

(4377)

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. ....

Fall

TERM, 1958.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Rondol Brown

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 Rondol Brown

Defendant .....

by Dolores Coleman Brown, a minor, by her next friend, Viola E.

Coleman

Plaintiff .....

Witness my hand this

day of

Sept.

1958

\_\_\_\_\_, Clerk

**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

this ....., 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

DELORES COLEMAN BROWN, a  
minor, by her next friend,  
VIOLA E. COLEMAN,

Complainant

vs.

RONDOL BROWN,

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

EQUITY No. \_\_\_\_\_.

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,  
AND TO THE HONORABLE H. M. HALL, JUDGE THEREOF;

Now comes your complainant, by her solicitor, and shows  
unto your Honor and unto this Honorable Court the following:

1. That the complainant is a minor, seventeen(17)years  
of age, who resides in Baldwin County, Alabama; that the  
said Viola E. Coleman, who brings this action as next friend,  
is the mother of the complainant, and is a resident of Baldwin  
County, Alabama, and is over the age of twenty-one(21) years;  
that the said respondent, Rondol Brown, is a resident of  
Baldwin County, Alabama, and is over the age of twenty-one  
(21)years.

2. That the complainant and the respondent were married  
on or about July 16, 1958, in Pascagoula, Mississippi, and  
that they lived together as man and wife, in Baldwin County,  
and in Mobile County, Alabama, until the matters complained  
of hereinafter; that on or about September 6, 1958, the res-  
pondent struck the complainant, and bruised her arms and face,  
and hit her in the throat until she became ill; that he struck  
her in the ribs, and that as a result of the violence of the  
respondent, the complainant had a reasonable apprehension that  
if she continued to live with the respondent, her life and  
health would be in danger; that on account of such matters,  
the complainant left the respondent.

3. That there have been no children born to the complainant  
and the respondent; that the complainant has no money with  
which to secure the services of an attorney, and that such  
services are necessary in order to bring this action; that  
she has secured the services of J. Connor Owens, Jr., a  
licensed attorney in Bay Minette, Alabama, as her solicitor

in this cause.

PRAYER FOR PROCESS

The premises considered, your complainant respectfully prays that the above named Rondol Brown 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 the Statutes in such cases made and provided.

PRAYER FOR RELIEF

The premises considered your complainant respectfully prays that upon final hearing of this cause that your Honor will enter an order divorcing your complainant from the respondent; further that your Honor will also enter an order allowing the Complainant to remarry if she sees fit; that your Honor will also fix and make and allow a reasonable attorney's fee for the services of her solicitor, and that the respondent be charged with the same. Should your complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound, she will ever pray.

*J. Lewis Owens, Jr.*  
Solicitor for Complainant

Baldwin C.

Rondol Brown  
of J.C. Brown  
Cedar Point Rd.  
P.O. Box 863.

Rt. Mohle  
P.O.

FILED  
SEP 12 1958

MISS A. DUGAN

✓

*[Handwritten signature]*

RECEIVED

The premises considered your complimentary respectfully  
Responding to this series by the usual with of process of  
this Honorable Court regarding him to appear and plead

the said series.

SUMMONS AND COMPLAINT

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BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

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by Dolores Coleman Brown, a minor, by her next friend, Viola E.

Coleman

\_\_\_\_\_, Plaintiff .....

Witness my hand this \_\_\_\_\_ day of Sept. 19 58

\_\_\_\_\_, Clerk



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minor, by her next friend,  
VIOLA E. COLEMAN,

Complainant

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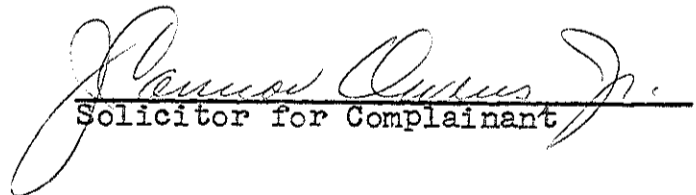
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Solicitor for Complainant