

Bill of Divorce.

Barbara Krob, Complainant vs. Andrew Krob, Respondent.

To Hon. F. W. Hare, Judge of the 21st Judicial Circuit.

Your complainant, Barbara Krob, respectfully represent unto your Honor, that she and respondent, Andrew Krob, were married in Bay Minette Alabama, on to-wit.:- March 14th., 1939, and both are over the age of 21 years. That both your complainant and respondent have been bona fide residents of Robertsdale, Baldwin County, Alabama for more than four years next before the filing of the bill of complaint in this cause. Complainant alleges that the said Andrew Krob has committed actual violence on her person, attended with danger to life or health, and on several occasions choked her and threatened to kill her, and at one time respondent took a gun and threatened to shoot her, and she begged him ^{not} to shoot her and he persisted that he would kill her if she did not leave home, so she had to go to the neighbors several times to keep from being killed. And on or about July 4th., ¹⁹⁴⁵ she left him after he threatened her and told her to leave or he would kill her. Complainant then went to Chicago, Ill., and stayed about two months, when she was notified that her little baby was very sick, so she came back to Robertsdale about two weeks ago. On account of respondent's cruel treatment of her, she could not live any longer with him. Also respondent came to Chicago, while she was there and in the presence of Mrs, Joseph Palma, Jr. and several others, he threatened to kill complainant and abused and cursed her.

That Complainant and respondent have two children viz.:- Jimmie Krob, five years of age and Helen Krob two years of age.

That Respondent has neglected these children and did not give them the proper food and medicine. That on account of his neglect, the little girl Helen drank some lye and her ^{mouth} ~~mouth~~ and throat were badly burned and the child is still sick and needs the care of her mother.

Prayer for relief.

Premises considered, complainant prays that she be granted an absolute divorce from the said Andrew Krob, respondent on the grounds of cruelty, and that she be granted the custody and control of said Jimmie Krob and Helen Krob, who are of tender age and need the care of their mother, complainant, and complainant alleges that she is able to take care of said children and is a fit and proper person to care for said children, and that Andrew Krob is not a proper person to care for said children.

That the said Andrew Krob be required to pay complainant alimony pending this suit for divorce, and on final decree permanent alimony for her sup-

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port and the support and maintenance of her two children.

That respondent has a half interest in a farm, has a large flock of chickens and has made this year on said farm about \$1500.00 and is well able to pay a reasonable sum for alimony and solicitor's fees.

Complainant also prays that she be granted a reasonable sum for solicitors fees incurred in her behalf for the prosecution of this suit.

Complainant prays that if she has not asked for the proper relief, that your Honor may grant unto her such further and other relief as may be proper.

Prayer for process.

Complainant prays that the said Andrew Krob be made respondent, and by proper process be given notice of this proceeding, and on the hearing your Honor will grant unto complainant an absolute divorce from respondent, with permission to marry again, and will award to her the control and custody of Jimmie Krob and Helen Krob, minor children of complainant and respondent, and also alimony pendente lite and permanent alimony, and also a reasonable solicitor's fee.

And your complainant will ever pray etc.



Solicitor for Complainant.

1403
Barbara Kroh.
Comptroller

vs
Andrew Kroh.

Bill for Divorce
Custody of children
Alimony etc.

Jan 14 1945
Rogers
Dep.

W. H. Hawkins
Solicitor for Com-
plaint

Bill of Divorce.

Barbara Krob, Complainant vs. Andrew Krob, Respondent.

To Hon. F. T. Hare, Judge of the First Judicial Circuit.

Your complainant, Barbara Krob, respectfully represent unto your Honor, that she and respondent, Andrew Krob, were married in Bay Minette Alabama, on to-wit, March 14th, 1939, and both are over the age of 21 years. That both your complainant and respondent have been bona fide residents of Robertsdale, Baldwin County, Alabama for more than four years next before the filing of the bill of complaint in this case.

Complainant alleges that the said Andrew Krob has committed actual violence on her person, attended with danger to life or health, and on several occasions choked her and threatened to kill her, and at one time respondent took a gun and threatened to shoot her, and she begged him not to shoot her and he persisted that he would kill her if she did not leave home, so she had to go to the neighbors several times to keep from being killed. and on or about July 4th, 1945 she left him after he threatened her and told her to leave or he would kill her. Complainant then went to Chicago, Ill., and stayed about two months, when she was notified that her little baby was very sick, so she came back to Robertsdale about two weeks ago. on account of respondent's cruel treatment of her, she could not live any longer with him. Also respondent came to Chicago, while she was there and in the presence of Mrs. Joseph Falan, Jr. and several others, he threatened to kill complainant and abused and cursed her.

That Complainant and respondent have two children viz.; - Jimmie Krob, five years of age and Helen Krob two years of age.

That Respondent has neglected these children and did not give them the proper food and medicine. That on account of his neglect, the little girl Helen drank some lye and her mouth and throat were badly burned and the child is still sick and needs the care of her mother.

Prayer for Relief.

Premises considered, complainant prays that she be granted an absolute divorce from the said Andrew Krob, respondent on the grounds of cruelty, and that she be granted the custody and control of said Jimmie Krob and Helen Krob, who are of tender age and need the care of their mother, complainant, and complainant alleges that she is able to take care of said children and is a fit and proper person to care for said children, and that Andrew Krob is not a proper person to care for said children.

That the said Andrew Krob be required to pay complainant alimony pending this suit for divorce, and on final decree permanent alimony for her sup-

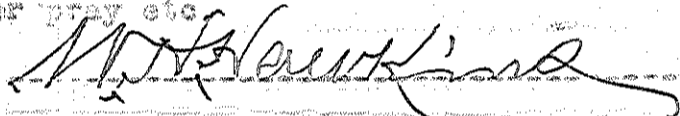
Two.

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That respondent has a half interest in a farm, has a large flock of chickens and has made this year on said farm about \$1500.00 and is well able to pay a reasonable sum for alimony and solicitor's fees. Complainant also prays that she be granted a reasonable sum for solicitor's fees incurred in her behalf for the prosecution of this suit. Complainant prays that if she has not asked for the proper relief, that your Honor may grant unto her such further and other relief as may be proper.

Prayer for process.

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Solicitor for complainant.

1403

Copy for
J. B. Blackburn
Sol for Respon-
dent

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Dulce Sept 14 1945
R. B. Bell
R. B.