

14578

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ALICE SIMPSON BOYINGTON, Complainant vs. CURTIS BOYINGTON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Answer and Cross Bill and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said Alice Simpson Boyington is forever divorced from the said Curtis Boyington for and on account of Cruelty. It is further

ORDERED, ADJUDGED AND DECREED that the Complainant, Alice Simpson Boyington, be and she hereby is awarded the care, custody and control of the two minor children, Deborah Sue Boyington and Stephen Lamar Boyington, the respondent having the right to visit said children at reasonable times and places. It is further ORDERED, ADJUDGED AND DECREED by the Court that the Respondent, Curtis Boyington, pay to the Complainant, Alice Simpson Boyington, the sum of FIFTEEN (\$15.00) DOLLARS a week for the support of said minor children, Deborah Sue Boyington and Stephen Lamar Boyington

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that Curtis Boyington, the Respondent pay the cost herein to be taxed, for which executed may issue.

This 28th day of October, 1960.

Hubert M. Hill

Judge Circuit Court, In Equity

I, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree, rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the day of 19

Register of Circuit Court, In Equity.

No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

OCT 28

ALICE J. DUCK, CLERK  
REGISTER

ALICE SIMPSON BOYINGTON,	⌘	
	Complainant	⌘ IN THE CIRCUIT COURT OF
	(Respondent)	⌘ BALDWIN COUNTY, ALABAMA
vs.		⌘ IN EQUITY
CURTIS BOYINGTON,	⌘	⌘ CASE NO. 4578
	Respondent	
	(Complainant)	⌘

VERIFIED PETITION

Comes now your Petitioner, Curtis Boyington, who was the Respondent in the above styled cause, and shows unto the Court as follows:

1.

That your Petitioner and Alice Simpson Boyington are each over the age of twenty-one years and residents of Bay Minette, Alabama.

2.

That Curtis Boyington and Alice Simpson Boyington were divorced from one another on the 28th day of October, 1960, by a decree rendered by this Honorable Court, a copy of this decree is attached hereto and marked Exhibit "A" and by reference is made a part hereof as if fully set out; by the terms of this said decree, the two minor children born to this union, Deborah Sue Boyington and Stephen Lamar Boyington, were awarded to the Respondent in this cause, Alice Simpson Boyington. The ages of these children at this time are: Deborah, age 5 and Stephen, age 2.

3.

Your Petitioner avers that he and Alice Simpson Boyington were separated from one another in April of 1959; that the aforesaid proceedings were filed in this Court on the 15th day of May, 1959. Your Petitioner avers that he has not lived with

FILED  
 MAR 27 1961  
 AILEY MARY CLERK  
 ALABAMA REGISTER

*B-38 - P. 179-A*

Alice Simpson Boyington since April of 1959 and they have not recognized one another as husband and wife since that time. Your Petitioner further avers that since the time of your Honor's Decree, a child was born to Alice Simpson Boyington; This child being born in the first half of March, 1961. Your Petitioner further avers that it is impossible for this to be his child because he has not had intercourse with Alice Simpson Boyington since April of 1959.

Your Petitioner avers that in October of 1960, and prior to the time Your Honor signed the aforesaid Decree, Alice Simpson Boyington brought Stephen Lamar Boyington to the home of your Petitioner, and left the child there and did not return to check on the welfare of the child or to see it until March 19, 1961. Your Petitioner further avers that Alice Simpson Boyington left Deborah Sue Boyington with Mrs. Lottie Simpson, Alice's mother, in the latter part of October, 1960. That your Petitioner went to her home and got the child in the early part of November, 1960, and this child has remained with him since that time. Your Petitioner has been informed and believes, and on such information and belief, avers that Alice Simpson Boyington, after abandoning these two children, left the State of Alabama and went to New Orleans and stayed for a period of time which is unknown to your Petitioner.

4.

Your Petitioner avers that he is a fit and proper person to have the care, custody and control of the aforesaid minor children, and that the Respondent is not, for the reasons heretofore set out in this Petition.

The premises considered, your Petitioner makes the said Alice Simpson Boyington a party Respondent to his Petition,

and in order that the Petitioner may have the relief herein-  
after prayed for, may it please Your Honor to cause the State  
Writ of Subpoena to be issued and directed to the said Alice  
Simpson Boyington commanding her to plead, answer or demur  
to this Petition within the time required by law.

Petitioner prays further that, upon the hearing of this  
Petition, Your Honor will make and enter an order granting  
him the following relief:

1.

Give your Petitioner the full care, custody and control  
of his minor children, Deborah Sue Boyington and Stephen Lamar  
Boyington.

