

3395

STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jerry Sobola 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 Lula Sobola, as Complainant, against Jerry Sobola, as Respondent.

Witness my hand this 2nd day of November, 1954.

Heise J. ...
Register.

LULA SOBOLA,
Complainant,
vs.
JERRY SOBOLA,
Respondent.

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

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

Comes your Complainant, Lula Sobola, and respectfully represents and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That she is over the age of twenty-one years and a resident citizen of Robertsdale, Baldwin County, Alabama. That the Respondent, Jerry Sobola, is over the age of twenty-one years and a resident citizen of Robertsdale, Baldwin County, Alabama.

SECOND:

That your Complainant and the Respondent were married on February 10, 1944, in Lucedale, Mississippi, and they lived together as man and wife until, to-wit; July 24, 1954, on which date your

Complainant was forced to leave the Respondent on account of the matters hereinafter complained of.

THIRD:

That on to-wit; July 24, 1954, the Respondent committed actual violence and cruelty upon the person of your Complainant attended with danger to her life and health and from his conduct your Complainant has reasonable apprehension that if she continues to live with the said Respondent as man and wife that actual violence will be committed on her person attended with danger to her life and health.

FOURTH:

That there were no children born to your Complainant and the Respondent out of their marriage.

FIFTH:

That the Respondent is a man of great means in that he owns property in Baldwin County, Alabama, consisting of a hotel building in Robertsdale, and twenty-nine (29) acres of land immediately North of Robertsdale, on which there are considerable improvements and that the total value of his said property is around Fifty Thousand Dollars (\$50,000.00). That your Complainant has no property of her own, but that she has worked diligently and constantly with and for the Respondent and has assisted him in improving his property and realizing the fruits thereof. That your Complainant operated the hotel for the Respondent and generally assisted him in procuring and preserving the property which now stands in his name.

SIXTH:

That your Complainant is without means of support and due to her present physical condition is unable to procure employment in order to provide herself with the necessities of life. That she has no funds out of which to pay her Solicitors, Chason & Stone, Attorneys at Law, Bay Minette, Alabama, who it was necessary that she employ in order to commence this action.

PRAYER FOR PROCESS:

Your Complainant respectfully prays that this Court will cause the usual writ of process to issue out of this Honorable Court notifying the said Respondent of the filing of this Bill of Complaint and requiring him to plead, answer or demur to the same within the time allowed by law and the rules prescribed by this Honorable Court.

PRAYER FOR RELIEF:

The premises considered your Complainant respectfully prays that your Honor will enter an order fixing a date to determine what amount, if any, should be paid to your Complainant as alimony, pendente lite, by the Respondent and your Complainant prays that on the day so set that your Honor will enter an order, or will cause the Register, on reference, to enter an order fixing and awarding to your Complainant a reasonable sum as such alimony to be paid to her by the Respondent.

And your Complainant further prays that upon a final hearing of this cause that your Honor will enter an order or decree divorcing your Complainant from the Respondent and dissolving the bonds of matrimony which have heretofore existed between them for and on account of cruelty and that in and by the terms of such order or decree that your Honor will fix and determine an amount to be paid by the said Respondent to your Complainant as alimony in accordance with the statute in such cases made and provided and will, in and by the terms of said order or decree fix and determine the amount to be paid to Chason & Stone, the Solicitors for your Complainant, and will order said amount to be paid by the Respondent; and your Complainant prays for such other, further and different relief as in the premises will be meet and proper.


Lula Sobola

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public in and for said State and County, personally appeared Lula Sobola, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That her name is Lula Sobola and that her name is signed to the foregoing Bill of Complaint and that the facts alleged therein are true.

Dated this 2nd day of November, 1954.

Lula Sobola
Lula Sobola

Sworn to and subscribed before me this 2nd day of November, 1954.

Norborne C. Stone, Jr.
Notary Public, Baldwin County, Ala.