

4609

BETTY JO FLOWERS MIDDLETON,		IN THE CIRCUIT COURT OF
Complainant		BALDWIN COUNTY, ALABAMA
-vs-		IN EQUITY:
JAMES W. MIDDLETON,		
Respondent.		NO. _____

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they were married to each other on January 28, 1957 in Lucedale, Mississippi. Both the Complainant and the Respondent are each over the age of twenty-one years. Both the Complainant and the Respondent are bona-fide resident citizens of the State of Alabama and have been such for more than one year next preceding the filing of the Bill of Complaint herein. There are no children as issue of their marriage. Complainant's maiden name was Betty Jo Flowers.

TWO

Respondent has committed actual violence upon the person of the Complainant attended with danger to her life or health, or from his conduct there is reasonable apprehension of such violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of this cause, will make the said James W. Middleton, party-respondent hereto, and will cause him to appear, plead, answer or demur hereto within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant prays that in the event she is granted a divorce herein that she be permitted to resume the use of her maiden name Betty Jo Flowers, and Complainant further prays for such other, further and different relief as in equity she may be due, and as in duty bound she will ever pray, etc.

  
SOLICITOR FOR COMPLAINANT.