

DONIE BURTON,

Complainant,

-vs-

JOHN BURTON,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Donie Burton, and files this her
Bill of Complaint for divorce against John Burton, and respect-
fully represents and shows unto your Honor:-

1. That the Complainant is over the age of twenty-one
years and is a bona fide resident citizen of Baldwin County,
Alabama, having been such a bona fide resident citizen for more
than ten (10) years. That John Burton is over the age of twenty-
one years and is a resident of Baldwin County, Alabama.

2. That the Complainant and Respondent were lawfully
married on, to-wit, January 23, 1936.

3. Complainant further avers that the Respondent has com-
mitted actual physical violence on her person attended with
danger to her life and health, by striking her with his fists,
and from his conduct toward her, she is reasonably apprehensive
of other and further violence, so much so that she can no longer
live with the Respondent; that the Respondent has made numerous
threats of doing her other and further physical harm, and from
his manner and conduct toward her she is reasonably convinced
that he will commit actual violence on her person attended with
danger to her life or health.

4. Complainant further avers that the Respondent has, since
marriage, become addicted to habitual drunkenness, and that the
habit continues to this date.

5. Complainant further shows to the Court that there was
born of this marriage eight (8) children, namely, Clifton Burton,
19 years of age, Dorothy Burton, 16 years of age, Marie Burton,
14 years of age, Floyd Burton, 12 years of age, William Burton,
10 years of age, Fay B urton, 5 years of age, Arden Burton, 2

THE PREMISES CONSIDERED, your Complainant prays that John Burton be made a party defendant of this cause by the usual process of this Honorable Court, requiring him to 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 she be granted a divorce from the said JOHN Burton, and that she be granted custody and control of the minor children hereinabove named. Complainant further prays that she be awarded such sum as the Court thinks meet and proper for alimony and for support of the minor children of this marriage. Should your Complainant be mistaken in the relief prayed for that she be granted such other, further, different and general relief to which she may be entitled and as in ^{OF} ⁽ ⁾ duty bound she will ever pray.

[illegible]

DONIE BURTON,
Complainant,
-vs-
JOHN BURTON,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE 28th JUDICIAL CIRCUIT,
BALDWIN COUNTY, ALABAMA, in Equity Sitting:-

Comes the Complainant in the above styled cause prior to
service of Summons and Complaint, and prays dismissal thereof,
without prejudice.


Solicitor for Complainant

FILED
DEC 31 1933
BALDWIN COUNTY, ALABAMA

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IN EQUITY

BALDWIN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

(((((

Respondent.

JOHN BURTON,

-vs-

Complainant.

DONIE BURTON,

FILED
DEC 31 1933
BALDWIN COUNTY, ALABAMA

MOTION TO DISMISS

DONIE BURTON,
Complainant,
-vs-
JOHN BURTON,
Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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FILED
DEC 31 1966
ALFRED I. DUCK, CLERK
REGISTER

NOTICE TO COMPLAINANT



ALFRED I. DUCK, CLERK

NOTICE TO COMPLAINANT: The Court has received your motion to dismiss and has considered the same. The Court has denied your motion to dismiss and has entered its judgment in favor of the respondent.

NOTICE TO COMPLAINANT: The Court has received your motion to dismiss and has considered the same. The Court has denied your motion to dismiss and has entered its judgment in favor of the respondent.

NOTICE TO COMPLAINANT

ALFRED I. DUCK, CLERK

NOTICE TO COMPLAINANT

NOTICE TO COMPLAINANT

ALFRED I. DUCK, CLERK

SUMMONS AND COMPLAINT

Moore Prg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4446

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN BURTON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against-----

~~DONIE BURTON~~ JOHN BURTON-----, Defendant-----

by DONIE BURTON-----
-----, Plaintiff-----

Witness my hand this 29 day of November 19 58

Reice J. French, Clerk

No. 11146 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

DONIE BURTON

Plaintiffs

vs.

JOHN BURTON

Defendants

Summons and Complaint

Filed November 29, 1958

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

CECIL G. CHASON
ATTORNEY-AT-LAW
FOLEY, ALABAMA
November 28, 1958

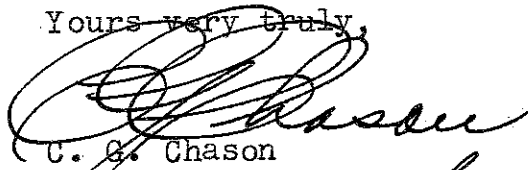
Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint in the Divorce
action of Burton -vs- Burton.

The Respondent lives in Gulf Shores.

Yours very truly,


C. G. Chason

CGC:fm

encls. as noted

DONIE BURTON,	}	
Complainant,		IN THE CIRCUIT COURT OF
-vs-		BALDWIN COUNTY, ALABAMA
JOHN BURTON,		IN EQUITY
Respondent.	}	

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Donie Burton, and files this her Bill of Complaint for divorce against John Burton, and respectfully represents and shows unto your Honor:-

1. That the Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a bona fide resident citizen for more than ten (10) years. That John Burton is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That the Complainant and Respondent were lawfully married on, to-wit, January 23, 1936.

3. Complainant further avers that the Respondent has committed actual physical violence on her person attended with danger to her life and health, by striking her with his fists, and from his conduct toward her, she is reasonably apprehensive of other and further violence, so much so that she can no longer live with the Respondent; that the Respondent has made numerous threats of doing her other and further physical harm, and from his manner and conduct toward her she is reasonably convinced that he will commit actual violence on her person attended with danger to her life or health.

4. Complainant further avers that the Respondent has, since marriage, become addicted to habitual drunkenness, and that the habit continues to this date.

5. Complainant further shows to the Court that there was born of this marriage eight (8) children, namely, Clifton Burton, 19 years of age, Dorothy Burton, 16 years of age, Marie Burton, 14 years of age, Floyd Burton, 12 years of age, William Burton, 10 years of age, Fay B urton, 5 years of age, Arden Burton, 2

years of age, and Cindy Burton, 1½ years of age, who are in the care, custody and control of the Complainant. Complainant further shows unto the Court that the Respondent has an average monthly income of Four Hundred Dollars (\$400.00).

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that John Burton be made a party defendant of this cause by the usual process of this Honorable Court, requiring him to 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 she be granted a divorce from the said John Burton, and that she be granted custody and control of the minor children hereinabove named. Complainant further prays that she be awarded such sum as the Court thinks meet and proper for alimony and for support of the minor children of this marriage. Should your Complainant be mistaken in the relief prayed for that she be granted such other, further, different and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

No. 4446 Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

DONIE BURTON

Plaintiffs

vs.

JOHN BURTON

Defendants

Summons and Complaint

Filed November 29, 1958

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

11/29 1958

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Recall

_____, Sheriff

_____, Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4446

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon JOHN BURTON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against-----

~~RONIE BURTON~~ JOHN BURTON-----, Defendant-----

by DONIE BURTON-----

-----, Plaintiff-----

Witness my hand this 29 day of November 19 58

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Alief - Alueh, Clerk

DONIE BURTON,
Complainant,
-vs-
JOHN BURTON,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE 28th JUDICIAL CIRCUIT,
BALDWIN COUNTY, ALABAMA, in Equity Sitting:-

Comes the Complainant in the above styled cause prior to
service of Summons and Complaint, and prays dismissal thereof,
without prejudice.

Filed Dec. 3, 1958
Alice J. Luck, Reg.


Solicitor for Complainant

4446

MOTION TO DISMISS

DONIE BURTON,

Complainant,

-vs-

JOHN BURTON,

Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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FILED
DEC 31 1988
ALICE J. DUCK, CLERK
REGISTER