

3512

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons John Tarvin, 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 Voncile Tarvin as Complainant and against John Tarvin as Respondent.

WITNESS my hand this the 21 day of April, 1955.

Deirdre H. H. H.

VONCILE TARVIN
COMPLAINANT
VS
JOHN TARVIN
RESPONDENT

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

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

Your complainant, Voncile Tarvin, respectfully represents unto Your
Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 16 and is a bona fide resident
of Baldwin County, Alabama, the Respondent is over the age of 21 and is
presently residing at 319 Thomas Street, Prichard, Alabama.

2.

That your Complainant and the Respondent married at Meridian, Mississippi,
in Baldwin County
on March 28, 1952, and lived together/as husband and wife until July 9, 1954.

3.

That on July 9, 1954, 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.

4.

There are no children as fruits of this marriage and no property to be
divided.

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, and that she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Attorney for Complainant

1231 ✓ 492
3572

Received in Sheriff's Office
this 21 day of April, 1955
TAYLOR WILKINS, Sheriff

VEHICLE TARIFF

COMPLAINT

VS

JOHN TAYLOR

RESPONDENT

SUBJECTS AND COMPLAINT

FILED
APR 21 1955

ALICE J. DUCK, Register

From the law offices of
C. LeRoy Thompson
Attorney-At-Law
Bay Minette, Alabama

RETURNED 5-31-55.
Not found in my County after diligent
search and inquiry.
RAY D. WILKINS, Sheriff
By 7/11/3. Sanders, D. S.