

4288

OFFICE OF  
CLERK OF THE SUPREME COURT  
STATE OF ALABAMA  
MONTGOMERY

J. RENDER THOMAS  
CLERK

September 13, 1958

Mr. Telfair J. Mashburn, Jr.  
Attorney at Law  
Dahlberg Building  
Bay Minette, Alabama

In re: 1 Div. 787  
Mary N. Grimes v.  
James V. Grimes

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Y

Dear Mr. Mashburn:

I am in receipt of copy of your letter of September 12, 1958, to Mrs. Alice J. Duck, Register Baldwin Circuit Court, informing her that the above styled cause has been settled and you desire to dismiss same.

In order to get this case dismissed, you will have to send in a motion showing the cause has been settled and service of a copy of the motion on opposing counsel. I shall be pleased to present your motion to the Court upon receipt of same.

Yours very truly,

*J. Render Thomas*  
Clerk, Supreme Court

JRT/lid  
CC: Mrs. Alice J. Duck  
Register Baldwin Circuit Court  
Box 239, Bay Minette, Alabama

Box 333, Bay Minette, Alabama  
Re: Walter Edgwin O'Connell  
cc: Mrs. Alice J. Dock  
2/11/19

*John A. Crain*  
Clerk, Supreme Court

John A. Crain

Court upon receipt of same.  
Counsel. I shall be pleased to present your motion to the  
court and advise of a copy of the motion on observing  
with you to send in a motion showing the case has been  
in order to get this case dismissed, you

same.  
I shall be pleased to present your motion to the  
court and advise of a copy of the motion on observing  
with you to send in a motion showing the case has been  
in order to get this case dismissed, you

Dear Mr. Messinger:

James A. Crain  
Walter M. Crain A.  
in re: J. E. A. 181

Bay Minette, Alabama  
Deirdre Edgwin  
Appointed as law  
Mr. Edgwin J. Messinger Jr.

September 13, 1928

MONTGOMERY  
STATE OF ALABAMA  
CLERK OF THE SUPREME COURT  
OFFICE OF

CLERK  
T. REMDER THOMAS

1928

No. 4288

MARY N. GRIMES  
Complainant.

vs.

JAMES V. GRIMES  
Respondent.

I, Alice J. Duck Register of the Circuit Court in Equity,  
Baldwin County, Alabama, hereby certify that in the cause of

MARY N. GRIMES Complainant,

vs.

JAMES V. GRIMES Respondent,

which was tried and determined in this Court on the 24 day of

June 1958, in which there was a decree in favor of the

Complainant

On the 18 day of August 58, the

Complainant, Mary N. Grimes took an appeal to the

Supreme Court of Alabama, to be holden of and for said State.

I further certify that Telfair J. Mashburn, Solicitor for Complainant

filed security for cost of appeal, to the Supreme Court,

on the 18 day of August 1958, and that

Telfair J. Mashburn,

is  
~~the~~ sureties on the appeal bond.

I further certify that notice of said appeal was on the 18

day of August 1958, served on Harry J. Wilters, Jr.

as attorney of record for said appellee.

Witness my hand and the seal of this Court, this the 18 day of

August 1958

Alice J. Duck

Register of the Circuit Court In Equity of  
Baldwin County, Alabama.

MARY N. GRIMES,  
Complainant,  
vs  
JAMES V. GRIMES,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY, No. 4288

PETITION FOR RULE TO SHOW CAUSE

Comes your Petitioner, Mary N. Kelley, formerly Mary N. Grimes, who is over the age of twentyone years, and respectfully shows unto your Honor as follows:

FIRST: That on the 24th day of June, 1958, in the above entitled cause, a final decree was rendered divorcing your Petitioner, the Complainant, from James V. Grimes, her husband; and in said decree the said James V. Grimes was directed to pay to your Petitioner the sum of ONE HUNDRED FIFTY (\$150.00) DOLLARS, per month towards the maintenance and support of their minor children, namely: James Vaughn Grimes, Jr., and Robert Jeffery Grimes.

