

HATTIE I. MIDDLETON,	I	IN THE CIRCUIT COURT OF
Complainant,	I	
vs.	I	BALDWIN COUNTY, ALABAMA.
ALVIN CLYDE MIDDLETON,	I	IN EQUITY.
Respondent.	I	

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

Your Complainant, Hattie I. Middleton, respectfully shows
unto the Court and your Honor as follows:

1. That your Complainant is eighteen years of age, a
resident of Bay Minette, Baldwin County, Alabama, and has been a
bona fide resident citizen of said State and County for several
years prior to this date; the Respondent, Alvin Clyde Middleton, is
over the age of twenty-one years and is a resident of Baldwin
County, Alabama.

2. That Complainant and Respondent were married to each
other on September 1, 1956, at Columbus, Mississippi, and lived to-
gether as husband and wife until June 28, 1959, on which date Com-
plainant was compelled to leave her home under the circumstances
hereinafter recounted.

3. Complainant alleges that on to-wit, June 27th, 1959,
while Respondent was in a drunken condition, he committed actual
violence on the person of Complainant, attended with danger to her
life or health.

4. Complainant alleges that there are two children born
of this marriage, namely: Alvin Matthew Middleton, twenty-one months
of age and Roy Clyde Middleton, nine months of age. Complainant
alleges that Respondent is not a fit person to be awarded the
custody of either of said children, and that Complainant is, in all
respects, a fit person to be awarded their custody. Complainant
alleges that the said two children are now with her and that it is
to the best interest of both children that their custody be awarded
to your Complainant.

5. Complainant alleges that the Respondent is an able bodied man and that he earns approximately \$60.00 each week. Complainant alleges that she is without funds with which to pay her Solicitor for his services rendered and to be rendered in this cause.

PRAYER FOR PROCESS:

WHEREFORE, the premises considered, Complainant prays that Alvin Clyde Middleton be made a party Respondent to this Bill of Complaint and that process issue to him out of this court, requiring him to plead, answer or demur hereto within the time allowed by law and under the rules of this Honorable Court.

PRAYER FOR RELIEF:

Complainant prays for the following relief:

A. That your Honor will make and enter an order or decree awarding to your Complainant, pendente lite, the custody of both children named above and requiring Respondent to pay such sum or sums as your Honor shall deem appropriate to your Complainant for attorney's fees and for support and maintenance for Complainant and her children.

B. That upon a final hearing of this cause your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between Complainant and Respondent and granting to your Complainant a divorce against Respondent for and on account of cruelty.

C. That upon a final hearing of this cause your Honor will award to your Complainant the permanent custody of Alvin Matthew Middleton and Roy Clyde Middleton, the children of this marriage.

D. Upon a final hearing of this cause that your Honor will enter an order or decree requiring the Respondent to pay such sum of sums as your Honor shall deem appropriate to your Complainant for her support and maintenance for Complainant and for the two minor children of this marriage.

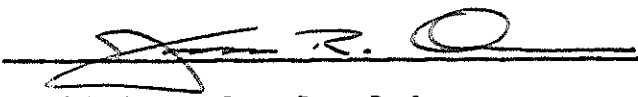
And if Complainant has in anywise mistaken the relief to which she is entitled hereunder, she prays for such other, further

or different relief as may be due her, the premises considered.

FILED

JUN 30 1950

ALICE J. DUCK, CLERK
REGISTER


Solicitor for Complainant.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4633

June TERM, 19 59

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ALVIN CLYDE MIDDLETON

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

ALVIN CLYDE MIDDLETON

Defendant

by HATTIE I. MIDDLETON

Plaintiff

Witness my hand this 30 day of June 19 59

Exp 6/30/59

Alice J. Duck

Clerk

No. 4633

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The State of Alabama

Baldwin County

CIRCUIT COURT

HATTIE I. MIDDLETON

Plaintiffs

vs.

ALVIN CLYDE MIDDLETON

Defendants

Summons and Complaint

Filed June 30, 19 59

Alice J. Duck Clerk

Respondent is employed
at Standard Furniture
Manufacturing Co.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

6/30 19 59

_____, Sheriff

I have executed this summons

this 6-30 19 59

by leaving a copy with

Alvin Clyde Middleton

Taylor Wilkins Sheriff

W. A. Talbot Deputy Sheriff

O. M.