

Eugene O. Terwilliger  
Complainant

vs

Dorothy Hastings Terwilliger  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 4058

Comes now the Respondent in the above styled cause and demurrs to the Complainant's Bill of Complaint and for grounds thereof says:

1.

That the Complaint fails to state a cause of action.

2.

That the Complaint fails to allege that the Respondent became an addict to habitual drunkenness after their marriage on the 21 day of March, 1953.

Wilters & Brantley

BY:

*Garry J. Wilters, Jr.*

*Comes now the Respondent's attorney and withdraws the above demurr.*

*Sept 11, 1957*

*Garry Wilters*

Eugene O. Terwilliger

Complainant

vs

Dorothy Hastings Terwilliger

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 4058

**FILED**

JUL 20 1957

**ALICE J. DUCK, Register**

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

September 5, 1957

Mrs. Alice J. Duck  
Register in Equity  
Bay Minette, Alabama

Dear Mrs. Duck:

Please send me a cost bill in the case of Eugene O.  
Terwilliger vs Dorothy Hastings Terwilliger, Equity No.4058.

Thank you.

Sincerely,

  
James A. Brice

JAB:ecg

JAMES A. BRICE

ATTORNEY AT LAW  
FOLEY, ALABAMA


June 18, 1957

Mrs. Alice J. Duck  
Register in Equity  
Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing a summons and complaint in the case of Eugene O. Terwilliger vs. Dorothy Hastings Terwilliger, divorce. Mrs. Terwilliger is now residing at the home of her aunt, Mrs. Maggie Byrd, at Robertsdale, Alabama. Your prompt attention and assistance in this matter will be greatly appreciated.

Sincerely,



JAMES A. BRICE

JAB:ss

encl-as noted

SUMMONS

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

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon Dorothy Hastings Terwilliger to appear and plead, answer or demur, within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Eugene O. Terwilliger, as complainant, against Dorothy Hastings Terwilliger as respondent.

Witness my hand this 19 day of June, 1957.

Archie J. Wauke  
Register

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COMPLAINT

Eugene O. Terwilliger )  
Complainant ) IN THE CIRCUIT COURT OF  
vs. ) BALDWIN COUNTY, ALABAMA  
Dorothy Hastings Terwilliger )  
Respondent ) IN EQUITY

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE SAID COURT IN EQUITY SITTING:

Your complainant, Eugene O. Terwilliger, respectfully avers and shows unto your Honor and the court as follows:

1. That your complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, and has been such for more than one year next before the filing of this complaint; that the respondent, Dorothy Hastings Terwilliger, is over the age of twenty-one years, and is a bona fide resident citizen of Baldwin County, Alabama, and has been such for a period of more than one year next before the filing of this complaint.

2. That your complainant and the said respondent inter-married in Lucedale, Mississippi, on, to-wit: March 21, 1953, and ever since have been and are now husband and wife.

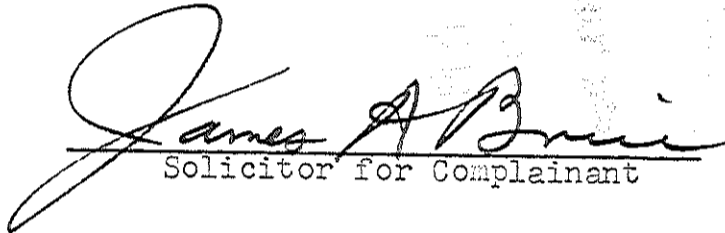
3. Your complainant further avers that since the said marriage, the said respondent, Dorothy Hastings Terwilliger, has become addicted to habitual drunkenness, and that said addiction has continued to the time of filing of this bill of complaint.

PRAYER FOR PROCESS

The premises considered, your complainant prays that the said respondent be made party respondent to this complaint and to this end, that notice may be given to her in the manner and form prescribed by law requiring her to answer this complaint or that the same be taken as confessed against her.

PRAYER FOR RELIEF

The premise considered, your complainant prays that upon a final hearing of this cause, your Honor will make and enter a decree, divorcing the bonds of matrimony now existing between complainant and respondent. And should your complainant be mistaken in the relief prayed for, that your Honor will grant such other, general and necessary relief as the complainant would in duty pray.

  
Solicitor for Complainant

24  
14

4058

ed. 19 day of June 1957.

21 day of June 1957

ed a copy of the within Summons

Dorothy Hastings Terwilliger

vice on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By Robert Robb D. S.

Robb

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY Stadham  
DEPUTY SHERIFF

Eugene B. Terwilliger

Dorothy Hastings Terwilliger

FILED

JUN 19 1957

ALICE J. DUCK, Register

Lives with  
Mrs. Maggie Byrd  
Robertsdale