

## Dear Miss Alice:

Please file the enclosed papers.

Sincerely

John

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	v 7 1 · · · · · · · · · · · · · · · · · · ·	Plaintiff's A	ttorney	A profession of the commencers	Taylor Welleris Sheriff			
<del></del>		Defendant's A	ttorney	-	Deputy Sheriff			

Defendant's Attorney

VANDORA HARKINS

Complainant

-VS -

STEPHEN BENNETT HARK INS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

## BILL OF COMPLAINE

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

Your Complainant, VANDORA HARKINS, respectfully shows unto your Honor and this Honorable Court as follows:

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That your Complainant is over the age of twenty-one years, and is a bona fide resident of Baldwin County, Alabama; that the Respondent, STEPHEN BENNETT HARKINS, is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama.

II

That the Complainant and the Respondent were married in Fair-hope, Alabama, on the 6th day of January, 1949, and have lived together as husband and wife in Fairhope, Alabama, until on to-wit; the 3rd day of July, 1958.

III

That the Respondent has become addicted to Habitual Drunkemness after the marriage, which caused the Complainant to leave him.

IV

That there were no children born as fruits of this marriage.

V

That your Complainant further avers that she has no funds out of which to pay a Solicitor for his services for the prosecution of this cause, and that the Respondent is an able bodied man and capable of paying the service heretofore mentioned.

## PRAYER FOR PROCESS AND RELIEF

WHEREFORE, the premised considered, your Complainant prays that the Respondent Stephen BennetttHarkins, be made a party respondent to this cause by the usual writ of process of this

Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and under the statutes and such cases made and provided.

Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from the said Respondent.

Complainant further prays that she Court will fix a reasonsble amount for the Complainant's Solicitor for representing her in this cause, and ordering the Respondent to pay the same.

Complainant prays for all such other further and different relief to which she may be entitled and as in duty bound she will ever pray.

Vandera Harkins
Compleinent

John V. Duck Solicitor for Compleinant