

BILL OF COMPLAINT

STATE OF ALABAMA,)
BALDWIN COUNTY.)

GLADYS PETERSEN,)
Complainant)
v.)
WARREN J. PETERSEN,)
Respondent)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

To the Honorable H. M. HALL, Judge of the Circuit Court of
Baldwin County,

Sitting in Equity:

Your complainant, Gladys Petersen, 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 com-
plaint; that Warren J. Petersen 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, November 2, 1935, at Crown Point,
Indiana.

3. Your complainant avers and charges that the said
respondent did on or about the 30th day of March, 1957, 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.

4. There was born to said marriage two children, JAN PETERSEN, age 11, and RAMON PETERSON, age 8; That your complainant is a person of good moral character, and is capable of keeping custody of said children; and that it will be to the best interest and welfare of the children to be in the custody of your complainant, their mother.

5. That your respondent is a carpenter by trade, and is steadily employed at a weekly wage of approximately \$110.00 per week; and that your respondent has upon deposit in checking and savings accounts an amount of not less than ONE THOUSAND DOLLARS (\$1000); has two automobiles and one truck, and has real estate consisting of the following:

Approximately 22 acres in the East half ($E\frac{1}{2}$) of the Southeast quarter ($SE\frac{1}{4}$) of Section 22, Township Seven South, Range Six East, which property has three dwelling houses on it; and also a waterfront lot in Section 26, Township 7 South, Range 6 East, which contains 100 feet frontage on Perdido Bay and $3\frac{1}{2}$ acres of land.

The premises considered your complainant prays that your Honor will upon final hearing of this cause decree that the respondent shall:

1. Pay to the Complainant for her care and support, and for the care and support and education for their two children, a suitable sum of not less than \$250.00 per month,

2. A 1955 Chevrolet automobile which is the personal car of your complainant, and which has been used by her for the past several years,

3. \$500.00 in cash as her share of the bank deposits,

4. The 10 acres of land upon which the dwelling houses are located, which is described as:

East half (E½) of West half (W½) of the Southeast Quarter (SE¼) of Section 22, Township 7 South, Range Six East,

and the waterfront lot on Perdido Bay described above.

5. That your complainant ~~is~~ without funds to pay her solicitor's fee, and that your Honor will decree that the respondent will pay the solicitor's fee in the amount of \$250.00 and all court costs involved in said action.

The premises considered, your complainant makes the said Warren J. Petersen 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 Warren J. Petersen, 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, etc.

Walter A. [Signature]
Solicitor for Complainant

Respondent

WARREN J. PETERSEN,

Complainant

GIVDYS PETERSEN,

IN EQUITY

BALDWIN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

FILED
JUN 21 1921
CLERK OF COURT

4002

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

GLADYS PETERSEN,
Complainant

v.
WARREN J. PETERSEN,
Respondent

[Handwritten Signature]
Attorney for Complainant

and your complaint will ever be, etc.

different relief as unto your Honor may seem just and proper,
and that your Honor will grant such other, further and
will enter a decree divorcing you complainant from said respon-
and first on a final hearing of this case, that your Honor
to this bill of complaint within the time required by law;

Warren J. Petersen, commencing him to answer, plead or demur
State, a writ of habeas corpus to be issued, directed to the said
herein prayed for, may it please your Honor to cause the
complaint, and in order that complainant may have the relief
said Warren J. Petersen a party respondent to this bill of

The premises considered, your complainant makes the
\$520.00 and all court costs involved in said action.
respondent will pay the petitioner's fee in the amount of
petitioner's fee, and that your Honor will decree that the
2. That your complaint ~~with~~ without funds to pay for
and the respondent for on herdigo pay described above.

Range Six West,
Quarter (SW) of Section 35, Township 7 South,
East Merit (MP) of West Merit (MP) of the Southern
are located, which is described as:

4. The 10 acres of land upon which the dwelling house

FILED
JUN 24 1957

ALICE L. BUCK, Register

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 4067.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Warren J. Peterson

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 _____

Warren J. Peterson, Defendant

by Gladys Peterson

....., Plaintiff.....

Witness my hand this 24th day of June 1957.....

Alvin J. Duck, Clerk

**THE STATE OF ALABAMA
BALDWIN COUNTY**

CIRCUIT COURT

Plaintiffs

vs.

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., 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

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 4067.....

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Warren J. Peterson _____, Defendant

by Gladys Peterson _____

_____, Plaintiff.....

Witness my hand this 21th day of June 1957.....

King - Clark _____, Clerk

No. Page

**THE STATE OF ALABAMA
BALDWIN COUNTY**

CIRCUIT COURT

vs. Plaintiffs

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

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v.)
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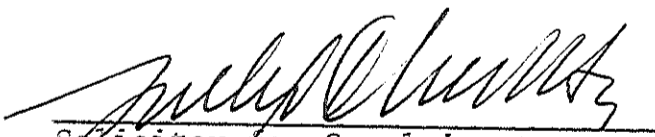
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Solicitor for Complainant