

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons LUTHER B. GALLOWAY, 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 CHRISTINE H. GALLOWAY as Complainant and against LUTHER B. GALLOWAY, as Respondent.

WITNESS my hand this the 10th day of aug, 1956.

Alice J. Hucks
Register. *sr*

CHRISTINE H. GALLOWAY
COMPLAINANT
VS
LUTHER B. GALLOWAY
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
CASE NO. 3846

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

YOUR Complainant, Christine H. Galloway, respectfully represents unto
Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and is a resident of Baldwin County, Alabama, and has been more than two years next preceeding; the Respondent is over the age of 21 and is a resident of Baldwin County, Alabama, and has been more than two years next preceeding.

2.

That your Complainant and the Respondent married in Columbus, Mississippi on April 15, 1952 and lived together as husband and wife in Baldwin County, until August 2, 1956.

3.

That on August 2, 1956, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

BOOK 022 PAGE 238

4.

Your Complainant avers and alleges that said Respondent has been guilty of adultery with divers parties and persons whose names to your Complainant are unknown.

5.

There was born as fruits of this marriage between the Complainant and the Respondent two children, Luther Dwight Galloway, age about three years, and Phylis Kay Galloway, age about one year, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Luther E. Galloway, 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 practice of this Honorable Court.

That your Complainant be awarded the care, custody and control of the minor children, Luther Dwight Galloway, age about three years, and Phylis Kay Galloway, age about one year; that your Honor will grant to the Complainant permanent maintenance for said children in the amount of One Hundred (\$100.00) Dollars per month and inasmuch as your Complainant is without funds it is suggested that One Hundred (\$100.00) Dollars be allowed as a reasonable Solicitor's fee to your Complainant's Solicitor for his services herein.

Your Complainant further prays that upon a hearing hereof your Honor will enter an order and decree granting to both parties an absolute decree of divorce forever barring the bonds of matrimony existing between the Complainant and the Respondent and that a decree be made awarding the Complainant, who now has the care, custody and control of the minor children, Luther Dwight Galloway, age about three years, and Phylis Kay Galloway, age about one year, the care, custody and control of said children pending further orders of this court; and your Complainant further prays that your Honor will determine the sum of \$100.00 per month as a reasonable amount for the support and maintenance of said minor children; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

C. Davis
Solicitor for the Complainant.

*Respondent works at Davis' Barber Shop
Bay Minette, Ala*

3846

CHRISTINE H. GALLOWAY,
COMPLAINANT

VS

LUTHER B. GALLOWAY,
RESPONDENT

BILL OF COMPLAINT

From the Law Offices of
C. LeNoir Thompson
Bay Minette, Alabama

FILED

AUG 10 1956

Alice J. Duck, Register

received 10 day of Aug 1956
and on 10 day of August 1956

served a copy of the within
on Luther B. Galloway

By service on _____

TAYLOR WILKINS, Sheriff
By W.A. Tolbert D. S.
omi

[Faint, mostly illegible text from the reverse side of the document, including a signature and various lines of text.]

CHRISTINE H. GALLOWAY,
COMPLAINANT
VS
LUTHER B. GALLOWAY,
RESPONDENT.

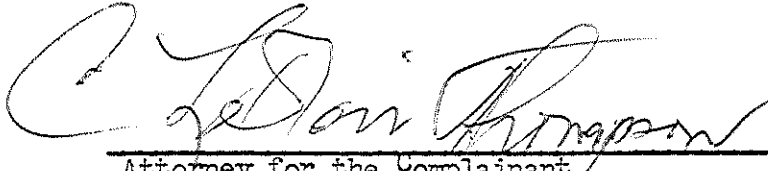
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the Complainant, Christine H. Galloway, by her attorney of
record, and moves to dismiss said cause.

FILED

AUG 13 1956

ALICE J. DUCK, Register


Attorney for the Complainant

CHRISTINE H. GALLOWAY,
COMPLAINANT

VS

LUTHER B. GALLOWAY,
RESPONDENT.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Complainant, Christine H. Galloway, by her attorney of record, and moves to dismiss said cause.

[Handwritten Signature]
Attorney for the Complainant

FILED
AUG 13 1956
ANNE L. DUCK, Register