

4432

KATHLEEN PERRY,
Complainant,

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

-vs-

ROBERT PERRY,

Respondent.

NO. _____

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto
this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they were
married to each other on December 16, 1950 in Lucedale,
Mississippi. Both the Complainant and the Respondent are each
over the age of twenty-one years and both the Complainant
and the Respondent are bona-fide resident citizens of the
State of Alabama and have been such for more than one year
next preceding the filing of the bill of complaint herein.
There are three minor children as issue of their marriage,
Ricky, age six years, Gwen, age five years and Diane,
age four years. Said children live and reside with the
Complainant and she is a fit and proper person to be granted
their custody and control.

TWO

Respondent has committed actual violence upon the
person of the Complainant, attended with danger to her life
or health, or from his conduct there is reasonable apprehension
of such violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction
of this cause, will make the said Robert, perry, papy-respondent
hereto and will cause him to appear, plead, answer or demur
hereto within the time allowed by law and the rules of this
Hoorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such other, further and different relief as in equity she may be due, and Complainant prays that she will be awarded the custody and control of her three minor children, and as in duty bound she will ever pray, etc.

Filed

Nov. 13, 1958

Alice J. Luck, Register

William J. Trapp
SOLICITOR FOR COMPLAINANT