

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 4153

TERM, 19 57.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Harvey Allen Brown

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

Harvey Allen Brown

, Defendant .....

by Rosie Ford Brown

, Plaintiff.....

Witness my hand this 28th day of October 1957.....

Alice J. Dyer, Clerk

**THE STATE OF ALABAMA  
BALDWIN COUNTY**

**CIRCUIT COURT**

**ROSIE FORD BROWN**

Plaintiffs

vs.

**HARVEY ALLEN BROWN**

Defendants

**SUMMONS and COMPLAINT**

Filed 10/28/57 \_\_\_\_\_, 19\_\_\_\_\_

Alice J. Duck \_\_\_\_\_, Clerk

\_\_\_\_\_  
Plaintiff's Attorney

\_\_\_\_\_  
Defendant's Attorney

\_\_\_\_\_  
Defendant lives at

\_\_\_\_\_  
RECEIVED IN OFFICE

\_\_\_\_\_, 19\_\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_, 19\_\_\_\_\_

by leaving a copy with

\_\_\_\_\_  
Sheriff

\_\_\_\_\_  
Deputy Sheriff

ROSIE FORD BROWN	:	IN THE CIRCUIT COURT OF
	:	
Complainant	:	BALDWIN COUNTY, ALABAMA
	:	
Vs.	:	
	:	IN EQUITY
HARVEY ALLEN BROWN	:	
	:	
Respondent	:	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 upon your complainant's person, attend with danger to her life and health by beating her with his fist 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 proceedings.

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 him.

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 proceedings; and your complainant prays for such other further and different relief as she may be entitled to receive the premises considered.

OCT 11 1917

Nozie Ford Brown  
Complainant

Maurice A. Downing  
Solicitor for Complainant

Respondent is Employed by  
Lurney Drilling Co which  
has just moved to Fairhope  
and is doing business with  
Gulf Station in Downtown  
Fairhope, who can lead you  
to Respondent.



ROSIE FORD BROWN	:	IN THE CIRCUIT COURT OF
	:	
Complainant	:	BALDWIN COUNTY, ALABAMA
	:	
Vs.	:	
	:	IN EQUITY
HARVEY ALLEN BROWN	:	
	:	
Respondent	:	No. _____
	:	

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The complainant further avers that the respondent did commit actual violence upon your complainant's person, attend with danger to her life and health by beating her with his fist 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 proceedings.

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 him.

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 proceedings; and your complainant prays for such other further and different relief as she may be entitled to receive the premises considered.

Rosie F. d. Brown  
Complainant

Maurice A. Downing  
Solicitor for Complainant

Mr. Wilkins,  
Respondent is Employed by  
Surrey Drilling Co. which  
has just moved to Fairhope  
and is doing business with  
Gulf station in Downtown  
Fairhope, who can lead ~~you~~  
you to Respondent.

#153

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MISSOURI STATE ARCHIVES

FILED  
OCT 28 1957

ALICE J. ROCK, Register

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Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 4153

TERM, 1957

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to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Harvey Allen Brown, Defendant

by Rosie Ford Brown

Plaintiff

Witness my hand this 28th day of October 1957

Rosie Ford Brown, Clerk

No. 4153

Page .....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

ROSIE FORD BROWN

Plaintiffs

vs.

HARVEY ALLEN BROWN

Defendants

**SUMMONS and COMPLAINT**

Filed 10/28/57, 19.....

Alice J. Duck  
....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

F. H. [unclear]  
RECEIVED IN OFFICE

11/29, 1957

....., Sheriff

I have executed this summons

this ....., 19.....

by leaving a copy with

Returned 3 day of Dec 1957

Not found in my county after diligent search and  
quiry.

Taylor Wilkins, She

By [Signature]  
Deputy Sheriff

..... Sheriff

..... Deputy Sheriff