2.

Ammend the Decree heretofore granted in this cause on  
the 20th day of October, 1960.

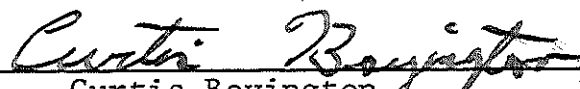
Your Petitioner prays for such other, further, different  
or general relief as in equity he may be entitled to receive.

  
Curtis Boyington - Petitioner

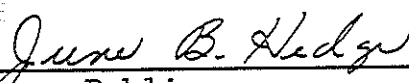
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared  
Curtis Boyington, who being by me first duly sworn, deposes and  
says on oath, that the foregoing Petition has been read to him  
and that all allegations contained therein are true and correct.

  
Curtis Boyington

Sworn to and subscribed  
before me on this the 23rd  
day of March, 1961.

  
Notary Public

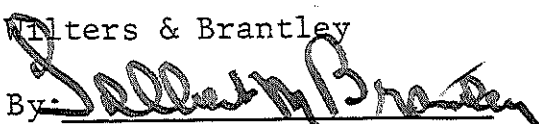
Hilfers & Brantley  
By:   
Tolbert M. Brantley  
Attorneys for Petitioner  
Respondent (Complainant)

EXHIBIT "A"

DIVORCE DECREE

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

ALICE SIMPSON BOYINGTON, Complainant

vs.

CURTIS BOYINGTON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Answer and Cross Bill and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said Alice Simpson Boyington is forever divorced from the said Curtis Boyington for and on account of Cruelty. It is further ORDERED, ADJUDGED AND DECREED that the Complainant, Alice Simpson Boyington, be and she hereby is awarded the care, custody and control of the two minor children, Deborah Sue Boyington and Stephen Lamar Boyington, the respondent having the right to visit said children at reasonable times and places. It is further ORDERED, ADJUDGED AND DECREED by the Court that the Respondent, Curtis Boyington, pay to the complainant, Alice Simpson Boyington, the sum of FIFTEEN (\$15.00) DOLLARS a week for the support of said minor children, Deborah Sue Boyington and Stephen Lamar Boyington.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that

if appeal is taken within sixty days, neither party shall marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that Curtis Boyington, the Respondent, pay the cost herein to be taxed, for which executed may issue.

This 28th day of October, 1960.

/s/ Hubert M. Hall  
Judge Circuit Court, In  
Equity

FILED

MAR 24 1961

ALICE J. DUCK, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. 4578

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ALICE SIMPSON BOYINGTON

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

ALICE SIMPSON BOYINGTON

-----, Defendant

by CURTIS BOYINGTON

-----, Plaintiff

Witness my hand this 28 day of March 1961

-----, Clerk

179 F



The State of Alabama  
Baldwin County

CIRCUIT COURT

ALICE SIMPSON BOYINGTON  
(Complainant & (Respondent)

Plaintiffs

vs.

CURTIS BOYINGTON

Defendants

Summons and Complaint

Filed March 28, 19 61

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 28 1961  
Taylor Wilkins Sheriff  
I have executed this summons

this 4-11 1961  
by leaving a copy with

Alice Boyington

Taylor Wilkins Sheriff

W. A. Albert Deputy Sheriff

ALICE SIMPSON BOYINGTON

COMPLAINANT

VS

CURTIS BOYINGTON

RESPONDENT

\*  
\*  
\*  
\*  
\*

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

CASE NO. \_\_\_\_\_

This cause being presented to the court on the verified petition of Alice Simpson Boyington, it is ordered that the Sheriff shall take into his custody, instanter the said Deborah Sue Boyington, age about 3 years and Stephen Lamar Boyington age about 8 months and deliver them forthwith to the complainant herein, Mrs. Alice Simpson Boyington pending further action before this court.

IT IS FURTHER ORDERED that a copy of the petition for divorce and immediate custody and a copy of this order be served on the said Curtis Boyington by the Sheriff, forthwith.

~~DONE AND ORDERED~~ this the 15 day of May, 1959.

*Hubert M. Stace*

CIRCUIT JUDGE.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

Yo u are hereby commanded to execute the foregoing and due return thereof made according to law.

This the 15 day of May, 1959.

*Hubert M. Stace*

CIRCUIT JUDGE.

44  
1607 m

4578

319

Received 15 day of May 1959  
on 26 day of June 1959  
I received a copy of the within Order  
Curtis  
service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Tolbert D. S.  
4 miles south  
of B. M.

