

1358

STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon ROSS F. WALKER, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction, within thirty days after the service of summons, and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by PAULINE WALKER, against the said Ross F. Walker, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court, this the 17 day of June, 1945.

R. S. Duck
Register

PAULINE WALKER,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA,
VS.)	IN EQUITY.
ROSS F. WALKER,)	
RESPONDENT.)	

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes your Complainant, Pauline Walker, and humbly complaining against the Respondent, Ross F. Walker, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and over twenty-one years of age;

2.

That your Complainant and the Respondent married at Belgium, Wisconsin, on July 5, 1924, and lived together as husband and wife until June 24, 1945;

3.

That the Respondent drinks to excess; that while under the influence of strong drink, he has a vile and ungovernable temper; that on June 24, 1945, and at various times prior thereto, the Respondent has threatened, cursed and abused the Complainant, and has often done violence to her person

which necessarily endangered her life and health; that the conduct of the Respondent is such as to give the Complainant every reasonable apprehension to believe, and she does actually believe that if she continues to live with him, he will carry out his threats and do further violence to her person, which will necessarily endanger her life and health;

4.

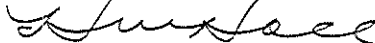
That there was born to the marriage between your Complainant and the Respondent, three children, who are now and have been all their lives living with your Complainant, who is suitable and capable to have the care, custody and control of them; Barbara Walker, 8; George Walker, 14; and Joan Walker, 15; that your Complainant has no funds with which to support herself, the said children, or to employ solicitors for prosecuting this suit.

WHEREFORE, your Complainant prays that your Honor will by proper process make the said Ross F. Walker, party Respondent to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that your Honor will order a reference to determine a reasonable alimony pendente lite and permanent and also a reasonable attorneys fee.

Complainant further prays that upon a final hearing hereof, your Honor will make and enter a decree forever barring the bonds of matrimony existing between her and the Respondent; that she be awarded the custody of the three children; Barbara Walker, George Walker, and Joan Walker; that the Respondent be required to pay to her such amount as to your Honor may seem just and proper as permanent alimony, and also as Solicitors fees.

Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound, she will ever pray.

BEEBE & HALL

By: 
Solicitors for the Complainant.

135-8

Rec'd 6/27/45 F.K.
Office

PAULINE WALKER,
COMPLAINANT,

VS.

ROSS F. WALKER,
RESPONDENT.

Executed 28th day of June 1945
by serving copy of within Summons and
Complaint on

Ross Walker

C. E. Garrett Sheriff

By Fred Walter Deputy Sheriff

SUMMONS & COMPLAINT.

Filed

6-27, 45-

R. S. Lucke -
Register