

3430

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commaned to summon Sidney Peterson to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Peggy Peterson.

WITNESS my hand, this 29 day of December, 1954.

*Archie J. Housch*  
Register

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PEGGY PETERSON,	)	
	)	
Complainant,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
SIDNEY PETERSON,	)	IN EQUITY
	)	
Respondent.	)	

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

Your Complainant, Peggy Peterson, respectfully represents and shows unto your Honor as follows:

1. That your Complainant is over the age of twenty-one years and a resident of Baldwin County, Alabama, and has been a bona fide resident citizen of said State and County for more than two years next preceding the filing of this Bill of Complaint; that the Respondent, Sidney Peterson, is over the age of twenty-one years and a resident of Baldwin County, Alabama.

2. That your Complainant and the Respondent were lawfully married on April 4, 1949, in Lucedale, Mississippi, and that there were two children born to this marriage, to-wit: Ronald Peterson, a son, four years of age and Deborah Peterson, a daughter, who is two years of age. The said children are now in the care, custody and control of your Complainant, and your Complainant alleges that she is a fit and proper person to have the care, custody and control of the said

minor children; that she has a home in which to keep the said children and it is to the best interest of the said minor children that they remain in the temporary and permanent custody of your complainant. Your Complainant further alleges that the Respondent has made threats of taking the said children from her custody and she alleges that the said Respondent is not a fit and proper person to care for the said minor children.

3. Your Complainant avers and charges that the said Respondent did on or about the 21st day of December, 1954, assault, beat, hit, choke and strike <sup>her;</sup> that said Respondent has committed actual violence on her person attended with danger to her life or health; Complainant avers and charges that Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person attended with danger to her life or health.

4. Your Complainant alleges that the Respondent is gainfully employed by St. Regis Paper Company and earns from his said employment approximately Three Hundred Dollars (\$300.00) each month.

5. Your Complainant alleges that it has been necessary for her to employ an Attorney to represent her in this suit and that she is without funds to pay her said Attorney for services rendered and to be rendered by him in this cause.

The premises considered, your Complainant makes the said Sidney Peterson a party respondent to this Bill of Complaint, and in order that the Complainant may have the relief prayed for herein, may it please the court to cause the States Writ of Subpoena to be issued direct to the said Sidney Peterson commanding him to plead, answer or demur to this Bill of Complaint within the time required by law and that on a final hearing of this cause that the Complainant be awarded a divorce from the said Respondent; that the court fix a reasonable monthly allowance to be paid to her as permanent

alimony; that the court will fix a reasonable amount to be paid by the Respondent to your Complainant's Attorney for services rendered and to be rendered in this cause; that she be awarded the permanent custody, care and control of the said minor children herein referred to and that your Honor grant such other further and different relief as may be just and proper in the premises.

Complainant further prays that the court will make and enter an order granting your Complainant the temporary care, custody and control of said minor children pending a final decree in this cause.

  
Solicitor for Complainant

STATE OF ALABAMA )  
                          \*  
BALDWIN COUNTY    )

Before me, the undersigned authority, personally appeared Peggy Peterson who first being duly and legally sworn deposes and says: That she has read over the foregoing Bill of Complaint and that the facts stated therein are true.

Peggy Peterson

Sworn to and subscribed before me  
on this the 23rd day of December, 1954.

James R. O.

Notary Public, Baldwin County, Alabama.

ORDER

The foregoing petition having been presented to me on this date, and it appearing to the court that it is to the best interest of said minor children that they remain in the temporary care, custody and control of the Complainant, it is therefore, ORDERED, ADJUDGED AND DECREED that the Complainant shall have and she is hereby awarded the temporary care, custody and control of Ronald Peterson and Deborah Peterson pending a final decree in this cause and the Sheriff of Baldwin County is hereby ordered and directed to serve a copy of this order to the Respondent, Sidney Peterson.

ORDERED, ADJUDGED AND DECREED on this the 23 day of December, 1954.

*Hubert M. Ivers*  
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Judge.