

3810

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summon Luther Pulliam 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 Georgia Etta Pulliam, as Complainant, against Luther Pulliam, as Respondent.

Witness my hand this 13<sup>th</sup> day of June, 1956.

*Alice F. Duck*  
REGISTER

GEORGIA ETTA PULLIAM,  
Complainant,  
vs.  
LUTHER PULLIAM,  
Respondent.

I  
IN THE CIRCUIT COURT OF  
I  
BALDWIN COUNTY, ALABAMA  
I  
IN EQUITY  
I

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

Comes the Complainant in the above styled cause, by her Solicitors, and respectfully represents and shows unto your Honor and unto this Honorable Court:

FIRST:

That the Complainant is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama and that the Respondent, Luther Pulliam, is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama, and that both the Complainant and the Respondent have been bona fide resident citizens of Baldwin County, Alabama for more than one year next preceding the filing of this Bill of Complaint, their more particular address being Robertsdale, Alabama.

Second:

That the Complainant and the Respondent were married on November 27, 1952 and that they have lived together as man and wife since that time, except for a temporary separation during the year to-wit, 1955, until June 10, 1956, when, on account of the matters hereinafter alleged, the Complainant was compelled to separate from the Respondent.

THIRD:

That, on to-wit: June 10, 1956, and on many occasions prior thereto the Respondent committed actual violence upon the person of the Complainant attended with danger to her life or health.

FOURTH:

That there were born to the Complainant and the Respondent two children, both of whom are minors of tender years and that said minor children are now in the custody and control of the Complainant. That the Complainant is a fit and proper person to have the care, custody and control of said minor children and the Respondent is not a fit and proper person to have such care, custody and control.

FIFTH:

That the Complainant and the Respondent own jointly a house in Robertsdale, Alabama which is subject to a mortgage to the State Bank of Elberta, upon which there is now due a principal amount of approximately Two Thousand Five Hundred Dollars (\$2,500.00). That the Complainant has no other property of her own, either real or personal and that because of the tender age of her children she is unable to secure employment to provide her with any income of her own.

SIXTH:

That the Respondent is an able bodied man and is now gainfully employed and earning approximately Five Hundred Dollars (\$500.00) per month from his employment as an electrician. That the Complainant has no funds or income out of which to provide for the maintenance and support of herself and her two minor children

either pending a determination of this cause or subsequent thereto.

SEVENTH:

That it was necessary that the Complainant employ Solicitors to represent her in the institution of this proceeding and to this end she has employed the firm of Chason & Stone, Attorneys at Law, Bay Minette, Alabama, to represent her and she has no funds nor property out of which to pay their fees for their services rendered to the Complainant.

PRAYER FOR PROCESS

The premises considered the Complainant respectfully prays that this Honorable Court will cause the usual process to be issued and served upon the Respondent making him a party to this cause and requiring him to plead, answer or demur to this complaint within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

The premises considered the Complainant respectfully prays that upon the filing of the Bill of Complaint that this Honorable Court will enter an order or decree awarding to the Complainant the following temporary relief pending a final determination of this cause:

1. Declaring that the Complainant shall be entitled to the complete custody and control of the two minor children of the Complainant and the Respondent, Luther Pulliam, Jr., and Velma Olivia Pulliam.
2. Declaring that the Respondent be required to pay a reasonable amount to the Complainant for the maintenance and support of herself and her two minor children pending a final determination of this cause.
3. Declaring that the Complainant shall have the right to the full and complete possession of the home in Robertsdale, Alabama.
4. Entering such orders and decrees that the Court deems proper relative to such temporary relief and notices to the Respondent of the rendition of such temporary orders or of the date set for the hearing of the petition for temporary relief.

The premises considered, the Complainant further prays that upon a final determination of this cause that this Honorable Court will enter an order and decree forever divorcing the Complainant from the Respondent for and on account of cruelty and that in and by the terms of said order or decree that the court will award to the Complainant a complete custody and control of the said minor children, will order that the Respondent be required to convey to the Complainant his undivided interest in their home in Robertsdale, Alabama, as permanent alimony and in the event of his failure or refusal to do so will order that the Register be authorized to do so; fix and determine the amount to be paid by the Respondent to the Complainant for the support and maintenance of the Complainant and the two minor children; fix and determine a reasonable Solicitors fee for the services rendered by the Solicitors for the Complainant and require the Respondent to pay said amount. And the Complainant prays for such other, further and different relief as in the premises will be meet and proper.

