

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.

Voncile Tarvin

\* \* \* \* \*

VONCILE TARVIN

IN THE CIRCUIT COURT OF

COMPLAINANT

BALDWIN COUNTY, ALABAMA

VS

IN EQUITY.

JOHN TARVIN

CASE NO. \_\_\_\_\_

RESPONDENT

TO HONORABLE HUBERT M. HALE, 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 18 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.

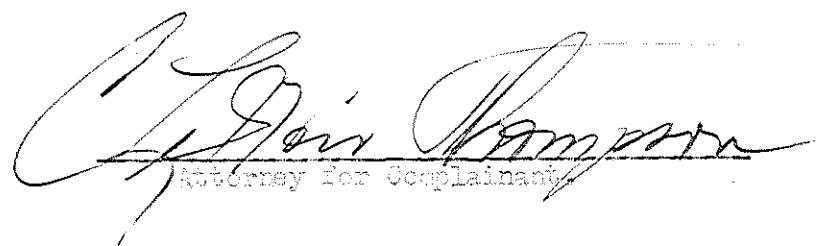
That on July 9, 1954, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable 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.

WHEREFORE, the premises considered, the complainant prays that your Honor will by proper process make the said John Tarvin 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.

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.



A handwritten signature in cursive ink, appearing to read "John Thompson". Below the signature, the text "Attorney for Complainant" is written in a smaller, printed-style font.

1231 ✓ 492  
3512

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

VOCALINE TAYLOR

COMPLAINANT

JOHN TAYLOR

RESPONDENT

SUITS AND COMPLAINT

FILED  
APR 21 1955

ALICE J. DUCK, Register

On the law offices of  
C. LeNoir Thompson  
Attorney-At-Law  
Bay Minette, Alabama

RETURNED 5-31-55  
Not found in my County cler diligent  
search and inquiry.  
By T. H. B. Bouldin, Sheriff  
P. D. S.