

4898

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CLAUDE ADAMS to appear within thirty days from the service of this writ in the Circuit Court, Equity Side, to be held for said County at the place of holding the same, then and there to answer the complaint of LELAR V. ADAMS.

WITNESS my hand this 14 day of April, 1960.

Alice J. Drake
Register.

Respondent's address:
Bay Minette, Alabama.

APR 19 60

LELAR V. ADAMS,		
		IN THE CIRCUIT COURT OF
Complainant,		
		BALDWIN COUNTY, ALABAMA
vs.		
CLAUDE ADAMS,		
		IN EQUITY.
Respondent.		

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Complainant, Lelar V. Adams, respectfully represents unto the Court and your Honor as follows:

1. Your Complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama. That the Respondent is over the age of twenty-one years and is a resident of Baldwin County, Alabama. That Complainant and Respondent have been bona fide resident citizens of Baldwin County, Alabama, for more than one year next preceding the filing of this Bill of Complaint.

2. That your Complainant and the Respondent were lawfully married on or about, to-wit, January 10, 1953, in Bay Minette, Alabama, and lived together as man and wife until April 6, 1960.

3. There was born to the Complainant and the Respondent two children, Raymond C. Adams, a son, 16 years of age, and Willie M. Adams, 12 years of age, which said children were born to the Complainant and Respondent before they were married but which children the Respondent admits to be his.

4. Your Complainant avers and charges that the said Respondent did on, to-wit, April 6, 1960, commit actual violence on her person attended with danger to her health and life, which said violence consisted of striking her about the head and body with his fist and Complainant avers that if she continues to live with the said Respondent that he will commit further violence upon her person attended with danger to her life or health.

5. Your Complainant avers that it has become necessary for her to employ an attorney to represent her in this cause and that she is without funds to pay her said attorney for services rendered and to be rendered by him in this cause.

6. Your Complainant avers that the Respondent is an able bodied man who earns approximately \$50.00 each week. That he is the owner of two parcels of land situated in Baldwin County, Alabama, described as follows:

PARCEL NUMBER ONE: Lot 5, Block 1 in West Douglasville Subdivision.

PARCEL NUMBER TWO: From the Southeast Quarter of the northeast Quarter of the Northwest Quarter of Section 19, Township 2 South, Range 3 East, run thence North 170 yards to a point of beginning; thence West 140 yards to a point; run thence North 70 yards to a point; run thence East 140 yards to a point; run thence South 70 yards to the point or place of beginning.

Complainant further avers that there is a four room frame house situated on Parcel Number Two described above and that the said property and house was acquired through the joint efforts of your Complainant and the Respondent.

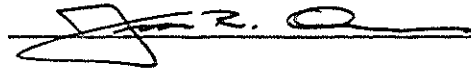
The premises considered, your Complainant makes the said Claude Adams a party respondent to this Bill of Complaint and in order that your Complainant may have the relief prayed for herein, may it please the court to cause the State's Writ of Subpoena to be issued, directed to the said Claude Adams, commanding him to plead, answer or demur to this Bill of Complaint within the time required by law; and that upon a final hearing of this cause, your Honor will make and enter a decree divorcing your Complainant from the said Respondent, awarding the care, custody and control of the said minor

children to your Complainant, will fix a monthly sum to be paid to your Complainant by the Respondent for the maintenance and support of the said minor children; will decree that the Respondent's interest in the above described property be vested in your Complainant as permanent alimony, will fix an amount to be paid to your Complainant's attorney for his services rendered in this cause and will order that this amount be paid by the said Respondent and that your Honor will grant such other, further and different relief as may seem just and proper, the premises considered.

FILED

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ALICE J. DUCK, Register



Solicitor for Complainant.