

SUMMONS AND COMPLAINT

2878

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THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2878

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Essex Casey

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 _____

Essex Casey, Defendant.....

by Bessie Lee Casey

_____, Plaintiff.....

Witness my hand this 27th day of August 1952

Alice J. Leach, Clerk

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed _____, 19_____

_____, 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

BESSIE LEE CASEY,

Complainant,

-vs-

ESSEX CASEY,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your Complainant, Bessie Lee Casey, respectfully represents and shows unto your Honor:-

1. That your Complainant is over the age of twenty-one years and is a resident of said County and State, and has been a bona fide resident of said State for more than one year next preceding the filing of this Bill of Complaint; that Essex Casey is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your Complainant and the Respondent were lawfully married on February 11, 1946.

3. Complainant further avers and alleges that the Respondent has committed actual violence on her person attended with danger to her life or health and from his conduct there is reasonable apprehension of other and further violence.

4. Complainant further shows that there has been born of this marriage four children, namely, Elenor Louise Casey, Age 5, Ethel Mae Casey, Age 3½, Essex Casey, Jr., Age 2, and Mary Lou Casey, Age 7 months, which said children are in the care, custody and control of the Complainant. Complainant avers that the Respondent is financially able to pay the sum of Fifteen Dollars (\$15.00) per week for support and maintenance of the four minor children.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your Complainant prays that Essex Casey be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your Complainant be granted a divorce from said Respondent. And that she be granted

custody and control of the four minor children with rights of visitation to the Respondent and that she be granted and awarded the sum of Fifteen Dollars (\$15.00) per week for the maintenance and support of these children. Should your Complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

Respondent resides in Mills
Quarters near Magnolia Springs,
Alabama.