

Sept. 28, 1988
Evelyn Alida Herlikofer
12810 Lillian Hwy
Pensacola, Fl. 32506

Eunice Tindal, Register of Circuit Court
P. O. Box 489
Bay Minette, Al. 36507

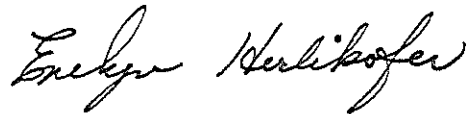
4002

Attention: Tammy

As per our phone conversation enclosed is a cashiers check for three (3) certified copies of my divorce papers. I was married to James Robert Herlikofer and divorced sometime in 1957. I have lost my papers and would appreciate some copies.

Thank you.

Sincerely yours,



Evelyn A. Herlikofer

CIRCUIT COURT
BALDWIN CO., ALA.
FILED

SEP 29 1988

EUNICE G. TINDAL
REGISTER

9-29-88 sent 3 certified
copies.

Tammy

EVELYN ALIDA HERLIKOFER

COMPLAINANT

vs.

JAMES ROBERT HERLIKOFER

RESPONDENT

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____

With agreement of Parties, Respondent's answer and waiver _____

Commissioner to take Testimony, _____

Oral Deposition of Complainant's _____

Witness _____

and in behalf of Defendant upon _____

Arthur C. Johnson
Solicitor
For Compl.

Alvin P. Smith
Register.

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

EVELYN ALIDA HERLIKOFER

COMPLAINANT

VS.

JAMES ROBERT HERLIKOFER

RESPONDENT

NOTE OF TESTIMONY

Filed in Open Court this

FILED

day of , 194

AUG 13 1957

ALICE J. DUCK, Register

Printed by the Baldwin Times

STATE OF ALABAMA)
)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF BALDWIN COUNTY

EVELYN ELINDA HERLIKOFER,) IN EQUITY
)
Complainant,)

vs.) No. 4002

JAMES ROBERT HERLIKOFER,)
)
Respondent.)

A P P E A R A N C E

We hereby enter the appearance of JAMES ROBERT HERLIKOFER
as Respondent in the above entitled cause and ourselves as attorneys
therein.

JOSEPH H. AND NORMAN BECKER

BY 
JOSEPH H. BECKER

Attorneys for Respondent
105 West Madison Street
Chicago 2, Illinois

Telephone: FRanklin 2-8744

DATED: April 24, 1957

LAW OFFICES

JOSEPH H. AND NORMAN BECKER

SUITE 707-105 WEST MADISON STREET

CHICAGO 2

JOSEPH H. BECKER
NORMAN BECKER

August 2, 1957

Alice J. Duck, Circuit Clerk
Baldwin County
Bay Minette, Alabama

Re: Evelyn Elinda Herlikofer vs. James Robert Herlikofer
In the Circuit Court of Baldwin County, Alabama
No. 4002

Dear Madam:


Thank you for submitting to us the Amended Complaint in the
aforementioned matter which we are returning to you herewith, Mr. Epperson
having sent us a copy of same.

Also, enclosed please find original and copy of our Answer
and Consent on behalf of the defendant, James Robert Herlikofer, a copy
of which we are forwarding to Mr. Epperson.

Again thanking you for your courtesy in this matter, we remain

Yours very truly,

JOSEPH H. AND NORMAN BECKER

BY: 

JHB.RS
Enclosures

THE STATE OF ALABAMA

Baldwin County. }

Circuit Court of Baldwin County, Alabama

(In Equity)

Evelyn Alida Herlikofer

Complainant

VS.

