

4290

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM W. KILLCREAS 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 EDWINA KILLCREAS as Complainant and William W. Killcreas as Respondent.

WITNESS my hand this the 21 day of May, 1958.

W. J. H. H. H.
Register

EDWINA KILLCREAS	∅	
		IN THE CIRCUIT COURT OF
COMPLAINANT	∅	
		BALDWIN COUNTY, ALABAMA,
VS	∅	
		IN EQUITY
WILLIAM W. KILLCREAS	∅	
RESPONDENT	∅	

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

Your Complainant Edwina Killcreas, respectfully represents unto Your Honor as follows:

1.

That your Complainant and Respondent are both over the age of 21 years and are bona fide resident citizens of Baldwin County, Alabama, and have been for more than five years next preceding the time of the filing of this Bill of Complaint.

2.

That your Complainant and Respondent were married to one another at Gulfport, Mississippi, on March 22, 1947.

3.

That there was born to the marriage of your complainant and respondent the following children: Clarice, age 10, James W. age 9, Brenda Kay, age 7, Don age 5, and Robbie age 2; That the Complainant is a fit and proper person to have the custody and control of these children; that the Respondent is not for the reasons hereinafter set out.

4.

That the Respondent is an able bodied man and earns a salary ranging from \$400.00 to \$600.00 per month and in addition to this gets \$131.00 per month from the Government.

5.

That during the married life of your Complainant and Respondent they have accumulated the following property: a stove, refrigerator, washing machine, dinette set, living room set, bed room set, television, sewing machine and sundry items of household furniture.

6.

That on, to-wit, April 9th, 1958, the Respondent did abuse the Complainant by beating her about the face and body with his fist and threatened at that time to take her life. These acts would of necessity endanger her life and health. The Respondent has on many occasions prior to this date cursed, threatened, beat and abused the Complainant and has on several occasions threatened to take her life.

7.

The Complainant alleges that the Respondent committed adultery on to-wit the 19th day of May, and the 10th day of April, 1958, with persons whose names to your Complainant are unknown.

8.

Your Complainant avers that she has employed the firm of Wilters and 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 William W. Killcreas party Respondent to this cause of action, 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 prays that on a hearing hereof, your Honor will enter an order and decree granting her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Respondent. Your Complainant prays further that your Honor will enter a decree causing the

Respondent to pay the firm of Wilton and Brantley an attorneys fee in an amount your Honor feels meet and proper; Your Complainant prays further that Your Honor give her the permanent care, custody and control of her minor children, Clarice, James W., Brenda Kay, Don, and Robbie Killcreas; that she prays further that your Honor will cause the Respondent to pay her support money for children and will award her the furniture hereinbefore set out for her use and the use of her children; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Wilton and Brantley

BY:

John M Brantley
Solicitors for the Complainant

Received 27 day of May 1958
on 28 day of May 1958

Received a copy of the within Bill Complaint
William W. Killcreas

service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.

omi

ca
No 4290 ✓

EDWINA KILLCREAS

COMPLAINANT

VS

WILLIAM W. KILLCREAS

RESPONDENT

RECORDED

BILL OF COMPLAINT

FILED

MAY 21 1958

ALICE J. DUCK, Register


EDWINA KILLCREAS,
Complainant,
vs.
WILLIAM W. KILLCREAS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
NO. 4290.

DEMURRER:

Now comes the Respondent in the above styled cause and demurs to the Complaint heretofore filed in this cause and to each paragraph thereof, separately and severally, and as grounds for said demurrer assigns the following, separately and severally:

1. There is no equity in the Bill of Complaint.
2. No facts are alleged upon which any equitable relief can be granted to the Complainant.


Solicitor for Respondent.

FILED

JUN 30 1958

ALICE J. DECK, Register

RECEIVED
JUN 25 1958

4290

REPORT ON THE PROGRESS OF THE INVESTIGATION

1. The case was referred to me April 24, 1958. The patient is a 42-year-old male, who has been suffering from a chronic cough since childhood. He has been treated with various antibiotics and steroids, but the cough has persisted. He has also had several episodes of hemoptysis. The patient is a heavy smoker and has a long history of alcohol consumption. He has been hospitalized several times in the past for respiratory distress. The patient is currently being treated with a combination of antibiotics and steroids. The cough has improved somewhat, but the hemoptysis has persisted. The patient is being followed up in the clinic.

RECORDED

DISCUSSION:

1. The patient has a long history of chronic cough and hemoptysis. The cough has been present since childhood and has been treated with various antibiotics and steroids. The hemoptysis has been present in several episodes in the past. The patient is a heavy smoker and has a long history of alcohol consumption. He has been hospitalized several times in the past for respiratory distress. The patient is currently being treated with a combination of antibiotics and steroids. The cough has improved somewhat, but the hemoptysis has persisted. The patient is being followed up in the clinic.

2. The patient has a long history of chronic cough and hemoptysis. The cough has been present since childhood and has been treated with various antibiotics and steroids. The hemoptysis has been present in several episodes in the past. The patient is a heavy smoker and has a long history of alcohol consumption. He has been hospitalized several times in the past for respiratory distress. The patient is currently being treated with a combination of antibiotics and steroids. The cough has improved somewhat, but the hemoptysis has persisted. The patient is being followed up in the clinic.