

3437

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| EDWINA DELORES SELLERS COMPLAINANT | | IN THE CIRCUIT COURT OF BALDWIN |
| | | COUNTY, ALABAMA |
| VS | | IN EQUITY |
| RAY VESTA SELLERS RESPONDENT | | NO, _____ |

TO THE HONORABLE JUDGE OF SAID COURT, Sitting in Equity:

Comes now your Complainant, EDWINA DELORES SELLERS, and, humbly complaining, presents this her Bill of Complainant against the Respondent, RAY VESTA SELLERS, and shows:

O N E

The Complainant is and has been for more than one year next before the filing of this suit a bona fide resident citizen of the State of Alabama, Baldwin County, more than 21 years of age. The Respondent is a resident citizen of the State of Alabama, Baldwin County, and more than 21 years of age.

T W O

The Complainant and the Respondent were lawfully married to each other on the 22nd day of February, 1946, at Lucedale, Mississippi and lived together as husband and wife for several years thereafter. Two children were born of this marriage, both girls, Linda Clyde Sellers, now 6 years of age; Carolyn Ann Sellers, now 2 years of age, the care, custody and control of the children to be awarded six months each to Complainant and Respondent.

T H R E E

After her marriage to ^{him,} the Respondent committed actual violence on the person of the Complainant attended with danger to life or health; or from his conduct toward her there was reasonable apprehension of such cruelty and violence so attended with like danger.

P R A Y E R

THE PREMISES CONSIDERED, Complainant prays that Respondent be made the party defendant hereto in a manner provided by law; that upon a final hearing herein a decree be rendered forever dissolving and annulling the bonds of matrimony heretofore existing between the parties hereto; that in said decree the care, custody and control of the two minor children be awarded as agreement. AND COMPLAINANT PREYS FOR GENERAL RELIEF.

Shelton Street
SOLICITOR FOR COMPLAINANT

Edwina Sellers
COMPLAINANT

FILED

Jan 7, 1955

ALICE I. DICK, REGISTER

EDWINA DELORES SELLERS

Complainant

IN THE CIRCUIT COURT OF
MOBILE COUNTY, ALABAMA
IN EQUITY

No.

Vs.

RAY VESTA SELLERS

Defendant

ANSWER AND WAIVER

Comes the Defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegation of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by disposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

WITNESSES:

Ann Street

Ray Vesta Sellers
Defendant

Betty Street

Note: The space below is intended for "Agreements Between the Parties."

It is agreed that Ann Street, of Prichard, Alabama is a suitable person to take the testimony in this cause and may do so without a Commission from the Court.

It is further agreed that the care, custody and control of the two children, Linda Clyde and Carolyn Ann be awarded as follows The First six month to the Complainant, Edwina Delores Sellers, with the right reserved to Respondent to visit with said children at all reasonable times. The next six months they be awarded to Respondent, Ray Vesta Sellers, with the right reserved to Complainant to visit with said children.

It is further agreed that the Respondent will pay to Complainant the sum of \$15,00 per week toward the support of said children when in her control.

It is agreed that the Complainant is to have the furniture now owned by the parties, and Respondent is to have the car a 1953 Dodge.

Edwina Delores Sellers
COMPLAINANT
Ray Vesta Sellers
DEFENDANT

STATE OF _____

COUNTY OF _____

I, _____, a NOTARY PUBLIC in and for said State and County, do hereby certify that _____, whose name is signed to the foregoing instrument, and who is known to me, acknowledge before me this day, that being informed of the contents of the instrument, _____ executed the same voluntarily on the day same bears date.

Witness my hand and seal this _____ day of _____, 19____.

Filed, _____

W. ELSWORTH HAUGHTON, REGISTER

NOTARY PUBLIC

STATE OF _____

COUNTY OF _____

RECORDED

No. 3437

EDWINA DELORES SELLERS
COMPLAINANT

Vs.

RAY VESTA SELLERS
RESPONDENT

ANSWER AND WAIVER

FILED

JAN 7 1955

Filed ALICE J. DUCK, Register, 19

Register