

3862

MAZIE BARNETT )  
COMPLAINANT )  
VS. )  
JAMES BARNETT )  
RESPONDENT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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

Your complainant Mazie Barnett respectfully represents and shows  
unto your Honor:

1. That the complainant is over the age of twenty-one years  
and is a resident of said State and County, and has been a bona  
fide resident for more than one year next preceding the filing of  
this bill of complaint; that James Barnett is over the age of twen-  
ty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully mar-  
ried on or about, to-wit: November, 1946, in Foley, Alabama, and  
of this marriage there are two minor children, James Wallace Bar-  
nett, four years old, and Melton Barnett, eight months old, depen-  
dent upon the respondent.

3. Your complainant avers and charges that the said respon-  
dent did on or about the 25th day of August, 1956, 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.

4. Complainant avers that respondent is employed and making a-  
bout \$50.00 a week; that the complainant owns no property and has no  
means of support for herself and minor children; and that said respon-  
dent has refused and failed to provide for the support and maintenance  
of the complainant and said minor children; your complainant further  
avers that she is without means to pay her solicitor of record for  
his services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Hon-  
or will order service to be had according to law upon said respondent,  
commanding him to appear and plead, answer or demur to this bill of  
complaint within the time required by law and that your Honor will  
hold a hearing and award the Complainant temporary care, control and  
custody of the said minor children, pending this suit, and that your  
Honor will order the Register of this Court to hold a reference and  
report to this court what would be a reasonable amount to be allowed  
your complainant as alimony for her support and maintenance and the  
support and maintenance of the said minor children, pending this suit,  
and what would be a reasonable amount to be allowed your complainant's  
solicitor for his services rendered and to be rendered in this suit,  
and that upon a final hearing of this cause, that your Honor will ren-  
der a decree divorcing your complainant from the respondent, granting  
the complainant permanent care, control and custody of the said minor  
children, permanent alimony for her support and maintenance and sup-

(page 2)

port and maintenance for said minor children, and your complainant prays for such other, further or general relief to which she may be entitled.

*Arthur C. Epperson*  
SOLICITOR FOR COMPLAINANT

RESPONDENT'S ADDRESS:

Care Irwin Warehouse  
Foley, Alabama

3862

FILED

AUG 30 1956

ALICE L. DUCK, Register

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3862

August

1956  
TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

JAMES BARNETT

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, State of Alabama, at Bay Minette, against

JAMES BARNETT

, Defendant

by

MAZIE BARNETT

, Plaintiff

Witness my hand this 30th. day of August 1956

*Alice J. Ducky*

, Clerk

No. 3862

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THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

MAZIE BARNETT

Plaintiffs

vs.

JAMES BARNETT, Foley, Ala.

Defendants

SUMMONS and COMPLAINT

Filed AUGUST 30, 19 56

Alice J. Duck, Clerk

A. EPPERSON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

Aug 30, 19 56

Taylor Wilkitts Sheriff

I have executed this summons

this Sept 4, 19 56 by leaving a copy with

James Barnett

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKITTIS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkitts Sheriff

Deputy Sheriff

Foley