

VANDORA VIRGINIA HARKINS,  
 COMPLAINANT  
 -VS-  
 STEPHEN B. HARKINS,  
 RESPONDENT

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA,  
 IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT:

Comes VANDORA VIRGINIA HARKINS by this, her Bill of Complaint presented against STEPHEN B. HARKINS, and respectfully shows:

1. That the complainant and respondent are both over the age of twenty-one years and bona fide residents of Baldwin County, Alabama, and have been such for the three years next preceding the filing of this Bill of Complaint.

2. That the complainant and respondent were lawfully married on the 6th day of January, 1949, and lived together as husband and wife in Fairhope, Baldwin County, Alabama, up until the 22nd day of February, 1957, when they separated because of respondent's conduct hereinafter complained of.

3. That said respondent has become addicted, after marriage, to habitual drunkenness.

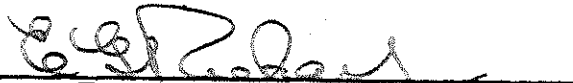
4. That said respondent has committed actual violence upon the person of his wife, attended with danger to her life or health, by striking her in their apartment in Fairhope, Alabama, on, to-wit, the 7th day of February, 1957.

5. There have been no children born to this marriage.

6. Complainant further alleges that the respondent, STEPHEN B. HARKINS, is an able-bodied man, earning good wages at Brookley Air Force Base, and that she has no estate sufficient to pay the costs and expenses of this proceeding, including her solicitor's fees.

THE PREMISES CONSIDERED, your complainant prays that this Court will make the said STEPHEN B. HARKINS a party respondent to this cause by appropriate process, requiring him to plead, answer or demur within the time prescribed by law.

Complainant further prays that, upon a hearing of this cause, the Court will ascertain the facts herein alleged and will render a decree forever divorcing her from the said respondent, and requiring him to pay a reasonable amount for her expenses in securing this divorce, including a reasonable solicitor's fee, and granting her the right to remarry should she so desire.

  
E. G. RICKARBY,  
Solicitor for Complainant

Respondent is a resident  
of Baldwin County, Alabama.  
*Sailor*

IN WITNESS WHEREOF  
I have hereunto set my hand  
and seal of said Court at  
the City of Montgomery,  
Alabama, this 10th day of  
February, 1922.

RECORDED

INDEXED

FILED

1922

CLERK

ASSISTANT CLERK



The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon STEPHEN B. HARKINS,

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State.

VANDORA VIRGINIA HARKINS, Complainant

against STEPHEN B. HARKINS, Respondent

Herein fail not. Due return make of this writ as the law directs.

Witness this 28 day of Feb, 19 57

Reisig. H. H. H. Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

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**The State of Alabama**

Baldwin COUNTY.

**IN CIRCUIT COURT, IN EQUITY**

VANDORA VIRGINIA HARKINS

vs.

STEPHEN B. HARKINS

**SUMMONS**

Returned by the Sheriff and filed in office, this  
the..... day of....., 19.....

Register.

*with Helt*

**FILED**  
FEB 25 1957  
ALBANY & ANNEX, BALDWIN

Respondent lives in  
Baldwin County, Alabama.  
*Stalove*

Received in office, this the 28 day of

Feb, 1957

Sheriff.

I have executed the within by leaving a copy  
thereof with.....

*Returned 3/4/57*  
*By order of*  
*L. C. Kerley*

defendant named herein, on this the.....  
day of....., 19.....

Sheriff.

By....., Deputy.

TELEPHONE WA 8-9836

LAW OFFICES

E. G. RICKARBY

BANK BUILDING

FAIRHOPE, ALABAMA

February 26, 1957

P. O. BOX 71

Mrs. Alice Duck  
Clerk of Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

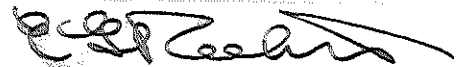
Re: Harkins vs. Harkins  
Our File: 3999

With this we are handing you divorce bill of Harkins  
vs. Harkins.

Please process, get it to the sheriff right away  
with the enclosed letter, so that we can get prompt  
service.

Thanks.

Yours very truly,



EGR/ts  
Encl.  
3-9-57

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

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against STEPHEN B. HARKINS, Respondent

Herein fail not. Due return make of this writ as the law directs.

Witness this 28 day of Feb, 1957

Alice J. Harkins, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

# The State of Alabama

Baldwin COUNTY.

## IN CIRCUIT COURT, IN EQUITY

VANDORA VIRGINIA HARKINS

vs.

STEPHEN B. HARKINS

# SUMMONS

Returned by the Sheriff and filed in office, this  
the ..... day of ....., 19.....

....., Register.

**FILED**

FEB 12 1957

ALICE A. BUCK, REGISTER

Respondent lives in  
Baldwin County, Alabama.

*Stark*

Received in office, this the ..... day of

....., 19.....

....., Sheriff.

I have executed the within by leaving a copy  
thereof with.....

defendant named herein, on this the.....

day of....., 19.....

....., Sheriff.

By....., Deputy.



VANDORA VIRGINIA HARKINS,  
COMPLAINANT

-VS-

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RESPONDENT

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E. G. RICKARBY,  
Solicitor for Complainant

Respondent is a resident  
of ~~Madison~~ Madison County, Alabama.