baldwin County, Alabama; that the Respondent is over twenty-one years of age and presently residing in Escambia County, Alabama.

2.

That your Complainant and the Respondent married at Atmore, Alabama, on June 24, 1924, and lived together as husband and wife until on to-wit April 27, 1952.


3.

That the Respondent subsequent to the marriage and a short time prior to their separation became addicted to habitual drunkenness and often while under the influence of liquor abused the Complainant; that conditions were such as to render it absolutely impossible for your Complainant and the Respondent to live together as husband and wife; that they were living at Bay Minette in Baldwin County, Alabama, at the time of their separation.



WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Tommy Edkins 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.

Your Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

Received in Sheriff's Office
this 12 day of May 1952
TAYLOR WILKINS, Sheriff

Executed this 3 day
June 1952 by serving
a copy of the within.

on Tomnie Eddins
J. S. Mills
C. Bryan Sheriff

Joe Dickson
RECORDED
720 2812

Lorelei Eddins
vs.

Tommy Eddins

*Served Copy
On Tommie Eddins
June 3, 1952
J. S. Mills Sheriff
to Lorene Bryan Depty*

2/82

FILED

MAY 19 1952

ALICE J. BUCK, Register