James Robert Herlikofer

Respondent

I, Vera Hough

as Register and Commissioner

have called and caused to come before me Evelyn Alida Herlikoferwitness named in the Requirement for Oral Examination, on the 13th day of August
1957, at the office of Vera Houghin Foley, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Evelyn Alida Herlikofer
doth depose and say as follows:

My name is Evelyn Alida Herlikofer, I am over twenty-one years of age and I am a resident of Baldwin County, Alabama. I have been a resident of Baldwin County, Alabama for more than one year before filing this suit for divorce against James Robert Herlikofer. James Robert Herlikofer is over the age of twenty-one years and is now residing in Chicago, Illinois. I was lawfully married to James Robert Herlikofer on June 12th, 1948, at Bethlehem, Pennsylvania. On February 16th of this year, my husband James Robert Herlikofer committed actual physical violence on my person with danger to my life and health. He had previous to that time made threats of doing physical violence to me and threatened at that time that if I did not take the children and leave immediately that I would have to be carried away. I called my father, Rev. Potzner who came and took me and the children to his home in Elberta, Ala., where we have remained ever since. I am mortally afraid to live with James Robert Herlikofer because of the physical injuries I have suffered from him in the past and his threats of more violence.

We have two children, Diana Evelyn Herlikofer, 7 years old and Michael Wayne Herlikofer, 3 months old. I and James Robert Herlikofer have entered into a written agreement which agreement is made part of my testimony hereof and marked Exhibit "A" and made a part of the bill of complaint, and by the provisions of the agreement I am to have the complete care, control and custody of the children. He is to pay to me for their support and maintenance the sum of \$60.00 per month beginning immediately.

Evelyn Alida Herlikofer

ORAL EXAMINATION.

I, Vera Houch, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to her and she signed the same in the presence of myself _____

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom made before me of the identity of said witness _____; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 13th day of August, 1957

Vera Houch (L. S.)

NO. _____ PAGE _____

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

Evelyn Alida Herlikofer
vs. Complainant

James Robert Herlikofer

Respondent.

Oral Deposition

Filed _____, 1957

Recorded in _____, Register.

Recorded in _____

Record _____

Vol. _____ Page _____

Register.

FILED
AUG 15 1957

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Vera Hough

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Vera Hough

a witnesses in behalf of Evelyn Alida Herlikofer in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Evelyn Alida Herlikofer

Complainant

and James Robert Herlikofer

Respondent

on oath, to be by you administered, upon her to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 13 day of August, 1957

Wesley J. Duck
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

**THE STATE OF ALABAMA
Baldwin County**

CIRCUIT COURT

EVELYN ALIDA HERLIKOFER

Complainant

VS.

JAMES ROBERT HERLIKOFER

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

VERA HOUGH

WITNESSES:

EVELYN ALIDA HERLIKOFER

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Complainant

Defendant

1961

Witness

Commissioner

Witness

STATE OF ALABAMA)
BALDWIN COUNTY) SS.
)

IN THE CIRCUIT COURT OF BALDWIN COUNTY
IN EQUITY

EVELYN ELINDA HERLIKOFER,)
Complainant,)
vs.) No. 4002
JAMES ROBERT HERLIKOFER,)
Respondent.)

ANSWER TO AMENDED COMPLAINT OF
EVELYN ELINDA HERLIKOFER


NOW COMES respondent, JAMES ROBERT HERLIKOFER,
answering the Amended Complaint heretofore filed by EVELYN ELINDA
HERLIKOFER, and states as follows:

1. That he admits the complainant is over the age of twenty-one years and is a bonafide resident of the State of Alabama, Baldwin County, and admits that this respondent is over the age of twenty-one years but denies that he is a resident of Baldwin County, Alabama, as alleged in Paragraph One (1) thereof.
2. That he admits the allegations in Paragraph Two (2) thereof.
3. That he denies the allegations in Paragraph Three (3) thereof.
4. That he admits the allegations in Paragraph Four (4) thereof.

THIS RESPONDENT further states that he waives Notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final Decree.

JAMES ROBERT HERLIKOFER, Respondent

BY: JOSEPH H. AND NORMAN BECKER
His Attorneys

Per 
JOSEPH H. BECKER

EVELYN ELINDA HERLIKOFER
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

IN EQUITY

JAMES ROBERT HERLIKOFER
RESPONDENT

CASE NO. _____

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

Your complainant EVELYN ELINDA HERLIKOFER, respectfully represents and shows unto your Honor:

1. That the complainant is over the age of twenty-one years of age and is a bona fide resident of said State and County; that James Robert Herlikofer is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about to-wit; June 12, 1948, in Bethlehem, Pennsylvania, and of this marriage there are two minor children, Diana Evelyn Herlikofer, seven years old and Michael Wayne Herlikofer, three months old, dependents upon the respondent.

