

ANNIE LAURA CAMPBELL
COMPLAINANT
VS
ROBERT RICHARD CAMPBELL
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
NUMBER: _____

4400

.-.-;.-.-.

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

Comes now your Complainant Annie Laura Campbell and shows to Your Honor
as follows:

I

That she is over the age of 24 years and is and has been a bona fide
resident of Bay Minette, Baldwin County, Alabama for more than one year next
preceding the filing of this complaint; that Respondent Robert Richard Campbell
is over the age of 21 years and was last known to reside at 3973 Sarpy Avenue,
St. Louis, Missouri.

II

That Complainant and Respondent were married on January 9, 1953 in
Pascagoula, Mississippi and that they lived together as husband and wife until
October 1, 1957.

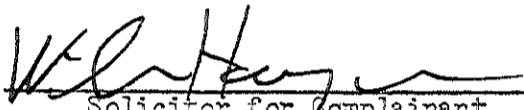
That Complainant and Respondent had two children, Patrica Ann Campbell
age 3 years and 9 months and Richard Wayne Campbell age 2 years; that Complainant
is a fit and proper person to have custody of the said children and that
Respondent is not a fit and proper person to have custody.

III

That on to-wit October 1, 1957 and many times before that and more than
two years next preceding October 1, 1957 Respondent committed actual violence
to the person of Complainant by striking her about the face and body with his
hands and fists, thereby breaking her nose, bruising her face and body and
making her ill wherefore she was compelled to be hospitalized, that he made
threats to beat her and kill her and that she believed and does believe that he
would carry out his threats; all attended with danger to her life and health
and that from his conduct and threats toward her as aforesaid there was and is
grave danger that he will committ further violence attended with danger to her
life and health; that he drove her from their home with his threats and abuse,
both physical and mental and that they have not lived together since that time.

Now therefore, the premises considered the Complainant prays that Your Honor Court will cause process to issue to the said Respondent, Robert Richard Campbell requiring him to plead, answer or demur to same within the time allowed by law.

And Complainant further prays that upon final hearing of this cause Your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between Complainant and Respondent, granting to Complainant the custody of the said minor children Patrica Ann Campbell and Richard Wayne Campbell, granting her alimony and support in keeping with her station in life and that Your Honor will grant such other, further different or general relief to which Complainant may be in equity and good conscience entitled.


Solicitor for Complainant
Annie Laura Campbell
Mrs. Anne Campbell

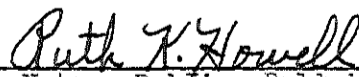
STATE OF ALABAMA

BALDWIN COUNTY

Before me Ruth K. Howell, a Notary Public in and for said County and State personally appeared Annie Laura Campbell, who being known to me, and by me duly sworn, deposes and says on oath: That she is the Complainant in the above styled cause, and has personal knowledge of the facts stated in the foregoing plea and that the said statements of fact therein contained are true.

Annie Laura Campbell
Mrs. Anne Campbell

Sworn to and subscribed before me on this the 11th day of October, 1958,


Notary Public, Baldwin County, Ala.

ANNIE LAURA CAMPBELL
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RESPONDENT

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W. L. Hay
Solicitor for Complainant
Annie Laura Campbell
Mrs. Anne Campbell

STATE OF ALABAMA
BALDWIN COUNTY

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Mrs. Anne Campbell

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Ruth K. Howell
Notary Public, Baldwin County, Ala.

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OCT 17 1958

FILED

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