

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU are hereby commanded to summon JOHN F. PEACOCK to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by FLORENCE J. PEACOCK as Complainant, and against John F. Peacock, as Respondent.

WITNESS my hand this 21 day of July, 1959.

W. J. Duck
Register

FLORENCE J. PEACOCK)
COMPLAINANT) IN THE CIRCUIT COURT OF
VS) BALDWIN COUNTY, ALABAMA,
JOHN F. PEACOCK) ? IN EQUITY
RESPONDENT)

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

Comes now your Complainant and respectfully represents and shows unto your Honor as follows:

1.

That your Complainant and the Respondent are over the age of twenty-one years and bona fide resident citizens of Baldwin County, Alabama.

2.

That your Complainant and the Respondent were married at Lucedale, Mississippi, on January 6, 1956, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit, July 16, 1959.

3.

Your Complainant avers and alleges that the Respondent has, since her marriage to him, become addicted to Habitual drunkenness and that said habit has continued to the filing of this bill. The Complainant avers that the Respondent started drinking very heavily several years ago and has become an alcoholic; that when he gets drunk he stays drunk for long periods of time.

4.

That there was born to the marriage between your Complainant and the Respondent two children, Steven Michael, and John Craig Peacock, age 2 years; that your Complainant is a fit and proper person to have the care, custody and control of her minor children.

5.

That your Complainant avers that the Respondent is an abled bodied man and is presently earning a substantial salary.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said John F. Peacock party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practices of this Honorable Court.

Your Complainant further prays that on a final hearing of this cause, Your Honor will enter a decree granting your Complainant a divorce from the Respondent and granting her the right to remarry; Your Complainant further prays that Your Honor will by said decree grant her the permanent care, custody and control of her minor children, Steven Michael Peacock and John Craig Peacock; Your Complainant further prays your Your Honor will order the Respondent to pay the Complainant support money for his minor children Your Complainant further prays for such, other, further or different relief to which the Complainant may be in equity entitled..

Filed July 21, 1959
Alice J. Luck, Register
Ex. July 21, 1959

Wilters and Brantley

BY:

Robert M. Brantley
Solicitors for the Complainant

70.4656

FLORENCE J. PEACOCK

COMPLAINANT

VS

JOHN F. PEACOCK

RESPONDENT

Received 21 day of July 1939
and on 21 day of July 1939
served a copy of the within Compt
on John F. Peacock
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.

BILL OF COMPLAINT

FILED

JUL 21 1939

ALICE J. DUCK, CLERK
REGISTERED