

4639

JOHN P. BEEBE
ATTORNEY AT LAW

~~JOHN P. BEEBE~~
Robertsdale, Ala.

July 7th, 1959

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

Dear Mrs. Duck:

I enclose original and copy of bill of complaint in divorce in the matter of Doris Weaver, complainant vs. Willie Alexander Weaver, defendant.

I am informed that the defendant is at present living in the City of Gulfport, Mississippi, and is employed at: "Pass Road Garage, Gulfport, Mississippi," where he can be served by certified mail, with return receipt requested.

Would appreciate that this bill of complaint be filed in your court and service of process be effected upon the defendant at this address.

Thanking you, I am

Sincerely yours,

John P. Beebe

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Willie Alexander Weaver

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-----

Willie Alexander Weaver

-----, Defendant-----

by Doris Weaver

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

Witness my hand this 8th day of July 1959

Alexander - Weaver, Clerk

DORIS WEAVER,
Complainant,

vs

WILLIE ALEXANDER WEAVER,
Defendant.

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, IN EQUITY SITTING:

Comes your Complainant, Doris Weaver, and humbly complaining against Willie Alexander Weaver, Defendant, and respectfully shows unto your Honor:

FIRST: That your Complainant is over the age of twenty-one years and is a resident of the Town of Robertsdale, Baldwin County, Alabama, and that she has been a bona fide resident of the State of Alabama, continuously since the year 1950.

SECOND: That the said Defendant is over the age of twenty-one years and is at present residing in the City of Gulfport, Mississippi, and is employed by Pass Road Garage, Gulfport, Mississippi, and that his place of residence and address is otherwise unknown.

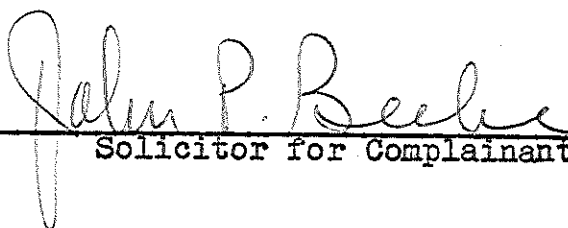
THIRD: That your Complainant and the said Defendant were married in the City of Purvis, Mississippi, on the 30th day of September, 1947, and lived together as husband and wife until the latter part of November, 1958.

FOURTH: That the said Defendant since their marriage has become an habitual drunkard; that frequently when in a drunken condition he would curse and abuse Complainant and commit actual violence upon her person attendant with danger to her life or health; that the latter part of November, 1958, in a drunken condition he beat your Complainant unmercifully; that because of his habitual drunkenness and his acts of violence from which she has reasonable cause to believe and does believe will be committed upon her person, to continue to live with him he would commit further acts of violence upon her person attendant with danger to her life or health

she left the said Defendant and they have not lived together as husband and wife since.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said Willie Alexander Weaver party Defendant hereto and by appropriate process require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this Complainant and the said Defendant and Complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive in the premises.


Solicitor for Complainant

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4639
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ALICE J. DUCK, Register

JUL 14 1959

FILED