

STATE OF ALABAMA	)							
	)	IN	THE	CIRCUIT	COURT	-	IN	EQUITY
BALDWIN COUNTY	)						,	

TO ANY SHERIFF OF BALDWIN COUNTY, ALABAMA:

You are hereby commanded to summon Will N. Clark 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 Frances Clark, as Complainant, against Will N. Clark, as Respondent.

Witness my hand this 10th day of September, 1952.

Register.

FRANCES CLARK,	ğ	IN THE CIRCUIT COURT OF
Complainant,	Q	BALDWIN COUNTY, ALABAMA,
Vs.	Ø	IN EQUITY.
WILL N. CLARK,	Q	• • • •
Respondent.	ð	

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY. AND TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE THEREOF:

Comes your Complainant, Frances Clark, and files this her Bill of Complaint for divorce against Will N. Clark, and shows unto your Honor and unto this Honorable Court as follows:

#### FIRST:

That your Complainant and Respondent are both over the age of twenty-one years, and are both resident citizens of Fairhope, Baldwin County, Alabama, where they have resided for the past nine years.

### SECOND:

That your Complainant and the Respondent were married on heretofore to-wit, December 26, 1936, and lived together as man and wife until, on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and apart from him; that on, to-wit, September 6, 1952, the Respondent committed acts of violence on the person of your Complainant attended with danger to her life or health by striking her with his fist and your Complainant and the Respondent have not lived together as man and wife since that time.

### THIRD:

That there was born to your Complainant and the Respondent of this marriage, three children, Robert Clark, a boy age 12; Ronnie Clark, a boy, age 9; and Sherry Clark, a girl, age 6. That your Complainant is a fit and proper person to have the care, custody and control of said minor children and the Respondent is not a fit and proper person to have the care, custody and control of such minors. That the Respondent is an able bodied man, earning approximately \$275.00 per month and that the Complainant does not own any property and has no money or income sufficient to support the above named

minor children. That it was necessary that she employ an attorney to institute these proceedings and to that end she has employed the firm of Chason & Stone, Bay Minette, Alabama, as her Solicitors in this cause and she has no property or money with which to compensate said Solicitors for their services in this behalf.

# PRAYER FOR PROCESS:

The premises considered your Complainant respectfully prays that the above named Will N. Clark be made a party Respondent to this cause by the usual writ or process of this Honorable Court, requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the statutes in such cases made and provided.

# PRAYER FOR RELIEF:

The premises considered your Complainant respectfully prays that upon a final hearing of this cause that your Honor will enter an order divorcing your Complainant from the Respondent; your Complainant further prays that your Honor will also enter an order or decree awarding the care, custody and control of the said Robert Clark, Romnie Clark and Sherry Clark to your Complainant and will also order the Respondent to pay to your Complainant an amount each month sufficient for the maintenance and support of the three minor children. That this Court will also ascertain and fix a reasonable fee to be paid by such Respondent to Chason & Stone, as Solicitors for the Complainant in this cause. That your Honor will also decree that the Complainant be allowed to remarry if she sees fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Frances Clark Complainant.

CHASON & STONE Solicitors for Complainant.