

	Form 1531-3	McQuiddy Printing Co., Nashville, Ten
The Sta	ate of Alabama,	Co., Nashville, Ten
	or Triavalla,	County
	IN CIRCUIT COURT, IN EQUIT	Y.
To any St		
To amy of the	e State of Alabama—Greeting:	
You are hereby	commanded to summonJames Downing	
200 200 200		
and the second s		***************************************
to appear and answe	er, plead, or demur, within thirty days from the sircuit Court, in equity, for said County of said S	service hereof, to a Bill of Com-
to appear and answer	owning of said Si	tateby
Bonnie P. Do	Owning  James Downing	tate by
Bonnie P. Do	owning of said Si	tate by
Bonnie P. Do	Owning  James Downing	tate by
Bonnie P. Do	Owning  James Downing	tate by
Bonnie P. Do	James Downing	tate by
Bonnie P. Do	James Downing  return make of this writ as about	tate by
Bonnie P. Do	James Downing  return make of this writ as the law directs.  day of May	ate by
gainsterein fail not. Due :	James Downing  return make of this writ as the law directs.  day of May	19_55_

No	
The State of Alabama	Received in office, this the day of
COUNTY.	19
IN CIRCUIT COURT, IN EQUITY	, Sheriff
	•
	I have executed the within by leaving a copy
Vs.	thereof with
SUMMONS	
Returned by the Sheriff and filed in office, this	
the, 19, Register.	
, register.	
	defendant named herein, on this the
	day of, 19
	, Sheriff.
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	By, Deputy.

STATE OF ALABAMA	)		
BALDWIN COUNTY	)		
BONNIE P. DOWNING	, COMPLAINANT	}	IN THE CIRCUIT COURT OF
	e Wajama a	- 44 - 44 <del>- </del>	BALDWIN COUNTY, ALABAMA
JAMES DOWNING,	BESPONDENT	{	IN EQUITY.

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

Your complainant, Bonnie P. Downing, respectfully represents and shows unto your Honor:

- 1. That complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State for more than two years next preceding the filing of this bill of complaint; that James Downing is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That your complainant and respondent were lawfully married on or about, to-wit, October 3, 1948, at Biloxi, Mississippi.
- 3. Complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health; the complainant further avers that the last of such threats did occur on about May 20, 1955, since which time and as a result of said threats complainant and respondent have not lived together nor in any way recognized each other as husband and wife.
- 4. Complainant further avers that no children were born to the union of said parties.

The premises considered, your complainant makes the said James Downing a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said James Downing, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will

enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry, and granting the complainant the right to resume her maiden name; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray, etc.

Solicitor for Complainant