

1402

STATE OF ALABAMA,  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon LUTHER F. LAWRENCE, 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 LULA LILLIAN LAWRENCE, against the said Luther F. Lawrence, 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 thereof.

WITNESS, R. S. DUCK, Register of said Court, this the \_\_\_\_\_ day of \_\_\_\_\_, 1945.

Register

LULA LILLIAN LAWRENCE,  
COMPLAINANT,

VS.

LUTHER F. LAWRENCE,  
DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY.

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

Comes your Complainant, Lula Lillian Lawrence, and humbly complaining against Luther F. Lawrence, Defendant, respectfully shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the said Defendant are both over the age of twenty-one years and residents of Baldwin County, Alabama; that the Defendant has the last few weeks been temporarily so journeying in Excell, sleeping in the home of his father, J. P. Lawrence, about one-half mile from Excell, Alabama:

2.

That your Complainant and the said Defendant are husband and wife, having entered into matrimony in Excell, Monroe County, Alabama in the year 1934; that there was born to them a child whose name is Rodger Lawrence; now of the tender age of eight (8) years.

3.

That the Defendant is a man of cruel and ungovernable temper and unmercifully beat this Complainant with his fist and knocked her down twice. Defendant drove her away from home, and told her not to return, and if she did, he would kill her. He was drunk. She went to the home of her parents where she has been continuously since. Complainant was without fault. From his conduct and treatment of her, Complainant has reasonable cause to believe and does believe that should she continue to live with the Defendant, he would do her bodily harm attendant with danger to her life or health;

4.

That Defendant is not only a man of cruel and ungovernable temper but also an habitual drunkard, and is not a suitable person to have the care and custody of the said minor child.

The Defendant is employed at Mobile Gulf Shipbuilding Company and earns \$60.00 a week, and is amply able to properly support and maintain your petitioner and said child, and, as well, to pay a reasonable attorney's fee for her solicitors in this cause. Complainant is without funds and without means of support for herself and her minor child and to pay her solicitor in this cause.

Therefore, Complainant prays this Honorable Court will take jurisdiction of the cost made by this Bill of Complaint and will by proper process make the said Luther F. Lawrence party Defendant hereto, and require him to plead, answer, or demur to this Bill of Complaint within the time and under the

penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that pending this cause this Honorable Court will order a reference to determine a reasonable attorney's fee for Complainants attorneys and a reasonable alimony for Complainant pending this suit.

Complainant further prays that upon the final hearing of the cause made by this Bill of Complaint, this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this Complainant and the said Defendant, and that this Honorable Court will further order, adjudge, and decree that this Complainant have the custody of the said Rodger Lawrence, and Complainant further prays that this Honorable Court will make and enter a decree fixing an amount to be paid to this Complainant as permanent alimony by the said Defendant at such times as to this Honorable Court shall seem proper for herself and for the support and maintenance of said minor; and order and decree that said Defendant pay the same under penalty of the law, and Complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive.

BEEBE & HALL

By:  
Solicitors for the Complainant.

1402  
Lula Lillian Lawrence  
Complainant

vs.

Luther A. Lawrence  
Respondent

Summons  
and Complaint

Executed by  
Serving a copy  
of the Summons  
and Complaint  
on Luther A. Lawrence  
this 3<sup>rd</sup> day  
October 1945

E.E. Nicholas

Sheriff Monroe Co.

Filed  
9-13-45  
R.S. Luck  
Reg.