SECOND: That the said James V. Grimes has failed for the past three months to make the said payment of ONE HUNDRED FIFTY (\$150.00) DOLLARS, per month, as required by said decree, although having the sufficient means to comply with said decree, and has willfully and contemptuously refused to obey said decree.

THE PREMISES CONSIDERED, your Petitioner prays for a rule be issued to the said James V. Grimes requiring him at a time and place to be therein stated, to appear before the Court and show cause, if any he have, why he should not be punished as for a contempt. And your Petitioner prays for such other and further relief as may be mete and proper in the premises.

FILED  
AUG 6 1962  
ALICE J. DUCK, CLERK  
REGISTER

Mary N. Kelley  
Petitioner

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, in and for said State and County, personally appeared Mary N. Kelley, formerly Mary N. Grimes, who first being duly sworn deposes and says: That she is the Petitioner in the above entitled cause, that she has read over the foregoing petition and that the facts alleged therein are true.

Mary N. Kelley  
Petitioner

Sworn to and subscribed before me on this the 4<sup>th</sup> day of August, 1962.

John P. Beebe  
Notary Public

FILED

AUG 6 1962

ALICE J. DUCK, CLERK REGISTER

MARY N. GRIMES,  
Complainant,

vs

JAMES V. GRIMES,  
Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY No. \_\_\_\_\_

RULE TO SHOW CAUSE

This day came Mary N. Kelley, formerly Mary N. Grimes, and filed herein her verified petition praying that James V. Grimes be required to appear and show cause, if any he have, why he should not be punished as for a contempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is

ORDERED, ADJUDGED and DECREED by the Court that the said James V. Grimes appear before the Court at 10 A M, on the 27 day of August, 1962, in the court room of the Circuit Court of Baldwin County, Alabama, at Bay Minette, Alabama, and show cause, if any he have, why he should not be punished as for a contempt.

Let a copy of said petition and of this rule to show cause be served forthwith, personally upon the said James V. Grimes, by the Sheriff of Baldwin County, Alabama.

Done this the 6 day of August, 1962.

Received 6 day of Aug 1962 Hubert M. Stone Judge

and on 6 day of Aug 1962

I served a copy of the within Baldwin on James V. Grimes

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Taylor Wilkins D. S.  
Josley

Sheriff claims 40 miles at \_\_\_\_\_  
Ten Cents per mile Total \$ 4.00  
TAYLOR WILKINS, Sheriff  
BY Taylor Wilkins DEPUTY SHERIFF

4268

2000  
LAWSON WITNESS COURT

2000  
LAWSON WITNESS COURT

BY SERVICE OF  
LAWSON WITNESS COURT

to the  
LAWSON WITNESS COURT

to the  
LAWSON WITNESS COURT

done this 10th day of

1998

and the undersigned, Attorney at Law, do hereby certify that the foregoing is a true and correct copy of the original as the same appears in the files of this office.

Witness my hand and the seal of this office this 10th day of

1998

at the City of

California

James V. Shines

Attorney at Law

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James V. Shines  
Attorney at Law

FILED IN

1998

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FILED IN

TELFAIR J. MASHBURN  
ATTORNEY AT LAW  
DAHLBERG BUILDING - TELEPHONE 4861  
BAY MINETTE, ALABAMA

September 12, 1958

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


Re: Mary N. Grimes  
VS.  
James V. Grimes

Dear Mrs. Duck:

The parties to the above styled cause have settled their differences and I have been authorized to dismiss the complainant's appeal to the Supreme Court of Alabama, filed 18 August, 1958.

You will please dismiss this appeal.

Yours very truly,

  
Telfair J. Mashburn, Jr.

TJM/dbh

CC: Supreme Court  
Montgomery, Alabama



Appeal  
Dismissed

NOV 19 1954

NOV 19 1954

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MARY N. GRIMES,  
Complainant,  
VS.  
JAMES V. GRIMES,  
Respondent.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 4288

NOTICE OF APPEAL

Now comes MARY N. GRIMES, the Complainant in the above styled cause, and give notice of appeal from the decree of the Circuit Court of Baldwin County, Alabama, in Equity, rendered in said cause on the 24th day of June, 1958.

Dated this the 18th day of August, 1958.

John A. Maslowski  
SOLICITOR FOR COMPLAINANT.

