

2910

ALICE CAMMACK,	Ø	
	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT,	Ø	BALDWIN COUNTY, ALABAMA
VS:	Ø	
D. P. CAMMACK,	Ø	IN EQUITY.
	Ø	
RESPONDENT.	Ø	

TO THE HONORABLE TELFAIR J. MASHBURN, JR., Judge of the Circuit Court
Sitting in Equity.

Comes your Complainant, ALICE CAMMACK, and files this her Bill of Complaint for divorce against D. P. CAMMACK and respectfully represents and shows unto your Honor:

1: Your oratrix, ALICE CAMMACK, a resident citizen of Baldwin County, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about November, 1942, oratrix intermarried with said D. P. CAMMACK, at Mobile, Alabama, and they lived together as man and wife until about September, 1951, most of the time residing in Baldwin County, Alabama, and oratrix has been a bona fide resident citizen of Alabama for one year next preceding the filing of this bill.

2: Complainant further avers that said respondent voluntarily abandoned the bed and board of complainant for more than one year next preceding the filing of this bill of complaint, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife.

3: The Complainant shows unto your Honor that the respondent has borrowed from her several hundred dollars at various times to assist him in purchasing real and personal property to wit: A fishing camp on Fort Morgan Highway near Fort Morgan, Alabama, which he later sold at a profit taking back a real estate mortgage as security, on which there is due TWO THOUSAND & 00/100 DOLLARS (\$2,000) this December 1st. Also, your respondent has another fishing camp on Bay Ridge Road, which furnishes the respondent with a good income. The Complainant therefore shows to the Court that the respondent has sufficient funds to properly and adequately support her and that he is able to pay her the sum of THREE THOUSAND & 00/100 DOLLARS (\$3,000), which sum of money may be made in monthly payments. Also, that the respondent is able to pay a reasonable attorney's fee of FIVE HUNDRED & 00/100 DOLLARS (\$500.00) for legal council.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your complainant makes the said D. P. CAMMACK a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said D. P. CAMMACK, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, and will enter a decree allowing the complainant permanent alimony as aforesaid, and that your Honor will grant such other, further and different relief as unto your Honors may seem just and proper, and your complainant will ever pray, etc.


Solicitor for Complainant

Respondent's address is
Cammacks Camp on Bay Ridge
Road, Daphne, Alabama.

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

January 5, 1953

2910

Mrs. Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Re: Alice Cammack
vs: D. P. Cammack

Dear Mrs. Duck:

You are hereby authorized and instructed to dismiss the case of divorce action in Alice Cammack vs: D. P. Cammack, without prejudice to the complainant, Alice Cammack, who I represent.

You will find my check enclosed in the amount of \$12.50 to pay the costs. Kindly send me a receipt.

Yours very truly,



FOREST A. CHRISTIAN

cc Mr. John Chason
Bay Minette, Alabama

The State of Alabama, _____ County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon D. P. CAMMACK

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

against D. P. CAMMACK

Herein fail not. Due return make of this writ as the law directs.

Witness this 16th day of October, 1952

Alice J. Slack, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

The State of Alabama

COUNTY.

IN CIRCUIT COURT, IN EQUITY

ALICE E. CAMMACK

vs.

D. P. CAMMACK

SUMMONS

Returned by the Sheriff and filed in office, this the _____ day of _____, 19_____

Register.

2910

Received in office, this the _____ day of _____

17

day of

1953

Taylor Wilkin, Sheriff.

I have executed the within by leaving a copy thereof with _____

D. P. Cammack

defendant named herein, on this the _____

30

day of _____, 1952

Oct.

Taylor Wilkin, Sheriff.

By H. G. Hall, Deputy.