

SUMMONS

600k 018 ava 210

THE STATE OF ALABAMA,)
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon HUGH DON LINTON, 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, Alabama, at Bay Minette, against HUGH DON LINTON, by MARY ETHELENE LINTON.

Witness my hand this the 10 th day of February, 1955.

Acice f. renete

BILL OF COMPLAINT

MARY	ETHELENE LINTON,	
•	COMPLAINANT	IN THE CIRCUIT COURT OF
	VS:	BALDWIN COUNTY, ALABAMA
HUGH	DON LINTON,	IN EQUITY.
	RESPONDENT	

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, SITTING IN EQUITY:

Your complainant, MARY ETHELENE LINTON, respectfully represents and shows unto your Honor that:

- l. That complainant is over the age of twenty-one years and a resident citizen of said State and County, and has been a bona fide resident citizen of said State for more than ten years next preceding the filing of this bill of complaint; that HUGH DON LINTON is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That your complainant and the respondent were lawfully married on or about the 25th day of July, 1936, at Altoona, Alabama.
- 3. That your complainant further avers and alleges that the said respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

The premises considered, your complainant makes the said HUGH DON LINTON a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said HUGH DON LINTON, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray, etc.

FILED

FLL, 20 1935

ALKE I. BUCK, Register

Mary Ethelene Linton

Mary Ethelene Linton

Bolicitor for Complainant