

3513

STATE OF ALABAMA)
BALDWIN COUNTY)
IN THE CIRCUIT COURT - IN EQUITY
TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mason Godson 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 Beulah Godson, as Complainant, against Mason Godson as Respondent.

Witness my hand this 22 day of April, 1955.

Beulah Godson
Respondent.

BEULAH GODSON,
Complainant,
vs.
MASON GODSON,
Respondent.
I
I IN THE CIRCUIT COURT OF
I BALDWIN COUNTY, ALABAMA
I IN EQUITY
I

Comes your Complainant, Beulah Godson, and files this her Bill of Complaint for divorce against Mason Godson, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and are both resident citizens of Bay Minette, Baldwin County, Alabama, and that they have been such resident citizens for more than the past five years.

SECOND:

That your Complainant and the Respondent married on heretofore, to-wit: September 16, 1948, and they lived together as man and wife until April 19, 1955, when your Complainant was compelled to leave your Respondent and live separate and apart from him and she has not lived with him as his wife since that time. That on

April 19, 1955, the Respondent committed actual violence upon the person of your Complainant by striking her on her face with his fist and your Complainant had reasonable apprehension that if she continued to live with him her life and health would be in danger.

THIRD:

That your Complainant and the Respondent secured their marriage certificate in Bay Minette, Alabama, and were married in Bay Minette, Alabama, under the names set out in the caption of this Bill of Complaint. That there has been born to your Complainant and the Respondent four children and according to the birth certificates of such children their names and ages are as follows: Judy V. Gatson, who is now five years of age; Ricky G. Gatson, who is three years of age; Mamie W. Gaston, who is two years of age; and Andrew B. Gaston, who is four months of age. That all of these children are the children of your Complainant and the Respondent and through error their names have been entered as set out above. That your Complainant is a fit and proper person to have the care, custody and control of said minor children and the Respondent is not a fit and proper person to have their care, custody and control.

FOURTH:

That your Complainant does not have any money and does not own any property and is not able to support and maintain herself and said minor children. The Respondent is an able-bodied man working for Newport Industries in Bay Minette, earning approximately Fifty Dollars (\$50.00) a week and is able to support and maintain your Complainant and said minor children.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Mason Godson be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in

such cases made and provided; that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from said Respondent; that your Honor will award your Complainant the full custody and control of her minor children as hereinabove mentioned; that the Court will ascertain and fix a reasonable amount of alimony and support to be paid by the Respondent to your Complainant for the support of herself and said minor children; that your Honor will also decree that the parties be allowed to remarry if they see fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Bessie Godson
Complainant.

CHASON & STONE

John Chason
Solicitors for Complainant.