

Lydia Ann Rice
Complainant

vs

William Elonzo Rice
Respondent

3521
Circuit Court
Baldwin County
Alabama
In Equity

To the Honorable Hubert M. Hall, Judge of said Court, sitting in
Equity;

Comes Lydia Ann Rice and exhibits this, her Bill of Complaint against
William Elonzo Rice, and respectfully shows unto Your Honor as follows:

First: Complainant, whose age is 32 years, and Respondent, whose age is
50 years, intermarried June 30th 1954 at and within Lucedale, Mississippi.

Second: Within a short time after said marriage, Complainant discovered
that Respondent was addicted to the habitual use of ~~intoxicating~~ intoxic-
ating liquors to the degree that he was habitual drunk.

Third: For several years prior to said marriage Respondent was a resid-
ent of Baldwin County, Alabama, and Complainant has been, for more than
one year, a resident of the State of Alabama and, since said marriage
a resident of said Baldwin County, Alabama.

Fourth: Said Respondent has continued an habitual drunkard.

The premises considered, Complainant prays that said William Elonzo Rice
be, by all due and appropriate process, made party defendant to the within
suit, that he be compelled to plead, demur or answer to the several parag-
raphs hereof within the time prescribed by law and that he be compelled to
abide and obey all orders and decrees made in the premises.

Complainant further prays, upon a hearing of the within cause, that a decree
be ordered and entered granting that she be forever divorced from said
William Elonzo Rice and granting her such other, further, different and
general relief as, In Equity, may be meet and proper.

E. A. Cramer
Solicitor for Complainant

Lydia Ann Rice
Lydia Ann Rice