

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

} No. 3777

Circuit Court, Baldwin County

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon C. J. Headon

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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

C. J. Headon, Defendant

by Lelan L. Stevens, Plaintiff

Witness my hand this 20th day of March 19 36

Wesley J. ..., Clerk

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_

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

LULAH L. STEVENS MEADOR )  
Complainant )

VS. )

C. L. MEADOR )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

Circuit Court of Baldwin County, Alabama, Sitting in Equity:

Your complainant Lulah L. Stevens Meador, respectfully shows and represents to your Honor:

1. That the 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 one year next preceding the filing of this bill of complaint; that C. L. Meador is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about to-wit October 8, 1954 at Pascagoula, Mississippi.

3. Your complainant further avers and alleges that the said respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

4. Your complainant further avers that since her marriage to the respondent, the respondent has been confined in various jails on numerous occasions; that your complainant has mortgaged her home which she had prior to her marriage to the respondent and become indebted for more than \$1200.00 which she spent in behalf of the respondent for his fines and court costs; that your complainant further avers that the respondent earns from \$50.00 to \$60.00 per week when employed and is able to pay your complainant alimony, support and maintenance and her attorney's fees; that your complainant is physically unable to do steady work and that your complainant has no means of support, and that said respondent has refused and failed to provide for the support and maintenance of the complainant. Your complainant further avers that she is without means to pay her attorney for his services rendered and to be rendered in this suit.

The premises considered, your complainant makes the said C. L. Meador a party respondent to this bill of complaint, and in order that the 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 C. L. Meador, 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 the respondent; granting to your complainant the right to resume the name of Lulah L. Stevens; granting to your complainant permanent alimony for her support and maintenance the sum of \$100.00 a month; granting the complainant in order directed to the respondent to pay off the mortgage and encumbrances upon the complainant's property and granting permanent attorney's fee in the sum of \$200.00, and your complainant prays for such other, further or general relief to which she may be entitled.

*Arthur C. Eason*  
Solicitor for the Complainant

Respondent's Address:  
C. L. Meador  
Foley, Alabama

BOYER, VIV.  
ALABAMA VS. IVM  
VECHUH C. EBBBROM

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

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SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. 2751

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon C. L. Meador

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-----

C. L. Meador-----, Defendant-----

by Lulah L. Stevens-----  
-----, Plaintiff-----

Witness my hand this 20th day of March 19 56

Henry J. Duck-----, Clerk

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

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

LULAH L. STEVENS MEADOR )  
Complainant )  
VS. )  
C. L. MEADOR )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

To the Honorable Hubert M. Hall, Judge of the  
Circuit Court of Baldwin County, Alabama, Sitting in Equity:

Your complainant Lulah L. Stevens Meador, respectfully shows and represents to your Honor:

1. That the 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 one year next preceding the filing of this bill of complaint; that C. L. Meador is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

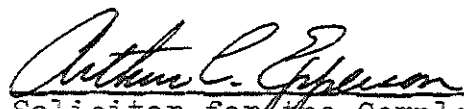
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Respondent's Address:  
C. L. Meador  
Foley, Alabama

  
Solicitor for the Complainant

3751

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

LULAH L. STEVENS MEADOR  
Complainant  
VS.  
C. L. MEADOR  
Respondent

BILL OF COMPLAINT

FILED

MAR 20 1956

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

Received 20 day of March 1956  
and on \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

I served a copy of the within Bill of Complaint  
on \_\_\_\_\_

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By \_\_\_\_\_

Returned 11 day of April 1956  
Not found in my county after diligent search and  
quiry.

By Taylor Wilkins  
Deputy Sheriff