

4312

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, } Circuit Court, Baldwin County  
 Baldwin County. } No. ....  
 ..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Kenneth W. Mathis

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Kenneth W. Mathis, Defendant

by Yvonne<sup>M</sup> Mathis, Plaintiff

Witness my hand this 21 day of June 1956

Beulah - Alice B, Clerk

STATE OF ALABAMA )

BALDWIN COUNTY )

YVONNE M. MATHIS, )  
Complainant, ) IN THE CIRCUIT COURT OF  
vs. ) BALDWIN COUNTY, ALABAMA  
KENNETH W. MATHIS, )  
Respondent. ) IN EQUITY.

To the Honorable Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Comes now the Complainant, Yvonne M. Mathis, humbly complaining of the Respondent, Kenneth W. Mathis, in a matter of divorce, and represents and shows unto your Honor as follows:

FIRST: That Complainant, Yvonne M. Mathis, is over the age of eighteen years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State for more than five years next preceding the filing of this Bill of Complaint; that Respondent is over the age of eighteen years and is residing at Loxley, Alabama.

SECOND: That Complainant and Respondent were married on August 3, 1957, at Lucedale, Mississippi.

THIRD: Your Complainant avers and charges that the said Respondent did on or about the 14th day of June, 1958, and many times prior thereto assault, beat, hit and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health and life; 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.

FOURTH: Your Complainant would further aver and show unto Your Honor that no children were born to the Union of the Complainant and Respondent; and further that there is no property to be settled between the Complainant and Respondent herein.

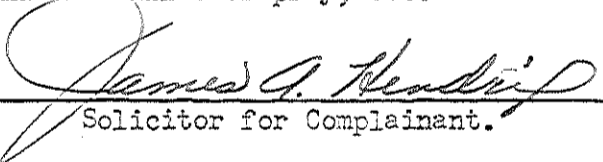
PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said Kenneth W. Mathis be made party Respondent to this her bill of Complaint and that a summons be issued and served upon him as required by law and the rules of this Honorable Court, and that he be required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage, that she be granted the right to resume her maiden name.

Complainant prays all other further or general relief to which she may be entitled, the premises considered and she will ever pray, etc.

  
Solicitor for Complainant.

PHONE 2801

JAMES A. HENDRIX  
ATTORNEY AT LAW  
ROBERTSDALE, ALA.

June 19, 1958

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Ala.

Dear Mrs. Duck:

Will you please staple a summons on this divorce and get it to the Sheriff at your very early convenience?

Very truly yours,

  
James A. Hendrix

JAH:db

4312