We, WILTERS & BRANTLEY, Solicitors for the Respondent, do hereby accept service of a copy of the above Notice of Appeal on this the 18<sup>th</sup> day of August, 1958.

WILTERS & BRANTLEY,

by Henry J. Wilton, Jr.

FILED

AUG 18 1958

ALICE J. BECK, Register

MARY N. GRIMES,  
Complainant,  
VS.  
JAMES V. GRIMES,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 4288

APPEAL WITH SECURITY FOR COSTS

Comes MARY N. GRIMES, the Complainant in the above styled cause, and hereby appeals to the Supreme Court of Alabama from the final decree and judgment of the Circuit Court of Baldwin County, Alabama, in Equity, rendered in the above styled cause on the 24th day of June, 1958.

J. Blair J. Mauldin  
SOLICITOR FOR COMPLAINANT

I hereby acknowledge myself security for costs for the foregoing appeal.

J. Blair J. Mauldin

Taken and approved this the 18 day of August, 1958.

Alice J. Duce  
REGISTER

1st Div. No. 787 Mobile Circuit Court

MARY N. GRIMES In Equity

Appellant.

vs.

JAMES V. GRIMES

Appellee.

Dear Sir ~~xx~~ Mrs. Duck:-

The Certificate of Appeal in the above case

was today received and filed in this office.

Yours truly,

J. RENDER THOMAS,

Clerk Supreme Court.

TUESDAY: AUG. 19, 195 8.

MOBILE ALA.  
AUG 22  
3 30 PM  
1958



THIS SIDE OF CARD IS FOR ADDRESS

Mrs. Alice J. Duck  
Register Baldwin Circuit Court  
Bay Minette, Alabama

STATE OF ALABAMA,                     0  
    0       TO ANY SHERIFF OF THE STATE OF ALABAMA:  
 COUNTY OF BALDWIN.                 0

You are hereby commanded to summon JAMES V. GRIMES 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 MARY N. GRIMES, as complainant, against JAMES V. GRIMES, as Respondent.

WITNESS my hand this 1st day of May, 1958.

*Alice J. ...*  
 \_\_\_\_\_  
 REGISTER

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MARY N. GRIMES,	0	
	0	
Complainant,	0	
	0	IN THE CIRCUIT COURT OF
VS.	0	
	0	BALDWIN COUNTY, ALABAMA.
JAMES V. GRIMES,	0	
	0	
Respondent.	0	IN EQUITY. NO. _____

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

Your complainant, MARY N. GRIMES, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your complainant is over the age of twenty-one years and is a bona fide resident citizen of the State of Alabama, residing in the Barnwell Community in Baldwin County, Alabama; that the respondent, JAMES V. GRIMES, is over the age of twenty-one years and is a resident of Baldwin County, Alabama;
2. That your complainant and the respondent married at Pascagoula, Mississippi, on December 23, 1953, and lived together as husband and wife in Baldwin County, Alabama, until, on, to-wit: the 1st day of September, 1957.
3. That said respondent, JAMES V. GRIMES, has been guilty of adultery with divers parties and persons whose names to your complainant are unknown.

Complainant further avers and charges that, prior to their separation, the respondent did on many occasions assault, beat, hit and strike your complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; and complainant further avers that she is reasonably convinced

that, should she return to live with said respondent as his wife, he would commit actual violence on her person which would necessarily endanger her life or health.

4. That there was born to the marriage between your complainant and the respondent two children, JAMES VAUGHN GRIMES, age twenty-eight months, and ROBERT JEFFERY GRIMES, age sixteen months; that your complainant is a fit and proper person to have the care, custody and control of said minor children; that the respondent is not a fit and proper person to have the care, custody and control of said minor children; and that it is to the best interests of said children that they be left with their Mother, your complainant.

5. That your complainant has no income and is without means to support herself and her minor children; and that, because of the age of the said minor children, it is impossible for your complainant to work outside the home to support them; that the respondent is strong and healthy and able-bodied and well able to work and earn money; and that said respondent has a large income and is well able to provide for the needs of your complainant and their minor children.

