

48661

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons MARVIN ROBERTSON 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 BONNIE OWENS ROBERTSON, as Complainant and against MARVIN ROBERTSON, as Respondent.

Witness my hand this the 21 day of June, 1957.

Alice O. Duck
Register 98

BONNIE OWENS ROBERTSON	∅	
COMPLAINANT	∅	IN THE CIRCUIT COURT OF
VS	∅	BALDWIN COUNTY, ALABAMA,
MARVIN ROBERTSON	∅	IN EQUITY
RESPONDENT	∅	

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

Your Complainant, Bonnie Owens Robertson, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is seventeen years of age and the Respondent is twenty-six years of age and are bona fide resident citizens of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on July 22, 1954, and lived together as husband and wife in Baldwin County, Alabama.

3.

That on, to-wit, June 18, 1957, and on various occasions prior thereto, the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent one child: Marilyn Robertson, age eighteen months; that your Complainant is a fit and proper person to have the care, custody and control of her minor child;

5.

The Complainant avers that the Respondent is an abled bodied man and is presently earning a salary of Sixty (\$60.00) Dollars per week.


6.

That the Complainant has employed the firm of Wilters and Brantley to represent her in this matter of divorce and has no means of paying them for their services.

WHEREFORE: the premised considered, your Complainant prays that Your Honor will by proper process make the said Marvin Robertson party Respondent to this Bill of Complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practices of this Honorable Court.

Your Complainant further prays that on a final hearing of this cause, your Honor will enter a decree granting your Complainant a divorce from the Respondent and granting her the right to remarry; your Complainant further prays that Your Honor will by said decree grant her the permanent care, custody and control of her minor child, Marilyn Robertson; Your Complainant further prays that Your Honor will order the Respondent to pay the Complainant support money for his minor child; Your Complainant further prays that the Court will ascertain a reasonable attorneys fee to be paid the firm of Wilters and Brantley for representing the Complainant in this cause and cause the Respondent to pay the same, together with the cost of this proceedings. Your Complainant further prays for such other, further or different relief to which the Complainant may in equity be entitled.

Wilters & Brantley

BY: 
Solicitors for the Complainant

4-061

BONNIE OWENS ROBERTSON
COMPLAINANT
VS
MARVIN ROBERTSON
RESPONDENT

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

R. Dale

FILED
JUN 21 1957
ALICE J. DUCK, Register

Received 21 day of June 1957
and on 25 day of June 1957
I served a copy of the within s/e
on Marvin Robertson

By service on _____
TAYLOR WILKINS, Sheriff
By Edleigh Steadham
Robert Dale

~~Pay To The Order Of
ALICE J. DUCK, Clerk
TAYLOR WILKINS, Sheriff
By _____~~

Sheriff claims 50 miles at
Ten Cents per mile Total \$ 5.00
TAYLOR WILKINS, Sheriff
BY Edleigh Steadham
DEPUTY SHERIFF