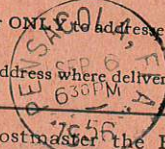


3863

DELIVERING
EMPLOYEE

Deliver ONLY to addressee. (Does not apply to Certified mail.)

Show address where delivered.



Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

FILED
SEP 7 1956
POST OFFICE

1. Arthur Cantor
(Signature or name of addressee)

2. Robert K. [unclear]
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of Delivery _____, 19____

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID
PAYMENT OF POSTAGE, \$300
(GPO)

POSTMARK OF
DELIVERING OFFICE

RETURN TO

REGISTERED NO.	NAME OF SENDER <i>Wesley J. French</i>
CERTIFIED NO.	STREET AND NO. OR P. O. BOX <i>Box 239</i>
INSURED NO.	POST OFFICE <i>Bay Marquette</i>
	STATE <i>Ala.</i>

POD Form 3811
July 1955

3862

CLARA INEZ AGERTON	Y	
Complainant		IN THE CIRCUIT COURT OF
	Y	
vs.		BALDWIN COUNTY, ALABAMA
	Y	
ARTHUR AGERTON		IN EQUITY.
Respondent.	Y	

To the Honorable Judge of the Circuit Court of Baldwin County,
Sitting in Equity:

Comes now the Complainant, CLARA INEZ AGERTON, humbly complaining of the Respondent, ARTHUR AGERTON, in a matter of divorce, and represents and shows unto your Honor as follows:

FIRST: That Complaint Clara Inez Agerton is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State and County for more than five years next preceding the filing of this Bill of Complaint; that Arthur Agerton is over the age of twenty-one years and resides in Pensacola, Florida.

SECOND: That your Complainant and Respondent were married on May 11, 1925, at Pensacola, Florida.

THIRD: Your Complainant avers and charges that the Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that she will commit an actual violence upon her person, attended with danger to her life and health; the last of such threats did occur on June 26, 1956 and as a result of said threats Complainant and Respondent have not lived together since that time as husband and wife.

FOURTH: That there was born to the union of the Complainant and Respondent three children, namely, Henry E. Agerton, a boy now about eighteen years old, Delores Agerton, a girl now about fifteen years old, and William A. Agerton, a boy now about thirteen years old. That these children are now in the custody of the Complainant, their mother; Complainant further avers that she is a fit and proper person to be awarded the permanent care, custody and control of the said minor children. Complainant further avers that the Respondent is an able bodied man and is well able to aid in the maintenance and support of the said minor children as set out herein.

FIFTH: Your Complainant further avers and shows unto the Court that the property hereinafter described was purchased by your Complainant and Res-

pendent with funds accumulated by and as a result of the joint efforts of the Complainant and the Respondent. That said property was purchased in the name of the Respondent, Arthur Agerton. Said purchase was made possible by the labor of both your Complainant and Respondent. Said property being described as follows; to-wit:

Beginning at an iron stake in the center of Section thirty-two (32), Township five, South, Range four East. Section Thirty two, T 5 S, R 4 E. From said stake run North along the Center line of said Section Five Hundred Seventy Eight feet (578 feet) to an iron stake Hence East One hundred forty nine and seven tenths feet (149.7 ft.) to an iron stake Hence South five hundred seventy eight feet (578) to an iron stake on East and West Center line of said Section Hence West along said Center line one hundred forty nine and seven tenths (149.7) feet to the place of beginning containing Two acres of land.

Complainant further avers and shows unto the Court that she is now occupying the said premises together with the three minor children born to the union of said parties; that she has no other place to live and that her income is not sufficient to rent property for her and the said minor children. That Complainant nor Respondent own any other property other than that above set out.

PRAYER FOR PROCESS

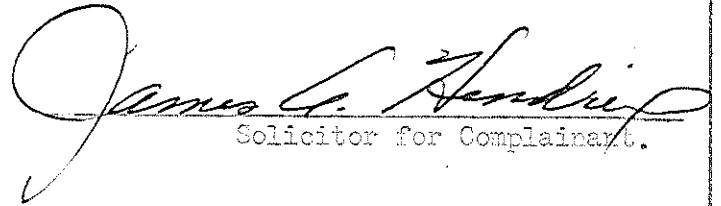
Wherefore the premises considered the Complainant prays that the said Arthur Agerton be made party Respondent to this her Bill of Complaint and that a summons be issued and served upon him as required by law and the rules of this Honorable Court, and that he be required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage. The complainant prays that in and by virtue of the said decree she will be awarded the custody of the minor children born to the union of the said parties, subject to the further orders of this Honorable Court. Complainant prays that by virtue of said decree she will be

awarded an amount to be paid each month by the Respondent to the Complainant for the support and maintenance of the minor children born to the union of said parties. Complainant prays that the property as above described will be awarded to her in the final order of this Honorable Court.

Complainant prays all other further or general relief to which she may be entitled, the premises considered and she will ever pray, etc.


Solicitor for Complainant.

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3863

August

TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ARTHUR AGERTON

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 _____

ARTHUR AGERTON

Defendant

by CLARA INEZ AGERTON

Plaintiff

Witness my hand this 30th. day of August 1956

Archie J. Duck, Clerk

BOOK 023 PAGE 57

No. 3863

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

CIARA INEZ AGERTON

Plaintiffs

vs.

ARTHUR AGERTON

Defendants

SUMMONS and COMPLAINT

Filed AUG. 30, 19 56

Alice J. Duck, Clerk

J.A. HENDRIX

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Plezing Food Store, Pensacola

RECEIVED IN OFFICE

_____, 19_____

_____, Sheriff

I have executed this summons

this _____, 19_____

by leaving a copy with

Sheriff

Deputy Sheriff

0001 077 077 01