Sheriff claims 8 miles at  
Ten Cents per mile Total \$ 80¢  
TAYLOR WILKINS, Sheriff  
BY Tolbert  
DEPUTY SHERIFF

Returned 6-15-59  
Without Action By Order of R. D. Bridges  
RAY D. BRIDGES, Sheriff  
By C. Schermer D. S.

**FILED**  
MAY 15 1959  
ALICE J. DUCK, CLERK  
REGISTER

CURTIS

NO. 1

ORDER FOR THE SHERIFF TO TAKE POSSESSION OF THE PROPERTY OF RAY D. BRIDGES, SHERIFF, COUNTY OF ...

ALICE SIMPSON BOYINGTON  
COMPLAINANT  
VS  
CURTIS BOYINGTON  
RESPONDENT

X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Comes the Complainant and Cross Respondent in the above styled cause and for answer to the cross bill filed therein shows unto this Honorable Court as follows:

-1-

As to Count one, she admits the allegations thereof.

-2-

As to Count two, she admits the allegations thereof.

-3-

As to Count three, she denies the allegations as alleged therein and shows unto this Honorable Court that at the present time there are living as fruits of the marriage between the parties to this cause, two children, Deborah Sue Boyington, age about four and one-half years and Stephen Lamar Boyington, age about fifteen months.

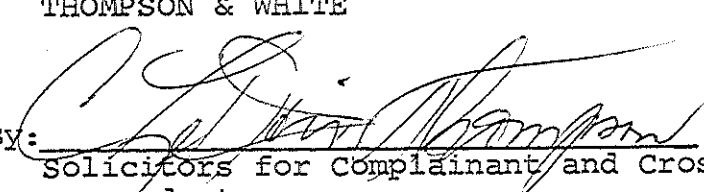
-4-

As to Count four, she denies the allegations thereof.

-5-

As to Count five, she denies the allegations thereof.

THOMPSON & WHITE

BY:   
Solicitors for Complainant and Cross Respondent

FILED

JAN 7 1960

ALICE J. DUCK, Register

8-2-52

8-2-52

RECEIVED  
 THE JUDGE  
 CLERK  
 ALICE SAMPSON BOYINGTON  
 vs  
 CURTIS BOYINGTON  
 BALDWIN COUNTY ALA

ALICE SAMPSON BOYINGTON  
 COMPLAINANT  
 vs  
 CURTIS BOYINGTON  
 RESPONDENT

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

Comes now the Respondent in the above styled cause and demurs to the Complainant's Complaint and for grounds therefor says:

The Complaint fails to show that this court has jurisdiction of this cause.

2.

That the section relating to cruelty fails to set out the necessary allegations therefor.

Willers & Brantley

BY: *William Brantley*  
 Solicitors for Respondent.

ALICE J. DUCK, CLERK  
REGISTER

FILED  
APR 1 1954

COMPLAINANT  
CURTIS BOYINGTON

CURTIS BOYINGTON

DEFENDANT

IN THE CIRCUIT COURT OF

ST. JOHNS COUNTY, ALABAMA

IN EQUITY

4378

Complaint filed in the above captioned case on April 1, 1954.

Complainant's Complaint and for Return thereon refer:

ALICE SIMPSON BOYINGTON  
COMPLAINANT  
VS  
CURTIS BOYINGTON  
RESPONDENT

DEMURRERS

It is requested that the court see jurisdiction of this case.

Attorneys for Respondent  
*[Signature]*  
Attorneys & Counselors

ALICE SIMPSON BOYINGTON	)	
	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA,
VS	)	
	)	IN EQUITY
CURTIS BOYINGTON	)	
	)	
RESPONDENT	)	

Comes now the Respondent in the above styled cause and for answer to the Complainant's Bill of Complaint says as follows:

1.

The Respondent admits the allegations of Section 1.

2.

The Respondents admits the allegations of Section 2.

3.

The Respondent denies the allegations of Section 3 and emphatically denies that he is addicted to drunkenness.

4.

The Respondent denies the allegations of Section 4 and says that he has never done any violence to the Complainant other than to hold her when she attacked him. For further answer to this section your Respondent says that on many occasions during their married life the Complainant attacked him and struck him with various objects and on one time attacked him with a butcher knife.

5.

The Respondent denies the allegations of Section 5 and says that he is at this time supporting his infant children and that the Complainant is at this time working.

6.

The Respondent admits the allegations of Section 6.

7.

The Respondent denies the allegations of Section 7 and demands strict proof of the same.

Now having answered the Complainant's Complaint fully, the Respondent now files this his cross bill. Your Cross Complainant represents and

shows unto Your Honor as follows:

1.