6. That your complainant is without funds with which to pay her Solicitor for his services rendered, and to be rendered, in this cause, and that she has employed Telfair J. Mashburn, Esq. as her Solicitor in this cause.

PRAYER FOR PROCESS

WHEREFORE, THE PREMISES CONSIDERED, Your complainant makes the said JAMES V. GRIMES a party respondent to this her bill of complaint, and, in order that complainant may have the relief herein-after prayed for, may it please your Honors to cause the State's Writ of Subpoena to be issued, directed to the said JAMES V. GRIMES, commanding him to plead, answer, or demur to this bill of complaint, within the time required by law.

PRAYER FOR RELIEF

Your complainant further prays that, on a final hearing of this cause, your Honor will make and enter a decree granting her the following separate and several relief:

1. Forever divorcing her from said respondent, JAMES V. GRIMES.
2. Giving her the care, custody and control of their minor children, JAMES VAUGHN GRIMES AND ROBERT JEFFERY GRIMES, with reasonable rights of visitation in the said respondent.
3. Fixing a reasonable sum for the respondent to pay to your complainant monthly as alimony and for the support and maintenance of herself and their minor children.
4. Providing for medical, dental and hospital care for your complainant and their minor children on the part of said respondent.
5. Fixing a reasonable sum for respondent to pay to your complainant's Solicitor, Telfair J. Mashburn, Esq., for his services in this cause.

And if your complainant be mistaken in the relief to which she is entitled, then she prays for such other, further, different or general relief, as in equity and good conscience she may be entitled to receive; and, as in duty bound, she will ever pray, etc.

**FILED**

MAY 21, 1953

ALICE L. DUCK, CLERK  
REGISTER

Telfair J. Mashburn  
SOLICITOR FOR COMPLAINANT.

*Service accepted by  
Harry J. Wilton  
Solicitor for Respondent*





support and maintenance, the Respondent paid to the Complainant the sum of THREE THOUSAND (\$3,000.00) DOLLARS, and at the same time delivered to her many items of household furniture and personal property, totalling approximately TWELVE HUNDRED (\$1200.00) DOLLARS.

8. That the Respondent has fully and promptly complied with the terms of the agreement entered into on, to-wit: April 4, 1957, and paid ONE HUNDRED FIFTY (\$150.00) DOLLARS per month to the Complainant towards the support and maintenance of said minor children, and that the Complainant has not refunded to the Respondent any part of the said THREE THOUSAND (\$3,000.00) DOLLARS or the property received by her in lieu of alimony.

9. That Telfair J. Mashburn, Jr. was employed by the Complainant to prosecute this cause of action.

10. That under the allegations of the bill of complaint and the proof the Complainant is entitled to a divorce.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the Complainant, Mary N. Grimes be, and she is hereby forever divorced from the Respondent, James V. Grimes, for and on account of cruelty.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant, Mary N. Grimes, be, and she is hereby awarded the custody, care and control of the minor children, James Vaughn Grimes, Jr., and Robert Jeffery Grimes, subject to the right of visitation on the part of the Respondent, James V. Grimes.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent, James V. Grimes, pay to the Complainant, Mary N. Grimes, the sum of ONE HUNDRED FIFTY (\$150.00) DOLLARS per month towards the maintenance and support of said minor children, namely, James Vaughn Grimes, Jr., and Robert Jeffery Grimes.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent pay the Doctor and Hospital bills of James Vaughn Grimes, Jr., totalling ONE HUNDRED FORTY FIVE AND 65/100 (~~\$145.65~~) DOLLARS.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent, James V. Grimes, forthwith procure and maintain and keep in force and effect a policy of sick benefits and hospital insurance on each of the said minor children, James Vaughn Grimes, Jr., and Robert Jeffery Grimes.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant's claim for alimony be and the same is hereby denied.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Court retain jurisdiction of this cause for such changes as may be necessary from time to time.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent, James V. Grimes, pay to Telfair J. Mashburn, Jr., the sum of ONE HUNDRED (\$100.00) DOLLARS, as his Solicitor's fee for representing the Complainant, Mary N. Grimes.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that neither party to this suit shall again remarry except to each other within sixty days from the date of this decree, and if appeal is taken, then during the pendency of said appeal.