Respectfully submitted,

CHASON & STONE

By:

Malcolm G. Stone

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA

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Alice J. Duck  
REGISTER W

GEORGIA ETTA PULLIAM,  
Complainant,  
vs.  
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Respondent.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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THIRD:

That, on to-wit: June 10, 1956, and on many occasions prior thereto the Respondent committed actual violence upon the person of the Complainant attended with danger to her life or health.

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That there were born to the Complainant and the Respondent two children, both of whom are minors of tender years and that said minor children are now in the custody and control of the Complainant. That the Complainant is a fit and proper person to have the care, custody and control of said minor children and the Respondent is not a fit and proper person to have such care, custody and control.

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SIXTH:

That the Respondent is an able bodied man and is now gainfully employed and earning approximately Five Hundred Dollars (\$500.00) per month from his employment as an electrician. That the Complainant has no funds or income out of which to provide for the maintenance and support of herself and her two minor children

either pending a determination of this cause or subsequent thereto.

SEVENTH:

That it was necessary that the Complainant employ Solicitors to represent her in the institution of this proceeding and to this end she has employed the firm of Chason & Stone, Attorneys at Law, Bay Minette, Alabama, to represent her and she has no funds nor property out of which to pay their fees for their services rendered to the Complainant.

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The premises considered the Complainant respectfully prays that this Honorable Court will cause the usual process to be issued and served upon the Respondent making him a party to this cause and requiring him to plead, answer or demur to this complaint within the time allowed by law and the rules of this Honorable Court.

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3. Declaring that the Complainant shall have the right to the full and complete possession of the home in Robertsdale, Alabama.
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The premises considered, the Complainant further prays that upon a final determination of this cause that this Honorable Court will enter an order and decree forever divorcing the Complainant from the Respondent for and on account of cruelty and that in and by the terms of said order or decree that the court will award to the Complainant a complete custody and control of the said minor children, will order that the Respondent be required to convey to the Complainant his undivided interest in their home in Robertsedale, Alabama, as permanent alimony and in the event of his failure or refusal to do so will order that the Register be authorized to do so; fix and determine the amount to be paid by the Respondent to the Complainant for the support and maintenance of the Complainant and the two minor children; fix and determine a reasonable Solicitors fee for the services rendered by the Solicitors for the Complainant and require the Respondent to pay said amount. And the Complainant prays for such other, further and different relief as in the premises will be meet and proper.

Respectfully submitted,

CHASON & STONE

By: Marlene J. Stone



GEORGIA ETTA PULLIAM,  
Complainant,

vs.

LUTHER PULLIAM,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ORDER

This day came Georgia Etta Pulliam, in the above styled cause, by her Solicitors, and filed her Bill of Complaint in this Court for a divorce and it appearing to the Court that she had prayed for temporary custody of the two minor children of the Complainant and the Respondent and for temporary support and maintenance for herself and said minor children and the Court being of the opinion that said cause should be set down for hearing on the prayer of the Complainant for such temporary relief and that the Respondent should be given notice of such setting; it is, therefore,

Ordered by the Court that the 18 day of June 1956, at 9 A. M. be and it hereby is, fixed as the date for the hearing in this cause of the prayer of the Complainant for temporary custody of the two said children and the temporary support and maintenance for herself and said children and that the Respondent be given notice of the day herein fixed by serving upon him, along with the Bill of Complaint, of a copy of this order.

Done this 13 day of June, 1956.

  
Circuit Judge

GEORGIA ETTA PULLIAM,  
Complainant,

vs.

LUTHER PULLIAM,  
Respondent.

0185  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ORDER

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Ordered by the Court that the 18 day of June 1956, at 9 A. M. be and it hereby is, fixed as the date for the hearing in this cause of the prayer of the Complainant for temporary custody of the two said children and the temporary support and maintenance for herself and said children and that the Respondent be given notice of the day herein fixed by serving upon him, along with the Bill of Complaint, of a copy of this order.

Done this 13 day of June, 1956.

Hubert M. Hall  
Circuit Judge