3. Your complainant avers and charges that 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 or health.

4. Complainant avers that respondent is employed and making about \$100.00 a week; That the complainant owns no property and has no means of support for herself and minor children; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor children; 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 children, 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 children, 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 children, permanent alimony for her support and maintenance and support and maintenance for said minor children, and that your Honor will order, permanent attorney fees for the sum of \$250.00 for her attorney of record; your complainant prays for each other, further or general relief to which she may be entitled.

RESPONDENT'S ADDRESS:
2720 West Belden Ave.
Chicago, Ill.,
-or-
c/o TW Airlines
Midway Airport
Chicago, Ill.,

Arthur C. Johnson
SOLICITOR FOR COMPLAINANT

FILED
JUN 15 1948
BALDWIN COUNTY, ALABAMA
CLERK OF COURT
HUBERT M. HALL, JUDGE

EVELYN ELINDA HERLIKOFER
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

JAMES ROBERT HERLIKOFER
RESPONDENT

IN EQUITY

CASE NO. _____

Personally appeared before me Arthur C. Epperson, Attorney of Record for complainant in the above styled cause, who being duly sworn, deposes and says, that he is informed and verily believes that JAMES ROBERT HERLIKOFER, the respondent in the above styled cause, is a nonresident of Baldwin County, Alabama, or conceals himself so that process can not be served, and whose residence and post office address is 2720 West Belden Ave., Chicago, Ill., and c/o TW Airlines, Midway Airport, Chicago, Ill., and that said respondent is in the belief of affiant over twenty-one years of age.

Arthur C. Epperson

Affiant.

Sworn to and subscribed before me, this 27th day of March, 1957.

Alice J. Duck

Alice J. Duck, Register
Circuit Court.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

EVELYN ELINDA HERLIKOFER
COMPLAINANT

VS.

JAMES ROBERT HERLIKOFER
RESPONDENT

AFFIDAVIT OF NONRESIDENCE

ARTHUR C. EPPERSON
Attorney at Law
Foley, Ala.

FILED

MAR 28 1957

ANDRE A. BUCK, *Recy*

EVELYN ALIDA HERLIKOFER)
Complainant)
)
VS.)
)
James Robert Herlikofer)
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:

Comes your complainant Evelyn Alida Herlikofer and amends her
Bill of Complaint hereto filed in this cause as follows:

1. That the complainant is over the age of twenty-one
years of age and is a bona fide resident of said State and County;
that James Robert Herlikofer is over the age of twenty-one years
and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully
married on or about to-wit: June 12th, 1948, in Bethlehem,
Pennsylvania, and of this marriage there are two minor children,
Diana Evelyn Herlikofer, seven years old, and Michael Wayne
Herlikofer, three months old, dependents upon the respondent.

3. Your complainant avers and charges that 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 or health.

4. That complainant and respondent have entered into an
agreement with reference to the custody, control, support and
maintenance of the said minor children, a copy of which is hereto
attached as Exhibit "A", and made a part hereof; and by the terms
of which agreement the complainant shall have the care, control
and custody of said minor children, the respondent will pay to
the complainant \$60.00 a month for the support and maintenance of
the said minor children.

Complainant avers that this is a reasonable, just and
proper agreement and prays the Court that in the event a decree
of divorce is given in this cause that the Court will decree that
the parties keep and abide by the terms of said agreement.

The premises considered, your complainant makes the said
James Robert Herlikofer a party respondent to this Bill of
Complaint and in order that complainant may have the relief here-
in prayed for may it please your Honor to cause the State's writ
of subpoena to be issued, directed to the said James Robert
Herlikofer, commanding him to answer, plead or demur to this Bill
of Complaint, within the time required by law; and that on a
final hearing of this cause, that your Honor will enter a decree
divorcing your complainant from the said respondent; and that
your Honor will grant such other further and different relief as
unto your Honor may seem just and proper, and your complainant
will ever pray.



