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STATE OF ALABAMA, 0
 0 TO ANY SHERIFF OF THE STATE OF ALABAMA
-COUNTY OF BALDWIN. 0

You are hereby commanded to summon JIMMY ZIGLAR to appear and plead, answer or demur, within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by CHARLOTTE MARIE ZIGLAR, as complainant, against JIMMY ZIGLAR, as Respondent.

WITNESS my hand this 28 day of October, 1958.

Ed. 11-1-58

Alfred K. ...
REGISTER

CHARLOTTE MARIE ZIGLAR, 0
 0 IN THE CIRCUIT COURT OF
Complainant, 0 BALDWIN COUNTY, ALABAMA.
VS. 0
 0 IN EQUITY. NO. _____
JIMMY ZIGLAR, 0
Respondent, 0

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

Your complainant, CHARLOTTE MARIE ZIGLAR, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your complainant is over the age of twenty years and is a bona fide resident of the State of Alabama, residing in Baldwin County; that the respondent is over the age of twenty-one years and is a bona fide resident of the State of Alabama.
2. That your complainant and the respondent married at Leakesville, Mississippi, on December 31, 1953, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit: the 26th day of October, 1958.
3. That on to-wit: the 26th day of October, 1958, and on many prior occasions, the respondent did assault, beat, hit, and strike the complainant; that he blacked her left eye, bruised her back severely and scratched her arm; that approximately three weeks ago he beat your complainant so severely that she was forced to have a warrant issued for his arrest; that the respondent has committed actual violence on the person of your complainant attended

with danger to her life and health; and that your complainant is reasonably convinced that should she continue to live with the respondent as his wife, he would commit further actual violence on her person which would necessarily endanger her life or health.

4. That there was born to the marriage between the complainant and the respondent, three children, JAMES ZIGLAR, age four years, SHIRLEY ZIGLAR, age two years, and VIVIAN ZIGLAR, age seven months; that your complainant is a fit and proper person to have the care, custody, and control of said minor children; that the respondent is not a fit and proper person to have the care, custody, and control of said minor children; and that it is to the best interest of said children that they be left in the custody, and under the control, of their mother, your complainant.

5. That your complainant has no income and is without means to support herself and her minor children; that because of their tender years, it is impossible for your complainant to work outside the home to support them; that the respondent is a healthy, able-bodied man and well able to work and earn money; that he is an operator of bull-dozers and other heavy equipment and, when he works, earns seventy to one-hundred dollars per week; and that said respondent is well able to provide for the needs of your complainant and their minor children.

6. That your complainant is without funds with which to pay her Solicitor for his services rendered and to be rendered in this cause, and that she has employed Telfair J. Mashburn, Esq., as her Solicitor in this cause.

PRAYER FOR PROCESS

WHEREFORE, THE PREMISES CONSIDERED, your complainant makes the said JIMMY ZIGLAR party respondent to this her bill of complaint and in order that complainant may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said JIMMY ZIGLAR, commanding him to plead, answer or demur to this bill of complaint, within the time required by law.

PRAYER FOR RELIEF

Your complainant further prays that on a final hearing of this cause your Honor will make and enter a decree granting her the following separate and several relief:

1. Forever divorcing her from said respondent.
2. Giving her the care, custody and control of their minor children, named in paragraph 4 of this complaint.
3. Fixing a reasonable sum for the respondent to pay to your complainant monthly as alimony and for the support and maintenance of their minor children.
4. Fixing a reasonable sum for respondent to pay to complainant's Solicitor, Telfair J. Mashburn, for his services in this cause.

And if your complainant be mistaken in the relief to which she is entitled, then she prays for such other, further, different or general relief as in equity and good conscience she may be entitled to receive; and, as in duty bound, she will ever pray, etc.

Telfair J. Mashburn
SOLICITOR FOR COMPLAINT