IT IS FURTHER ORDERED that the Complainant and the Respondent be and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

IT IS FURTHER ORDERED that James V. Grimes, the Respondent, pay the cost herein to be taxed, for which execution may issue.

This 24th day of June, 1958.

*Hubert M. Hall*  
Judge of the 28th Judicial  
Circuit of Alabama.

**FILED**  
**JUN 25 1958**  
**ALICE J. DUCK, Clerk**

MARY N. GRIMES, X  
Complainant, X IN THE CIRCUIT COURT OF  
Vs. X BALDWIN COUNTY, ALABAMA  
JAMES V. GRIMES, X IN EQUITY  
Respondent. X CASE NO. 4288

Comes now the Respondent in the above styled cause and for answer to the Complainant's Petition for Rule to Show Cause says:

That he is not now financially able to support the named children in the amount of \$150.00 per month; that his salary has been reduced by 50% since the time of the original decree ordering him to pay this said amount.

For further answer to this Petition, your Respondent says that he has supported the said children to the best of his ability since the time of the aforesaid decree.

FILED

AUG 10 1962

ALICE J. DUCK, CLERK  
REGISTER

WILKERS & BRANTLEY

BY:

*Robert M Brantley*

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN THE CHANCERY COURT OF BALDWIN COUNTY

To JAMES V. GRIMES

Or To WILTERS & BRANTLEY, Solicitors of record.

Whereas, on the 18 day of August, 1958,

Mary N. Grimes

took an appeal from the decree rendered on the 24 day of June,  
1958, by the Circuit Court of said county, in the cause of

MARY N. GRIMES

versus

JAMES V. GRIMES

Now, therefore, you are cited to appear as required by law, before the Supreme Court of Alabama, to defend on said appeal, if you think proper so to do.

Witness my hand this 18 day of August, 1958.

  
Register in Chancery.

Appeal dismissed

No. 4288

Received 19 day of Aug 1958  
Filed on 19 day of Aug. 1958  
Served a copy of the within Citation  
Wilton & Brantley

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. L. Tolbert D. S.  
omi

Mary N. Grimes Complainant

vs.

James V. Grimes Respondent

**CITATION OF APPEAL**

**IN EQUITY**

Issued \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

-serve on  
Wilton & Brantley

THE STATE OF ALABAMA--JUDICIAL DEPARTMENT

THE SUPREME COURT OF ALABAMA

October Term, 19 59=60

To the REGISTER of the CIRCUIT Court of BALDWIN County, Greeting:

Whereas, the Record and Proceedings of the CIRCUIT Court IN EQUITY of said county, in a certain cause lately pending in said Court between MARY N. GRIMES, Appellant, and JAMES V. GRIMES, Appellee, wherein by said Court, at the Term, 1959, it was considered adversely to said appellant, were brought before our Supreme Court, by appeal taken, pursuant to law, on behalf of said appellant:

Now, it is hereby certified, That it was thereupon considered by our Supreme Court on the 26th day of October 19 59, on motion of the appellant \* \* \* \* \*, that the said appeal be and stand dismissed; and that it was further considered that the appellant, and

Mary N. Grimes,

and

Telfair J. Mashburn, surety on the appeal bond, pay

the costs accruing on said appeal in this Court and in the Court below, for which costs let execution issue accordingly.

Witness, J. Render Thomas, Clerk of the Supreme Court of Alabama, at the Capital, this the 26th day of October 19 59.

J. Render Thomas, Clerk of the Supreme Court of Alabama.



4288

THE SUPREME COURT OF ALABAMA

October Term, 19 59=60

1 Div., No. 787

MARY N. GRIMES

Appellant,

v.

JAMES V. GRIMES

Appellee.

From Baldwin Circuit Court.  
In Equity  
NO. 4288

CERTIFICATE OF DISMISSAL

The State of Alabama,

Baldwin County.

} Filed

this 27 day of Oct 1959

*Deirdre...*

Vertical text on the right side of the page, including "RECORDED" and "INDEXED" stamps.

