

3791

SUMMONS

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon GEORGE T. INGRAM, 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, Alabama, at Bay Minette, against GEORGE T. INGRAM by LOLA INGRAM.

Witness my hand this the 17th day of April, 1956.

Alice J. Decker
Clerk

BILL OF COMPLAINT

LOLA INGRAM,)	
)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
GEORGE T. INGRAM,)	IN EQUITY.
)	
RESPONDENT)	

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

Your complainant, LOLA INGRAM, respectfully represents and shows unto your Honor:

1. That the complainant is over the age of twenty-one years and is a resident citizen of said State and County; that GEORGE T. INGRAM is over the age of twenty-one years and resides in Baldwin County, Alabama.
2. That your complainant and respondent were lawfully married on or about, to wit: the 1st day of July, 1939, at Birmingham, Alabama.
3. Your complainant further avers and alleges that the said respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.
4. Your complainant avers and charges that the said respondent did on or about the 21st day of April, 1955, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical

harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

5. There has been born to said marriage three children, namely: George Ingram, II, age 15; Charles Ingram, age 9; and Penny Ingram, age 7, and the complainant alleges that she is a person of good moral character and a prudent parent and is a suitable person to take proper care of said minor children.

6. That respondent did on or about, to wit: the 24th day of March, 1956, commit actual violence on said three children or one or more of them by throwing to wit: pine oil, in the eyes of one of the children causing greivous injury and harm, and causing said child much pain, suffering, medical expense and fear of losing his eye sight, all this being done while he was intoxicated.

7. Your complainant further avers that she and the three children are destitute and without funds with no place to go for help and that your respondent is in good health, is an able bodied man, is an electrician by trade, whose income will exceed \$500.00 per month; that your complainant has no means of support either for herself or for her three children and that respondent has refused and failed to provide for the support and maintenance of her and the three minor children; and that your complaint further avers that she is without means to pay her attorney for services rendered and services to be rendered in this suit.

8. That your complainant and respondent own a homestead near Foley, Alabama, which is subject to a mortgage.

The premises considered, your complainant makes the said GEORGE T. INGRAM a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoens to be issued, directed to the said GEORGE T. INGRAM, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, and that your Honor will further order that the care, custody and control of said minor children of the marriage, namely: George Ingram, II, Charles Ingram and Penny Ingram, be awarded to your complainant; that your Honor will award permanent alimony, support and

) continued (

maintenance of THREE HUNDRED & 00/100 DOLLARS (\$300.00) per month for herself and the three minor children, and attorney's fees in the amount of \$150.00, granting your complainant the homestead in absolute fee simple, subject to the present mortgage, with the right to sell and convey said homestead and all of the furniture without the signature or permission of the respondent; and your complainant prays for such other, further or general relief to which she may be entitled.


Solicitor for Complainant

LOLA INGRAM,

Complainant,

-vs-

GEORGE T. INGRAM,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

DEMURRER

Comes the Respondent in the above styled cause and demurs to the Bill of Complaint heretofore filed therein, and as grounds for demurer, shows as follows:-

1. There is no equity in the Bill.

2. Respondent for further ground of demurrer, demurs to the aspect of the Bill alleging cruelty as being in Paragraph 4 thereof, and as ground therefor shows that the alleged cruelty is not described with sufficient certainty.

3. As further grounds for demurrer, Respondent demurs to the aspect of the Bill alleging cruelty to the minor children of this marriage, this being Paragraph 6 thereof, and as ground for such demurrer shows: (a). That said allegations of illegal or unlawful conduct are designed to injure Respondent and are improper. (b). Said allegations do not constitute grounds for divorce. (c). Said allegations are superfluous, and are designed to influence the Court improperly. 4. Respondent demurs to the aspect of the Bill containing the allegations of the ownership of the homestead, this being Paragraph 8 thereof, and as ground shows that this allegation is vague and indefinite.

5. Respondent demurs to the Prayer for relief as contained in said Bill, and as ground for demurrer shows: (a). That the Prayer asks improper relief. (b). That the Prayer for relief is vague and indefinite. (c). That the Prayer for relief requests right to sell furniture without showing in the Bill of Complaint that any furniture is owned by either of the parties.


Attorney for Respondent

