

VERA W. JOYNER	)	IN THE CIRCUIT COURT OF
Complainant	)	BALDWIN COUNTY, ALABAMA,
-VS-	)	IN EQUITY
RUSSEL L. JOYNER	)	
Respondent	)	

BILL OF COMPLAINT

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

Comes your Complainant in the above styled cause, and respectfully shows unto your Honor and this Honorable Court as follows:

I

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

II

That your Complainant and the Respondent were married on December the 23rd, 1946, at Pascagoula, Mississippi, and lived together as husband and wife untill on to-wit; the 14th day of April, 1958.

III

That the Respondent has become addicted to habitual drunkenness after the said date of marriage.

IV

There were born as fruits of this marriage three children, Russell Joyner Jr., age eleven years, Linda Joyner, age nine years, and William Joyner, age five years; that the said minor children have been and are now living with your Complainant, and she is a fit and proper person to have their permanent care, custody and control; that the Respondent is an able bodied man, capable of supporting the heretofore mentioned minor children.

That the Complainant and the Respondent own the following described property jointly:

Lot eleven(11), Block 33, Division 2 of the lands of the Fairhope Single Tax Corporation as per its plat thereof filed for records Sept. 13, 1911 and Executive Council actions of April 19, 1926, May 20, 1929, March 15, 1945, and April 5, 1949.

From the Northeast corner of Government Subdivision No. 8 of Fractional Section 31, Township 6 South, Range 2 East, run West along the Grand Hotel fence 1184 feet and South 74 feet to a cement post marking the Grand Hotel Property, for the beginning corner; thence run South 844.4 feet to an iron pipe corner; thence run West 414 feet, along the old fence on the Packer North line, to an old fence corner; thence run North 800 feet to a cement post on the Grand Hotel property line; thence run East 418 feet to the Beginning corner, being the property formerly owned and occupied by Charles Henry. The said tract contains 7.8 acres, more or less, and lies in Government Subdivision No. 7 and 8 of Fractional Sections 31, Township 6 South, Range 2 East, in accordance with the plat of survey of February 25, 1952, by H. W. Graham, Surveyor.

Your Complainant further avers that the Complainant and the Respondent own jointly the following described property.

Lot 11, Block 33, division 2, of the land of the Fairhope Single Tax Corporation, in the Town of Fairhope, Alabama, as per its plat thereof, filed for records Sept. 13, 1911, and executive council actions of April 19, 1926, May 20th, 1929, March 15th, 1944, and April 5, 1949. Fractional Section 18, Township 6 South, Range 2 East, Baldwin County, Alabama, located on Nichols Street of Fairhope, Alabama. That this above described property now has an outstanding mortgage with the Baldwin County Savings and Loan Association and the balance due under the said mortgage is Seventeen Hundred (\$1,700.00) Dollars,

The Complainant further avers that the Complainant and the Respondent have a leasehold interest in the following described property.

Lot number 1-A, of the replat of Lot 1 of Bay Ridge Subdivision, Section 7, Township 5 South, Range 2 East, Baldwin County, Alabama, according to map recorded in Map Book 4, page 150 in the office of the Judge of Probate of Baldwin County, Alabama, and subject to restrictions on said map.

Plaintiff further avers that the leasehold interest in the above described property is for a period of five years and that there is a service station located on the property and that the Respondent is now operating the said service station and from

the profits of the said service station is not supporting the Complainant nor the heretofore mentioned minor children.

PRAYER FOR PROCESS AND RELIEF

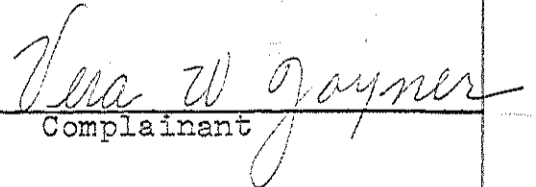
Wherefore the premises considered, your Complainant prays that the Respondent Russel L. Joyner, be made a party Respondent to this cause by the usual writ of process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and statutes in such cases made and provided.

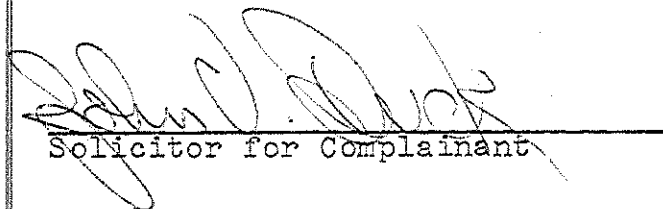
Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from the said Respondent.

Your Complainant further prays that this Court will ascertain and fix a reasonable sum of money to be paid by the Respondent to the Complainant for the support of the minor children, Russell L. Joyner Jr., Linda Joyner, and William Joyner; and that your Honor will order the Respondent to convey to the Complainant in lieu of Alimony the above described property on Nichols Street; and your Complainant will assume the balance of the Seventeen Hundred (\$1,700.00) Dollars mortgage owing to the Baldwin County Savings and Loan Association.

Your Complainant further prays that your Honor will also decree that the Complainant be allowed to remarry if she sees fit.

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

  
Complainant

  
Solicitor for Complainant

VERA E. JOYNER

Complainant

-VS-

RUSSEL L. JOYNER

Respondent

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

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BILL OF COMPLAINT

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon RUSSEL L. JOYNER

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-----

Russel L. Joyner-----

Defendant-----

by-----

Vera W. Joyner-----

Plaintiff-----

Witness my hand this-----

16

day of-----

Aug 1958

Aring Duck

-----, Clerk

The State of Alabama  
Baldwin County

CIRCUIT COURT

VERA W. JOYNER

Plaintiffs

vs.

RUSSEL L. JOYNER

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_  
**FILED**  
AUG 16 1958 Clerk

**ALICE I. DICK, Register**

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at  
Park City Service Station  
Between Daphne & Spanish Ft.

Received In Office

8-16-57 1957

\_\_\_\_\_, Sheriff

I have executed this summons

this 18 Aug 1958

by leaving a copy with

Russel L Joyner

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY Leiser S.  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Leiser S. Deputy Sheriff

at Park City