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CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA

JOHN CHASON  
NORBORNE C. STONE, JR.

PHONE 3641

October 22, 1959

Mrs. Alice J. Duck, Register  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

We are enclosing herewith the sum of \$22.60 as the court cost due in the suit filed in the Circuit Court of Baldwin County, Alabama, In Equity by Lola L. Woodyard against Walter Woodyard, and which is a suit for divorce. Will you please dismiss such proceedings as the parties are going to live together again.

Yours very truly,

CHASON & STONE

By: 

JC:bw

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Walter Woodyard 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 Lola L. Woodyard as Complainant, against Walter Woodyard, as Respondent.

Witness my hand this 13 day of October, 1959.

*Price J. Houch*  
Register

Exp Oct 16, 1959

LOLA L. WOODYARD,	I	
Complainant,	X	<del>IN THE CIRCUIT COURT OF</del>
vs.	I	
	I	BALDWIN COUNTY, ALABAMA
WALTER WOODYARD,	I	
Respondent.	I	IN EQUITY
	I	

Comes your Complainant, Lola L. Woodyard, and files this her Bill of Complaint for divorce against Walter Woodyard, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and Respondent are over the age of twenty-one years, and are both resident citizens of Baldwin County, Alabama, residing at Foley, Alabama, and that they have been such residents for more than ten years last past.

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit: May 29, 1958, and lived together as man and wife until, on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate

and apart from him; that on, to-wit: October 12, 1959, the Respondent committed acts of violence on the person of your Complainant by striking her with his fist and on the same date he loaded his shot gun and threatened to kill your Complainant.

THIRD:

That your Complainant has known the Respondent for several years and on September 1, 1956, she paid \$300.00 and the Respondent paid \$100.00 on the purchase of a tract of land situated in Foley, Alabama, from Alvin Dubose and Virginia Dubose, his wife. That the deed conveying said property was to the Respondent alone, such deed being recorded in Deed Book 243 at page 222, Baldwin County, Alabama records. That the Complainant and the Respondent purchased materials with which to erect a dwelling house on the above noted tract of land the materials costing approximately \$700.00 and of which amount the Complainant paid approximately \$600.00. That the labor on such house was performed by the Complainant and the Respondent jointly. The home in which the parties are living is situated on such property and reference is made to the deed for an accurate description of the property conveyed. The Respondent is an able bodied man now working for the A. B. C. Store in Foley, Alabama, and the amount of his earnings are unknown to the Complainant.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Complainant prays that the above named Walter Woodyard be made a party to this cause by the usual writ or 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; that upon a final hearing of this cause that Your Honor will grant unto your Complainant an absolute divorce from said Respondent; that the Respondent be required to convey the real property above referred to to your Complainant and that he be required to pay her such amount as the Court may see fit for her support and maintenance; that Your Honor will also decree that the Complainant be allowed to remarry if she sees fit. 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.

*Lila L. Woodcock*  
Complainant