

3670

ANNIE MAE AARON,	¶	
	¶	IN THE CIRCUIT COURT OF
Complainant,	¶	BALDWIN COUNTY, ALABAMA
vs.	¶	IN EQUITY
NICHOLAS TRAVIS AARON,	¶	
Respondent.	¶	

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause says:

1. The Respondent admits the allegations of the 1st paragraph of the Bill of Complaint.
2. The Respondent admits the allegations of the 2nd paragraph of the Bill of Complaint.
3. The Respondent denies the allegations of the 3rd paragraph of the Bill of Complaint and demands strict proof thereof.
4. The Respondent admits the allegations of the 4th paragraph of the Bill of Complaint.
5. The Respondent denies the allegations of the 5th paragraph of the Bill of Complaint and demands strict proof thereof.

CHASON & STONE

By: John R. Chason  
 Solicitors for Respondent

STATE OF ALABAMA )  
                          \*  
BALDWIN COUNTY    )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Nicholas Travis Aaron to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of Annie Mae Aaron.

WITNESS my hand, this 5 day of Dec, 1955.

Herbie J. Drake  
Register.

\* \* \* \* \*

ANNIE MAE AARON,	)	
	)	
Complainant,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
NICHOLAS TRAVIS AARON,	)	
	)	IN EQUITY
Respondents.	)	

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

Your Complainant, Annie Mae Aaron, respectfully represents and shows unto the Court and your Honor as follows:

1. Your Complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State for more than one year next preceding the filing of this Bill of Complaint. The Respondent is over the age of twenty-one years and resides in Baldwin County, Alabama.
2. The Complainant and Respondent were lawfully married on or about, to-wit, May 21, 1949, in Perdido, Alabama, and lived together as man and wife until on or about July, 1954.
3. Your Complainant avers and charges that the said Respondent did on or about July, 1954, and many times prior thereto, make 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 and health if she continues to live with him. Your Com-

plainant further avers that the said Respondent has committed actual violence on her person attended with danger to her health and life on numerous occasions prior to July, 1954.

4. There was born to the Complainant and the Respondent during this marriage three children, Nicholas Travis Aaron, Jr., a son, who is now four years of age, Robert Randall Aaron, a son, who is now two years of age, and Deanna Sharee Aaron, a daughter, who is now ten months of age, and who are in the care, custody and control of your Complainant who is a fit and proper person to have the care, custody and control of said minor children.

5. Complainant alleges that it has been necessary for her to employ an attorney to represent her in this suit and that she is without funds to pay her said attorney for services rendered and to be rendered by him in this cause.

#### PRAYER FOR PROCESS

The premises considered, your Complainant makes the said Nicholas Travis Aaron a party respondent to this Bill of Complaint and in order that the Complainant may have the relief herein prayed for she prays that the usual process of this honorable Court issue to the Respondent, Nicholas Travis Aaron, requiring him to appear and plead, answer or demur to this Bill within the time prescribed by law and under the rules and practices of this honorable Court.

#### PRAYER FOR RELIEF

Complainant respectfully prays for the following separate and several relief:

1. That on a final hearing of this cause the Court will make and enter a proper order or decree giving and granting the Complainant the permanent custody and control of the said minor children.

2. That the Court will make and enter a proper decree divorcing the Complainant from the Respondent and will fix a reasonable monthly amount to be paid to the Complainant as alimony and a reasonable monthly amount to be paid to the Complainant for maintenance and support of the said minor children.

3. That the Court will ascertain and fix a reasonable amount to be paid by the Respondent to the Complainant's solicitor of record for his services rendered and to be rendered in this cause.

4. Complainant further prays for such other, further and general relief as she may be equitably entitled to, the premises considered.

Respectfully submitted,

Annie Mae Aaron  
Complainant.