

HAZEL RIPPY,
Complainant,

-vs-

BILLIE CARL RIPPY,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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 February 25, 1958 in
Leaksville, Mississippi. The Complainant is sixteen years
of age and the Respondent is twenty-six years of age.
The Complainant is a bona-fide resident citizen of the State
of Alabama and has been such for more than one year next
preceding the filing of the bill of complaint herein. The
Respondent is a resident of the State of North Carolina.
There are no children as issue of their marriage.

TWO

The Respondent has committed adultery with one or more
females since his marriage to the Complainant.

THREE

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 Billie Carl Rippy, party respondent hereto, and will cause him to appear, plead, answer or demur hereto within the time allowed by law and the rules of this Honorable 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 of different relief as in equity she may be due, and as in duty bound she will ever pray, etc.


SOLICITOR FOR COMPLAINANT.