

MARGUERETT (PEGGY) GALENTO,
Complainant,
-vs-
ALBERT GALENTO, SR.
Defendant.

¶ 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 May 23, 1950 in Benton, Arkansas. 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. There are
three minor children as issue of their marriage, Albert
Galento, Jr., age nine years, Johnny Galento, age eight years,
and Vittoria Galento, age seven 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

The 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 Albert Galento, Sr., 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, that she will be granted the custody and control of their three minor children, and Complainant further prays for such other, further or different relief as in equity she may be due, and as in duty bound she will ever pray, etc.

FILED
3 29 1961
ALICE J. DUCK, CLERK
REGISTER

William E. Brown
SOLICITOR FOR COMPLAINANT.

(4880)

MARGUERETT (PEGGY) GALENTO

Complainant

IN THE CIRCUIT COURT OF
BALDWIN
MOBILE COUNTY, ALABAMA

No. _____

Vs.

ALBERT GALENTO, SR.

Defendant

IN EQUITY

ANSWER AND WAIVER.
AGREEMENT

Comes the defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegation of said Bill of Complaint and demands strict proof thereof.

I understand ^{and agree} that the testimony in this cause will be taken ^{by deposition} ~~in open Court or oral examination~~ and waive notice of the time of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

X Albert Galento, Sr.
Defendant

NOTE: The space below is intended for "Agreements Between the Parties"

Defendant agrees that the Complainant should be granted the custody and control of their minor children, subject to his right to see and visit with said minor children at all reasonable times.

Defendant agrees to provide the said minor children with reasonable support and maintenance. Both Complainant and Defendant agree that Peggy Preston may take the testimony in this cause without the issuance of a commission.

Marguerett (Peggy) Galento
COMPLAINANT.

X Albert Galento, Sr.
DEFENDANT.

STATE OF ALABAMA
COUNTY OF MOBILE

I, PEGGY S. PRESTON, a NOTARY PUBLIC in and for said State and County, do hereby certify that Albert Galento, Sr., whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, ^{he} executed the same voluntarily on the day same bears date.

Witness my hand and seal this 29th day of March, 1960.

Peggy S. Preston
NOTARY PUBLIC

FILED _____
_____, Register

STATE OF ALABAMA
COUNTY OF MOBILE