THE STATE OF ALABAMA,	No. 4153	T COURT, BALDWI	N COUNTY
BALDWIN COUNTY		т	ERM, 19.57
TO ANY SHERIFF OF THE STATE OF ALABA	MA. Market and the second		
You Are Hereby Commanded to Summon I	larvéy Allen Brown		
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to appear and plead, answer or demur, within t	hirty days from the service h	pereaf to the comple	int filed in
the Circuit Court of Baldwin County, State of A			
Harvey Allen Brown			endant
by Rosie Ford Brown			-
		, I	Plaintiff
Witness my hand this 28th	day of October	1957	

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	OF ALABAMA			٠					
BALDW	VIN COUNTY				REC	EIVED	IN (FFICE	
CIRCU	JIT COURT								19
			<u>.</u>					,	, Sheriff
ROSIE FORD	BROWN	.:		I	have	execute	d thi	s summo	ons .
	Plaintiffs		this.	:		:			, 19
	vs.		by le	aving	a cop	y with			
HARVEY ALL	EN BROWN	<u>.</u>							
	Defendants	legi e	2 - 1444 -				;		
SUMMONS d	and COMPLAINT		100			:		3	
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Filed 10/28/5	7 , 19			r.	:		· · · · · · · · · · · · · · · · · · ·		
Alice J. Du	ıck Clerk		No.			:			
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	Plaintiff's Attorney			:	:	:			Sherif
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	Defendant's Attorney					***************************************		Der	uty Sherif

ROSIE FORD BROWN : IN THE CIRCUIT COURT OF

Complainant : BALDWIN COUNTY, ALABAMA

Vs. : IN EQUITY

HARVEY ALLEN BROWN : No.

TO THE HONORABLE JUDGES OF SAID COURT SITTING IN EQUITY.

Comes your complainant, Rosie Ford Brown, in the above styled cause, and shows unto your Honors and this Honorable Court, as follows:

ONE

Your complainant and the respondent are both over the age of 21 years and both are bona fide resident citizens of Baldwin County, Alabama.

TWO

Your complainant and the respondent were lawfully married to each other on July 21, 1957, at Lucedale, Mississippi, and lived together as husband and wife from that time until October 26, 1957, at which time they separated in Mobile County, Alabama, and they have not lived or cohabited together since that time.

THREE

The complainant further avers that the respondent did commit actual violence spon your complainant's person, attend with danger to her life and health by beating her with his vist and hitting her with a pistol across the leg, or from his conduct there is reasonable apprehension of such danger, and by reason thereof she separated from him and has not lived or cohabited with him since that time.

FIVE

Your complainant further avers that the respondent is an able bodied man and works and earns money and is well able to contribute to the support of your complainant, both pendente lite and permanent; and to pay your complainant's solicitor's fee and the costs incurred in these precedings.

PRAYER FOR PROCESS

WHEREFORE, the premises considered, your complainant prays that Harvey Allen Brown, be made a party respondent to this Bill of Complaint; that process in the usual form and according to the rules of this Honorable Court, be issued to him, commanding him to plead, answer or demur to this Bill of Complaint as he may be advised or suffer a decree pro confesso to be entered against hom.

PRAYER FOR RELIEF

To the end that justice and equity may be done in the premises, your complainant prays that this Honorable Court will completely and entirely sever the bonds of matrimony now existing between the complainant and the respondent; will grant your complainant the right to remarry after the time required by law; and will order the respondent to pay a reasonable amount as solicitor's fee for your complainants solicitor of record, and to pay the costs incurred in these precedings; and your complainant prays for such other further and different relief as she may be entitled to receive the premises considered.

now for Bosur

Respondent is Employed by Survey Arilling Contriet to Fairhope and is doing husiness with July Station in Downtown Fairhope, who can lead your To Perpondent.

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ROSIE FORD BROWN : IN THE CIRCUIT COURT OF

Complainant : BALDWIN COUNTY, ALABAMA

Vs.

Respondent

HARVEY ALLEN BROWN : IN EQUITY

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demur to this Bill of Complaint as he may be advised or suffer a decree
pro confesso to be entered against him.

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osic Fad Brown
mplainant

My Milkins, Solicitor for Comptainant

My Milkins, Surployed by Survey Arilling Co. Which has just money to Fairhope and is doing husiness with July station in Downtown Taishope, who can lead to you to respondent.

FILED OCT 28 1957 MICE J. BECK, Rogistor

THE STATE OF ALABAMA,

COURT,	BALDWIN	COUNTY
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		No. 415	3	÷
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You Are Hereby Com	manded to Summon_	Harvey Allen	Brown	
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the Circuit Court of B				to the complaint filed in
		e of Alabama, at Bay	Minette, against	
		Brown		Defendant
	Harvey Allen I	Brown vn	: :	Defendant
	Harvey Allen I	Brown vn	: :	
	Harvey Allen F Rosie Ford Brow	Brown vn		Defendant

No	4153

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THE STATE OF ALABAMA BALDWIN COUNTY					
CIRCUIT COU	RT				
ROSIE FORD BROWN	:				
vs. HARVEY ALLEN BROWN	Plaintiffs				
TRACEST ADDISA DILOWS					
	Defendants				
Filed 10/28/57	10				
Alice J. Duck	, Clerk				
Plaintifi	s Attorney				
	s's Attorney				

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Defendant lives at