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VERNA ADAMS RABON,)
Complainant,)
-vs-)
ROBERT M. RABON,)
Defendant.)

IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.

TO THE HON. THE CIRCUIT COURT BALDWIN COUNTY
ALABAMA AND THE HON. JOHN D. LEIGH, JUDGE THERE-
OF, SITTING IN EQUITY:

Comes your Complainant Verna Adams Rabon and exhibits
this, her Bill of Complaint against Robert M. Rabon, the defendant,
and shows unto your Honor and unto this Honorable Court as foll-
ows:

1. That both your complainant and the defendant are over the age of 21 years and are bond fide residents of Baldwin County, Alabama, both of them having been such residents for the past ten years continuously next immediately preceding the filing of this Bill of Complaint.
2. That your complainant and the defendant were married on heretofore to-wit: November 15th., 1904 and lived together as man and wife until to-wit: the early part of 1926, when, on account of the matters hereinafter complained of your complainant was compelled to cease to live with the defendant as his wife.
3. That during the early part of 1926 and while your complainant and the defendant were residing in Baldwin County, Alabama, the defendant on divers occasions committed actual violence on the person of your complainant, attended with danger to her life or health; that he continuously cursed and abused your complainant; that he struck her and that the conduct of the defendant was such that your complainant had reason to apprehend the commission of actual violence on her person attended with danger to life or health.
4. That there were born to your complainant and the defendant by said marriage two children, namely: Ernest Rabon, a son who is 16 years of age and Robert Rabon Jr., a son who is 7 years of age; that both of said children reside with your complainant who is a fit and proper person to have the custody and control

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of them; that the defendant Robert M. Rabon is not such a fit and proper person to have the custody and control of said children.

5. That your complainant is without any income or means of livelihood, unable to earn a living for herself or for said children and is without funds; that the defendant is an experienced naval stores operator and operates at this time turpentine orchards or places in Baldwin County, Alabama. That the defendant is possessed of much property and is worth from \$50,000.00 to \$75,000.00 in real and personal property and in cash which he now possesses. That your complainant on account of having no income or funds and not being able to earn a livelihood is not possessed of sufficient money or income to properly prosecute this cause.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your complainant prays that such orders, decrees, summons and notices be made, entered and issued or caused to be made, entered and issued as will make the said Robert M. Rabon party defendant in this cause requiring him to appear and plead, answer or demur within the time and under the pains and penalties prescribed by law and the rules and practices of this court; that your Honor will order a reference to be held by the Register of this Honorable Court to ascertain a reasonable amount to be paid by the defendant to your complainant as attorneys fees for complainant in this cause and for alimony pendente lite and for support of your complainant and the said children and that upon the holding of such reference your Honor will decree unto your complainant an amount to be paid to her by the defendant as such attorneys fees, alimony and maintenance suitable to ^{her} condition and state in life and as is consistent with the property and earning capacity of the defendant.

That upon a final hearing of this cause your Honor will grant unto your complainant a divorce mensa et thora from the defendant and will give and grant unto your complainant the custody and control of said children; that your Honor will further grant unto your complainant a reasonable amount to be paid her by the defendant for the maintenance and support of your complainant and

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the said children and, as in duty bound, your complainant will
ever pray, etc.

Verna Adams Rabon

As Complainant.

NORBORNE STONE,

As Solicitor for Complainant.

FOOT NOTE:-

The defendant, Robert M. Rabon, is required to answer
each and every paragraph of the foregoing Bill of Complaint from
1 to 5, both inclusive, but not under oath, as oath is hereby
expressly waived.

Verna Adams Rabon

As Complainant.

NORBORNE STONE,

As Solicitor for Complainant.

VERNA ADAMS RABON
Complainant.

-vs-

ROBERT M. RABON.

) IN THE CIRCUIT COURT.

) STATE OF ALABAMA.

) BALDWIN COUNTY.

This cause is upon application of the Plaintiff
no answer or cross bill having been filed.

Dated this 10th day of February, 1926.

D. W. Rechner
Register.

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RECORDED

Filed Feb 10/1927
T. W. Richardson
Register

RECORDED

VERNA ADAMS RABON
Complainant.

-vs-

ROBERT M. RABON

)
) IN THE CIRCUIT COURT, EQUITY SIDE
) STATE OF ALABAMA.
) BALDWIN COUNTY

TO THE HONORABLE T. W. RICHERSON, REGISTER:-

Comes the and moves the Register to dismiss the
cause, no answer or cross bill having been filed.

Norborne Stone.
Solicitor for Complainant.

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RECORDED

Filed Feb 10/1927

T. M. McKeever
Register

RECORDED