

4234

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

P. O. Box 298

April 7, 1958

WH 3-3601

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

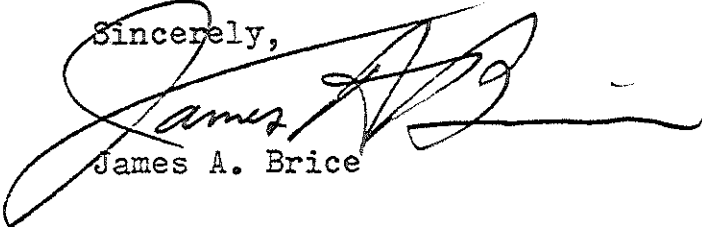
Re: Dorothy N. Hall
Vs: William W. Hall
Equity 4234

Dear Mrs. Duck:

Please dismiss this case at request of complainant.

I shall appreciate a cost bill.

Sincerely,


James A. Brice

JAB:ecg

cc: Mr Cecil Chason
Attorney at Law
Foley, Alabama

DOROTHY N. HALL)	
Complainant	:	IN THE CIRCUIT COURT OF
)	
VS.	:	BALDWIN COUNTY, ALABAMA
)	
	:	IN EQUITY
WILLIAM W. HALL)	
Respondent	:	

TO THE HONORABLE H.M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes your Complainant, Dorothy N. Hall, and files this her Bill of Complaint for Divorce from bed and board against William W. Hall, and respectfully represents and shows unto your Honor:

1. That the Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such for more than five years next preceeding to the filing of this cause; that William W. Hall is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such for more than five years preceeding the filing of this cause.

2. That the Complainant and Respondent were lawfully married on, to wit, May 11, 1935, and lived together as man and wife until February 13, 1958.

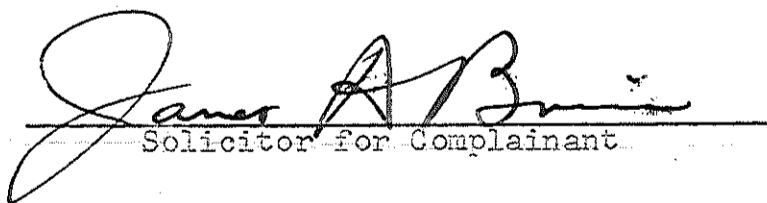
3. The Complainant further avers that at divers times and places, since August, 1957, the Respondent has committed adultery by unlawful cohabitation with an adult woman, whose real name is unknown to your Complainant, said woman having identified herself only as "Mrs. Hall", that said acts of adultery were discovered or made known by your Complainant on the 20th day of February, 1958.

4. Complainant further avers to the Court that there has been born of this marriage four issue, namely: Rex Dickson Hall, who is twenty-one years of age; Billy Bruce Hall, who is seventeen years of age; Media Kaye Hall, who is thirteen years of age; and Dorothy Renee Hall, who is seven years of age, the latter three of whom are in the care, custody and control of the Complainant.

5. Complainant further avers that the Respondent is a person of good financial means, owning a residence in Foley, Alabama, a Ford pick-up truck, a 1955 Mercury automobile, and having an estimated average weekly income of more than \$100.00, and that the Respondent is financially able to pay the Complainant the sum of \$70.00 per week for the support and maintenance of herself and the said three minor children.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that William W. Hall be made a party respondent to this cause by the usual process of this Honorable Court, requiring him to 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; that upon a final hearing of this cause, that your Complainant be granted a divorce from the bed and board of the Respondent, and that she be granted her dower and homestead interests in the property and assets of the Respondent; and that she be granted separate maintenance for herself and the three minor children hereinabove named; and that she be granted the care, custody, and control of the three minor children of the marriage, with reasonable rights of visitation to the Respondent. Should your Complainant be mistaken in the relief prayed for, that she be granted such other, further, different, and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No.

..... TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William W. Hall

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

William W. Hall, Defendant

by Dorothy N. Hall, Plaintiff

Witness my hand this 7th day of March 19 58

Blaise J. Darr, Clerk

No. 4234

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The State of Alabama
Baldwin County

CIRCUIT COURT

DOROTHY N. HALL

Plaintiffs

vs.

WILLIAM W. HALL

Defendants

Summons and Complaint

Filed 3-7-1958

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

3/7/ 58 19

Sheriff

I have executed this summons

this 15- March 1958

by leaving a copy with

Sheriff claim \$ 2.20 miles at
Ten Cents per Mile Total \$ 2.20
JAYLOR WILKINS, Sheriff
BY Childress
DEPUTY SHERIFF

Jaylor Wilkins Sheriff
Alice J. Duck Deputy Sheriff

J.oley