That your Complainant and Cross Respondent is over the age of 18 and a resident of Baldwin County, Alabama, and has been more than two years next preceding; That your Cross Complainant and Respondent is over the age of 21 and a resident of Baldwin County, Alabama, and has been for more than two years next preceding.

2.

That your Cross Complainant and the Cross Respondent married at Lucedale, Mississippi on September 12, 1954, and lived together as husband and wife in Baldwin County, Alabama, until April 7, 1959.

3.

There was born as fruits of this marriage between the Cross Complainant and Cross Respondent two children, Deborah Sue Boyington, about 3 years of age and Stephen Lamar Boyington about 8 months of age.

4.

Your Cross Complainant avers that the Cross Respondent has been guilty of adultery with divers persons whose names are to your Cross Complainant at this time unknown.

5.

Your Cross Complainant further alleges that Alice Simpson Boyington is not a fit and proper person to have the care, custody and control of the minor children born to this union; that she does not give them proper care and attention; that she uses vile and coarse language in their presence; that she had tantrums and would fight your Cross Complainant in the presence of these children; that she leads a wild and desolute life. Your Cross Complainant alleges further that the home in which these children are now being kept is not adequate nor suitable in which to rear small children.

Your Cross Complainant avers that he is a fit and proper person to have the care, custody and control of these children; that he is living with his mother, Maggie Boyington, and intends to rear the children there



if given the custody of them; that this is a large and comfortable home and surrounded by a christian environment.

WHEREFORE, the premises considered, Your Cross Complainant prays that your Honor will by proper procedure make the said Alice Simpson Boyington party respondent to this Cross Bill of Complainant requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Cross Complainant further prays that upon a final hearing of this cause Your Honor will enter an order and decree granting him an absolute decree of divorce, forever barring the bonds of matrimony existing between the Cross Complainant and Cross Respondent and will enter a decree giving your Cross Complainant the permanent care, custody and control of the aforesaid infant children, Deborah Sue Boyington and Stephen Lamar Boyington; Your Cross Complainant prays for such other, further, different or general relief to which he maybe in equity and good conscience entitled to receive.

Wilters & Brantley

BY: Albert W. Brantley  
Solicitors for the Respondent  
and Cross Complainant

I hereby accept service this  
18th day of Dec, 1959  
LeAnn Thompson  
As Attorney for Complainant

FILED

DEC 18 1959

ALICE J. DUCK, Register

4578

ALICE SIMPSON BOYLINGTON

COMPLAINANT

VS

CURTIS BOYLINGTON

RESPONDENT

ANSWER AND CROSS BILL

FILED

DEC 18 1959

ALICE J. DUCK, Register

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CURTIS BOYINGTON, 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 ALICE SIMPSON BOYINGTON, as Complainant and against CURTIS BOYINGTON, as Respondent.

WITNESS my hand this the 15 day of May, 1959.

Alice J. Quak  
Register.

\*\*\*\*\*

ALICE SIMPSON BOYINGTON	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA.
VS	*	IN EQUITY.
CURTIS BOYINGTON	*	CASE NO. <u>4578</u>
RESPONDENT	*	

TO HONORABLE HUBERT M. MALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

Your Complainant, Alice Simpson Boyington, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 18 and a resident of Baldwin County, Alabama; and has been more than two years next preceding; The Respondent is over the age of 21 and a resident of Baldwin County, Alabama, and has been more than two years next preceding.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi on September 12, 1954, and lived together as husband and wife in Baldwin County, Alabama, until April 7, 1959.

3.

Your Complainant further avers and alleges that the said Respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

4.

That on to-wit April 7, 1959 and on several occasions prior thereto the respondent threatened and abused the complainant and on said date did actual violence to her persons striking her about her

head and body which necessarily endangered her life or health and because said respondent had on previous occasions blacked her eyes and inflicted a bleeding wound on her head and the said respondent's conduct was so violent as to give your complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

5.

Your Complainant further avers that she is without funds with which to support herself and her infant children and with which to pay her Solicitor for his services in this cause; that the respondent is an able-bodied man gainfully employed; that he earns money and is well able to furnish complainant with money with which to support herself and infant children and to pay her Solicitor. She further avers that a reasonable Solicitor fee in this cause would be One Hundred Fifty (\$150.00) Dollars.

6.

There was born as fruits of this marriage between the complainant and the respondent two children, Deborah Sue Boyington, about 3 years of age and Stephen Lamar Boyington about 8 months of age.

7.

