

3870

STATE OF ALABAMA, BALDWIN COUNTY

LYDA LOUISE PHILLIPS	Y	
Complainant	Y	IN THE CIRCUIT COURT OF
vs.	Y	BALDWIN COUNTY, ALABAMA
FREDERICK VICTOR PHILLIPS	Y	IN EQUITY.
Respondent.	Y	

To the Honorable Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Comes now the Complainant, LYDA LOUISE PHILLIPS, humbly complaining of the Respondent, FREDERICK VICTOR PHILLIPS, in a matter of divorce, and represents and shows unto your Honor as follows:

FIRST: That Complainant, Lyda Louise Phillips is over the age of eighteen years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State and County for more than one year next preceding the filing of this Bill of Complaint; that Frederick Victor Phillips is over the age of twenty-one years and resides in Foley, Alabama.

SECOND: That your Complainant and Respondent were married on September 25, 1954, at Frisco City, Alabama.

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 he will commit an actual violence upon her person, attended with danger to her life and health; the last of such threats did occur on August 20, 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 one child, namely, Jerry Wayne Phillips, a boy now about fourteen months old. That this child is now in the custody of the Complainant, its 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 child. 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 child as set out herein.

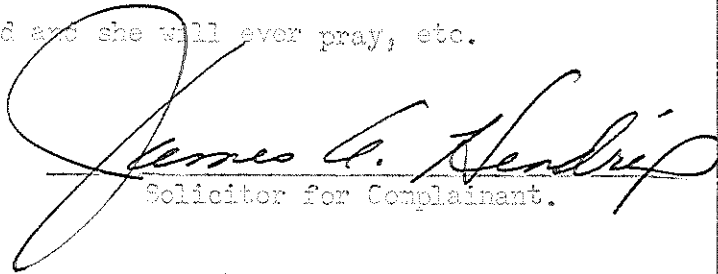
PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said Frederick Victor Phillips 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 child~~ 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 child born to the union of said parties.

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. 3870

Sept.

TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon FREDERICK VICTOR PHILLIPS

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

FREDERICK VICTOR PHILLIPS

, Defendant

by

LYDA LOUISE PHILLIPS

, Plaintiff

Witness my hand this 6th. day of September 19 56

Alice J. Ducky

, Clerk

No. 3870

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THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

CLERK OF THE COURT AND COMPTROLLER

LYDA LOUISE PHILLIPS

Plaintiffs

vs.

FREDERICK VICTOR PHILLIPS

Defendants

SUMMONS and COMPLAINT

Filed SEPT. 6th. 19 56

Alice J. DUCK

, Clerk

JA. HENDRIX

Plaintiff's Attorney

Defendant's Attorney

Record Printing Co.

Defendant lives at

RECEIVED IN OFFICE

Sept. 6, 1956

, Sheriff

I have executed this summons

this Sept 12, 1956 by leaving a copy with

Frederick Victor Phillips

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Charles Deputy SHERIFF

Taylor Wilkins Sheriff

Charles Deputy Sheriff

Gokey