

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 1959

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon William S. Lee

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 William S. Lee

_____, Defendant

by Illa O. Lee

_____, Plaintiff

Witness my hand this 21 day of July 1959

Ed. 9-2-59 Alice J. Luck, Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

ELLA O. LEE

Plaintiff

vs.

WILLIAM S. LEE

Defendant

Summons and Complaint

Filed _____ 19__

Clerk

J. Connor Owens, Jr.

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

ILLA O. LEE,
Complainant,

vs.

WILLIAM S. LEE,
Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO. _____

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

Now comes your Complainant, Illa O. Lee, and files this
her Bill of Complaint for Divorce against William S. Lee, and
shows unto Your Honor and unto this Honorable Court as follows:

I.

That the Complainant and the Respondent are both over
the age of 21 years, and that both are residents of Baldwin
County, Alabama.

II.

That your Complainant and the Respondent were married
heretofore, to-wit: July the 26th, 1951, in Lucedale, Missi-
ssippi, and lived together as man and wife until, on account
of matters hereinafter complained of, your Complainant has
lived separate and apart from the Respondent. Thereon or
about May 21, 1959, in New Orleans, Louisiana, that the Re-
spondent committed acts of adultery with other women, whose
names are unknown to the Complainant.

III.

That there was born to your Complainant and the Respondent
one child, Gwenda Carol Lee, age six and a half years; that
your Complainant is a fit and proper person to have the care,
custody and control of the said minor child.

IV.

That your Complainant further alleges that the Respondent
is an able bodied man, who earns approximately \$120.00 a week.
That your Complainant further alleges that the Respondent is
able to provide the sum of \$150.00 per month as support and
maintenance for said minor child.

V.

That to institute this action, it was necessary for your Complainant to retain a lawyer, and Complainant alleges that she has obtained the services of J. Connor Owens, Jr. as her Solicitor and she has no funds with which to pay said lawyer.

PRAYER FOR PROCESS

The premises considered, your Complainant respectfully prays that the above named William S. Lee be made a Party Respondent to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided.

PRAYER FOR RELIEF

The premises considered, your Complainant respectfully prays that upon a final hearing of this cause that Your Honor will enter an order divorcing the Complainant from the Respondent; that pending the disposition of this case that Your Honor will issue a temporary order or decree ordering the Respondent to pay to the Complainant the sum of \$150.00 per month as support and maintenance for the said minor child; your Complainant further prays that Your Honor will also enter an order or decree upon final hearing of this matter, awarding the care, custody and control of the minor child, Gwenda Carol Lee, to your Complainant; that this Honorable Court will also further provide that the Respondent pay to the Complainant as support for the said minor child, the sum of \$150.00 per month; that this Court will also award upon hearing an attorney's fee for her Solicitor in this cause; that Your Honor will also enter a decree allowing the Complainant to remarry if she sees fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound, she,

will ever pray.

Mrs. O. Lee
Complainant

J. Connor Owens, Jr.
Solicitor for Complainant

[REDACTED]