Solicitor for Complainant

Exhibit "A"

STATE OF ALABAMA

BALDWIN COUNTY

THIS AGREEMENT made and entered into on this the Eighth day of June, 1957, by and between Evelyn Alida Herlikofer, hereinafter referred to as the party of the first part, and James Robert Herlikofer, hereinafter referred to as the party of the second part.

WITNESSETH:

WHEREAS, the parties hereto have been husband and wife since June 12, 1948, and as a result of such union have two minor children, Diana Evelyn Herlikofer, seven years old, and Michael Wayne Herlikofer, three months old, and,

WHEREAS, the parties have been separated and living apart for over several months and have definitely concluded that it is impractical for them to live together as man and wife, and,

WHEREAS, the party of the first part has brought action for a divorce and it is the desire to settle the matter of the care, control, support and maintenance of the said minor children of the marriage without litigation, however, it shall be thoroughly understood that the party of the second part denies and expects to continue to deny that she is in any way entitled to a divorce, and in the event the court, upon hearing, should decide that the party of the first part is entitled to a divorce, then it is agreed and understood that this agreement and all of its terms shall be submitted to the court for its approval, and shall not be executed until and unless the court does approve the same.

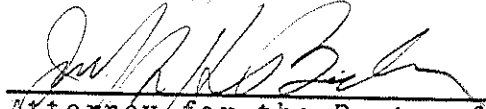
NOW, THEREFORE, in consideration thereof, and of the mutual agreements hereinafter made, they have mutually agreed to the following terms and conditions:

1. That the care, control and custody of the said minor children be in the mother, the party of the first part, with rights of visitation at reasonable times and places in the father, the party of the second part, and that the party of the second part will pay to the party of the first part for the support and maintenance of the said minor children, the sum of SIXTY DOLLARS (\$60.00) per month due and payable on or before the fifth day of each and every month.
2. The party of the second part agrees to pay to the party of the first part's attorney the sum of ONE HUNDRED DOLLARS (\$100.00) for his representation of the party of the first part in the present litigation.
3. That, other than the aforementioned, each of the parties hereto waive any and all rights or claims to alimony, past, present, and future, homestead and dower, property rights, real, personal, or mixed, or any other rights of any kind, nature or description arising out of the marital relationship, or otherwise.

THIS AGREEMENT has been made and executed by the parties hereto in good faith on the day and date hereinabove set forth, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.


Attorney for the Party of
the First Part.


Party of the First Part.


Attorney for the Party of
the Second Part.


Party of the Second Part.

Equity 4002

Amended Complaint

And
Exhibit A.

FILED
AUG 13 1957
ALICE L. BUCK, Register

STATE OF ALABAMA)
) SS.
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF BALDWIN COUNTY

IN EQUITY

EVELYN ELINDA HERLIKOFER,)
)
 Complainant,)
 vs.) No. 4002
 JAMES ROBERT HERLIKOFER,)
)
 Respondent.)

ANSWER TO AMENDED COMPLAINT OF
EVELYN ELINDA HERLIKOFER

NOW COMES respondent, JAMES ROBERT HERLIKOFER,
answering the Amended Complaint heretofore filed by EVELYN ELINDA
HERLIKOFER, and states as follows:

1. That he admits the complainant is over the age of twenty-one years and is a bonafide resident of the State of Alabama, Baldwin County, and admits that this respondent is over the age of twenty-one years but denies that he is a resident of Baldwin County, Alabama, as alleged in Paragraph One (1) thereof.
2. That he admits the allegations in Paragraph Two (2) thereof.
3. That he denies the allegations in Paragraph Three (3) thereof.
4. That he admits the allegations in Paragraph Four (4) thereof.

THIS RESPONDENT further states that he waives Notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final Decree.

JAMES ROBERT HERLIKOFER, Respondent

BY: JOSEPH H. AND NORMAN BECKER
His Attorneys

Per 
JOSEPH H. BECKER

EVELYN ALIDA HERLIKOFEK)
Complainant)
VS.)
JAMES ROBERT HERLIKOFEK)
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:

Comes your complainant Evelyn Alida Herlikofer, and amends her
bill of complaint hereto filed in this cause as follows:

1. That the complainant is over the age of twenty-one
years of age and is a bonafide resident of said State and County;
that James Robert Herlikofer is over the age of twenty-one years
and is a resident of Baldwin County, Alabama.

