

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons HERBERT H. MILLS, 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 MARY McCAW MILLS, as Complainant and against HERBERT H. MILLS, as Respondent.

WITNESS my hand this the 17th day of Aug, 1956.

Alice J. Dusk
Register.

MARY McCAW MILLS
COMPLAINANT
VS
HERBERT H. MILLS
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
CASE NO. 5853

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

Your Complainant, Mary McCaw Mills, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married at Waynesboro, Mississippi on May 25, 1933, and lived together as husband and wife in Baldwin County, Alabama, until June 30, 1956.

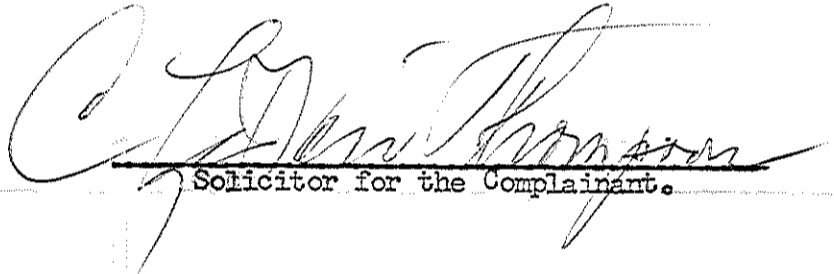
3.

That on June 30, 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.

There was born as fruits of this marriage between the Complainant and the Respondent two children who are grown, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process make the said Herbert H. Mills, 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; Your Complainant further prays that your Honor will upon a final hearing hereof, award to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent .

Complainant prays for such other, further, different or general relief as she may be entitled in the premises, etc.


Solicitor for the Complainant.

3853

MARY McCAW MILLS

COMPLAINANT

VS

HERBERT H. MILLS

RESPONDENT

Received 17 day of Aug 1956
 and on 22 day of Aug 1956
 served a copy of the within _____
Herbert H Mills
 service on _____

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

 SUMMONS AND COMPLAINT

FILED

AUG 17 1956

ALICE J. DUCK, Register

From the law offices of

C. LeNoir Thompson
 Bay Minette, Alabama

3853

[Faint, mostly illegible text from the reverse side of the document, including a large circular stamp containing the number 3853.]