

CECIL G. CHASON

ATTORNEY-AT-LAW

FOLEY, ALABAMA

July 23, 1959

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

Re: Ilene Styron -vs- Raymond C. Styron
Case No. 4628

Dear Mrs. Duck:

Enclosed herewith is Demurrer of the Respondent in the above styled cause, a copy of which has been sent to the attorneys for the Complainant.

Yours very truly,


C. G. Chason

CGC:fm

encls. 1

cc: Mr. Richard C. Lacey
Brice and Lacey, Attorneys
Foley, Alabama

BILL OF COMPLAINT

ILENE WOOTEN STYRON)	IN THE CIRCUIT COURT
Complainant)	OF
)	BALDWIN COUNTY,
-vs-)	ALABAMA
)	
RAYMOND C. STYRON)	IN EQUITY
Respondent)	

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

Comes your Complainant, ILENE WOOTEN STYRON, and respectfully shows unto this Honorable Court as follows:

1. That she is over the age of twenty-one years and that she is a bona fide resident citizen of Baldwin County, Alabama; that Raymond C. Styron, the Respondent in this cause, is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama.

2. That on, to-wit: the 26th day of September, 1958 your Complainant and Respondent were intermarried at Mobile, Mobile County, Alabama, and that your Complainant and the Respondent are still lawfully married.

3. That there has been born of said marriage two minor children, whose names and ages are respectively: Mary Styron, age nine; and Judy Styron, age three months. That said children are temporarily in the custody of the parents of the Respondent.

4. Your Complainant further avers that at diverse times and places, since 26 September 1958, the Respondent has committed adultery by unlawful cohabitation with an adult woman, whose name to your Complainant is not known;

5. Your complainant further avers and charges that on the 19th day of June, 1959, the Respondent, without cause or justification, using his hands and closed fists and feet, struck, kicked and beat your complainant about the face and body a number of times, inflicting bruises and injuries upon the body of your complainant, attended with great danger to her health and life; and from his manner and conduct toward her, she is reasonably

convinced that he will commit further actual physical violence upon her person attended with danger to her health and life; that on, to-wit: the 19th day of June, 1959, she separated from and abandoned the said Respondent, and is now living separate and apart from him.

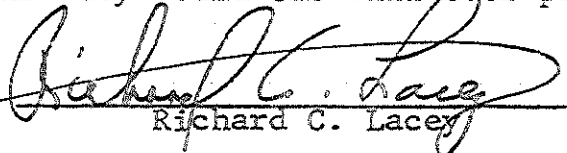
6. Your complainant further avers that on the 19th day of June, 1959, your Complainant went to the home of the parents of the said Respondent and was denied custody of the children by the said Respondent; that your complainant is a fit and proper person to have control of the minor children of this marriage, and that it would be to their interest to be in the care, custody and control of your Complainant.

7. Your Complainant further avers that Raymond C. Styron is gainfully employed, and is informed and believes, and on information and belief, alleges that he receives Seventy-two (\$72.00) Dollars per week for his work and labor.

The premises considered, your Complainant prays that the Respondent be made a party respondent to this Bill of Complaint by the usual process of this Honorable Court, and the statutes in such cases made and provided requiring him to plead, answer or demur, within the time and within the manner provided by law; and that on the final hearing of this cause that your Honor will enter a decree divorcing your Complainant from the said Respondent, granting both parties the right to re-marry, awarding the custody and control of said minor children unto your complainant, and decreeing that the Respondant shall pay the sum of \$100.00 per month for the support and maintenance of said children.

Your Complainant further prays that your Honor will decree that Respondent pay the Complainant's attorneys' fee for this action in the amount of \$250.00. Your Complainant further prays for such other, and further relief to which she may be entitled and as in duty bound she will ever pray.

James A. Brice


Richard C. Lacey

Solicitors for Complainant

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, the undersigned, a Notary Public in said County and State, personally appeared ILENE WOOTEN STYRON, who, after being duly and legally sworn, deposes and says that the matters and facts set out in the foregoing Bill of Complaint are true.

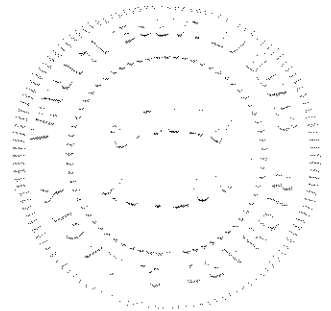
Ilene Styron

ILENE WOOTEN STYRON

Sworn to and subscribed before
me on this the 19th day of June,
1959.

Richard C. Laeg

Notary Public,
Baldwin County, Alabama



SUMMONS AND COMPLAINT

Moore Prtg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4628

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon Raymond C. Styron

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.....

..... Raymond C. Styron, Defendant.....

by Elene Wooten Styron, Plaintiff.....

Witness my hand this 22nd day of June 19 59

Ef 6-24-59 Archie Duke, Clerk

No. 4628

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

LENE WOOTEN STYRON

Plaintiffs

vs.

RAYMOND C. STYRON

Defendants

Summons and Complaint

Filed 6-22 59 19_____

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

6/22 1959

_____, Sheriff

I have executed this summons

this June 24 1959

by leaving a copy with

Raymond Styron

Sheriff claims 22 miles at _____

Fee Com's per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

Taylor Wilkins Sheriff

[Signature] Deputy Sheriff

ILENE WOOTEN STYRON,)	
Complainant,)	IN THE CIRCUIT COURT OF
-vs-)	BALDWIN COUNTY, ALABAMA
RAYMOND C. STYRON,)	IN EQUITY
Respondent.)	CASE NO. 4628

DEMURRER

Comes the Respondent in the above styled cause, Raymond C. Styron, and demurs to the Bill of Complaint heretofore filed therein, and each Paragraph thereof, separately and severally, and as grounds for demurrer, assigns, separately and severally, the following:-

1. That there is a variance in the name of the Complainant as shown on the Summons and as shown in the Bill of Complaint.

2. That the name of the person directing the Respondent "to appear and plead, answer or demur . . . to the Complaint" is not the same as the name of the person shown as Complainant on the Bill of Complaint served upon the Respondent.

3. Respondent further demurs to the aspect of the Bill wherein it is shown that the Complainant and the Respondent intermarried on the 26th day of September, 1958, and wherein it is stated that there was born of this marriage two children, the age of one of which is shown to be nine years.

4. Respondent further demurs to the aspect of the Bill wherein custody and support are prayed for by the Complainant for the minor child, Mary Styron, whose age is shown as 9 years, and who is alleged to have been born of this marriage, wherein the marriage is shown to have occurred on the 26th day of September, 1958.


 Solicitor for Respondent