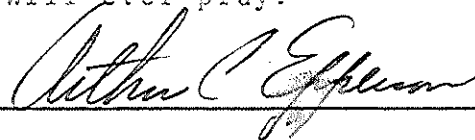
2. That your complainant and respondent were lawfully
married on or about to-wit: June 12, 1948, in Bethlehem,
Pennsylvania, and of this marriage there are two minor children,
Diana Evelyn Herlikofer, seven years old, and Michael Wayne
Herlikofer, three months old, dependents upon the respondent.

3. Your complainant avers and charges that 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 or health.

4. That complainant and respondent have entered in-to
an agreement with reference to the custody, control, support and
maintenance of the said minor children, a copy of which is here-
to attached as Exhibit A. and made a part hereof; and by the
terms of which agreement the complainant shall have the care,
control and custody of said minor children, the respondent will
pay to the complainant \$60.00 a month for the support and
maintenance of the said minor children .

Complainant avers that this is a reasonable, just and
proper agreement and prays the Court that in the event a decree of
divorce is given in this cause that the Court will decree that
the parties keep and abide by the terms of said agreement.

The premises considered, your complainant makes the said
Bennie McComb a party respondent to this bill of complaint, and
in order that complainant may have the relief herein prayed for,
may it please your Honor to cause the State's writ of subpoena to
be issued, directed to the said James Robert Herlikofer, commanding
him to answer, plead or demur to this bill of complaint, within the
time required by law; and that on a final hearing of this cause,
that your Honor will enter a decree divorcing your complainant from
the said respondent; and that your Honor will grant such other,
further and different relief as unto your Honor may seem just
and proper, and your complainant will ever pray.



Solicitor for Complainant

STATE OF ALABAMA)
) SS.
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF BALDWIN COUNTY
IN EQUITY

EVELYN ELINDA HERLIKOFER,)
)
 Complainant,)
 vs.) No. 4002
 JAMES ROBERT HERLIKOFER,)
)
 Respondent.)

ANSWER TO COMPLAINT OF EVELYN ELINDA HERLIKOFER

NOW COMES respondent, JAMES ROBERT HERLIKOFER, answering the Complaint heretofore filed by EVELYN ELINDA HERLIKOFER, and states as follows:

1. That he admits that the complainant is over twenty-one years of years, and further admits that this respondent is over twenty-one years of age, as alleged in Paragraph One (1) thereof.

That he neither admits nor denies that the complainant is a bona fide resident of said State and County, he having no knowledge thereof.

That this respondent denies that he is a resident of Baldwin County, Alabama, as alleged in Paragraph One (1) thereof.
2. That this respondent admits that he and the complainant were lawfully married on or about June 12, 1948, at Bethlehem, Pennsylvania, and further admits that two minor children were born unto the parties hereto, namely, DIANA EVELYN HERLIKOFER, seven years of age, and MICHAEL WAYNE HERLIKOFER, three months of age, and admits they are dependents upon this respondent, as alleged in Paragraph Two (2) thereof.
3. That this respondent denies that he has made numerous threats of doing complainant physical harm, and further denies that he will commit actual violence upon her person with danger to her life or health, as alleged in Paragraph Three (3) thereof.
4. That this respondent admits that he is employed, but denies that he is making about \$100.00 a week, as alleged in Paragraph Four (4) thereof.

That this respondent neither admits nor denies that the complainant owns no property and has no means of support for herself and minor children, he having no knowledge thereof.

That this respondent denies that he has refused and failed to provide for the support and maintenance of the complainant and said minor children, as alleged in Paragraph Four (4) thereof.

That this respondent neither admits nor denies that the complainant is without means to pay her solicitor of record for his services rendered and to be rendered in this suit, as alleged in Paragraph Four (4), he having no knowledge thereof.

WHEREFORE, this respondent prays that each and every prayer of the complainant's Complaint be denied; that complainant's Complaint be dismissed for want of equity and complainant take naught by her suit.

