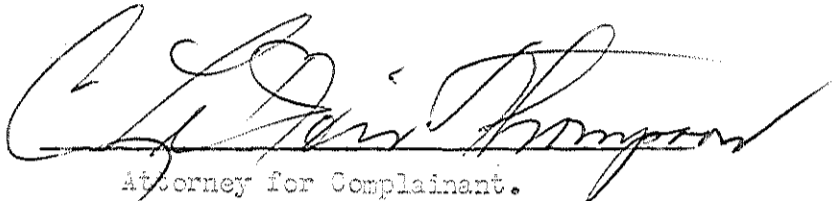


3493

FLARIE G. GRAHAM  
COMPLAINANT  
VS  
WILLIAM TROY GRAHAM  
RESPONDENT

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

Comes the complainant by her attorney of record and moves to dismiss  
the above styled cause.

  
Attorney for Complainant.

ELARIE G. GRAHAM

COMPLAINANT

VS

WILLIAM TROY GRAHAM

RESPONDENT

From the law offices of  
C. LeNoir Thompson  
Attorney-at-Law  
Ray Minette, Alabama

FLORRIE G. GRAHAM  
COMPLAINANT  
VS  
WILLIAM TROY GRAHAM  
RESPONDENT

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

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

Comes your Complainant, Florrie G. Graham, and shows unto this Honorable Court as follows:

1.

That complainant is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama, and has been such citizen for more than ten years next preceding the filing of this bill of complaint; that William Troy Graham, the respondent, is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama.

2.

That your complainant and the respondent were married at Bay Minette, Alabama, on or about, to-wit: January 10, 1938; and that they lived together as husband and wife until, to-wit: March 21, 1955.

3.

That during the time the complainant and the respondent were living together as husband and wife they bought the following described real property, in Baldwin County, Alabama, viz:

West half of lot 88 in Old Town of Bay Minette, according to plat recorded in miscellaneous book 1 page 106 in the office of Probate Judge of Baldwin County, Alabama.

That said conveyance was made to both the complainant and the respondent with the right of survivorship being continued therein.

That there are two buildings on said property one of which is the residence of the parties to this cause and the other building being used as rental property.

4.

Your Complainant further avers that she bought and paid for with her own money or that the respondent purchased and gave to her the following personal property situate in or about the house or on the real property described herein: one couch, curtains, drapes, 1 coffee table, 2 rockers, 1 gas heater, rugs, sewing machine, 1 electric range, set of cook ware, 1 sink, 1 refrigerator, 1 dinnette set, set of silverware, 3 table cloths, 1 kitchen cabinet, 1 bed

room suit, 2 mattresses, 2 sets of springs, 3 bedspreads, 2 table lamps, 9 sheets, 1 rug, 1 radio, 3 shades, 4 pair curtains, 1 vacuum cleaner, 1 bed, 1 chifferobe, 14 quilts, 3 blankets, 1 spread, 1 rug, 1 platform rocker, 2 electric fans, 2 irons, 1 ironing board, 1 lawn mower, 1 washing machine, 2 wash tubs, 1 wash board, 18 head of chickens.

5.

Your Complainant further avers that the real property described in paragraph 3 hereof is not capable of being divided.

6.

That on, to-wit, March 21, 1955, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

7.

Your Complainant further avers and alleges that said respondent has been guilty of adultery with Ada Owens, and with divers parties and persons whose names to your complainant are unknown.

WHEREFORE, the premises considered, your complainant prays that your Honor will, by proper process make the said William Troy Graham, party respondent to this bill of complaint, 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; that your Honor will order a reference to determine a reasonable amount to be paid by the Respondent to the Complainant as alimony pendente lite, and Attorney's fees.

Complainant further prays that this Honorable Court will decree that she be the owner of all of said property in lieu of alimony; and that the respondent be ordered to execute a proper conveyance of his undivided interest in said property to the said complainant; and should said respondent fail or refuse to execute said instrument that the Clerk of said court be empowered by a proper decree of said court to make and execute a proper conveyance to the complainant in the respondent's name and further will decree that the said complainant is the owner of the personal property described in paragraph 4 herein; and that the court will make and enter a proper order or decree fixing the Solicitor's

fee to be paid to the Complainant's Solicitor inasmuch as your complainant is without funds.

Your Complainant further prays that your Honor will upon a final hearing hereof, award to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent.

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

Flavie G. Graham  
Complainant.

C. L. H. Thompson  
Attorney for Complainant.

3493

FLORRIE G. GRAHAM

COMPLAINANT

VS

WILLIAM TRCY GRAHAM

RESPONDENT

FILED

MAR 24 1955

ALICE J. DUCK, Register

From the law offices of  
C. Le<sup>W</sup>oir Thompson  
Attorney-at-Law  
Bay Minette, Alabama

The State of Alabama, BALDWIN County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon WILLIAM TROY GRAHAM

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State by

Flornie G. Graham

against WILLIAM TROY GRAHAM

Herein fail not. Due return make of this writ as the law directs.

Witness this 24 day of March, 19 55

Asie J. Duck, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

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No. 3493 Page.....

**The State of Alabama**

BALWIN COUNTY.

**IN CIRCUIT COURT, IN EQUITY**

FLORRIE G. GRAHAM

vs.

WILLIAM TROY GRAMAM

**SUMMONS**

Returned by the Sheriff and filed in office, this  
the..... day of....., 19.....

....., Register.

Received in office, this the 24 day of

March, 1953

Taylor Wilkins, Sheriff.

I have executed the within by leaving a copy

thereof with William Troy Graham

defendant named herein, on this the 24

day of Mar., 1953

Taylor Wilkins, Sheriff.

By J.P. Brown, Deputy.