MARY N. GRIMES,  
Complainant,  
VS.  
JAMES V. GRIMES,  
Respondent.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. \_\_\_\_\_

AMENDED COMPLAINT

Comes the complainant in the above styled cause, MARY N. GRIMES, and amends her Bill of Complaint heretofore filed in said cause, so that, as amended, said Bill of Complaint reads as follows:

"1. That your complainant is over the age of twenty-one years and is a bona fide resident citizen of the State of Alabama; that the respondent, JAMES V. GRIMES, is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and the respondent married at Pascagoula, Mississippi, on to-wit: the 23rd day of December, 1953, and lived together as husband and wife in Baldwin County, Alabama, until, on, to-wit: the 1st day of September, 1957.

3. That the respondent, prior to their separation, did on many occasions assault, beat, hit and strike your complainant; that on or about, to-wit: the 1st day of April, 1957, he committed actual violence on her person attended with danger to her health or life by kicking her in the back and dislocating a disc in her spine; and complainant further avers that she is reasonably convinced that, should she return to live with the respondent as his wife, he would commit further further actual violence on her person which would necessarily endanger her life or health;

Your complainant further avers and charges that, as a result of the injuries inflicted on her by the respondent, she was forced to have an operation on her back which costs her more than ONE THOUSAND (\$1,000.00) DOLLARS of her own funds; and that said operation was performed at the Mobile Infirmary, Mobile, Alabama, by Dr. Earl King, in the latter part of April, 1957.

4. That there was born to the marriage between your complainant and the respondent two children, JAMES VAUGHN GRIMES, age twenty-nine months, and ROBERT JEFFERY GRIMES, age 17 months; that your complainant is a fit and proper person to have the care, custody and control of said minor children; that the respondent is not

a fit and proper person to have the care, custody and control of said minor children; and that it is to the best interests of the said children that they be left in the custody and control of their Mother, your complainant;

5. That your complainant has no income and is without means to support herself and her minor children; that, because of their tender years, it is impossible for your complainant to work outside the home to support them; that it has been necessary for your complainant to expend large sums of money for medical care and for medicines for said minor children, particularly the younger, ROBERT JEFFERY GRIMES; that the respondent is strong and healthy and able-bodied and well able to work and earn money; and that said respondent has a large income and is well able to provide for the needs of your complainant and their minor children.

6. That your complainant is without funds with which to pay her Solicitor for his services rendered, and to be rendered, in this cause and that she has employed Telfair J. Mashburn, Esq., as her Solicitor in this cause.

#### PRAYER FOR RELIEF

Your complainant prays that, on a final hearing of this cause, your Honor will make and enter a decree granting her the following separate and several relief:

1. Forever divorcing her from said respondent, JAMES V. GRIMES.
2. Giving her the care, custody and control of their minor children, JAMES VAUGHN GRIMES AND ROBERT JEFFERY GRIMES, WITH reasonable rights of visitation in the said respondent.
3. Fixing a reasonable sum for the respondent to pay to your complainant monthly as alimony and for the support and maintenance of herself and their minor children.
4. Providing for medical, dental and hospital care for your complainant and their minor children on the part of said respondent.
5. Fixing a reasonable sum for respondent to pay to your complainant's Solicitor, Telfair J. Mashburn, Esq., for his services in this cause.

And if your complainant be mistaken in the relief to which she

is entitled, then she prays for such other, further, different or general relief, as in equity and good conscience she may be entitled to receive; and, as in duty bound, she will ever pray, etc.

J. Wain A. Maslow  
SOLICITOR FOR COMPLAINANT.

I certify that I have on this 13<sup>th</sup> day of June, 1958 derived a copy of the foregoing Amended Bill of Complaint on the Respondent by receiving a copy in the office of Hon. Harry Wilton, Solicitor for the Respondent.

J. Wain A. Maslow  
Solicitor for Complainant

FILED

JUN 13 1958

ALICE J. DUCK, CLERK  
REGISTER

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. \_\_\_\_\_

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MARY N. GRIMES,  
Complainant,  
VS.  
JAMES V. GRIMES,  
Respondent.

\*\*\*\*\*

AMENDED BILL OF COMPLAINT.

FILED  
JUN 13 1958  
ALICE J. DUCK, Register

88217