JAMES ROBERT HERLIKOFER, Respondent

BY: JOSEPH H. AND NORMAN BECKER
His Attorneys

Per



JOSEPH H. BECKER

EVELYN ELINDA HERLIKOFER
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

JAMES ROBERT HERLIKOFER
RESPONDENT

IN EQUITY

CASE NO. _____

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

Your complainant EVELYN ELINDA HERLIKOFER respectfully represents and shows unto your Honor:

1. That the complainant is over the age of twenty-one years of age and is a bona fide resident of said State and County; that James Robert Herlikofer is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about to-wit; June 12, 1948, in Bethlehem, Pennsylvania, and of this marriage there are two minor children, Diana Evelyn Herlikofer, seven years old, and Michael Wayne Herlikofer, three months old, dependents upon the respondent.

3. Your complainant avers and charges that 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 or health.

4. Complainant avers that respondent is employed and making about \$100.00 a week; That the complainant owns no property and has no means of support for herself and minor children; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor children; 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 children, 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 children, 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 children, permanent alimony for her support and maintenance and support and maintenance for said minor children, and that your Honor will order, permanent attorney fees for the sum of \$250.00 for her attorney of record; your complainant prays for each other, further or general relief to which she may be entitled.

RESPONDENT'S ADDRESS:
2720 West Belden Ave.
Chicago, Ill.,

-or-

c/o TW Airlines
Midway Airport
Chicago, Ill.,


SOLICITOR FOR COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

CASE NO. 4002

EVELYN ELINDA HERLIKOFER
COMPLAINANT

VS.

JAMES ROBERT HERLIKOFER
RESPONDENT

Complaint

ARTHUR C. EPPERSON
Attorney at Law
Foley, Ala.

FILED

MAR 28 1957

ALICE J. DUCK, Clerk

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 4002

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James Robert Herlikofer

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-----

James Robert Herlikofer

-----, Defendant-----

by Evelyn Elinda Herlikofer

-----, Plaintiff-----

Witness my hand this 28th day of March 1957

Ellis J. Newcomb-----, Clerk

No. 4002

Page

The State of Alabama
Baldwin County

CIRCUIT COURT

EVELYN ELINDA HERLIKOFER

Plaintiffs

vs.

JAMES ROBERT HERLIKOFER

Defendants

Summons and Complaint

Filed 3/28/57 19

Alice J. Duck Clerk

Arthur C. Epperson

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

, Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

EVELYN ALIDA HERLIKOFER)
COMPLAINANT)
)
VS.)
JAMES ROBERT HERLIKOFER)
RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

This cause coming on to be heard was submitted upon Bill of Complaint, answer and waiver of Respondent and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ORDERED, ADJUDGED and DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Evelyn Alida Herlikofer is forever divorced from the said James Robert Herlikofer.

Upon consideration of the written agreement entered into between the Complainant and Respondent touching the custody of the said minor children of the marriage and alimony for support of said minor children, it is further ORDERED, ADJUDGED and DECREED by the Court as follows:

A: That said written agreement is hereby ratified and approved, and the care, custody and control of the minor children of the marriage, namely, Diana Evelyn Herlikofer and Michael Wayne Herlikofer, is awarded to the mother, the Complainant.

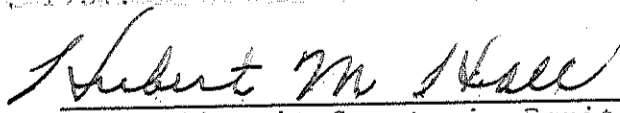
B: That James Robert Herlikofer pay over to Evelyn Alida Herlikofer the sum of sixty dollars (\$60.00) per month as alimony for the support and maintenance of said minor children, said payments to begin immediately and be payable on or before the 5th day of each month.

It is further ORDERED, ADJUDGED and DECREED that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ORDERED that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ORDERED that Evelyn Alida Herlikofer the Complainant pay the cost herein to be taxed, for which execution may issue.

This 13 day of August, 1957.



Judge Circuit Court, in Equity

I, _____, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19____.

Register of Circuit Court, in Equity