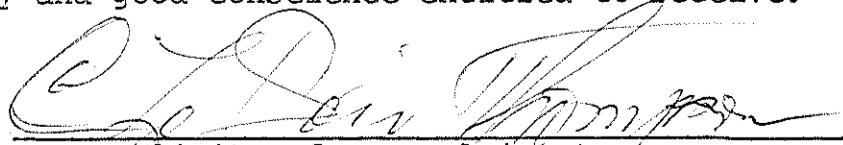
The said respondent forcibly took the said Deborah Sue Boyington from your complainant and has not returned her. The said child being an infant of tender age, to-wit: about 3 years, and further on to-wit May 8th the said respondent came and forcibly took from the custody of your complainant the said infant Stephen Lamar Boyington an infant of tender age to-wit about 8 months and has concealed both of said infants from your petitioner, depriving them of a mother's care despite the temporary arrangement made by your Honor in your Honors Juvenile Court, entered on to-wit: May 7th, requiring the said respondent to provide temporary maintenance and support for the said 8 months old infant who is in need of a special diet. And further that the said respondent here has not complied with the said arrangement, to-wit, to pay the sum of \$15.00 per week in accordance with the instructions of this Honorable Court.

WHEREFORE, your Petitioner prays that your Honor will issue a writ instanter for the immediate return of said children, Deborah Sue Boyington age about 3 years and Stephen Lamar Boyington age about 8 months, to the custody of your petitioner pending a hearing of this petition, that said children may receive proper and adequate care from your petitioner.

And further that this Honorable Court may determine a reasonable amount which the respondent shall be required to pay weekly to the complainant herein as support and maintenance for said infants and as support and maintenance pendante lite and your complainant being without funds to pay her Solicitor of record to ascertain the amount of a reasonable Solicitor fee which the said respondent shall be compelled to pay to Complainants Solicitor of record herein for his services in this cause in Complainants behalf, and,

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper procedure make the said Curtis Boyington, party respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the respondent; and that a decree be made awarding to the complainant the care, custody and control of the infant children, Deborah Sue Boyington, about 3 years of age and Stephen Lamar Boyington about 8 months of age, and that this Honorable Court will determine a reasonable and proper sum which the said respondent shall be ordered to pay to the said complainant for the maintenance and support of the said infant children, Deborah Sue Boyington, about 3 years of age and Stephen Lamar Boyington, about 8 months of age after this cause has been finally adjudicated; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for Complainant.

STATE OF ALABAMA  
BALDWIN COUNTY

in said State, personally appeared Alice Simpson Boyington, who being known to me, and by me first duly sworn, deposes and says on oath: That she is the Complainant in the above entitled cause, and has personal knowledge of the facts stated in the foregoing summons and complaint and that the said statements of fact therein contained are true.

Alice Simpson Boyington

Sworn to and subscribed before me this the 12<sup>th</sup> day of May, 1959.

Lewis M. Wilson  
Notary Public, Baldwin County, Alabama.

Printed and registered receipt of the Sheriff's Office, County of ...  
This receipt is given to the ...  
and the ...  
and the ...

*[Handwritten signature]*

...  
...  
...  
...

CD  
1607  
4578  
315

Returned 6-15-59  
Without Action By Order of ally  
RAY D. BRIDGES, Sheriff  
By C. L. Schmitt, D. S.

FILED  
May 15 1959  
ALICE J. DUCK, CLERK REGISTER

Received 15 day of May 1959  
and on 26 day of June 1959  
I served a copy of the within D.C.  
on Curtis Dunnington

By service on \_\_\_\_\_  
TAYLOR WILKINS, Sheriff  
By W. O. Zolbert, D. S.  
4 miles south  
of B.M.

Sheriff claims 8 miles at  
Ten Cents per mile Total \$ 80¢  
TAYLOR WILKINS, Sheriff  
BY Zolbert  
DEPUTY SHERIFF

ALICE SIMPSON BOYINGTON )

COMPLAINANT )

VS )

CURTIS BOYINGTON )

RESPONDENT )

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

Comes now the Respondent in the above styled cause and demurs to the  
Complainant's Complaint and for grounds therefor says:

1.

The Complaint fails to show that this court has jurisdiction of this  
cause.

2.

That the section relating to cruelty fails to set out the necessary  
allegations therefor.

FILED

JUL 1 1959

ALICE J. DUCK, CLERK  
REGISTER

Wiltors & Brantley

BY:

*Arthur M. Brantley*  
Solicitors for Respondent.



4578

ALICE SIMPSON BOYINGTON

COMPLAINANT

VS

CURTIS BOYINGTON

RESPONDENT

DEMURRERS

*[Faint handwritten text, possibly a signature or date]*