

3979

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Edmond J. Newton 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 Annie Newton, as complainant, against Edmond J. Newton, as Respondent.

Witness my hand this 25 day of February, 1957.

*Annie J. Newton*  
Register

ANNIE NEWTON,	I	
Complainant,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
EDMOND J. NEWTON,	I	IN EQUITY
Respondent.	I	

Comes your complainant, Annie Newton, and files this her Bill of Complaint for divorce against Edmond J. Newton, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and Respondent are over the age of twenty-one years, and are both resident citizens of Baldwin County, Alabama, residing at Foley, Alabama, and that they have been such resident citizens for more than two years last past.

SECOND:

That your Complainant and the Respondent were married on heretofore to-wit, June 26, 1936, and lived together as man and wife until, on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and

apart from him; that on, to-wit, January 20, 1957, the Respondent committed an act of violence on the person of your Complainant by slapping her in the face. Again, on January 28, 1957, the Respondent committed violence on the person of your Complainant attended with danger to her life and health. On that day he beat her with his fist and caught her by one of her feet and pulled her off the bed and across the room. Again, on February 9, 1957, the Respondent threatened to kill your Complainant and on February 10, 1957, she left the home in which they were living and she has not returned. The Complainant had reasonable apprehension that if she continued to live with the Respondent her life and health would be in danger. Your Complainant has not lived with the Respondent as man and wife since February 10, 1957. The Respondent has made numerous other threats against your Complainant. He has also caused a young woman named June Jeffries to live in the home of your Complainant and Respondent against the will of your Complainant and has stated to your Complainant that such woman has as much right in the home as your Complainant has. When your Complainant objects to such woman living in the home the Respondent threatens to kill your Complainant.

THIRD:

Your Complainant is unable to earn a living for herself suitable to her station in life. She assisted the Respondent in acquiring the property that they now own which consists of forty acres of land, a dwelling house, farming implements, livestock and chickens etc. Such property, real and personal, has a value of approximately Twenty Thousand Dollars and is under mortgage for approximately Thirty Two Hundred Dollars. The real property stands in the joint name of your Complainant and the Respondent. The Respondent is an able bodied man earning approximately One Hundred Twenty-five Dollars per week. Your Complainant and the Respondent did own a joint bank account but your Complainant does not know whether there is any money in such account at this time.

FOURTH:

Your Complainant has employed Chason & Stone, Solicitors in Bay Minette, Alabama, to bring such suit and your Complainant is unable to pay them a reasonable solicitor's fee for their services in the matter.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Complainant prays that the above named Edmond J. Newton be made a party Respondent to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from said Respondent; that your Honor will award your Complainant, in lieu of support, the one-half interest owned by the Respondent in the property owned jointly by the Complainant and the Respondent or if your Honor sees fit will award your Complainant a sum of money to be paid by the Respondent to your Complainant for her maintenance and support, either weekly or monthly as your Honor sees fit; that your Honor will fix a reasonable solicitor's fee to be paid by the Respondent to Chason and Stone as solicitors for the Complainant; that your Honor will order and decree that the Complainant be allowed to remarry if she sees fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Annie Newton  
Complainant

CHASON & STONE  
SOLICITORS FOR COMPLAINANT