

RITA MOORE BOLLING,

Complainant

VS

RAY BOLLING,

Respondent

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*
*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
CASE NO. 4047

Comes Ray Bolling, the Respondent in the above styled cause and appearing specially for the purpose of filing the following Plea in Abatement to the complaint filed in this cause and to each count thereof as follows:

That in accordance with Title 28, Code of Alabama, 1940, Section 28, the venue of this action is improper in that the Respondent, Ray Bolling, is a resident of Mobile County, Alabama, and that the parties to this action resided in Mobile County when the separation occurred.

WHEREFORE, the Respondent prays that this Honorable Court will dismiss this cause for want of proper venue.

Ross Diamond, Jr.
ROSS DIAMOND, JR.
Solicitor for Respondent

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4047

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ray Bolling

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 _____

Ray Bolling, Defendant.....

by Rita Moore Bolling

_____, Plaintiff.....

Witness my hand this 10th day of June 19...57.

King Duck, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

RITA MOORE BOLLING

Plaintiffs

vs.

RAY BOLLING

Defendants

SUMMONS and COMPLAINT

Filed 10th June, 1957

Alice J. Duck, Clerk

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

BILL OF COMPLAINT

RITA MOORE BOLLING,)	
)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
)	
VS:)	BALDWIN COUNTY, ALABAMA
)	
RAY BOLLING,)	IN EQUITY.
)	
RESPONDENT)	

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

Your complainant RITA MOORE BOLLING, respectfully represents and shows unto your Honor:

1. That complainant is over the age of twenty-one years and is a resident citizen of said State and County, and has been a bona fide resident citizen of said State and County for more than one year next preceding the filing of this bill of complaint; that RAY BOLLING 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: the 1st day of May, 1954, at Lucedale, Mississippi.
3. 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; and that respondent failed to support said complainant.
4. Your complainant avers and charges that the said respondent did on or about the 30th day of May, 1956, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; 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.

ROSS DIAMOND, JR.

ATTORNEY AT LAW

426 FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

TELEPHONE ME 8-1261

July 17, 1957

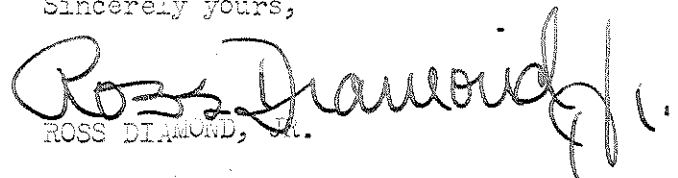
Mrs. Alice J. Duck, Clerk
Circuit Court, In Equity
Courthouse
Bay Minette, Alabama

Re: ~~Rita Moore Bolling~~
vs
Ray Bolling
In Equity No. 4047

Dear Mrs. Duck:

I represent Ray Bolling, the Respondent in the above entitled action. Enclosed I am forwarding the original and one copy of Plea in Abatement to the Complaint as filed. I will appreciate it if you will accept this for filing.

Sincerely yours,

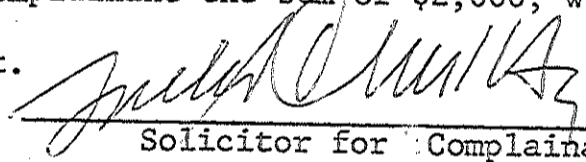

ROSS DIAMOND, JR.

RDjr:gb

That complainant avers that she is a teacher in the public schools and that during her marriage to respondent, she and the respondent had a joint bank account; that the respondent, at the time he abandoned the complainant, withdrew this account, which amounted to approximately TWO THOUSAND & 00/100 DOLLARS (\$2,000), most of which was deposited by your complainant.

The premises considered, your complainant makes the said RAY BOLLING 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 RAY BOLLING, 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 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.

Your complainant further prays that your Honor will order and decree that respondent pay to the complainant the sum of \$2,000, withdrawn from their joint bank account.


Solicitor for Complainant