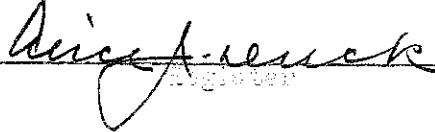


STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons PATIE WORRELL 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 ALICE WORRELL, as Complainant, and against Patie Worrell, as Respondent.

WITNESS my hand this the 12 day of November, 1957.



Alice Worrell

ALICE WORRELL

COMPLAINANT

VS

PATIE WORRELL

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

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

Comes now your Complainant and respectfully shows unto your Honor as follows:

1.

That the Complainant and Respondent are both over the age of twenty-one years and are bona fide resident citizens of Baldwin County, Alabama, and have been for more than one year next preceding the filing of this Bill of Complaint.

2.

That your Complainant and Respondent were lawfully married to one another on March 3, 1956, at Brewton, Alabama, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit, November 4, 1957.

3.

That on, to-wit, November 4, 1957, and on various occasions prior thereto, the Respondent hit the Complainant about the face and body, and cursed, threatened and abused your Complainant and threatened to do actual violence to her person, which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant

every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would carry out his threats which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent two children, Ronnie Worrell, age $3\frac{1}{2}$; and Mickael Worrell, age 1; that your Complainant is a fit and proper person to have the care, custody and control of her minor children.

5.

The Complainant avers that the Respondent is an abled bodied man and is presently earning a substantial salary.

6.

That the Complainant has employed the Firm of Wilters & Brantley to represent her in this matter of divorce and has no means of paying them for their services.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Patie Worrell party respondent to this Bill of Complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that on a final hearing of this cause, Your Honor will enter a decree granting your Complainant a divorce from the Respondent and granting her the right to remarry; your Complainant further prays that Your Honor will by said decree grant her the permanent care, custody and control of her minor children, Ronnie Worrell and Mickael Worrell; Your Complainant further prays that Your Honor will order the Respondent to pay the Complainant support money for his minor children; Your Complainant further prays that the Court will ascertain a reasonable attorneys fee to be paid the firm of Wilters and Brantley for representing the Complainant in this cause and cause the Respondent to pay the same, together with the cost of this proceedings. Your Complainant further prays for such other, further, or different relief to which the Complainant may in equity be entitled.

Wilters & Brantley

BY: 
Attorneys for the Complainant

Revised

NO. 4165'

Received 13 day of Nov. 1957
and on 16 day of Nov. 1957
served a copy of the within B/C
on Patie Warrill

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolant D. S.
O mi

FILED

NOV 12 1957

ALICE I. DUCK, Register