

4131

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HERMAN PAUL to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of June Anice Paul.

Witness my hand, this the 18 day of Sept, 1957.

*Anice J. ...*  
CLERK

JUNE ANICE PAUL  
Complainant  
VS  
HERMAN PAUL  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY  
NUMBER: \_\_\_\_\_

..-.-..

TO THE HONORABLE HUBERT M. HALL JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN SITTING EQUITY:

Your Complainant, JUNE ANICE PAUL, respectfully represents and shows unto Your Honor and this Honorable Court as follows:

I

That your Complainant is over the age of 21 years and is a bona fide resident of Baldwin County, Alabama, and that Respondent is over 21 years of age and is a bona fide resident of Baldwin County, Alabama.

II

That Complainant and Respondent were married in Leakesville, Mississippi on August 19, 1956 and that they lived together as husband and wife until to-wit, August 4, 1957 and that they have not lived together as husband and wife since that date.

III

That one child, Darlene Paul, was born during the marriage on to-wit March 16, 1957 and that Complainant is a fit and proper person to have custody of said child and that Respondent is not a fit and proper person to have custody of said child.

IV

That on to-wit: 4th day of August 1957, and many times prior thereto, and since said marriage, the said Respondent committed actual violence to her person by striking her with his hand attended with danger to her life or health and that from his conduct and threats toward her at said time there was and is grave danger that he would commit further violence, and that she has not condoned such violence or threats.

That it has been necessary that Complainant employ a Solicitor to prosecute this, her cause, that she has so employed Wilson Hayes, a Solicitor to so prosecute her cause, that she is unable to pay her Solicitor's fee in this cause, and that Respondent is able to pay her Solicitor's fee.

Now therefore, the premises considered, Complainant prays that this Honorable Court will cause process to issue to the said Respondent, HERMAN PAUL requiring him to plead, answer or demur to same within the time allowed by law.

And Complainant further prays that upon final hearing of this cause Your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between Complainant and Respondent, giving her custody of the said Darlene Paul, allowing her alimony and a reasonable Solicitor's fee, and that Your Honor will grant such other, further, different or general relief to which Complainant may be in equity and good conscience entitled.

June Paul  
Complainant

W. L. Hayes  
Solicitor for Complainant

