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ETHEL LEE TILLMAN
COMPLAINANT

VS.

WILLIE MAYO TILLMAN
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. _____

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

Your complainant ETHEL LEE TILLMAN respectfully represents and shows unto your Honor:

1. That the complainant is over the age of sixteen years and is a resident of Baldwin County, Alabama, and have been a bona fide resident of said State for more than one year next preceding the filing of this bill of complaint; that WILLIE MAYO TILLMAN, the respondent, is over the age of twenty-one years and resides in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit: February 19, 1955, at Foley, Alabama, and of this marriage, there is one minor child, Rosa Lee Tillman, born July 22, 1956, Foley, Alabama.

3. The complainant further avers that said respondent voluntarily abandoned the bed and board of complainant, for more than one year next preceding the filing of this bill of complaint, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife.

4. Complainant avers that respondent is capable of making \$60.00 a week; that the complainant owns no property and has no means of support for herself and minor child; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor child; 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 Honor 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 child, 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 child, 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 render a decree divorcing your complainant from the respondent, granting the complainant permanent care, control and custody of the said minor child, permanent alimony for her support and maintenance and support and maintenance for said minor child.

RESPONDENT'S ADDRESS:

Baldwin County Jail
Bay Minette, Alabama

Arthur C. Gifferson
Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4000

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon Willie Mayo Tillman

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

Willie Mayo Tillman, Defendant

by Ethel Lee Tillman

, Plaintiff

Witness my hand this 27th day of March 19 57

Blaise J. Wacker Clerk

4000

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ETHEL LEE TILLMAN

Plaintiffs

vs.

WILLIE MAYO TILLMAN

Defendants

SUMMONS and COMPLAINT

Filed 3/27/57, 1957

Alise J. Duck, Clerk

Arthur C. ~~Box~~ Epperson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

3/27/, 1957

, Sheriff

I have executed this summons

this 3-27, 1957

by leaving a copy with

Willie Mayo Tillman

Taylor Walker Sheriff

W. B. Tolbert Deputy Sheriff

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